# Appendix A

Public Comment Letters on the Draft EIR

State of California - Natural Resources Agency DEPARTMENT OF FISH AND WILDLIFE Bay Delta Region 2825 Cordelia Road, Suite 100 Fairfield, CA 94534 (707) 428-2002

GAVIN NEWSOM, Governor CHARLTON H. BONHAM. Director



February 8, 2023

www.wildlife.ca.gov

Letter A-1

Eric Gage Sonoma County 2550 Ventura Avenue Santa Rosa, CA 95403 Eric.Gage@sonoma-county.org

Subject: Housing Element Update, Draft Program Environmental Impact Report,

SCH No. 2022060323, Sonoma County

Dear Mr. Gage:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a draft Program Environmental Impact Report (EIR) for the Housing Element Update Project (Project) pursuant to the California Environmental Quality Act (CEQA).<sup>1</sup>

CDFW is submitting comments on the draft Program EIR to inform Sonoma County, as the Lead Agency, of our concerns regarding potentially significant impacts to sensitive resources associated with the proposed Project.

#### **CDFW ROLE**

CDFW is a Trustee Agency with responsibility under CEQA (Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as a California Endangered Species Act (CESA) Permit, a Lake and Streambed Alteration (LSA) Agreement, or other provisions of the Fish and Game Code that afford protection to the State's fish and wildlife trust resources.

#### REGULATORY REQUIREMENTS

#### California Endangered Species Act

Please be advised that a CESA Permit must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA including candidate species, either during construction or over the life of the Project. The Project has the potential to impact the following CESA listed species, as further described in the Comments and Recommendations Section below.

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<sup>&</sup>lt;sup>1</sup> CEQA is codified in the California Public Resources Code in Section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with Section 15000.

- Coho salmon (Oncorhynchus kisutch), CESA listed as endangered
- California tiger salamander Sonoma County Distinct Population Segment (DPS) (*Ambystoma californiense* pop. 3), CESA listed as threatened
- California freshwater shrimp (Syncaris pacifica), CESA listed as endangered
- Swainson's hawk (Buteo swainsoni), CESA listed as threatened
- tricolored blackbird (Agelaius tricolor), CESA listed as threatened
- northern spotted owl (Strix occidentalis caurina), CESA listed as threatened
- several CESA listed plant species

Issuance of a CESA Permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with Fish and Game Code section 2080.

#### Lake and Streambed Alteration Agreement

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. **The Project would impact streams; therefore, an LSA Notification(s) is warranted, as further described below.** CDFW will consider the CEQA document for the Project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement (or CESA Incidental Take Permit (ITP) until it has complied with CEQA as a Responsible Agency.

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#### **Raptors and Other Nesting Birds**

CDFW also has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession, or destruction of any birds of prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

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#### PROJECT DESCRIPTION SUMMARY

**Proponent:** Sonoma County

**Objective:** To update Sonoma County's current housing element, including rezoning of 59 sites located in designated Urban Services Areas throughout unincorporated Sonoma County for medium density housing. Current designations of sites include agricultural, residential, commercial, and industrial Use. In addition, 20 additional sites would be added to the Housing Element inventory but would not be rezoned. The Project is intended to facilitate and encourage housing development that could be developed over an 8-year period, commencing in 2023 and ending in 2031.

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**Location:** The Project encompasses all of Sonoma County, located on the northern coast of California. The County is bordered by Mendocino County to the north, Lake and Napa counties to the east, and the Pacific Ocean to the west.

#### **COMMENTS AND RECOMMENDATIONS**

CDFW offers the below comments and recommendations to assist Sonoma County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Based on the Project's avoidance of significant impacts on biological resources, in part through implementation of CDFW's recommendations described below and in **Attachment 1: Draft Mitigation and Monitoring Reporting Plan**, CDFW concludes that an EIR is appropriate for the Project.

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#### Mitigation Measure and Environmental Setting Shortcomings

Mandatory Findings of Significance: Does the Project have the potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

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And,

Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS)?

#### Comment 1: Section 4.4, page 30

**Issue:** Mitigation Measure (MM) BIO-2 may not reduce impacts to CESA listed and other special-status plant species such as Burke's goldfields (*Lasthenia burkei*), congested-headed hayfield tarplant (*Hemizonia congesta* ssp. *congesta*), and Pacific grove clover (*Trifolium polyodon*), to less-than-significant because appropriate survey methodology, specific protocols, and adequate review and approval by CDFW are not included.

**Recommended Mitigation Measure:** (Additions made in **BOLD**, deletions made with strikethrough)

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

A-1.7 Cont.

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.

A-1.7 Cont.

#### Comment 2: Section 4.4, pages 30-31

**Issue:** MM BIO-4 may not reduce impacts to CESA listed and other special-status plant species to less-than-significant because adequate mitigation ratios for impacts to CESA listed special-status plant species are not included. Restoration at the proposed 1:1 ratio may result in a significant net loss of the impacted special-status plant species and higher ratios are often applied.

**Recommended Mitigation Measure:** (Additions made in **BOLD**, deletions made with strikethrough)

#### 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 43:1 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 3:1 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

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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 [...]

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#### Comment 3: Section 4.4, page 31

**Issue:** MM BIO-5 may not reduce impacts to California tiger salamander (CTS) to less-than-significant because adequate survey and habitat compensation requirements for impacts to CTS are not included.

**Recommended Mitigation Measure:** (Additions made in **BOLD**, deletions made with strikethrough)

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, National Marine Fisheries Service (NMFS), and/or USFWS protocols prior to issuance of any construction permits. If projects are located within the Santa Rosa Plain (SRP) 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 SRP 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 SRP 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 SRP 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 SRP 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,

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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.

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#### Comment 4: Section 4.4, pages 31-33

**Issue:** MM BIO-6 may not reduce impacts to endangered or threatened animal species such as Coho salmon and steelhead (*Oncorhynchus mykiss irideus* pop. 8) and their associated habitat to less-than-significant because adequate mitigation measures to avoid seasonally timed migration of salmonids are not included.

**Recommended Mitigation Measure:** (Additions made in **BOLD**, deletions made with strikethrough)

BIO-6 Endangered/Threatened Animal Species Avoidance and Minimization

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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 [...]

2. All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 June 15 and October 31 15 to avoid impacts to sensitive aquatic species. Any work outside these dates would require Project-specific approval from the County and may shall be subject to regulatory agency approval [...]

CDFW also recommends adding the following species specific mitigation measures to reduce impacts to CESA listed species to less-than-significant:

No-Disturbance of California Freshwater Shrimp Habitat. No vegetation shall be disturbed or removed from habitat that may support California freshwater shrimp. Sediment shall be prevented from entering habitat supporting California freshwater shrimp. Streambank shape and form shall not be disturbed or altered within habitat supporting California freshwater shrimp. If impacts to California freshwater shrimp cannot be avoided, a CESA ITP shall be obtained by the Project before Project activities commence.

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Swainson's Hawk Avoidance. If Project activities in Sonoma, Agua Caliente, or Glenn Ellen are scheduled during the nesting season for Swainson's hawks (March 1 to August 31), then prior to beginning work on the Project, a qualified biologist shall survey for Swainson's hawk nesting activity. The survey area shall

> include a 0.5-mile distance surrounding the Project site, unless otherwise approved in writing by CDFW. The qualified biologist shall conduct surveys according to the 2000 Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (see: https://wildlife.ca.gov/Conservation/Survey-Protocols#377281284-birds) or, if proposing an alternate survey methodology, shall submit the proposed survey timing and methods to CDFW for review and written approval at least 30 days prior to initiation of surveys. Survey results shall be submitted to CDFW for review and written acceptance prior to starting Project activities. If the qualified biologist identifies nesting Swainson's hawks, then a no-disturbance buffer of 0.5-mile radius shall be implemented and no Project work shall occur within the buffer area, or an alternative buffer may be submitted to CDFW for written acceptance taking into account existing visual or noise barriers or other factors justifying a reduced buffer, and the Project shall implement the CDFW-approved buffer. Project activities shall be prohibited within the approved buffer between March 1 and August 31, unless otherwise approved in writing by CDFW, which may include consultation pursuant to CESA and the Project obtaining an ITP, or a qualified biologist determining that the nest is no longer active.

> Northern Spotted Owl Surveys. No Project activities within 0.25 miles of northern spotted owl (NSO) nesting habitat, such as in the vicinity of Guerneville, shall occur from March 15 to July 31, unless NSO surveys have been completed by a qualified biologist following USFWS Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls, dated (revised) January 9, 2012, and the survey report is accepted in writing by CDFW. Surveys shall be conducted in accordance with Section 9 of the survey protocol, Surveys for Disturbance-Only Projects. If breeding NSO are detected during surveys, a quarter mile no-disturbance buffer zone shall be implemented around the nest. Survey results shall be provided to CDFW and to the Spotted Owl Observations Database (https://wildlife.ca.gov/Data/CNDDB/Spotted-Owl-Info). No Project activities shall occur within the buffer zone until the end of breeding season, or a qualified biologist determines that the nest is no longer active, unless otherwise approved in writing by CDFW. If take of NSO cannot be avoided by Project activities, the Project shall obtain a CESA ITP from CDFW prior to starting Project activities, and authorization from USFWS may be required.

Alternate buffer zones may be proposed by a qualified biologist after conducting an auditory and visual disturbance analysis following the USFWS guidance, Estimating the Effects of Auditory and Visual Disturbance to NSO and Marbled Murrelets in Northwestern California, dated October 1, 2020. Alternate buffers must be approved in writing by CDFW.

A-1.11 Cont.

Tricolored Blackbird Surveys. If nesting tricolored blackbird or evidence of their presence is found, CDFW shall be notified immediately, and work shall not occur without written approval from CDFW allowing the Project to proceed. Project activities shall not occur within 500 feet of an active nest unless otherwise approved in writing by CDFW. If take of tricolored blackbird cannot be avoided by Project activities, the Project shall obtain a CESA ITP from CDFW prior to starting Project activities.

A-1.11 Cont.

#### Comment 5: Section 4.4, pages 33-34

**Issue, specific impacts, and evidence of significant impacts:** Wintering burrowing owl (*Athene cunicularia*) are documented to occur in Sonoma County. MM BIO-7 may not reduce impacts to wintering burrowing owl to less-than-significant because the Project could result in disturbance or mortality of wintering burrowing owl and adequate avoidance and mitigation measures for the species are not included. Burrowing owl is a California Species of Special Concern and; therefore, if wintering burrowing owl occurs on or adjacent to the Project site, impacts to burrowing owl would be potentially significant.

**Recommended Mitigation Measure:** To reduce impacts to wintering burrowing owl to less-than-significant, CDFW recommends including the following mitigation measure:

Burrowing Owl Surveys. Where grasslands or other suitable wintering burrowing owl habitat occurs on the Project site or within 500 meters (1,640 feet) of the Project site, as determined by a qualified biologist, a qualified biologist shall conduct a habitat assessment, and surveys if warranted based on the habitat assessment, pursuant to the Department of Fish and Game Staff Report on Burrowing Owl Mitigation (2012) survey methodology prior to Project activities beginning during the non-breeding wintering season (September 1 to January 31), unless otherwise approved in writing by CDFW. Any deviations from the survey methodology must be approved in writing by CDFW. If burrowing owl is detected, CDFW shall be immediately notified and a qualified biologist shall establish suitable buffers pursuant to the above survey methodology to ensure the owl Is not disturbed by Project activities, unless otherwise approved in writing by CDFW. To prevent encroachment, the established buffers shall be clearly marked by high visibility material. Detected burrowing owls shall be avoided, unless otherwise approved in writing by CDFW, and any eviction plan shall be subject to CDFW review. Please be advised that CDFW does not consider eviction of burrowing owls (i.e., passive removal of an owl from its burrow or other shelter) as a "take" avoidance, minimization, or mitigation measure; therefore, off-site habitat compensation shall be included in the eviction plan. Habitat compensation acreages shall be approved by CDFW, as the amount depends on site-specific conditions, and completed before Project construction unless otherwise approved

A-1.12

in writing by CDFW. It shall also include placement of a conservation easement and preparation, implementation, and funding of a long-term management plan prior to Project construction.

A-1.12 Cont.

#### Comment 6: Section 4.4, page 35

**Issue:** MM BIO-10 may not reduce impacts to special-status and other nesting birds such as white-tailed kite (*Elanus leucurus*) a California Fully Protected Species, to less-than-significant because adequate survey areas and avoidance buffers are not included.

**Recommended Mitigation Measure:** (Additions made in **BOLD**, deletions made with strikethrough)

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

For projects that require **construction**, **grading**, vegetation removal, **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 714 days prior to project activities vegetation removal and shall conduct additional surveys if there is a lapse of 7 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 450 500 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

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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 pre-construction nesting bird surveys to the County to document compliance within 30 days of its completion.

A-1.13 Cont.

Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS?

Comment 7: Section 4.4, page 37

**Issue:** MM-BIO 14 may not reduce impacts to riparian habitat to less-than-significant. Additionally, the Project may result in a violation of Fish and Game Code section 1600 et seq. because the draft Program EIR does not require projects to submit an LSA Notification to CDFW and comply with the related LSA Agreement, if issued, prior to Project construction. Additionally, MM-BIO-14 does not require an adequate mitigation to impact ratio based on the acreage and linear feet of impacts to riparian habitat to offset loss of canopy cover and temporal habitat loss, or adequate revegetation ratios for riparian tree removal.

**Recommended Mitigation Measures:** To reduce impacts to less-than-significant, CDFW recommends revising MM BIO 14 to read as follows (Additions made in **BOLD**, deletions made with strikethrough):

A-1.14

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, RWQCB, or U.S. Army Corps of Engineers (USACE) (hereafter "agency" or "agencies")) 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 3:1 mitigation to 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 34:1 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 [...]

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 DBH (diameter at breast height);
- 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 5-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

A-1.14 Cont.

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.

A-1.14 Cont.

Please be advised that an LSA Agreement obtained for this Project would likely require the above recommended mitigation measures, as applicable.

A-1.15

#### **ENVIROMENTAL DATA**

CEQA requires that information developed in EIR and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to California Natural Diversity Database (CNDDB). The CNDDB field survey form, online field survey form, and contact information for CNDDB staff can be found at the following link: https://wildlife.ca.gov/data/CNNDDB/submitting-data.

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#### **FILING FEES**

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

#### CONCLUSION

CDFW appreciates the opportunity to comment on the draft Program EIR to assist Sonoma County in identifying and mitigating Project impacts on biological resources.

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Questions regarding this letter or further coordination should be directed to James Hansen, Environmental Scientist, at (707) 576-2869 or

<u>James.Hansen@wildlife.ca.gov</u>; or Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or <u>Melanie.Day@wildlife.ca.gov</u>.

Sincerely,

—DocuSigned by: Erin Chappell

Erin Chappell Regional Manager Bay Delta Region

Attachment 1: Draft Mitigation Monitoring and Reporting Program

ec: State Clearinghouse #2022060323

# ATTACHMENT 1 Draft Mitigation and Monitoring Reporting Plan

Mitigation Measure (MM)	Description	Timing	Responsible Party
MM-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,	Prior to Ground Disturbance	Project Applicant

	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.		
MM-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 13:1 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 3:1 mitigation to impact ratio shall be provided, which may include either the purchase of	Prior to Ground Disturbance	Project Applicant

	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 []  Note to County, please add remaining mitigation measure from Draft EIR.		
MM-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 (SRP) 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 SRP 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 SRP rendering surveys unnecessary, and therefore any protocol CTS surveys shall be	Prior to Ground Disturbance	Project Applicant

	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 SRP 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 SRP 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.		
MM-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 []	Project Implementat	Project Applicant
	2. All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 June 15 and October 31 15 to avoid impacts to sensitive aquatic species. Any work outside these dates would require project-specific approval from the County	ion	

	and may shall be subject to regulatory agency approval []		
	Note to County, please add remaining mitigation measure from Draft EIR.		
	No-Disturbance of California Freshwater Shrimp Habitat		
MM-BIO- 6A	No vegetation shall be disturbed or removed from habitat that may support California freshwater shrimp. Sediment shall be prevented from entering habitat supporting California freshwater shrimp. Streambank shape and form shall not be disturbed or altered within habitat supporting California freshwater shrimp. If impacts to California freshwater shrimp cannot be avoided, a CESA ITP shall be obtained by the Project before Project activities commence.	Prior to Ground Disturbance	Project Applicant
	Swainson's Hawk Avoidance		
MM-BIO- 6B	If Project activities in Sonoma, Agua Caliente, or Glenn Ellen are scheduled during the nesting season for Swainson's hawks (March 1 to August 31), then prior to beginning work on the Project, a qualified biologist shall survey for Swainson's hawk nesting activity. The survey area shall include a 0.5-mile distance surrounding the Project site, unless otherwise approved in writing by CDFW. The qualified biologist shall conduct surveys according to the 2000 Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (see: https://wildlife.ca.gov/Conservation/Survey-Protocols#377281284-birds) or, if proposing an alternate survey methodology, shall submit the proposed survey timing and methods to CDFW for review and written approval at least 30 days prior to initiation of surveys. Survey results shall be submitted to CDFW for review and written acceptance prior to starting project activities. If the qualified biologist identifies nesting Swainson's hawks, then a no-disturbance buffer of 0.5-mile radius shall be implemented and no project work shall occur within the buffer area, or an alternative buffer may be submitted to CDFW for written acceptance taking into account existing visual or	Prior to Tree Removal and Ground Disturbance	Project Applicant

	noise barriers or other factors justifying a reduced buffer, and the project shall implement the CDFW approved buffer. Project activities shall be prohibited within the approved buffer between March 1 and August 31, unless otherwise approved in writing by CDFW, which may include consultation pursuant to CESA and the project obtaining an ITP, or a qualified biologist determining that the nest is no longer active.		
MM-BIO- 6C	Northern Spotted Owl Surveys  No Project activities within 0.25 miles of northern spotted owl (NSO) nesting habitat, such as in the vicinity of Guerneville, shall occur from March 15 to July 31, unless NSO surveys have been completed by a qualified biologist following USFWS Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls, dated (revised) January 9, 2012, and the survey report is accepted in writing by CDFW. Surveys shall be conducted in accordance with Section 9 of the survey protocol, Surveys for Disturbance-Only Projects. If breeding NSO are detected during surveys, a quarter mile no-disturbance buffer zone shall be implemented around the nest. Survey results shall be provided to CDFW and to the Spotted Owl Observations Database (https://wildlife.ca.gov/Data/CNDDB/Spotted-Owl-Info). No Project activities shall occur within the buffer zone until the end of breeding season, or a qualified biologist determines that the nest is no longer active, unless otherwise approved in writing by CDFW. If take of NSO cannot be avoided by Project activities, the Project shall obtain a CESA ITP from CDFW prior to starting Project activities, and authorization from USFWS may be required.  Alternate buffer zones may be proposed by a Qualified Biologist after conducting an auditory and visual disturbance analysis following the USFWS guidance, Estimating the Effects of Auditory and Visual Disturbance to NSO and Marbled Murrelets in Northwestern California, dated October 1, 2020. Alternate buffers must be approved in writing by CDFW.	Prior to Tree Removal and Ground Disturbance	Project Applicant

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MM-BIO- 6D	Tricolored Blackbird Surveys  If nesting tricolored blackbird or evidence of their presence is found, CDFW shall be notified immediately, and work shall not occur without written approval from CDFW allowing the Project to proceed. Project activities shall not occur within 500 feet of an active nest unless otherwise approved in writing by CDFW. If take of tricolored blackbird cannot be avoided by Project activities, the Project shall obtain a CESA ITP from CDFW prior to starting Project activities.	Prior to Tree Removal and Ground Disturbance	Project Applicant
MM-BIO-7	Burrowing Owl Surveys  Where grasslands or other suitable wintering burrowing owl habitat occurs on the Project site or within 500 meters (1,640 feet) of the Project site, as determined by a qualified biologist, a qualified biologist shall conduct a habitat assessment, and surveys if warranted based on the habitat assessment, pursuant to the Department of Fish and Game Staff Report on Burrowing Owl Mitigation (2012) survey methodology prior to Project activities beginning during the non-breeding wintering season (September 1 to January 31), unless otherwise approved in writing by CDFW. Any deviations from the survey methodology must be approved in writing by CDFW. If burrowing owl is detected, CDFW shall be immediately notified and a qualified biologist shall establish suitable buffers pursuant to the above survey methodology to ensure the owl is not disturbed by Project activities, unless otherwise approved in writing by CDFW. To prevent encroachment, the established buffers shall be clearly marked by high visibility material. Detected burrowing owls shall be avoided, unless otherwise approved in writing by CDFW, and any eviction plan shall be subject to CDFW review. Please be advised that CDFW does not consider eviction of burrowing owls (i.e., passive removal of an owl from its burrow or other shelter) as a "take" avoidance, minimization, or mitigation measure; therefore, off-site habitat compensation shall be included in the eviction plan. Habitat compensation acreages shall be approved by CDFW, as the amount depends on	Prior to Ground Disturbance	Project Applicant

	site-specific conditions and completed before Project construction unless otherwise approved in writing by CDFW. It shall also include placement of a conservation easement and preparation, implementation, and funding of a long-term management plan prior to Project construction.		
MM-BIO- 10	Pre-Construction Surveys for Nesting Birds for Construction Occurring within Nesting Season  For projects that require construction, grading, vegetation removal, 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 eovered by the CGFC no more than within 744 days prior to project activities vegetation removal and shall conduct additional surveys if there is a lapse of 7 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 450 500 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 for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distances for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distances for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distances for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distances for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distance recommendation shall be developed after field investigations that evaluate the bird(s) apparent distress in the presence of peopl	Prior to Tree Removal and Ground Disturbance	Project Applicant

	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.		
MM-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, RWQCB, or USACE (hereafter "agency" or "agencies")) 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 3:1 mitigation to impact ratio through the funding of the acquisition and inperpetuity 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	Prior to Tree Removal and Ground Disturbance	Project Applicant

> 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 31:1 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 [ ]

> Habitat restoration shall occur in the same calendar year as the impact on-site 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 DBH (diameter at breast height);
- 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 5-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.

Note to County, please add remaining mitigation measure from Draft EIR.



## Letter O-1

January 25, 2023

PermitSonoma-Housing@sonoma-county.org
Eric Gage — Planner III, Sonoma County PRMD (Eric.Gage@sonoma-county.org)

#### RE: Comments on Draft Environmental Impact Report on the Housing Element Update

On behalf of the Milo Baker Chapter (Sonoma County) of the California Native Plant Society, thank you for the opportunity to share our comments on the upcoming Sonoma County Draft Environmental Impact Report (DEIR) on the Housing Element Update. The Milo Baker Chapter is dedicated to protecting native plants and their habitats in Sonoma County and we are very interested in advancing the County's protection measures for them. To that end, we are requesting that Sonoma County address several issues in the DEIR for the Housing Element Update.

0-1.1

We understand that the purpose of the Draft EIR is to allow for rezoning for new housing. However, we feel that not enough scrutiny has occurred for these rezoning areas in this initial evaluation. The delay of specific analysis per site may allow for an overlook of special status species, for which a site has been pre-approved by issuing the EIR. It is a fault with the CEQA process, but it should be addressed by Sonoma County PRMD.

There are several areas that have been identified in the document as needing further analysis, but once an area has identified for development, such as in the DEIR, then there is little chance that development will not go through despite the site constraints. The following is not a detailed analysis of each site, but a quick overview of the lack of biological evaluation that was conducted for this DEIR.

For example, Site GUE 4 is on Fife Creek in the riparian zone, which is not stated in the document. The San Francisco Bay Joint Venture EcoAtlas

O-1.2

(https://www.ecoatlas.org/regions/adminregion/sfbjv?project=5630&site=5469) shows associated habitats and sensitivities per area. With climate change Fife Creek will likely be an area of flooding and appropriate setbacks should be applied to riparian areas to encompass climate change. The 35- to 50-foot setbacks required by PRMD for small streams will likely be inadequate. This should be addressed in the DEIR.

Site GRA-2 is situated *in* riparian habitat, adjacent to Atascadero Creek, as stated on the DEIR. There are likely several special status plant species that occur in this area of rezoning. Although not found this far downstream of Pitkin Marsh, there is a potential for range expansion of Pitkin marsh lily (*Lilium pardalinum* ssp. *pitkinense*) as the climate changes. The lily once occurred in three different area and now is considered to occur in only one area in Sonoma County under a 19-acre conservation easement held by CDFW and is managed by Milo Baker. The largest threat to the survival

O-1.3

of Pitkin Marsh lily is loss and disturbance of habitat resulting from nearby residential development. The development along Atascadero Creek could remove habitat that the lily could move into. Even if development does not directly affect occupied habitat, it could cause changes in hydrology and enable encroachment by invasive species. The development along Atascadero Creek could further cause invasive plants to move into Pitkin Marsh. Developing rural residences, driveways, and agricultural operations such as vineyards could also lead to increases in runoff, nutrient loading, erosion, sedimentation, and changes in soil pH. This should be addressed in the DEIR.

O-1.3 Cont.

Sites SAN 9 and 10 are in areas that supports California tiger salamander and likely support wetlands and vernal pools that have not been delineated, despite being fallow fields. This should be addressed in the DEIR.

0-1.4

Site AGU 2 is located in Sonoma Creek, as stated on page 223 of 601. Although housing currently exists within the riparian zone of Sonoma Creek it is inappropriate to put more development along the creek that will remove riparian habitat and potentially compromise the flood plain of Sonoma Creek. This should be addressed in the DEIR.

O-1.5

In short, we feel that not enough scrutiny has occurred for the DEIR and additional evaluation is required before promoting these areas for rezoning for additional housing. We look for to reading the answers to these concerns in the final EIR.

Regards,

Tush Tatana

Trish Tatarian, Conservation Co-Chair

Milo Baker Chapter of the California Native Plant Society

From: Lucy Hardcastle < lucybhardcastle@gmail.com>

Sent: Sunday, February 12, 2023 8:37 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org > **Subject:** Issues around rezoning Forestville with punishing numbers of units

#### **EXTERNAL**

Date: February 12, 2023 From: Lucy Hardcastle

President of the Forestville Planning Association (FPA) Board of

Directors

To: Eric Gage

History: The FPA was founded as a 501c3 in 2002 to help address land use issues after Empire Storage paved over a meadow to put up storage units. Since then, we've helped educate the community on projects that would affect the quality of life in this small town.

Adding an additional 1,652 people to the town's population of 3,788 without widening the highway and every other traffic corridor translates into gridlock and pollution. Our question is, how would it be possible to do this massive buildout without strangling everyone who is here?

We recognize three things:

- You have numbers you need to allocate.
- This is a mandate from the State.
- You do not wish to destroy a town or culture in the process.

We'd like you to recognize three things:

- Forestville welcomes more workforce housing.
- Forestville hopes and prays to get more affordable housing for families.
- Forestville would like to see affordable housing for seniors close to town.

With those hopes however we do have legitimate concerns on how to accommodate very large numbers of new people without jeopardizing the health and safety of our current residents. 0-2.1

Obstacles to this ambitious plan concern lack of sufficient infrastructure such as roads and the ability to have swift egress when evacuations are called. Highway 116 may sound like a Highway due to its name, but it remains a two-lane country road, busy with lumbering quarry trucks competing with parents dropping their kids off at school in the middle of town. Adding large or very large apartment complexes along these roads is a sure-fire way to destroy our town's capacity to adapt. Businesses needing to take advantage of the tourist trade for survival would be devastated if and when traffic and parking became a nightmare.

0-2.2

Having said that, here is what we feel could work...

#### FOR-1 Electro Vector Site

We consider this a good location for multiple housing units. It does have a contamination issue which makes it hard to sell to an independent developer however if the land could be paved over with parking on the lower level and two stories of housing units over that perhaps that blighted parcel could find some redemption. Note it will present a traffic problem with the school next door. If it were senior housing perhaps that wouldn't be such an issue.

0-2.3

#### For- 2 Between Nolan Road and Gusti

This lot is allocated for 170 units, which would be a huge apartment complex. This project would create health and safety concerns. The roadway simply cannot handle these numbers.

O-2.4

#### For-3, 5 and 6

Affordable housing from Burbank Housing is close by. Their 6 units per acre works well in that area. It's possible that this location could host a Skatepark, a long-held dream of many community members.

O-2.5

#### For- 4

Adding more than nominal housing units to the end of Van Kepple has health and safety concerns about evacuations. The scale is totally out of whack.

O-2.6

#### For-7

This lot is next door to the local gas station. It could hold a multiple story unit without disrupting the nature of the neighborhood but would cause traffic issues.

O-2.7

Along with our local MAC representatives we are planning a Town Hall April 20th to address our concerns over this rezoning allocation. Pushing extreme numbers on a small town seems not only unreasonable but punishing. You must find alternatives for your numbers. Our future is at stake. At this Town Hall we hope to address not just what we DON'T want but what we DO! We will be inviting affordable housing advocates to come and teach us what could work well for our community.

0-2.8

We are grateful for the opportunity to pull our community together; learn how to attract the kinds of housing we feel will fit well into our needs and sense of place. This has been a catalyst for our town and for that we are grateful.

Letter O-3

From: Gary Harris < <a href="mailto:sequoia@sonic.net">sent: Monday, February 13, 2023 2:38 PM</a>
To: Eric Gage < <a href="mailto:eric.Gage@sonoma-county.org">Eric.Gage@sonoma-county.org</a>

Subject: Draft EIR Comments: Housing Element Update

#### **EXTERNAL**

Dear Mr. Gage,

My name is Gary Harris. I am writing this response on behalf of the Forestville Chamber of Commerce. The Chamber address is P.O. Box 546, Forestville CA 95436. The Chamber email address is forestvillechamber.org and I can be contacted at the email address above.

The Forestville Chamber of Commerce is the oldest established entity that represents both the businesses and the residents of Forestville. Here is some background. When I moved to Forestville with my family in 1978, the Chamber members were the first people that I met. They basically were the "town fathers" and they became my mentors. They consisted of people like the bank president, the pharmacist, the high school principal, the elementary school superintendent, members of the Forestville United Methodist Church, etc. All smart and honest people. I soon joined the Chamber and after many years became the president. Presently, I am a director and therefore have been asked to write this response.

Looking at the potential of all 6 sites identified being rezoned and built out to full capacity, it appears that the result would be a population increase of 1651 people. So our question is how will you mitigate such an increase? A good example of real world issues is site 2. First, it would require being annexed to the sewer district. That is not difficult but, the connection to the sewer line has real issues. When the 8 inch line from the Speer subdivision gets to downtown, at the Rotten Robbie gas station, the line is the original line through downtown to the sewer plant. It is a very old 6 inch line that has been "sleeved" and has a section by the bank and hardware store that frequently requires the County to clear it. I have personally seen the sewer manhole cover at 2nd Street and Front St. (Hwy. 116) rise up and sewage spill out because of a blockage in the old sewer line. I can tell you, as a former board director at Forestville Water District, that the downtown line will need to be replaced at a substantial cost. How do you mitigate that situation?

We are also concerned about issues that don't seem to be understood or addressed. An example of that is drainage of water during winter storms. Along Mirabel Rd. the drainage goes north and overflows during big rains. During this last rain storm a property was flooded on Mirabel Rd. close to Giusti Rd. from excessive runoff. Development of Site 2 would definitely exacerbate that problem. How will you mitigate that problem?

Traffic issues are a big concern to all of us. I own a building at 6701 Front St. and I can tell you that the downtown crosswalks are inadequate and not safe. Increasing auto and pedestrian traffic will exacerbate this problem. How will you mitigate that issue.

O-3.1

0-3.2

0 - 3.3

0 - 3.4

Forestville has a small mix of businesses primarily located in the 3 block downtown area. The only open parcel that was available downtown for development in the last 40 years was the Crinella property which was purchased by a developer who planned to build a combination of commercial and residential live/work units. This was the same developer who built the Windsor Town Green. Unfortunately, the economy went "south" and the developer lost the property in a foreclosure sale. That property is now owned by a 501C3. That property was the best place for high density housing that ever was available.

O-3.5

Site 1 (6555 Covey Rd.) formerly known as Electro Vector actually is a good selection which the Chamber would support. Whether the Caloyeras family will agree to sell is another matter. The existing ground contamination on this parcel is a factor to consider.

O-3.6

The issue of employment in the Forestville area is something that the Chamber knows something about. Unfortunately, there are few job opportunities in our area and the prospect of new jobs is limited because of lack of space for new businesses. That means that these new housing units will likely be occupied by working people who will be commuting to Santa Rosa and beyond. That means more traffic and the need for improved roads, traffic lights, crosswalks, etc. How will you mitigate that?

O-3.7

Attached to this response is a copy of a letter written 6 years ago to Susan Klassen. It was signed by the Chamber president and a Chamber director along with our former fire chief. Some of the concerns expressed in that letter are the same concerns that we are expressing today. In this whole process, we in the Forestville area do not feel that we have been represented. So the bottom line is that we know our area very well and should be consulted and considered with much more respect.

O-3.8

Gary Harris

Director Susan Klassen La Plaza B 2300 County Center Drive Suite B 100 Santa Rosa, CA 95403

Dear Ms. Klassen,

My name is Dan Northern and I am submitting a list of suggestions to improve public safety in downtown Forestville, on behalf of the Forestville Chamber of Commerce and at the recommendation of Hal Wood. I originally submitted these suggestions, in 2014, to Supervisor Carrillo. I made the original request to Supervisor Carrillo with the anticipation that the Forestville roundabout would begin construction in 2015-2017 and that the stated improvements would provide additional safety measures for pedestrian traffic in the downtown area. After talking to Mr. Wood recently, I now understand that construction of the roundabout has been put off indefinitely but that there may still be existing or new funding available for some of the proposed safety improvements. These suggestions are similar to existing safety measures taken else ware along Hwy 116.

Here are the suggestions related to public safety, that I submitted to Supervisor Carrillo in 2014:

- Additional street lighting, vintage/antique style, to provide better illumination of the sidewalks
  and crosswalks in town at night. Currently there are standard street lights along the south side
  of Hwy 116 between Mirabel Road and Covey Road in the downtown area. There are no street
  lights on the north side of the road/highway. The existing lighting does little to illuminate
  parking or pedestrian traffic on the north side of the road/highway or at existing crosswalks.
- Improved crosswalks with Warning Light Systems. Hwy 116 is narrow, with parking on both sides of the street, through the downtown area. It is difficult to see pedestrians entering the crosswalks during the day and even more difficult if not impossible at night. In addition, there is a senior citizen trailer park on the north side of Hwy 116 in the midtown area. Several of the seniors use the midtown crosswalk to access the on the south side of the highway. Warning Light Systems along with additional street lighting would improve pedestrian safety in the downtown area.
- A bus stop that allows the bus to pull completely off east bound Hwy 116 in midtown, so that it does not block the crosswalk at that location. Currently there is no pullout at the east bound bus stop. The crosswalk in midtown is directly in front of the bus stop. When a bus is parked at the stop it completely blocks the entry and a significant portion of the cross walk. By providing a bus pullout in this area the crosswalk would be completely visible and pedestrian traffic would be improved. I am aware of two or more vehicle vs pedestrian incidents at this location in the last 10 years. The location of the bus stop is adjacent to a proposed town square. Current plans for the square include the ability to place a bus pull out on the property.
- Improving site distance at Covey and Hwy 116. The Forestville Elementary and El Molino High Schools are in close proximity to this intersection. There is a significant number of school

children, of all ages, that use the crosswalks that transvers Covey road and Hwy 116 at this location. The vehicle site distance both east and west bound on Hwy 116 in this area is marginal. The site distance for pedestrians crossing Covey Road and Hwy 116 at this location is equally poor. Improving the site distance by removing a portion of a retaining wall, additional street lighting and crosswalk Warning Systems would greatly improve pedestrian and traffic safety at this location.

Repair sidewalk system on both sides of the Hwy 116 in the downtown area. In a few locations, the sidewalks in downtown Forestville are in poor repair and present a significant trip hazard. A tree planting program years ago, has caused the uprooting of the sidewalk in a few locations. While the trees are appropriate and necessary to the community the damage to the sidewalks pose a significant hazard to pedestrians. Repair of the sidewalks along with adequate street lighting would improve pedestrian traffic both day and night.

I recognize that funding is always an issue and with the current condition of the County roads it is understandable that the roundabout has been put on hold. With this in mind I would like to offer a reminder that there have been funds established for some of this work. There is a Lighting District in Forestville and funds do exist in the County Budget. In addition, Canyon Rock Quarry and Blue Rock Quarry as part of a settlement with the County, have contributed 4 million dollars for various road improvements in the downtown Forestville area. Some of these improvements have a direct connection to the suggestions provided above. I have attached a copy of the Canyon Rock settlement with the County that outlines the allocations to each project area.

I hope that there might be a window of funding opportunity to address these issues and make our downtown area a safer place to work and visit. If there is any possibility of some or all of these projects being considered please contact me or Wendi Gianni, President of the Forestville Chamber of Commerce.

Sincerely,

Dan Northern

Forestville Fire Chief (RET) dsnorthern@sbcglobal.net

707-887-0580

Hal Wood

Forestville Chamber of Commerce

wdhal@aol.com

707-887-2981

Wendi Gianni, President Forestville Chamber of Commerce Wendi\_gianni@sbcglobal.net

707-887-2561

From: Rebecca Mateja To: PermitSonoma-Housing

Subject: How and Why?

Date: Wednesday, December 28, 2022 12:56:36 PM

Currently we are being told to cut our water usage, and the government is telling us that we need more housing. How and Why? Just asking...

I understand the need for more housing - I just don't understand the how and why of it. If we build these home for the next 8 years, what happens when we reach that point.

I guarantee that we will be trying to accommodate more people then. The reason that we are a small town is because we don't just build more housing as soon as it's needed.

Because we do not have the water that these homes will be using. That's the why....

We already supply Marin County and Rohnert Park with water from the Russian River through the caissons. So we are giving away our water there.

1.1

Letter 1

From: <u>Greg Tatarian</u>
To: <u>PermitSonoma-Housing</u>

Subject: Comments on Housing Element Update

Date: Tuesday, January 03, 2023 12:06:12 PM

#### **EXTERNAL**

Hello,

I am providing the following comments to Section BIO-7 of the Housing Element Update Draft Environmental Report (Rincon Consultants, Inc. 2022).

As a bat specialist consultant for 32 years with particular expertise with bats in human-made structures (1), I find that Mitigation Measures 2 and 3 are insufficient to prevent direct mortality of roosting bats, and could result in loss of large number of bats that could potentially roost in buildings, trees or other features contained within the properties considered in this document. Additionally, the current measures could result in costly delays to construction schedules if roosting bats are found to be present during the recommended seasonal period. Also, Measure 4 requiring pre-construction surveys could be misconstrued to be effective for roosting bats. More concerns are specified below the currently proposed language:

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 nonbreeding 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.).

## **COMMENT - BIO-7, Measure 2:**

As written, Measure 2 presumes bats are active throughout the year, which is not true, so will make surveys ineffective. Measure 2 also requires additional surveys only if a colony is present, but this is insufficient. Also, Measure 2 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, such as trees, bridges, and culverts.

The first step in a project involving potential bat roosting activity is a habitat assessment by a qualified bat biologist, followed by project-specific recommendations which could include humane eviction (blockage of potential openings along with installation of one-way exits on active openings), partial dismantling under direct supervision of a qualified bat biologist, two-step tree removal also under supervision, or other action - all to be conducted only during seasonal periods of bat activity.

Bat breeding and roosting ecology is more complex than that of other taxa, such as birds.

2.1

Letter 2

Unlike birds, breeding in bats may occur in fall, winter or spring months depending on the species. Bats have two seasonal periods each year when some or all bats are not active maternity season when young remain in the roost until dispersal in fall, and winter months when many bats that remain in structures enter torpor (light form of hibernation). Winter torpor or hibernation occurs because bats are affected by external temperatures, so when temperatures drop below about 40-45F for many species, they become inactive. During the months of November through March as shown in the DEIR, bats in this region are likely to be in torpor and mostly inactive throughout the winter. As a result, surveys are unlikely to be effective unless bats are roosting in open spaces accessible to biologist. Enclosed, inaccessible roost features common in many structures would require night emergence surveys to determine presence or absence, and since bats are only occasionally active during winter months, false negative results would result from conducting surveys between November and March. Also, visitation of more open roosts during winter months may disturb bats when they are conserving energy and cause them to abandon the roost during winter months when they may be much less active and capable of flying to alternative roost sites. Both of these actions would result in unintended and unnecessary mortality.

2.2 Cont.

Instead, surveys should be conducted only when bats are active, which in this region would be from approximately April 1 through mid-October. If a maternity colony is suspected, particularly for species such as pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*) or other California Species of Special Concern (SSC), additional mitigation other than just preventing direct mortality may be required. This would require more accurate surveys to identify bats by species and quantify population. Night emergence surveys are generally the most accurate method and, conducted properly, the least negatively impactful to the colony.

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 reenter the structure. Maternal bat colonies shall not be disturbed.

#### **COMMENT - BIO-7, Measure 3:**

As currently written, Measure 3 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, such as trees, bridges, and culverts.

2.3

Bats that roost in buildings in colonies during maternity season are almost always maternity colonies, although a few individual bachelors may roost together in a building. As a result, it is rare that an aggregation of bats in a building, tree, bridge, culvert, etc. during maternity season is not a maternity colony. Therefore, humane eviction as detailed in Measure 3 (or other suitable measures), would need to occur only during seasonal periods of bat activity, which means; after winter torpor and just before maternity season (in this region, about March 1 to April 15), and after young are self-sufficiently volant - flying to and from the natal roost and no longer relying on milk from their mothers (September 1 - about October 15). These seasonal periods are conservative to protect all bat species in the region, and account for different typical dates in birth of pups, development, and volancy.

2.4

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 nonlisted 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 preconstruction survey to the County for their review and approval prior to the start of construction.

## **COMMENT - BIO-7, Measure 4:**

Pre-construction surveys for roosting bats should be considered only as confirmation that all previous efforts to assess the potential habitat and conduct project-specific measures to prevent direct mortality of roosting bats have been effective. If pre-construction surveys are conducted during winter months for example, presence of roosting bats may go undetected and direct mortality of bats could occur. If surveys are conducted during maternity season and bats not previously found are present, construction delays would result. The complex life history and roosting activity patterns of bats requires a careful habitat assessment by a qualified bat biologist early in the project, with subsequent recommendations to be implemented during the appropriate seasonal periods. These actions often occur many months in advance of construction activities.

Finally, it is generally ineffective and inappropriate, not to mention in violation of wildlife laws and regulations, to capture and relocate native wildlife species without project-specific permits issued by the California Department of Fish and Wildlife (CDFW). There are currently 13 special-status bat species in California (CDFW Special Animals List, October, 2022), and direct capture and relocation is not appropriate, effective or legal. Further, the County is not the Trustee Agency for wildlife translocation decisions, particularly with special-status species. Approval for such actions would be issued by CDFW.

Regards,

Greg Tatarian

[1] Greg Tatarian is an independent bat specialist wildlife consultant with 32 years of experience with bats in human-made structures. He has held a Scientific Collection Permit from the California Department of Fish and Wildlife (CDFW) for approximately 27 years with Additional Authorizations for Research on Bats, including radio-tracking, banding, genetic sampling, mist-netting, and hand-capturing of various species, including California Species of Special Concern (SSC), including pallid bat (*Antrozous pallidus*) and Townsend's big-eared bat (*Corynorhinus townsendii*). Mr. Tatarian is an expert in conducting habitat assessments, species surveys (bioacoustic, visual and capture) for both day and night roost habitat and has extensive experience with anthropogenic roosts. Has performed inspections of over 4,100 structures, including bridges and buildings, to satisfy CEQA requirements for demolition, development, retrofit and rehabilitation projects. He has personally performed ca. 350 bat evictions from residential, commercial, and institutional structures, and designs, implements, and supervises mitigation strategies including humane bat eviction from bridges, culverts, large buildings, and other settings. Mr.

Tatarian has unique and extensive expertise with artificial replacement bat roosts, creating first known successful maternity bat house in California *A. pallidus* in 1995, culminating in successful designs of on and in-structure bridge bat habitat.

--

Greg Tatarian Conservation Lecture Series Archive: Conserving California's Bats Through Environmental Review and Permitting: https://www.youtube.com/watch?v=OFXLRa5mCll&feature=youtu.be

CNDDB News: <a href="https://www.wildlife.ca.gov/Data/CNDDB/News/cnddb-contributor-spotlight-trish-greg-tatarian">https://www.wildlife.ca.gov/Data/CNDDB/News/cnddb-contributor-spotlight-trish-greg-tatarian</a>

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From: <u>brian bollman</u>

To: <u>PermitSonoma-Housing</u>
Subject: draft Environmental

Subject: draft Environmental

Date: Wednesday, January 11, 2023 4:47:18 PM

Letter 3

## **EXTERNAL**

Response to draft Environmental Impact Report for the Housing Element Update

The purpose of the update may be to comply with state law, and it may do so. However, there are a few observations that I think really should be included in the document:

- 1) Housing needs in this document focus on vacancy rates, but vacancy rates are only a snapshot of availability, and not reflective of actual housing stocks.
- 2) Sonoma county is in its sixth year of population decline.

3.2

3) Until recently, the U.S. and California experienced an increase in the size of units for decades, resulting in much larger square footage per person.

3.3

3.1

4) The number of persons per unit has decreased steadily in the United States for decades, and has been decreasing in Sonoma County for some time as well.

3.4

5) Vacancy rates always drop during periods of prosperity because people who were previously sharing accommodations with friends or family find that they can afford to have there own units. By contrast, when the economy worsens, people often move in together to save money. (It is understandable that people want their own units, but it is a much better use of resources and better for the environment for people to share.)

3.5

6) A recent audit by the state found that the state's methodology for calculating housing needs grossly exaggerates actual housing needs.

3 6

7) The Association of Bay Area Governments (ABAG) bases its housing allocations on (exaggerated) regional needs, not on local housing needs. This is not a functional or realistic practice, because outlying areas like Sonoma County that are losing population can't appropriately provide housing for communities in the core of the Bay Area that are growing. The last thing we need in the Bay Area is people commuting 100 miles to work. The RHNA process that ABAG uses effectively shifts the burden of housing incurred by growth and bad planning in the core of the Bay Area onto outlying areas like Sonoma County that have not shared in that growth.

3.7

#### Conclusion:

The draft environmental Impact Report doesn't address the potentially catastrophic environmental consequences of the flawed RHNA process. And it really should.

3.8

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From: Josette Brose-Eichar

To: PermitSonoma-Housing

Subject: DEIR Housing element

Date: Wednesday, January 11, 2023 11:24:38 AM

## **EXTERNAL**

I of course could not read this entire voluminous DEIR. But, I continue to be puzzled by your assessment of what is really vacant property and how you came up with this data. Here is what I find in the DEIR as it relates to vacant developed property (not vacant undeveloped land).

"Of the 64,807

housing units in the Unincorporated County in 2019, 10,769 units (16.6 percent) were vacant (DOF

2019). There were 1,904 permitted vacation rentals in the County as of June 23, 2020 (County of

Sonoma 2020c)."

First question is: are the 1,904 permitted vacation rentals included in the 10,769 vacant housing units? And if they are, why? These are not vacant. Vacation rentals are occupied by short term renters.

Then I go back to the housing element itself. Where I state that how census data was not used correctly to identify vacant housing units. Here is what I wrote concerning that back on 11-18-2022:

To Permit Sonoma 11-18-2022

In reading your draft report it is stated:

In 2019 there were 11,500 vacant units in Unincorporated Sonoma County, a significantly higher ratio of vacant units than in the County as a whole (including the 9 cities) or in the Bay Area region (see Figure 9). Of the Unincorporated County's vacant units, 63% (7,300) were held for seasonal, recreational, or occasional use. This is a significantly higher rate than the County as a whole or the Bay Area. Only 7% of the Unincorporated County's vacant units were held for rent, and only 4% for sale.

Then in reading the graphs I see that 17% of housing units are listed as vacant. Of this 17% 63% are listed as seasonal, recreational or occasional use. 24% are listed as other vacant. For a total of 87% of all vacant units.

You pointed me to the census website that provides definitions for these terms, seasonal etc. I find that you are not really following all the definitions laid out in the census, where your figures are derived from.

As many consider the high vacancy rate one of the primary reasons for lack of housing and specifically affordable housing, I think you must find a better and more

4.1

Letter 4

accurate count of what this vacant housing really is.

As a vacation rental owner I have been subject to constant negative opinions and ideas based on what people perceive, and some of this is because of the county's inability to really define in specific numbers what makes up vacant housing.

You have an accurate count of how many homes are vacation rentals, from the number of valid permits in place. You have already concluded, but not publicized that vacation rentals have little or no impact on housing prices or rents. But we have no real data on what percentage of vacant units are vacation rentals. It seems the census data is used in an inaccurate way, where we are given no idea the actual make up of vacant housing units. I would suggest the county undertake a real survey and not manipulate census data in this less than accurate way, as you go forward in assessing the state of housing in the county.

4.2 Cont.

## Here are some of the census definitions:

**For occasional use.** If the vacant unit is not for-rent or for-sale-only but is held for weekends or occasional use throughout the year, the unit is included in this category. Time-shared units are classified in this category if the vacant unit is not for-rent or for-sale-only, but held for use for an individual during the time of interview.

Units Occupied by Persons with Usual Residence Elsewhere. A housing unit which is occupied temporarily by persons who usually live elsewhere is interviewed as a vacant unit provided that a usual place of residence is held for the household which is not offered for rent or for sale. For example, a beach cottage occupied at the time of the interview by a family which has a usual place of residence in the city is included in the count of vacant units. Their house in the city would be reported "occupied" and would be included in the count of occupied units since the occupants are only temporarily absent. Units occupied by persons with usual residence elsewhere (URE) are further classified as seasonal vacant or year round vacant units.

4.3

**Other vacant.** Included in this category are year-round units which were vacant for reasons other than those mentioned above: For example, held for settlement of an estate, held for personal reasons, or held for repairs.

**Seasonal Vacant Units.** Seasonal housing units are those intended for occupancy only during certain seasons of the year and are found primarily in resort areas. Housing units held for occupancy by migratory labor employed in farm work during the crop season are tabulated as seasonal

So by reading your graph, I am unsure of where second homes are in the equation. In an e-mail you told me that vacation rentals are included in the 63% of seasonal, recreations or occasional use. As you know the actual number of vacation rentals, why don't you just break them out and show us what the real percentage of vacant units they are? And as it would seem that second home owners should really be filling out the census to be as, "Units Occupied by Persons with Usual Residence Elsewhere", you would have much more accurate data.

As for the 24% listed as other vacant, I find it hard to believe this percentage is really as the census describes it.

4.4

Last, by relying on what people report on the census, may not be the most accurate way to define what all these vacant units really are, leading the county to make erroneous judgments on our housing picture and why we have so many "vacant" housing units.

Thank you and sincerely,
Josette Brose-Eichar
Boyes Hot Springs

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From: <u>Jim Bell</u>

**To:** <u>PermitSonoma-Housing</u>

Subject: County"s Housing Element Update

Date: Saturday, January 14, 2023 12:11:58 PM

Letter 5

## **EXTERNAL**

I do not understand how the Planning Commision can consider a Plan at this time that will have far reaching impacts on transportation issues like traffic and road upkeep, "water supply", power, sanitation, potential wildfires, schools, aesthetics, hazardous waste, law enforcement, fire protection, homeless, and much more. Many of the issues above have not been abated to this day so how do you expect to abate more future issues??????

5.1

James Bell

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From: Matt O'Donnell Letter 6

To: PermitSonoma-Housing

**Subject:** Re: Public Comment on Graton Housing Element **Date:** Thursday, January 26, 2023 10:41:39 AM

## **EXTERNAL**

Correction: I incorrectly put the wrong address in the letter. The correct address is 3280 Hicks Rd. Here is the updated public comment:

Dear Permit Sonoma,

I am writing to express my strong opposition to the proposed rezoning of 3280 Hicks Rd. in unincorporated Sonoma County near Graton. The proposed development of this property would have a detrimental impact on the rural nature of our community, as well as the safety and well-being of its residents.

First and foremost, the development would destroy the rural nature of the area by introducing more urban-style housing into a community that values its natural setting. Additionally, the houses in the surrounding area rely on wells for their water supply, and the construction of new homes would put a strain on this limited resource.

Furthermore, the street on which the property is located is narrow and does not have sidewalks, making it dangerous for pedestrians, especially children walking to school. The lack of street parking also poses a problem for residents and visitors alike. The infrastructure of the surrounding area simply cannot handle this type of development without a major investment from the county which has never been a priority in this area. Hicks Road is in major disrepair with a patchwork of partially filled potholes. There is no shoulder on the road and cars do not have the space to drive side by side down the road.

The intersection of Hicks Road and Graton Road is already problematic with cars coming around a blind turn at high rates of speed. In order for students to cross to get to Oak Grove Elementary School or to a bus stop they must navigate a 3-way intersection where cars cannot see people walking in the faded crosswalk. This gets much worse in the afternoon with the lower sun which creates blinding conditions where drivers cannot see pedestrians. I was almost hit in the crosswalk once and the driver exclaimed that he could not see me due to the light. I did not allow my kids to walk to school because of the danger of this intersection. Once you get across the street there are no sidewalks on the other side to get to the school or to get to the bus stop. Nor is there a shoulder so you are forced to walk in the street. Pedestrians would have to walk on the street which is extremely dangerous. The county cannot allow for a large increase in housing at this site if they are not willing to make massive

6.1

infrastructure improvements to the whole area which they do not have the funding to do. Making this choice would put new residents, especially children at high risk.

6.2 cont.

Since there is no street parking in the area and no walkable grocery stores the inhabitants of high-density housing will be automobile dependant. This will lead to a series of detrimental outcomes for the area. Firstly, there will need to be parking for at least two cars per housing unit which will mean pavement and concrete over the majority of the lot. This will remove most of the tree cover and will cause warming to the area and will destroy wildlife habitat. Secondly, the lot is at the top of a hill and there is already a large amount of runoff from the property in big rain storms. This runoff floods the backyards of houses on Jannette Avenue. With more concrete and housing there will be a massive amount of new runoff leading to flooding of houses and pollution into the Atascadero Creek. In addition, the development would contribute to light pollution and the natural rural feel of the area. The construction noise would also be disruptive to the peacefulness of the area.

6.3

6.4

6.5

Hicks Rd already is impacted by county development with the moving of the Graton Fire Station to Hicks Road. Residents already have to endure extra traffic due to the Christmas Tree Farm associated with the fire station and have to endure the very loud fire siren at high decibels. The county may also put sewer access for trucks to bring wastewater from Occidental to the end of Hicks Road.

6.6

During the recent storms, this property and adjacent ones lost power and the power was not restored for 6 days. When the area was evacuated during the fires the gas was turned off for two weeks before it was restored. This is part of living in a rural area but not something that works well for big housing projects.

6.7

With the narrowness of the road and nearby evacuation routes, adding this much population to the area would be dangerous during an evacuation. It took people hours to get out of West County during the last evacuation and this would increase the time.

6.8

This property is already zoned for 8 additional housing as well as 8 ADU and can help increase the housing stock in Sonoma County. with 16 new dwelling, much more than currently sit on surrounding properties. The current zoning will keep some of the rural feel of the area and limit the negative effects of a large housing development on the property. There are plenty of better areas for this type of development like the area of the empty Redwood Shopping Center in Sebastopol that is much more pedestrian friendly and has the infrastructure already in place.

I urge Permit Sonoma to consider the negative impact that this development would have on the community and deny the rezoning request. Thank you for your time and

consideration.

Sincerely,

Matt O'Donnell

On Wed, Jan 25, 2023 at 3:23 PM Matt O'Donnell < <a href="mailto:odmatt@gmail.com">odmatt@gmail.com</a>> wrote: Dear Permit Sonoma,

I am writing to express my strong opposition to the proposed rezoning of 3430 Hicks Rd. in unincorporated Sonoma County near Graton. The proposed development of this property would have a detrimental impact on the rural nature of our community, as well as the safety and well-being of its residents.

First and foremost, the development would destroy the rural nature of the area by introducing more urban-style housing into a community that values its natural setting. Additionally, the houses in the surrounding area rely on wells for their water supply, and the construction of new homes would put a strain on this limited resource.

Furthermore, the street on which the property is located is narrow and does not have sidewalks, making it dangerous for pedestrians, especially children walking to school. The lack of street parking also poses a problem for residents and visitors alike. The infrastructure of the surrounding area simply cannot handle this type of development without a major investment from the county which has never been a priority in this area. Hicks Road is in major disrepair with a patchwork of partially filled potholes. There is no shoulder on the road and cars do not have the space to drive side by side down the road.

The intersection of Hicks Road and Graton Road is already problematic with cars coming around a blind turn at high rates of speed. In order for students to cross to get to Oak Grove Elementary School or to a bus stop they must navigate a 3-way intersection where cars cannot see people walking in the faded crosswalk. This gets much worse in the afternoon with the lower sun which creates blinding conditions where drivers cannot see pedestrians. I was almost hit in the crosswalk once and the driver exclaimed that he could not see me due to the light. I did not allow my kids to walk to school because of the danger of this intersection. Once you get across the street there are no sidewalks on the other side to get to the school or to get to the bus stop. Nor is there a shoulder so you are forced to walk in the street. Pedestrians would have to walk on the street which is extremely

dangerous. The county cannot allow for a large increase in housing at this site if they are not willing to make massive infrastructure improvements to the whole area which they do not have the funding to do. Making this choice would put new residents, especially children at high risk.

Since there is no street parking in the area and no walkable grocery stores the inhabitants of high-density housing will be automobile dependant. This will lead to a series of detrimental outcomes for the area. Firstly, there will need to be parking for at least two cars per housing unit which will mean pavement and concrete over the majority of the lot. This will remove most of the tree cover and will cause warming to the area and will destroy wildlife habitat. Secondly, the lot is at the top of a hill and there is already a large amount of runoff from the property in big rain storms. This runoff floods the backyards of houses on Jannette Avenue. With more concrete and housing there will be a massive amount of new runoff leading to flooding of houses and pollution into the Atascadero Creek. In addition, the development would contribute to light pollution and the natural rural feel of the area. The construction noise would also be disruptive to the peacefulness of the area.

Hicks Rd already is impacted by county development with the moving of the Graton Fire Station to Hicks Road. Residents already have to endure extra traffic due to the Christmas Tree Farm associated with the fire station and have to endure the very loud fire siren at high decibels. The county may also put sewer access for trucks to bring wastewater from Occidental to the end of Hicks Road.

During the recent storms, this property and adjacent ones lost power and the power was not restored for 6 days. When the area was evacuated during the fires the gas was turned off for two weeks before it was restored. This is part of living in a rural area but not something that works well for big housing projects.

With the narrowness of the road and nearby evacuation routes, adding this much population to the area would be dangerous during an evacuation. It took people hours to get out of West County during the last evacuation and this would increase the time.

This property is already zoned for additional housing and can help increase the housing stock in Sonoma County. The current zoning will keep the rural feel of the area and limit the negative effects of a large housing development on the property. There are plenty of better areas for this type of development like the area of the empty Redwood Shopping Center in Sebastopol that is much more pedestrian friendly and has the infrastructure already in place.

6.9 Cont.

I urge Permit Sonoma to consider the negative impact that this development would have on the community and deny the rezoning request. Thank you for your time and consideration.

Sincerely,

Matt O'Donnell

--
Matt O'Donnell

3220 Hicks Rd. Sebastopol, CA 95472 (2707) 332-9220 (cell) (707) 528-4654 (home)

Matt O'Donnell 3220 Hicks Rd. Sebastopol, CA 95472 (707) 332-9220 (cell) (707) 528-4654 (home)

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6.9 Cont.

From: Rick Maifeld

To: PermitSonoma-Housing
Subject: Zoning proposal in Forestville
Date: Friday, January 27, 2023 7:39:51 PM

Letter 7

#### **EXTERNAL**

Dear Eric Gage,

I am writing in regard to the proposed multi-unit, high density housing under review by the Sonoma County Permit Board.

As a resident of Forestville, I am very concerned for several reasons.

Adding that many residents at once would seem to overwhelm a small community such as Forestville. A 20% increase in population, essentially overnight, would put a strain on law enforcement, the fire department, garbage collection, water, and a massive strain on traffic flow.

The intersections of Hwy 116 and Mirabel, and Mirabel and River Road will become a congested mess without massive changes in traffic flow.

Presumably, this large influx of new residents will also come with several hundred new children, which will need to be transported to schools, further congesting roads in the morning and afternoon.

From a purely selfish standpoint, I would be curious to know how propert values of existing residents will be impacted if this zoning change is allowed to proceed.

I see very few positives for the current residents of Forestville should this project proceed.

I would welcome any information you have to share, but I hope the negative impact on current residents is a major factor as this project is considered.

Thank you,

Richard Maifeld 9440 Rio Vista Road Forestville, CA 95436

From: Stacie Gradney
To: PermitSonoma-Housing

**Subject:** Forestville re zoning for housing **Date:** Friday, January 27, 2023 12:22:31 PM

Letter 8

#### **EXTERNAL**

Forestville is a small town. I am not sure who's idea it is to develop housing tracks in forestville.

I believe you are the people who closed our high school.

Our town has been through enough. How are the schools suppose to teach if there is already issues with overcrowded classrooms and NO high school.

Why isn't Sebastopol on your list?? Why not build farther East? Who's idea is this?

Have you visited our town? West county area? Guerneville?? The drive is beautiful. Our towns are beautiful. Developing will ruin it all.

There is no crime here building is an invitation to crime and riff raff.

Thank you

Concerned forestville resident

Sent from my iPhone

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From: <u>Colin Baptie</u>

To: PermitSonoma-Housing
Subject: Housing Element Draft EIR

Date: Saturday, January 28, 2023 11:25:25 AM

Letter 9

## **EXTERNAL**

Dear Sir,

## Re: Draft EIR on the Draft Housing Element Update

I am writing regarding the draft EIR mentioned above. On page 4.4-21 in Table 4.5-5, the report fails to mention that, within five miles of the proposed Guerneville housing sites, there is federally designated critical habitat for the Northern Spotted Owl. In fact, in August 2020, a pair of nesting Northern Spotted Owls were discovered less than three miles from the Guerneville BSA during a survey conducted as part of the Silver Estates Timber Harvest Plan (THP#1-20-00084SON). This omission is concerning and leads one to question the accuracy of information within the draft report.

9.1

I am also confused why, on page 2-7 Table 2-2, there are six housing sites listed for Guerneville while the Guerneville Biological Study Area only includes four sites. Why was the BSA not extended to include GUE-5 and GUE-6?

9.2

Yours faithfully,

Colin A. Baptie, Psy.D. PO Box 503 Guerneville CA 95446

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From: <u>Elissa Rubin-Mahon</u>
To: <u>PermitSonoma-Housing</u>
Subject: Proposed units in Forestville

Date: Saturday, January 28, 2023 10:58:48 AM Letter 10

## **EXTERNAL**

Hello

I am opposed to the proposed amount of increase in housing in Forestville.

10.1

Forestville is unincorporated without adequate services to support the influx of new residents.

Elissa Rubin-Mahon 209 Armentieres Rd Forestville, CA 95436 mofungi@comcast.net

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From: Becky Boyle

To: Eric Gage; district5

Cc: Lynda Hopkins; Leo Chyi; David Rabbitt; Susan Gorin; district4; Jenny Chamberlain

**Subject:** Permit Sonoma / Planning - FOR-1 - Alternative: fewer rezoning sites.

 Date:
 Monday, January 30, 2023 6:01:51 PM

 Attachments:
 Screen Shot 2023-01-30 at 12.44.54 PM.png

 Screen Shot 2023-01-30 at 5.12.40 PM.png

Screen Shot 2023-01-30 at 12.44.54 PM.png Screen Shot 2023-01-30 at 5.12.40 PM.png Screen Shot 2023-01-30 at 12.53.34 PM.png

Letter 11

#### **EXTERNAL**

## Dear Sonoma County,

I have been looking through the Housing Element Update Draft Environmental Impact Report and have some grave concerns as it pertains to the future of Forestville, were these plans to go through in full as is. Thank you for welcoming community feedback and taking the various community's character into account. I'm sending in the same letter for each parcel in case they end up in different files down the line pertaining to each property and end up going to different developers. Thank you for your understanding.

In section: Environmental Impact Analysis Public Services and Recreation (aka: 4.15-11), I see that it states, in the first paragraph, that it "would not increase the total population served by more than 10 percent, with the exception of the Forestville sites. This is pertaining to Fire Districts. There are a few issues here. Forestville is being put forth to take on an undo burden of the state's quota in comparison to other unincorporated areas. While others are looking at 10% or less (per your document) Forestville is looking at 25%. This is unsettling to say the least. Please see section 2-26 for the info:

forestsville max build out is projected to increase by 25% while other communities are no more than 10%

Environmental Impact Analysis
Public Services and Recreation

Sites. As shown therein, the Rezoning Sites could be accessed from the nearest fire stations within the response time goal for the respective district, and would not increase the total population served by more than 10 percent, with the exception of the Forestville sites. Because the sites are

Growth of: FOR-1, FOR-2, FOR-3, FOR-4, FOR-5 and FOR-6: Draft impact report 2-26 on page 101 of the document.

Total population allowed under current designation: 167 Total population under proposed designation: 1,652

# Sonoma County Housing Element Update

Rezoning Site	Total Allowable Dwelling Units Under Current Designation	Total Allowable Dwelling Units Under Proposed Designation	Change in Total Allowable Dwelling Units (Buildout Potential)	Total Population Under Current Designation <sup>1</sup>	Total Population Under Proposed Designation <sup>1</sup>	Change in Buildout Population Potential
LAR-4	4	6	2	10	16	5
LAR-5	72	99	27	187	257	70
LAR-6	0	12	12	0	31	31
LAR-7	10	45	35	26	117	91
LAR-8	0	11	11	0	29	29
FOR-1	46	70	24	120	182	62
FOR-2	7	283	276	18	736	718
FOR-3	3	33	30	8	86	78
FOR-4	2	71	69	5	185	179
FOR-5	6	58	52	16	151	135
FOR-6	0	120	120	0	312	312
COA 1	6	22	4.7	16	60	4.4

11.1 Cont.

The current population of Forestville, as defined by the boundaries of the Grammar School is 6,771. The addition of 1652 residents would be a population increase of nearly 25%. Forestville would have the greatest number of proposed new occupancies/population in the County with the exception of the city of Santa Rosa which is much better equipped for such a drastic influx vs the small community of Forestville who still have the same sized roads they did when I grew up there back in 1971. There is not the infrastructure nor the services in place to accommodate this kind of growth and it is not right to put such a burden on one community in contrast with what is being put on others. The difference of 10 vs 25 percent is not insignificant, it isn't small and unlike the EIR states -- it would be dominant vs "could be dominant". There is simply no way to believe it would not be dominant given the unit #'s proposed vs what the landscape actually is. Unless the proposed developments are single story ranch like homes, there is no "could" about it. See table 4.1-6 in section 4.1-51 for further comparisons.

LAN-0	LOW	Lo-Dominant	Less than significant	AES-9
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
C04.4	P. Arreit	Co Deminent	Lancette designation	APP P

Also of note regarding errors in the document is the statement on 4.1-18 (page 127) in the first paragraph about FOR-2 is "On Mirabel Road, a school is directly across the street from FOR-2." This is simply not the case. There is no school across Mirabel from FOR-2. The only schools in Forestville are the now-defunct El Molino High School @ 7050 Covey Rd. and the Elementary School, now known as Forestville School & Forestville Academy, down the hill off 116 @ 6321 Hwy 116, ironically by some of the other proposed locations.

quantitive developing. They are the same streets I played with childhood friends on in the early 1970's. They are one lane each way, no space for going around, not good for emergency evacuation situations, not built for dense populations. These are small country roads built to sustain neighborhood housing, at most, single family homes suburban in nature. They are not built nor would logic say they are prudent for a development the likes of rezoning specified as FOR-2 units. There is no mention that these are small country roads, where pedestrians and bicyclists often very little room for error. That description seems glaringly omitted for a project of such large changes discussed. That point actually goes for the parcels throughout much of Forestville as well as many others.

11.3

I've seen nothing in the document that speaks to what would be done with respect to urban renewal effects for the people displaced to enact these potential build-outs, displacing locals, loss of character, threat to local business and the introduction of community conflicts, pollution-related health conditions, around town parking needs and sanitization challenges. This feels omitted, as does any mention of an infrastructure plan to accommodate the potential influx such as roads that are simply not built to accommodate such a large increase.

11.4

Where is the mention of how the county plans on widening roads, adding left turn lanes, round-abouts and crosswalks for public safety on roads that are used by commuters, visitors, pedestrians and gravel trucks all coming through town in an environment that is only 1.7 miles to get through town (Speer's Market @ one end of Mirabel Road to the Elementary School on the other side of town).

11.5

Where is the study for the safety of it's citizens just trying to get through the day without a horrible accident when there's an extra thousand or so cars and pedestrians jaywalking, risking their lives, with such a large increase of traffic on such a small stretch of travel. I am gravely concerned about the implications. These are urban services as much as sewer and water are per: page xviii yet there is no study about this as far as I'm able to tell.

11.6

There's the discussion of no feasible mitigation measures available for the elements that would damage the scenic route along FOR-1, FOR-3, FOR-5. They would create detrimental significant and unavoidable impacts whereas other areas would be far less significant along the 101 corridor.

11.7

FOR-1, FOR-5 and FOR-6 are all listed as being on "Existing Hazardous Material Contamination". Tables 4.9-1 and 4.9-2 on pages 4.9-1 thru 4.9-3. I have not been able to find a study in this EIR as to what the health risks to pending future potential residents, students located .1-.2 miles from the sites, and to the surrounding community during the excavation and build would at risk to. If I'm not mistaken, some of these properties were once considered by the Elementary School nearby and decidedly declined due to their toxic nature (and possibly the cost of remediation).

I also am not seeing any study of the risk of these hazardous elements ending up in the watershed in Forestville (all sites) for Lower Russian River and sub-watershed to Green Valley Creek and ground water basins - especially in an area notorious for flooding when rains really kick in as they did in 1940, 1955, 1964, 1986, 1995, 1997, 2006, 2019, 2023 - this isn't an unknown problem nor is it going away drought or no drought.

It's noteworthy that in section 4.15.1a: Fire Protection for the EMT call response times are prior to the now combined departments. Guerneville, Larkfield and Forestville have all consolidated into Bennett Valley, Bodega Bay, Mountain Volunteer, and Windsor FPDs. I don't see any study pertaining to the ratio of calls per capita and if what the combining of districts as well as the increase of population would mean for that ratio.

With respect to greenhouse gas emissions, page 556 of section 5.2.1 correctly calls out "Additional vehicle trips associated with the proposed project would incrementally increase local traffic and regional air pollutant and greenhouse gas emissions." "These are considered irreversible environmental effects." The last paragraph of that section goes on to say, "CEQA requires decision makers to balance the benefits of a proposed project agains it's unavoidable environmental risks in determining whether to approve a project. the analysis contained in the EIR concludes that the proposed project would result in significant and unavoidable aesthetic, cultural resources, greenhouse gas emissions, hazards, transportation, utilities and wildfire impacts. Although development facilitated by the project would be required to implement mitigation measures, impacts would remain significant and unavoidable due to the irreversible loss." With all these potential rezone projects in what are zoned as Rural Residential and Low Density, does it not make more sense to seek locations for housing that is more directed to areas and communities that are not so car dependent? In particular for the low income population, does it not make more sense for them to have housing opportunities in communities that have better price points in urban/suburban areas with things around them? In implementing the proposal as it is, we are also pushing the people that need it the most into situations where they have to drive further when gas prices are among the highest levels the last few years.

11.9

The EIR calls out that Forestville has stores and restaurants. It does not call out that it offers one small-family type grocery store, one Mexican grocery store that has a sitting area/restaurant, one pharmacy, one gas station, one expensive fancy restaurant coupled with a couple casual spots being the local drive in, a coffee shop with sandwiches and a pizza joint. There's a bakery, there's a wine tasting place, there's one hardware store and all these places are great but they're not built to sustain the kind of growth that Forestville is now being considered for. Where are an additional 1,600 people going to park? How are they going to go to one of the 3 restaurants that might be open to serve them (one is closed at 2pm). That growth, that population needs more support than is currently able to be offered in this town. It's a half hour drive to: Costco, Target. It's a 15 minute drive to Safeway, Walgreens, Coddingtown.

11.10

This community is built for people to pick up those last little things on their to-do list, it is not, nor has it ever been the community that serves to support a day to day way of life where you can get everything you need in the one mile that goes from one end of town to the other.

I understand that implementing this plan is not a choice you made and that it is being dictated to you. I know this is not an easy process and I don't want to see things get worse than they already are. Nobody wants the County to be sued by the State, nor does anyone want another builder frenzy free for all to occur in Sonoma County as it has in other places where the governing body did not meet the State's demands, we do respectfully request equality within the obligations and to not have a tiny town like Forestville to be pushed beyond the brink of what it is realistically able to handle. If all of these build outs were to occur, it would be too much for the area and the community to absorb. It is only 1.7 miles from one end of 'town' to the other, it's akin to me trying to stuff my post-pandemic size 12 body into my old size 6 jeans... the math just isn't there.

11.11

I implore you to opt for your Alternative choice where do not choose to rezone all 6 parcels for Forestville, and I implore you to consider doing the same for the ones that have documented historical toxic hazardous situations especially as they are so close to the Elementary School when children are clearly proven to be more at risk to lung problems as they are still growing.

11.12

Please give due consideration to avoinding FOR-1, FOR-2, FOR-3 FOR-5, FOR-6 at the minimum and move those project's potential population to a part of the unicorporated county that is better for the people in need of more affordable housing as well as the small communities that aren't prepared to accept the inflow from a practical, geographical, economical, services and

logistical egress perspective.

Please set out to find parcels that can meet the counties needs that the State has put your feet to the fire for and find territories that fall in the "Less than Significant", "Less than Significant with Mitigation" or "No Impact" vs the very many "Significant and Unavoidable". Not an easy task but detrimental otherwise.

11.13 Cont.

Thank you for your time in reading this and giving consideration to the macro of the micro picture of a massive endeavor. Much appreciated..

Respectfully, Becky Boyle Forestville, California

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Letter 12

**Draft EIR Comments: Housing Element Update** 

Attn: Eric Gage, Permit Sonoma January 24, 2023

The DEIR is an extensive amount of work to say the least.

A superficial glance would barely enlighten one of its full scope and content.

To make a full reading of it and have a good grasp of its content would likely be overpowering for most individuals.

It seems unfortunate that we are forced to push towards the limit of our Petri dish even further, due to our inabilities, it seems, to relieve in some more reasonable way, our population pressures.

And while we simultaneously try to preserve and enhance our community character and quality of life.

A razor's edge?

As to the DEIR—I can easily admit that I did not read the entire document.

I did read as much of it as I could that does have a direct bearing on compromising the esthetic and economic value of my rural residential property through the ultimate effect of the DEIR and its potential following plan implementations.

I am a co-owner, with family members, of one of the adjacent parcels to your DEIR parcel SAN-10. To the best of our knowledge, we have not received, until now, nor have we been made specifically aware of, any potential idea, request, plan, or execution of any rezoning of APN# 134-192-016 known in the DEIR as "SAN-10".

My family has owned this land we reside on, our 3 acres zoned RR3, since the days when it had an Agricultural zoning—we moved here in 1955.

I am almost 72 years old and have spent a large portion of my life on this property.

We have lived with the slow encroach of light industrial/commercial development along the Santa Rosa Avenue corridor and its attendant noise, light, and visual pollution which has, in the last 20 years or so, accelerated on the parcel directly NW of us—SAN-10, APN# 134-192-016.

We hoped that due to zoning and historical values and ideas that it would creep no further.

And that while we concurrently live with the increase of traffic and speed on what we sometimes refer to, along with some Highway Patrol members, as *Mountain View Speedway*...

On page 1-4 of the DEIR, under point 1.6 is stated: "The County received letters from two agencies and one person in response to the NOP during the public review period."

In Table 1-1 on page 1-5 these comments are summarized on half a page.

I believe that this questions how well the public, certainly less the specifically affected individuals/parcels, were *advance noticed*.

We certainly don't seem to have been given any notice, until now, even though we will be directly affected by portions of the Housing Element Update represented by the DEIR.

It certainly seems that during whatever nomination of parcels went on leading up to this DEIR, those parcels directly affected by the nominated parcels should have openly and clearly been made aware of what was happening.

<u>Public outreach</u>, particularly to those potentially directly affected, by your consultants apparently was less than comprehensive.

## "1.6 Public Review and Participation Process

- ... The County received letters from two agencies and one person in response to the NOP during the public review period. ..."
- --page 1-4 of DEIR

#### "1.7 Scope and Content

- ... An NOP was prepared and circulated (Appendix NOP), and responses received on the NOP were considered when setting the scope and content of the environmental information in this Program EIR. ..."
- --page 1-5 of DEIR

<u>Three responses</u>, with only one from the public, over a 30-day period, seem hardly enough to adequately address <u>"scope and content"</u>.

The legal issues and public policy underlying this Project notwithstanding, I and my family object to the adoption of this Project, with such apparent little involvement of the public, particularly those of us who stand to be directly harmed, due perhaps to insufficient outreach, and further <u>we object</u>, if the plan is carried out, <u>specifically to the inclusion of APN 134-192-016 (SAN-10) due to its excessive impact upon our own enjoyment of our own property and for the following reasons:</u>

- 1. SAN-10 is not the only parcel in the area that could have been considered for this iteration of the Housing Element Update—reasons for which follow.
  - Others, or groups of others, including it seems the group SAN-11 to SAN-17 could make up most of the difference leaving SAN-10 out would entail (Map Graphic 2).
  - They are already located in higher density residential areas for the most part.
  - More specifically, and to our point, <u>APN 044-141-045 (3614 Brooks Avenue</u>), located at the intersection of E. Todd Road and the unfinished extension to the south of Brooks Avenue (or alternatively at Brooks Avenue and Bucks Road) <u>seems a much better candidate for inclusion</u>.
  - It appears from a parcel report to have almost identical characteristics to SAN-10 with the positive reasons for inclusion in the following points.
  - Another potential inclusion in the area is APN 044-141-005, 3548 Brooks Avenue.
  - See below Map Graphic 1 for large scale detail area for this and the following points.

12.1 Cont.

12.4

- 2. On page 2-4 of the DEIR is the following:
  - "2. Site must be located within an established Urban Service Area where public sewer and water service is available."

"Available" is the key word here.

The most common meaning here would imply that the connections for sewer and water are available at the existing parcel.

Not that it is "available" on the other side of the Urban Service Area, for instance.

The map of the existing sewer connections in the area leading to the Laguna Treatment Plant is attached below (Map Graphic 2).

The closest any main line is apparent leading in SAN-10's direction is about 2000' feet away, north on Santa Rosa Avenue.

An 8" sewer main appears to go north from parcel 044-141-045, 3614 Brooks Avenue, and a 6" sewer main on E. Todd Road passes along the south side of it, both no more than 30-40' feet from the parcel.

Immediately available without major work to extend a sewer main, and two directions to send sewage.

And, if any work for sewer or water was needed, E. Todd Rd. is much more in need of repair work on its surface than is Santa Rosa Avenue.

Neither parcel is located in the South Park Sanitation District, however, the 3614 Brooks Avenue parcel borders on it, while SAN-10, as said, is as much as 2000' feet from its border.

3. SAN-10 has a "fence line" border of approximately 1000' (out of a total of ~3500 feet) that is part of the Urban Growth Boundary, and is directly adjacent to 4 parcels (5 if the Water Agency's Hunter Creek parcel is included) that <u>presently contain</u> minimal density housing, are zoned RR3, and are constrained to the limitations of that zoning and will have no benefits from the Urban Service Area.

And yet directly adjacent to them the DEIR and potential following implementations will upset the bucolic nature of their rural residential zonings.

During the nascent years of the Sonoma County General Plan in the 1970s, it was a common idea that this area around Mountain View Avenue would remain a "green belt" between the cities of Santa Rosa and Rohnert Park—and the Santa Rosa Avenue commercial corridor.

As the attached map sections of the GIS shows (Map Graphics 1 & 3), the oddly excluded portion of the Urban Service Area, APN 134-182-063, seems an attempt, in this RR area, along with the 045-131-016 County Water Agency parcel along Hunter Creek, to complete as much as possible that idea from Petaluma Hill Road to Santa Rosa Avenue and encompassing the Mountain View Avenue environs.

The only elements not included in that "completion" are the eastern portion of APN 134-192-014 (owned by the County Water Agency as part of Hunter Creek Trail), APN 134-192-015 (privately held?), and the eastern section of APN 134-192-016 (SAN-10).

These actions and mappings would imply that, <u>instead of a somewhat abrupt and haphazard inclusion of SAN-10 under this Update iteration</u>, it should be passed over for now so that serious consideration to this <u>last extension of the Community Separator in the area can be considered.</u>

Or, at the very least, the RR3 designation of the roughly eastern half of the parcel should remain in place to perhaps *functionally keep a separator intact* until it can be decided.

To drop a 20—22 unit per acre development into the eastern portion of SAN-10 would hardly seem to keep with the earlier ideas, <u>especially when other alternatives clearly exist</u>.

From: Sonoma County General Plan 2020 OPEN SPACE AND RESOURCE CONSERVATION ELEMENT:

"Community Separators enhance the identities of individual cities and communities."

"Lands within Community Separators generally meet the following designation criteria:

- (1) Lands shall be located outside an Urban Service Area designated in the General Plan.
- (2) Lands shall have a General Plan land use designation of Timber Production, Resources and Rural Development, Land Intensive Agriculture, Land Extensive Agriculture, Diverse Agriculture, Rural Residential, or Agricultural Residential.
- (3) Lands should logically separate cities or unincorporated communities or extend or complete an existing Community Separator to provide continuity."

The Mountain View Avenue RR area is a community in itself that deserves a complete Separator.

It would seem that the parcels mentioned above absolutely fit with points 2 and 3 and are merely a short Urban Boundary line move from being consistent with point 1.

Perhaps the Planning Commission, Zoning Board, and Local Agency Formation Commission could, or should re-visit the Urban Boundary in our area, already existent with incongruities, and consider a lot-split of SAN-10, and the Water Agency's APN 134-192-014 along their RR boundaries re-drawing the Urban Boundary along that line. With those two inclusions, and APN 134-192-015, which needs no lot split, 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 idea is clearly presented in the following map (Map Graphic 3).

4. SAN-10, as said, already has zoning suggestive of an idea to keep a space between the existing RR3 development on Mountain View Avenue and the Santa Rosa Avenue commercial corridor. It is one of the few in the area with such split zoning, and for apparently the same reason. A comparison of the County GIS zoning mapping and satellite imaging shows a question that should be resolved before any consideration of including SAN-10 in this Update iteration. It seems clear that the *permit Sonoma GIS* mapping shows a distinct idea that the RR3 zoning that includes a portion of SAN-10, extends more less south from the northeast corner of APN 134-192-010, more or less

a portion of SAN-10, extends more less south from the northeast corner of APN 134-192-010, more or less south across Water Agency's APN 134-192-014, to the point that is the northern coincidence of APN 045-021-003 and APN 045-021-004 and continues more or less south along their joint border.

The attached graphic (Map Graphic 4) shows both the GIS section and the satellite image.

SAN-10's commercial development and use appears to have encroached up to 100' into the RR3 zoning of its eastern portion.

Whether this seemingly apparent issue is due to the users of the parcel, or some issue of interpretation due to the zoning board or other agency, it seems to bear resolving before any consideration of SAN-10's inclusion in inventory of the housing element.

12.4 Cont.

Further, I have a few comments—on both substance and error in addition to the objections to the specific inclusion in the "inventory" already presented.

As to further comments: I have mostly only cursorily looked over the DEIR—except where specific to me. Errors, both typographical and in substance certainly occur in such expansive works.

The question that is begged is what level of error causes serious lack of trust in the work.

12.6

In that relatively small area of the Report, which has direct impact on me and my family, I have noted apparent errors, confusion, or omission:

12.7

a. The caption on Figure 4.1-36 is wrong. *The view is East*. The same as Figure 4.1-35.

12.8

b. In *Table 2-2 Inventory Site Information*, beginning on page 2-7, these entries seem to not match the "Sonoma County Parcel lookup" website, assuming the APN shown is correct:

SAN-10, shown as 4020 SR Ave., is 4028 (APN 134-192-016)

SAN-13, shown as 3847 SR Ave., is 3855 (APN 134-181-046);

SAN-14, also shown as 3847 SR Ave., is 3845 (APN 134-181-047);

SAN-16, shown as 3445 Brooks Ave., is 3453 (APN 134-132-067).

I only checked SAN-10 to SAN-16 due to the duplicate 3847 entries— 4 out of 7 do not match.

The issue no doubt permeates the entire list and a shortcoming of it is that it makes it a bit difficult to locate the parcels on a Google map using that address.

c. The following may be an error of omission:

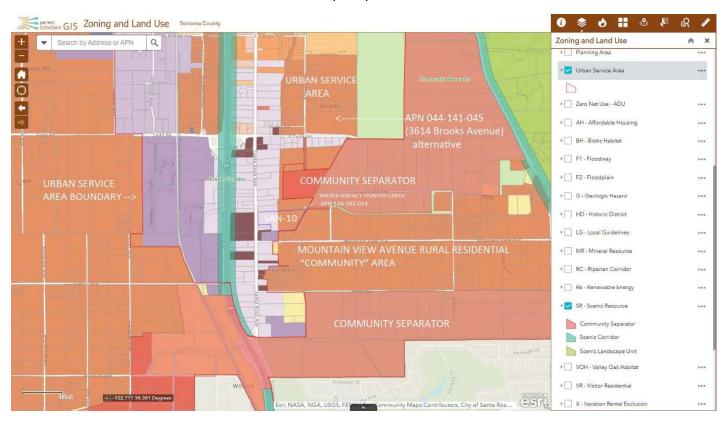
In *Table ES-1*, pages ES-5 and 6, and *Table 4.1-6*, beginning on page 4.1-50, reference is made to *Mitigation Measure AES-5*.

Beginning on page 4.1-54, c. Project Impacts and Mitigation Measures contains no definition or reference to AES-5, and I cannot find it anywhere else except the tables.

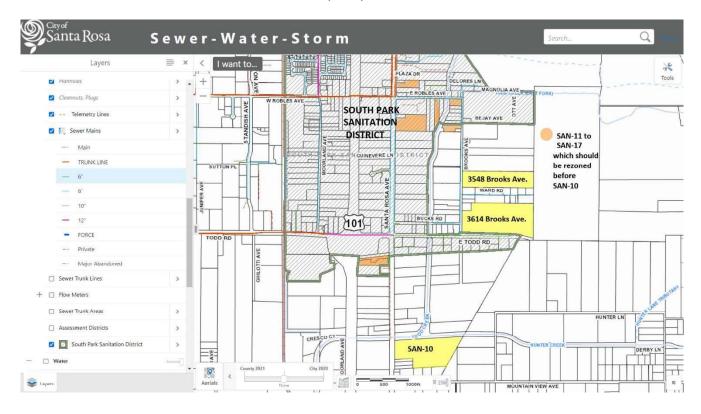
12.9

One is left to wonder how many other errors, confusions, or omissions occur in the whole document.

Respectfully, Jim Severdia 105 Mountain View Avenue Santa Rosa, CA 95407 nvmtnman@yahoo.com



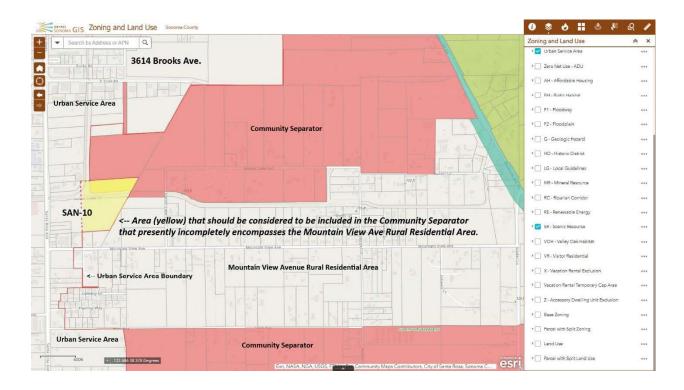
Map of general area of South Santa Rosa Avenue and Mountain View Avenue showing major land use and zoning



South Park Sanitation District sewer map referred to in point (2) above.

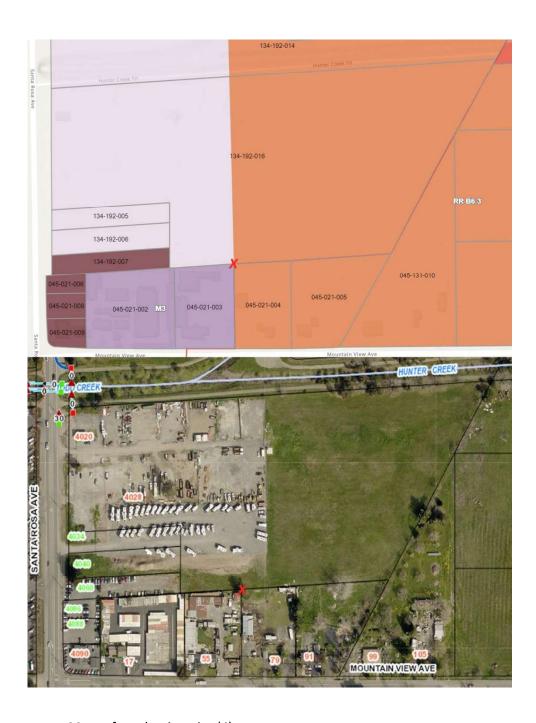
Sewer is not now "available" at SAN-10 (APN 134-192-016).

It is clearly "available" now, from two directions, at 3614 Brooks Avenue (APN 044-141-045) as well as the other alternative inclusion on Brooks Avenue.



Map referred to in point (3) above.

Yellow area (part of SAN-10 plus two other parcels) should be considered as logically for inclusion into the Community Separator instead of for medium density housing



Map referred to in point (4).

Red X refers to northmost common point of APN 045-021-003 (55 Mountain View Ave.) and APN 045-021-004 (79 Mountain View Ave.) as mentioned above

From: <u>kim thatcher</u>

To: PermitSonoma-Housing
Subject: 635 new dwellings in Forestville
Date: Monday, January 30, 2023 10:09:54 PM

Letter 13

## **EXTERNAL**

## To Eric Gage

Hi there my name is Kimberly Thatcher and I have been a resident of Forestville for the past 26 years.

I'm writing in response to the proposed 635 new apartments that would potentially be added to this very small town of Forestville, California.

Firstly, I do not understand why more building is being allowed in this county.

Water issues are huge problem and growing more dire every year. That is 1,652 new residents using irrigation and water usage for daily consumption which will greatly strain our ongoing water issues!

I know that low income folks have as much right to be here as any other but building that many dwellings for that many people is just simply unacceptable! We have to figure out another way.

Secondly, how are the residents of Forestville going to be involved in this kind of decision making process when the times chosen are during normal work days and hours?? I very much want to be part of this discussion but cannot take the time off in the middle of the work day to join this zoom meeting.

Please let me know how my voice can be heard in regards to this matter. I would also like to know the results of the zoom meeting scheduled on February 2nd. How do I find those results?

Thank you for your time and consideration of my thoughts around this issue.

Kimberly Thatcher Forestville, California Sent from my LG Phoenix 5, an AT&T 5G Evolution capable smartphone

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13.1

Date: January 31, 2023

Mr. Eric Gage & Lynda Hopkins / Board of Supervisors Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403 Letter 14

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3-16500 Cutten Ct, and GUE 4-16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

14.1

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

14.2

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

4.3

The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

14.4

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

14.5

The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

14.6

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

14.7

Name: Jonathan Teel

Address: 14735 Carrier Lane

Guerneville, CA 95446

Date: January 31, 2023

Signature:

Sonoma County Planning Department

Santa Rosa, Ca

ATTENTION:: Nina

Letter 15

While it took close to 15 people from a professional "environmental" firm to prepare this EIR (and I'm assuming many people in the county offices,) it's a daunting chore j to read and analyze what is in these 1300 pages. If the public had an equivalent amount of time plus the ease of putting our fingers on the data required, more input and corrections would be highlighted.

Because of our lack of expertise in many of these subjects I believe many of the property owners, especially senior citizens, may need a county paid lawyer to represent them and carefully explain their rights and a educated EIR examiner to verify so called "facts" Is it too much to ask the county to appoint a resource bureau where we could easily find date not available outside of government walls?

Certainly, an in-person meeting for just the owners of these 59 property OWNERS should have been a wiser and less jolting beginning.

Knowledgeable Representatives from the RR Sanitation, and the limited bus system with an emphasis on West County should have been at a meeting in person with the

15.2

stakeholders able to answer questions about the true viability of the transit and sewage capacity. I emphasize knowledgeable. Ever tried to find the ridership of the Guerneville buses? Impossible. Crime statistics from the buses? Fires started by arsonists? Emergency ambulance rides?

15.2 Cont.

This plan is causing my family uncalled for trauma and is ruining our retirement. Only the two other property owners on Laughlin Rd. have been notified of the profound change coming to our little neighborhood.

(There has not been a link on the Planning website for weeks that should lead me to the Draft EIR, but led to only a 404 error. This seems a huge failure) The Scooping meeting was badly run with communication fails, and as lightly attended as most the Zoom meetings are with the government. Considering all of this, an in print copy of the draft EIR should have been in the local libraries. . Staff there assured me that if they got one it could be loaned out even under the Covid restrictions for the last year. But despite several requests by library staff, no printed copy was ever sent.

15.3

Now as edicts come from hundreds of miles away, it is shocking and heartbreaking to contend with. At a time when the governor calls for more local control, the county seems willing to off load planning/zoning to people who don't know our county at all. Considering this, do we need a planning

15.3 Cont.

department? Does 50 years of fairly consistent zoning mean nothing?

Our property was chosen on the basis of being in the RR sewer district, where millions of dollars from the Federal govt were spent, (and corners were cut) based on a the sanitation district's promise that "we" would not build the collection system or the plant for any growth. The feds eventually sued us for millions of dollars for just that expansion and I don't believe there was anywhere in that settlement that put an expired clause for the original promises. Can you assure me that the district has learned their lesson and now obeys the Federal Governments sensible mandates? We already have about 1000 more hook ups than the collection system allowed for

15.4

We, by the way, tried to get out of the sewer district, being on the farthest borders. But the district needed every hook up they could get because they underestimated the final cost amd needed more ratepayers. That Sewer debacle EIR was also quite un-fact filled. What was promised as a sewer charge of about \$40 a month to begin with, now wil rise this year from \$1774 to \$1932. A 8.9% raise. In the report requesting a large sum `for emergency repairs, the SCWA stated "It is determined that

complete failure of the pipelines was highly possible and If the pipelines were to fail it could cause major erosion, flooding and contamination." In April 24, 2021 in a letter to the Water Agency, the North Coast Regional Board enumerated a multitude of violations that included the releases of untreated sewage in 2017. And 2019.

And then three emergency breakdowns in 2021 Although the Board of Supervisors allocated 750,000 for repairs, the estimate cost to fix it is at least 20 million. There is a surcharge of man-holes and lift stations, pump stations nearing the end of their useful lives We have had a notice that repairs would "happen soon".

From the RRWatershed Protection Committee: "the system is old, it was not appropriately constructed in the first place in terms of design and some of the pipe materials and parts of the collection system may be currently on the verge of total collapse

This EIR of, I believe, over a thirteen hundred pages, has many things wrong, uses out of date data, some as old as 2013 and seems to have never seen our property.

15.4 cont.

Our road is without a white line, narrow and the use from perhaps 40 Laughlin Road car trips a day will increase to somewhere around 500-- surely a difference in our environment.

There are fire rules (Fire Safety Odinance 6184) that restrict building on a dead end road, a cul-de-sac Our road is one way in some spots plus there has been increased traffic because of several VRBO's on Laughlin and Cutten Drive.

15.5

With the unflattering pictures in the Guerneville part, the picture of our parcel doesn't even appear.

FEMA rates our valley, much of it is in the 6 factor and they note "flood risk is increasing as weather patterns change." In 4.10.5, the Fema map represents an unfinished. 1950's study. The straight line that stops before Gue 3 is not a rendition of th true flood stage that occurs in what the county calls a 100 year flood (and we natives call perhaps a 30 year flood.) After this ruler straight cut off, the water can rise to stretch to and over Watson Road. We've seen it many times, and like most Guerneville Natives, have the pictures to prove it.

15.6

When the PGE rates our neighborhood as the 'highest fire danger category and the county rates us lower, who should we believe.? See Editorial

"Developers can't just brush aside fire risk anymore" Press Democrat Jan.21

Here on the latest Wild Fire Risk Index, we are shown as being in the category, "High Hazard" yet Korbel Laughlin Vineyard, just east of us, seems to be one step more dangerous ignoring the fact that their parcel is vines, no grass even in spring, two large water ponds and a sprinkler system over all the vines.



This map shows

There is also a map of liquification that comes from another government agency that shows our property right is the middle of it. We live an ancient river bed.

15.7 Cont.

Our property and home is everything to us...we worked for it, it wasn't inherited, we are non college educated work force people. Could anyone explain to me how my land became a "by right" coveted target while on the other hand, the county allowed hundreds and hundreds of (mostly newly bought) rental housing to be turned into little hotels and taken out of the housing market in west county? Wouldn't one of the alternatives be to eliminate vacation rental properties and turn hundreds of small houses back into long term rentals? (That would take courage). I believe we have about the equivalent of VRBO's in our town as this plan will provide on the designated sites in Guerneville. It has advantages that plan: it won't cost the county anything. It won't force homeowners out of their long held properties, it won't require sewer plant expansion and it will follow the Lafco goals of "promote orderly growth and discourage urban sprawl" and

preserve agriculture land and open space resources"

Here are some suggestions: In a time of Covid it was reasonable to have meetings on line but it does cut out anyone that is not terribly techie and doesn't spend a lot of time in meetings on line. There is every reason for county meetings to go back to all

15.8

meetings in person and if we can't find a way then the Brown Act should be reinvented.

There should have been a meeting of all of the the 59 property owners that are stake holders in this huge transaction. I would like to know how many feel like our property is being taken away from us? There is a law percolating in Sacramento that will tax owners on the zoning of property by what you COULD built there.(not only unconstitutional but also unhinged. My children are the inheritors that will face this. Prop. 19 was another nail in the coffin of inheritance and my life work, which was singly to be sure my kids could still live in Guerneville (as our family has for 162 years)... will be gone. Jama Henger 16050 Laughlin Rd.

15.9 cont.

Date:

1-30-23

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave.. Santa Rosa, California 95403

Letter 16

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

16.1

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

16.2

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

16.3

The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

16.4

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

16.5

The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

16.6

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

16.7

Name:

5. maley 14390 Laughlin Rd. / guerneville 1-30-23

Address: Date:

Signature:

From: <u>Eric Gage</u> on behalf of <u>PermitSonoma-Housing</u>

To: <u>PermitSonoma-Housing</u>

**Subject:** FW: Housing Element Forestville FOR-2 **Date:** Tuesday, January 31, 2023 8:39:26 AM

**From:** Sue Zaharoff < sue.zaharoff@comcast.net >

Sent: Saturday, January 28, 2023 6:53 PM

**To:** PlanningAgency < <u>PlanningAgency@sonoma-county.org</u>>

**Subject:** Housing Element Forestville FOR-2

Jan 29, 2023

Eric Koenigshofer,

I am writing to inform you of my opposition to the rezoning of Forestville FOB-2. The rezoning of FOB-2 would be a catastrophe.

There is no infrastructure in Forestville to support a 'medium density 3 story high 283 dwelling with 736 people'!

The impact of rezoning would adversely affect traffic flow, gravel truck routes, sewer, water, wildlife and overall quality of life in Forestville.

The EIR draft goes against everything that this community is built on. Our residential streets would be clogged with cars. We would be at risk for

escaping fires with stopped traffic flow. The sewer capacity would have to be increased. Water pulled from the Russian River would have further

damaging effects on our limited River supply. Traffic lights, sidewalks and street lights would need to be installed. Our already limited Fire and

Sherriff services would be taxed beyond their limits. Our small local expensive grocery store Speers can not provide for the influx of people that

rezoning would create. The building of multiple structures and the parking water runoff would add to drainage problems.

I made the decision to move to Forestville 33 years ago because it is in a rural setting zoned Agricultural/Residental.

17.1

Letter 17

I was required by zoning to build my house on 2 acres which I did. Any zoning changes made to FOB-2 would end Forestville as we know it.

17.1 Cont.

Sue Zaharoff 6875 Nolan Road Forestville

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From: <u>Arlene Warner</u>
To: <u>PermitSonoma-Housing</u>

Subject: Draft EIR Comments: Housing Element Update

Date: Wednesday, February 01, 2023 11:19:02 AM

Letter 18

February 1, 2023

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave. Sant Rosa, CA 95403

Mr. Gage,

The community surrounding Laughlin Road in Guerneville, CA opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE-2 16450 Laughlin Rd, GUE-3 16500 Cutten Ct., and GUE-4 16050 Laughlin Rd., located off Armstrong Woods Road, Scenic Corridor in Guerneville, CA.

18.1

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents, as well as the additional prospective of 588 residents allowed by the proposed rezoning.

18.2

GUE-2 and GUE-3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closures will have a negative impact on the daily lives of current residents and will severely impact the emergency egress for residents.

The increased traffic on Laughlin Rd, the only access to the elementary school, which

always has numerous potholes will further deteriorate and will likely cause weekday traffic jams during the school year. In addition, the left and right from Laughlin to Armstrong during this time will also cause traffic jams/delays.

The potable water and sewer system are inadequate for the proposed growth. The

18.3

sewer line located next to GUE-2 and GUE-3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages. Also, the cost of upgrading the sewer system will most likely increase the sewer taxes of all residents which have already been burdened with sewer tax increases year over year.

18.4

The GUE-2, GUE-3, and GUE-4 properties are within areas documented as high wildfire danger, flood plains, and earthquake prone. They are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety

#### reasons.

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

18.5

The rezoning of GUE-2, GUE-3, and GUE-4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

18.6

I, as an individual, and we as a concerned community, sincerely express discontent for the lack of clear up front notification and inclusion in the early processes and oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE-2-16450 Laughlin Rd, GUE-3-16500 Cutten Ct., and GUE-4-16050 Laughlin Rd, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, CA.

18.7

Sincerely,

Arlene Warner 16375 Cutten Dr. Guerneville, CA

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From: Neil Shevlin

To: <u>PermitSonoma-Housing</u>

Subject: Draft EIR Comments: Housing Element Update

Date: Wednesday, February 01, 2023 9:42:58 AM

Letter 19

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

19.1

There are many specific adverse effects noted in the DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one-lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

19.2

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

19.3

The GUE 2,3 and 4 properties are within areas documented as high wildfire danger, flood plains, and earthquake-prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

19.4

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old-growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high-density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

19.5

The rezoning of GUE 2, 3, and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

19.6

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500

Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

19.7 Cont.

Name: Neil Shevlin

Address: 16477 Cutten Dr, Guerneville, CA 95446

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From: Becky Boyle < becky.boyle@gmail.com > Sent: Tuesday, January 31, 2023 10:25 AM

To: PermitSonoma-Housing < <a href="mailto:PermitSonoma-Housing@sonoma-county.org">PermitSonoma-Housing@sonoma-county.org</a>

Subject: Permit Sonoma / Planning - FOR-1, FOR-2, FOR-3, FOR-4, FOR-5, FOR-6 - Alternative: fewer

rezoning sites.

# **EXTERNAL**

Dear Sonoma County,

I have been looking through the Housing Element Update Draft Environmental Impact Report and have some grave concerns as it pertains to the future of Forestville, were these plans to go through in full as is. Thank you for welcoming community feedback and taking the various community's character into account. I'm sending in the same letter for each parcel in case they end up in different files down the line pertaining to each property and end up going to different developers. Thank you for your understanding.

In section: Environmental Impact Analysis Public Services and Recreation (aka: 4.15-11), I see that it states, in the first paragraph, that it "would not increase the total population served by more than 10 percent, with the exception of the Forestville sites". This is pertaining to Fire Districts. There are a few issues here. Forestville is being put forth to take on an undo burden of the state's quota in comparison to other unincorporated areas. While others are looking at 10% or less (per your document) Forestville is looking at 25%. This is unsettling to say the least. Please see section 2-26 for the info: <image001.png>

Growth of: FOR-1, FOR-2, FOR-3, FOR-4, FOR-5 and FOR-6: Draft impact report 2-26 on page 101 of the document.

Total population allowed under current designation: 167 Total population under proposed designation: 1,652 <image002.png>

The current population of Forestville, as defined by the boundaries of the Grammar School is 6,771. The addition of 1,652 residents would be a population increase of nearly 25%. Forestville would have the greatest number of proposed new occupancies/population in the County with the exception of the city of Santa Rosa which is much better equipped for such a drastic influx vs the small community of Forestville which still has the same sized roads they did when I grew up there back in 1971. There is not the infrastructure nor the services in place to accommodate this kind of growth and it is not right to put such a burden on one community in contrast with what is being put on others. The difference of 10 vs 25 percent is not insignificant, it isn't small and unlike the EIR states -- it would be dominant vs "could be dominant". There is simply no way to believe it would not be dominant given the unit #'s proposed vs what the landscape actually is. Unless the proposed developments are single story ranch like homes, there is no "could" about it. See table 4.1-6 in section 4.1-51 for further comparisons. <image003.png>

Also of note regarding errors in the document is the statement on 4.1-18 (page 127) in the first paragraph about FOR-2 is "On Mirabel Road, a school is directly across the street from FOR-2." This is simply not the case. There is no school across Mirabel from FOR-2. The only schools in Forestville are the

now-defunct El Molino High School @ 7050 Covey Rd. and the Elementary School, now known as Forestville School & Forestville Academy, down the hill off 116 @ 6321 Hwy 116, ironically by some of the other proposed locations.

20.2 Cont.

The streets encircling FOR-2 (Guisti/Nolan/Mirabel) are not built to withstand this type of quantitive developing. They are the same streets I played with childhood friends on in the early 1970's. They are one lane each way, no space for going around, not good for emergency evacuation situations, not built for dense populations. These are small country roads built to sustain neighborhood housing, at most, single family homes suburban in nature. They are not built nor would logic say they are prudent for a development the likes of rezoning specified as FOR-2 units. There is no mention that these are small country roads, where pedestrians and bicyclists often very little room for error. That description seems glaringly omitted for a project of such large changes discussed. That point actually goes for the parcels throughout much of Forestville, as well as many others.

20.3

I've seen nothing in the document that speaks to what would be done with respect to urban renewal effects for the people displaced to enact these potential build-outs, displacing locals, loss of character, threat to local business and the introduction of community conflicts, pollution-related health conditions, around town parking needs and sanitization challenges. This feels omitted, as does any mention of an infrastructure plan to accommodate the potential influx such as roads that are simply not built to accommodate such a large increase.

20.4

Where is the mention of how the county plans on widening roads, adding left turn lanes, round-a-bouts, traffic lights, street lights and crosswalks for public safety on roads that are used by commuters, visitors, pedestrians and gravel trucks all coming through town in an environment that is only 1.7 miles to get through town (Speer's Market @ one end of Mirabel Road to the Elementary School on the other side of town)? This is omitted.

20.5

Where is the study for the safety of it's citizens just trying to get through the day without a horrible accident when there's an extra thousand or so cars on the road and pedestrians jaywalking, risking their lives, with such a large increase of traffic on such a small stretch of travel? This is omitted. I am gravely concerned about the implications. These are urban services as much as sewer and water are, per: page xviii, yet there is no study about this as far as I'm able to tell.

20.6

There's the discussion of no feasible mitigation measures available for the elements that would damage the scenic route along FOR-1, FOR-3, FOR-5. They would create detrimental significant and unavoidable impacts whereas other areas would be far less significant along the 101 corridor.

20.7

FOR-1, FOR-5 and FOR-6 are all listed as being on "Existing Hazardous Material Contamination". This is reflected on tables 4.9-1 and 4.9-2 on pages 4.9-1 thru 4.9-3. I have not been able to find a study in this EIR as to what the health risks to pending future potential residents, students located .1-.2 miles from the sites and to the surrounding community would be at risk to during the excavation and built outs. Additionally, If I'm not mistaken, some of these properties were once considered by the Elementary School nearby and decidedly declined due to their toxic nature (and possibly the cost of remediation). I also am not seeing any study for the risks of these hazardous elements ending up in the watershed in Forestville (all sites) for Lower Russian River and sub-watershed to Green Valley Creek and ground water basins - especially in an area notorious for flooding when rains really kick in as they did in 1940, 1955, 1964, 1986, 1995, 1997, 2006, 2019, 2023 - this isn't an unknown problem nor is it going away drought or no drought.

It's noteworthy that in section 4.15.1a: Fire Protection for the EMT call response times are prior to the now combined departments. Guerneville, Larkfield and Forestville have all consolidated into Bennett Valley, Bodega Bay, Mountain Volunteer, and Windsor FPDs. I don't see any study pertaining to the ratio of calls per capita and what the combining of the districts as well as the increase of population would mean for that ratio on a town by town basis.

20.8

With respect to greenhouse gas emissions, page 556 of section 5.2.1 correctly calls out "Additional vehicle trips associated with the proposed project would incrementally increase local traffic and regional air pollutant and greenhouse gas emissions." It also states, "These are considered irreversible environmental effects." The last paragraph of that section goes on to say, "CEQA requires decision makers to balance the benefits of a proposed project agains it's unavoidable environmental risks in determining whether to approve a project. The analysis contained in the EIR concludes that the proposed project would result in significant and unavoidable aesthetic, cultural resources, greenhouse gas emissions, hazards, transportation, utilities and wildfire impacts. Although development facilitated by the project would be required to implement mitigation measures, impacts would remain significant and unavoidable due to the irreversible loss." With all these potential rezone projects in what are zoned as Rural Residential and Low Density, does it not make more sense to seek locations for housing that is more directed to areas and communities that are not so car dependent? In particular for the low income population, does it not make more sense for them to have housing opportunities in communities that have better price points in urban/suburban areas with things around them? In implementing the proposal as it is, we are also pushing the very people that need it the most into situations where they have to drive further when gas prices are among the highest levels the last few years.

20.9

The EIR calls out that Forestville has stores and restaurants. It does not call out that it offers one small-family type grocery store, one Mexican grocery store that has a sitting area/restaurant, one pharmacy, one gas station, one expensive fancy restaurant coupled with a couple casual spots being the local drive in, a coffee shop with sandwiches and a pizza joint. There's a bakery, there's a wine tasting place, there's one hardware store and all these places are great but they're not built to sustain the kind of growth that Forestville is now being considered for. Where are an additional 1,600 people going to park? How are they going to go to one of the 3 restaurants that might be open to serve them (one is closed at 2pm). That growth, that population needs more support than is currently able to be offered in this town. It's a half hour drive to: Costco, Target. It's a 15 minute drive to Safeway, Walgreens, Coddingtown (this is in 'good' traffic).

20.10

This community is built for people to pick up those last little things on their to-do list, it is not, nor has it ever been the community that serves to support a day to day way of life where you can get everything you need in the one mile that goes from one end of town to the other.

I understand that implementing this plan is not a choice you made and that it is being dictated to you. I know this is not an easy process and I don't want to see things get worse than they already are. Nobody wants the County to be sued by the State, nor does anyone want another builder frenzy free for all to occur in Sonoma County as it has in other places where the governing body did not meet the State's demands, we do respectfully request equality within the obligations and to not have a tiny town like Forestville to be pushed beyond the brink of what it is realistically able to handle. If all of these build outs were to occur, it would be too much for the area and the community to absorb. It is only 1.7 miles from one end of 'town' to the other, it's akin to me trying to stuff my post-pandemic size 12 body into my old size 6 jeans... the math just isn't there.

I implore you to opt for your Alternative choice where do not choose to rezone all 6 parcels for Forestville, and I implore you to consider doing the same for the ones that have documented historical toxic hazardous situations especially as they are so close to the Elementary School when children are clearly proven to be more at risk to lung problems as they are still growing.

Please give due consideration to avoinding FOR-1, FOR-2, FOR-3 FOR-5, FOR-6 at the minimum and move those project's potential population to a part of the unicorporated county that is better for the people in need of more affordable housing as well as the small communities that aren't prepared to accept the inflow from a practical, geographical, economical, services and logistical egress perspective. Please set out to find parcels that can meet the counties needs that the State has put your feet to the fire for and find territories that fall in the "Less than Significant", "Less than Significant with Mitigation" or "No Impact" vs the very many "Significant and Unavoidable". Not an easy task but detrimental otherwise.

Thank you for your time in reading this and giving consideration to the macro of the micro picture of a massive endeavor. Much appreciated.

Respectfully, Becky Boyle Forestville, California

12/1/22

I wanted to protest this property infringement, that is just one in a long list since zoning began here in the early sixties, when most of us native bumpkins had no idea that it was malicious incremental takings with a never-ending list of tiny-printed new rules. Being educated in the middle of the 20<sup>th</sup> century, I realize that the second most important subject of the Constitution is protection of property rights. The people who don't understand this will miss it. Our consolation is we will not see the end of the madness.

In the last couple of months, Maui outlawed any new VRBO's because much of the rental stock has been bought by outsiders and prepped for vacation rentals. Young people born there are leaving the island because of the escalating competitive cost of houses ..rising taxes and failing schools. Soon, the city knew, the old families and culture of Hawaii would be seen only at performance Luaus. "We can't build our way out of this" they wisely said.

Here in Sonoma County we too are truly on the edge of losing the rural, agricultural underpinnings of our culture and the peace and sense of community that kept our churches and institutions alive and beckoned those weary city dwellers running for cover. We've been blackened with the Nimby label before and it comes to this...we were right. Our county population has tripled and more. Up there in Sacramento, where quite ugly subdivisions rule the day, the "law makers" are busy pocketing the money and if they heard there was a mandate from here from mere mortals, they heard wrong. I noticed in the early 80's that my kids wouldn't be able to stay here with the rising costs of housing. So my husband I made a plan to provide them the homes they will need. But the recent onslaught of statewide, often misunderstood bond measures has taken away many of the protections of Prop. 13.

It occurs to us, the last of the baby boomers, that this is also falling heaviest on the elders as we have worked hard to create these places they want to jerk out from under us, with the of trashing a half century of expensive planning and zoning laws that we thought might stick. Without asking, our land is rezoned and in another Capital hearing room they are formulating a way to charge sky high taxes, based on a ghost rezone... even if we can fend off the carpet baggers. We believed in Open Space and we paid for it. We believed that the building of Lake Sonoma wasn't for growth and with those promises, we paid for it. We built schools, colleges and to educate OUR children, fire stations to protect our homes. We planted trees and left them to grow to lower our carbon foot print. We heard the call for less population and sacrificed our dreams of a large family. All for naught. Here we fought for a sewer system that encompassed just downtown and, on the River, because we believed you could not build a common sense reliable, affordable system in our far flung topography. We were blackmailed to hook up by a network of laws that defeated us. Now it is fact, the system is failing, and the prices per single family home are some of the highest in the state. All, or most all of its pump stations must be replaced. I don't believe the federal government will kick in money this time, considering that they had to sue Sonoma County for millions for not following the parameters of the law for the last, (should I say?) RR sewer boondoggle.

There are somewhere like 8 billion people in the world...and they all want to come here..! just wonder...how many...((just give us a number).... are we required to move over for? And where in the Constitution does it allow governments to infringe on property rights?

When the PGE identifies fire zones, it's crucial to get it right, because the resulting loss of human souls will be on their conscience and battering their check book. They are the experts, and they can be sued. The county cannot and the question is: why is their fire map identifying the very same area as Tier 2 vulnerability when PGE finds it to be the most critical.? Guerneville is surrounded by some of the most fire prone lands and is every bit as dangerous as the Eastern part of the county. Can each of these entities be viewing it in a different way because of wanting different outcomes? Under pressure from the state to do an impossible thing, provide low cost housing for everyone who wants to slide in here, it's decided to identify our properties as "underutilized".

21.2

In our case, we live on a one lane dead-end road. There is no other way out. Why is that not scrutinized in the EIR? The car trips multiply on weekends when the VRBO'ers are in residence. With the Trip generation table as my guide, I figure there will be at least 770 more trips a day? Wouldn't you consider this an environmental catastrophe for our neighborhood, who most times has two or three cars an hour? Not to mention the car trips that have been added from Valley Lane (about 19 houses) and Cutten Drive, (about 12 houses) both that feed into Laughlin....not to mention School Lane, Janet Lane and

21.3

The Hoffman's, descendants of the Laughlin's have been on their property for at least 100 years...It's a long-time tradition and even an American value that we have the legal right to leave our property to our children. We bought our property knowing that the zoning could only change if we asked for it. In 50 years we haven't done that except for building our family house. Because of Prop. 19, the terms of how properties are taxed has changed and no longer protects the kids from having to sell their newly over-appreciated property. (This Proposition 19 was a darling of the real estate industry and not very well understood by the less educated.) How much will the re-zoning of our property add to re-assessment when Paul and I have died? If you never plan to sell your property, what does it matter that the years and new rules continue to force it into a new higher value? (That was how Prop. 13 was born!) No money comes of it. No new cars are bought. No around the world trips are taken. Our property is everything to us and our children. We did not inherit it...we worked hard for it. We are workforce people, non-college educated, working in the private sector with all

that defines; no pensions, sparse benefits and non-protected job security. We planned carefully for our future...but we hadn't figured on the covetousness of our rulers.

Although no one in a county office can tell me how many short term rentals have been authorized in the West County, some one has offered that there are more than 2000, and adding to the problem, every day WE SEE houses being rehabbed, new owners possibly waiting for the short term housing permits to begin to be allowed again. How does the conversion of what were once long term rental housing, do to the rental market in our area and more important, effect the lack of housing we now seem to face? This is a critical component of the problem in our immediate area, where nearly half the houses are VRBO's or waiting to become VRBO's. Supposedly there is a study being done as to the advisability of stuffing rural neighborhoods with hundreds of little hotels, ...why not wait for the results of that study? Why not rezone all of those beautiful little TOT houses back to what they should be: in a county that can't build starter houses? Personally, we miss the families and kids that used to be a part of our very cohesive neighborhood...our school's declining enrollment tells the story of the VRBO craze. Losing a school (and in our case two schools are affected) is historically the beginning of the decline of community in most towns isn't it?

Can you really solve the housing problems of 2000 in-coming people when you caused the housing problems of several thousand renters and their families? And what's the number we have to provide by uprooting the steady peaceful neighborhoods? 10% more, 100% more? There are 7 billion + people who would like to live here...just give us a number so that we can quantify the misery we may have to put up with.

"The purpose of the Workforce Housing (WH) Combining Zone is to increase housing opportunities for Sonoma County's local workforce in areas that are close to employment and transit". Is our property and the Hoffman's within 3000 feet of transit? Are there jobs? Do we have the educated, trained workforce to fill them? Do they pay a living wage? Do you mean Local, Guerneville or Local if you just got here? Is there anyone that rides the bus that actually pays a fare? Rumor here in Guerneville is that it is mainly the homeless and that there have been assaults on the bus...unthinkable 20 years ago.

21.4 Cont.

21.5

"Projects that provide only market-rate housing or that do not meet WH combining zone development standards may be approved with a use permit". Is this or isn't this Workforce Housing? The General Plan was barely two years ago...why wasn't this part of it? It's a big thing to change the General Plan isn't it?

21.6 Cont.

There is a law that protects senior citizens from financial abuse...people are arrested for it. They are often taken advantage of because they are elderly and can't fight back. This notice of an EIR meeting came in the mail about 2.5 weeks ago. It took us about two weeks to find someone to go the extra mile to send us a flashdrive. Despite many calls to the local library, whereby law, EIR materials must be available, the library still hasn't received it. They were willing to loan it out a day at a time. The EIR I received is some 635 pages long which for me, is hard to read on the computer. The notice for the meeting online still shows the April date. Though I signed up for email notices, I haven't received any instructions for Thursday's meeting. Many of my neighbors are elderly and can't manage the Zoom...it's fine for your line of work...you have an IT Dept. to soothe the way...how does technology stand in the way of public transparency? Blaming it on the Covid can no longer stand scrutiny can it? This is a major thing to be decided on Zoom.

21.7

This hearing and the proposal for three properties to radically change Laughlin Road hasn't formally notified the affected residents on Laughlin Road, Valley Lane and Cutten Drive. We already have hundreds of trips a day to the school. We have big heavy trucks and farm equipment and misc. vehicles, farm workers going to Korbel Vineyard. It is a dead end road, (a cul du sac) that is a fire issue and regulated by fire codes. Have you cited those regulations? Your Fire Hazard Map shows that we are in the Moderate designation..but with 70 little houses across our three and a half acres, the fire hazard would be more because the available fuel would be increased by many magnitudes. We are, after all, on the boundary of High rating and seemingly surrounded on three sides by High rating according to the PGE How is it that the County views it as Tier 2?....we were evacuated early in the lightening fire as in a very dangerous spot.

21.8

When our sewer committee became a force in the objections of our planned over ambitious, pricey sewer system, we were told from the beginning that the system

would be an affordable and not an "overbuilt" system. We were told that the Federal government grants forbid overbuilding the system and plant. It could NOT be, by Federal law, built for growth. It could not incorporate land outside of the boundaries unless there were failing systems on parcels just across the boundary line. There were 2200 hookups planned .The facility was planned for that many parcels. Somewhere in the 80's, the Feds decided to do their job and pursue the county's overbuilding of the plant.

"On one side there's the EPA, demanding the county return millions of federal dollars. Your wastewater plant is too big, says the agency; sign up more users or return up to \$4 million.

The sewer system, too expensive for a small town, came to a 1975 election, when the majority of the district's voters agreed to sell \$2.9 million in bonds to finance its share of a sewage plant.

That voters would approve the 1975 bond was by no means guaranteed. Similar bond measures appeared on the 1972 and '73 ballots and both failed. The county applied pressure in 1973; a building moratorium was slapped on the district until the plant went into operation -- property owners couldn't even put an addition on the house. If that wasn't enough to ensure victory the third time around, the district changed the requirements for passage from two-thirds to a simple majority.

The 1975 measure also received support from prominent local citizens and business owners and community groups such as the Russian River Chamber of Commerce and the Russian River Renewal Association, as well as endorsement from the local newspaper, the Russian River News.

Proponents of the sewer system said it would abate the slew of antiquated cesspools and septic systems that were leaking pollution into the area's waterways and groundwater. Opponents countered that the sanitation district had not fully explored other ways to remedy the leaky systems, and that a sewer plant would encourage unwanted development in the rural area.

Don Head, retired director of the Sonoma County Public Works Department, the agency that was then in charge of county sewage districts, said studies conducted at the time indicated many residential sewage systems were malfunctioning, but most of the documented failures came from businesses. "The gross septic failures

21.9 Cont.

occurred in commercial establishments. They were most anxious to connect," said Head.

For violating businesses and homeowners with failing systems, the hookup promised to be a great deal. The connection permit fee was set at \$100, and annual costs for a single family dwelling were estimated at approximately \$70.

Nearly a decade later in 1984, district voters passed a ballot item to maintain the \$100 permit fee -- but after the election, the county threw the measure out and ignored the voter's mandate.

That wasn't the first time that county counsel threw out results after election day; there was also measure L, passed in 1982. Concerned about the escalating project costs, voters wanted to put a brake on the district acquiring further debt.

They had good reason to worry. Estimated to cost about \$13.6 million in the 1976 EIR, the final bill for the plant was about three times that -- over \$35 million. Besides the system and related expenses there were millions in lawsuits and counter-lawsuits involving inadequate work by the original project engineers and the construction company JMM Caputo-Wagner.

Some of those millions came from the state and the district bond issue, but most came from a \$26.5 EPA Clean Water Act grant. It is this federal money that has spurred the current showdown. Sonoma County has agreed to pay back \$1.2 million, but the EPA also contends that the plant is underutilized, and the district has to repay another \$2.8 million. That is, if they don't pass the mandatory connection ordinance by September 30.

On paper, the EPA's right. The plant was sized to serve "maximum daily flow projections based upon peak visitor weekends," according to the 1976 EIR. The projected population for this year was 9,100 people, including permanent residents, weekenders, and tourists. A district report written this summer estimates that the system currently serves a population of about 7,500 -- about 1,600 bodies short of the original estimate.

Isn't it true that VRBO's and the like put an additional burden on our system because vacationers and their friends are the equivalent of a baseball team moving in for the weekends and all summer? How is our plant holding up? My question here is, is this another part of propping up an overbuilt sewer plant and a badly built collections system?

21.9 Cont.

I've always told my children that the most logical use for our land in Guerneville, identified as Gu-2, was to grow redwoods well. (We have about 30 on the property). Out in the Big Bottom which is just west of us, one square acre was measured to have more board feet of redwood lumber than any other spot in California. In the winter; it is a swampy place with large wet areas where water lies, and some of my neighbors have over the years re-directed their excess water into our fields. In winter ducks sometimes appear, thinking we are actually a pond. On very high water floods, water comes up about halfway on our property and flows westward out to Livereau Creek. On the days that it's at it's height, the flood plain that is Korbel Vineyard has water all the way to Watson Road and across.

What I put on Russian river Municipal committee site.

While it took close to 15 people from a professional "environmental" firm to prepare this EIR (and I'm assuming many people in the county offices,) it's a daunting chore to read and analyze what is in these 1300 pages. If the public had an equivalent amount of time plus the ease of putting our fingers on the data required, more input and corrections would be highlighted.

Because of our lack of expertise in many of these subjects I believe many of the property owners, especially senior citizens, may need a county paid lawyer to represent them and carefully explain their rights and a educated EIR examiner to verify so called "facts" Is it too much to ask the county to appoint a resource bureau where we could easily find data not available outside of government walls?

Certainly, an in-person meeting for just the owners of these 59 property OWNERS should have been a wiser and less jolting beginning.

Knowledgeable Representatives from the RR Sanitation, and the limited bus system with an emphasis on West County should have been at a meeting in person with the stakeholders able to answer questions about the true viability of the transit and sewage capacity. I emphasize knowledgeable. Ever tried to find the ridership of the Guerneville buses? Impossible. Crime statistics from the buses? Fires started by arsonists? Emergency ambulance rides? This plan is causing my family uncalled for trauma an Only the two other property owners on Laughlin Rd. had been been notified (as of late December.) of the profound change coming to our little neighborhood

(There had not been a link on the Planning website for weeks that should lead me to the Draft EIR, but led to only a 404 error. This seems a huge failure) The Scooping meeting was badly run with communication fails, and as lightly attended as most the Zoom meetings are with the government. Considering all of this, an in print copy of the draft EIR should have been in the local libraries months ago. LibraryStaff there assured me that if they got one it could be loaned out even under the Covid restrictions for the last year. But despite several requests by library staff, a printed copy was just recently sent.

Now as edicts come from hundreds of miles away, it is shocking and heartbreaking to contend with.

At a time when the governor calls for more local control, the county seems willing to off load planning/zoning to people who don't know our county at all. Considering this, do we need a planning department? Does 50 years of fairly consistent zoning mean nothing? Our property was chosen on the basis of being in the RR sewer district, where millions of dollars from the Federal govt were spent, (and corners were cut) based on a the sanitation district's promise that "we" would not build the collection system or the plant for any growth. The feds eventually sued us for millions of dollars for just that expansion and I don't believe there was anywhere in that settlement that put an expired clause for the original promises. Can you assure me that the district has learned their lesson and now obeys the Federal Governments sensible mandates? We already have about 1000 more hook ups than the collection system was built for. We, by the way, tried to get out of the sewer district, being on the farthest borders. But the district needed every hook up they could get because they underestimated the final cost and needed more ratepayers.. That Sewer debacle EIR was also quite un-fact filled. What was promised as a sewer charge of about \$40 a month to begin with. Now raised, this year, from \$1774 to \$1932. A 8.9% raise. Januar Janger

21.11 Cont.

In the report requesting a large sum 'for emergency repairs, the SCWA stated "It is determined that complete failure of the pipelines was highly possible and If the pipelines were to fail it could cause major erosion, flooding and contamination." In April 24, 2021 in a letter to the Water Agency, the North Coast Regional Board enumerated a multitude of violations that included the releases of untreated sewage in 2017. And 2019.

And then three emergency breakdowns in 2021 Although the Board of Supervisors allocated \$750,000 for repairs, the estimate cost to fix it is at least 20 million. "There is a surcharge of man-holes and lift stations, pump stations nearing the end of their useful lives We have had a notice that repairs should "happen soon".

From the RRWatershed Protection Committee: "the system is old, it was not appropriately constructed in the first place in terms of design and some of the pipe materials and parts of the collection system may be currently on the verge of total collapse"

This EIR of, I believe, over a thirteen hundred pages, has many things wrong, uses out of date data, some as old as 2013 and seems to have never seen our property.

Our road is without a white line, narrow, and the use from perhaps 30 Laughlin Road car trips a day will increase to somewhere around 500-- surely a difference in our environment.

There are fire rules (Fire Safety Odinance 6184) that restrict building on a dead end road, a culde-sac. Our road is one way in some spots plus there has been increased traffic because of several VRBO' conversions on Laughlin and Valley Road.

With the unflattering pictures (and narrative) in the Guerneville part, the picture of our parcel doesn't even appear. It's actually a picture of the Laughlin ranch looking southwest, labeled as ours.

FEMA rates our valley, much of it, as in the 6 factor and they note "flood risk is increasing as weather patterns change." In 4.10.5, the Fema map represents an unfinished. 1950's study. The straight line that stops before Gue 3 is not a rendition of the true flood stage that occurs in what the county calls a 100 year flood (and we natives call perhaps a 30 year flood.) After this ruler straight cut-off, the water can rise in reality to stretch to and over Watson Road. We've seen it many times, and like most Guerneville Natives, have the pictures to prove it.

When the PGE rates our neighborhood as the 'highest fire danger category and the county rates us lower, who should we believe.? See Editorial "Developers can't just brush aside fire risk anymore" Press Democrat Jan.21 22

Here on the latest Wild Fire Risk Index, we are shown as being in the category, "High Hazard" yet Korbel Laughlin Vineyard, just east of us, seems to be one step more dangerous ignoring the fact that their parcel is vines, no grass even in spring, two large water ponds and a sprinkler system over all the vines.

Reply

- Share
- 19h
- Edited

Date: January 31, 2023

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3-16500 Cutten Ct, and GUE 4-16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

22.1

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

22.2

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

22.3

The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

22.4

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

22.5

The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

22.6

l, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4-16050 Laughlin Road, focated off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

**22.7** 

Name: Daniel O'Leary

14735 Carrier Lane

Guerneville, CA 95446

Date: January 31, 2023

Signature

From: kdpmick < kdpmick@aol.com >

**Sent:** Tuesday, January 31, 2023 11:14 PM **To:** Eric Gage < Eric.Gage@sonoma-county.org>

Cc: bassman.pulley@gmail.com

Subject: Property FOR-2, Mirabel Rd.

### **EXTERNAL**

## Good morning

I am the owner of FOR-2, as mentioned in the housing elements report. After reading the document I have questions not answered by the document.

Most important to address is, were the report approved and rezoning set in place, what changes would be imposed on my land? Would I be forced into those guidelines for future property changes? Currently it is zoned RR, so it is agricultural with housing. If rezoned, the imposed density rules could make any future changes to the land and use of the land changed. This is devastating.

Would the knowledge that I have no intentions of selling this land make a difference in the viewing towards my land? We as a family, are in the process of regenerating the orchard, to the original orchard purchased in 1911 from the evolution of the El Molino Rancho Land Grant, which transferred to Hermann Wohler, and sold to a Mr. Peterson. It was then my grandfather purchased the land from Mr. Peterson. It was then that our family agricultural history began and remains in Sonoma County. Again I reiterate, there are no intentions of selling this land.

I will be sending a more in depth response to the report prior to the February 13th meeting. At this present time, learning answers to the questions is appreciated. I look forward to your response.

Sincerely Karyn Pulley 23.1

Letter 23

Linda Hopkins Sonoma County 5<sup>th</sup> District Supervisor lynda.hopkins@sonoma-county.org

Letter 24

Eric Gage
Sonoma County Planner III
Eric.Gage@sonoma-county.org

PermitSonoma-Housing@sonoma-county.org

To Everyone It Concerns:

As a longtime resident of Cutten Drive and the community adjacent to Laughlin Road in Guerneville, CA, I STRONGLY OPPOSE THE REZONING OF THE PROPERTIES LISTED IN THE HOUSING ELEMENT AND SONOMA COUNTY DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR), specifically those located off of the Armstrong Woods Road Scenic Corridor: GUE 2-16450 Laughlin Road; GUE 3-16500 Cutten Ct; and GUE 4-16050 Laughlin Road.

Due to the nature of our small, residential neighborhood in this rural, unincorporated town of West Sonoma County, such rezoning poses SPECIFIC ADVERSE EFFECTS THAT WOULD IMPACT THE HEALTH AND SAFETY OF THE ALREADY CURRENT AND PROPOSED FUTURE RESIDENTS—the area is comprised of narrow, winding one-way, dead-end roads unsuitable for additional traffic; the sewer system is inadequate to accommodate additional dwellings; Fife Creek regularly floods Armstrong Woods Road and its adjacent businesses and homes; evacuating this neighborhood during flood or fire would be catastrophic with an additional 200 homes; and Armstrong Woods Road leads to a state park that cannot handle additional traffic.

GUE 2 and GUE 3 are ONLY ACCESSIBLE VIA ONE LANE ROADS, which would require widening and utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

The POTABLE WATER AND SEWER SYSTEM ARE NOT ADEQUATE for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions including during floods and power outages.

The GUE 2,3, and 4 PROPERTIES ARE WITHIN AREAS DOCUMENTED AS HIGH WILDFIRE DANGER, FLOOD PLAINS, AND EARTHQUAKE PRONE. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D which is the most severe. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. BUILDING IN FLOOD AND HIGH-FIRE ZONES IS CONTRARY TO THE COUNTY GENERAL PLAN.

SCENIC RESOURCES WILL BE ADVERSELY IMPACTED IN AN ECONOMIC AREA THAT DEPENDS ON REVENUE FROM TOURISM. Old growth redwoods and valley oak habitat will be destroyed to allow for

24.1

24.2

24.3

24.4

the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

24.5 cont.

THE REZONING OF GUE 2, 3 AND 4 ARE INCONSISTENT WITH THE GOALS OF THE COUNTY GENERAL PLAN, BAY AREA 2050, AND HOUSING ELEMENT POLICY.

24.6

I AS AN INDIVIDUAL, AND WE, AS A CONCERNED COMMUNITY, SINCERELY EXPRESS DEEP CONCERN AND DISCONTENT FOR THE POTENTIAL DANGERS THAT THE REZONING WOULD POSE FOR OUR NEIGHBORHOODS AND FAMILIES, as well as for the lack of notification and inclusion in the early processes and opposes the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

24.7

Sincerely,

Chris Bross | 24-year resident @ 16351 Cutten Drive, Guerneville, CA, 95446

Date:

Letter 25

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

25.1

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

25.2

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

25.3

The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

25.4

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

25.5

The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

25.6

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

25.7

Name: CINRY ROMERO

Address: 16424 CUTTEN DR GUEVNEVIlle CA 95446

Signature:

Linda Hopkins Sonoma County 5<sup>th</sup> District Supervisor lynda.hopkins@sonoma-county.org

Letter 26

Eric Gage
Sonoma County Planner III
Eric.Gage@sonoma-county.org

PermitSonoma-Housing@sonoma-county.org

To Everyone It Concerns:

As a longtime resident of Cutten Drive and the community adjacent to Laughlin Road in Guerneville, CA, I STRONGLY OPPOSE THE REZONING OF THE PROPERTIES LISTED IN THE HOUSING ELEMENT AND SONOMA COUNTY DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR), specifically those located off of the Armstrong Woods Road Scenic Corridor: GUE 2-16450 Laughlin Road; GUE 3-16500 Cutten Ct; and GUE 4-16050 Laughlin Road.

Due to the nature of our small, residential neighborhood in this rural, unincorporated town of West Sonoma County, such rezoning poses SPECIFIC ADVERSE EFFECTS THAT WOULD IMPACT THE HEALTH AND SAFETY OF THE ALREADY CURRENT AND PROPOSED FUTURE RESIDENTS—the area is comprised of narrow, winding one-way, dead-end roads unsuitable for additional traffic; the sewer system is inadequate to accommodate additional dwellings; Fife Creek regularly floods Armstrong Woods Road and its adjacent businesses and homes; evacuating this neighborhood during flood or fire would be catastrophic with an additional 200 homes; and Armstrong Woods Road leads to a state park that cannot handle additional traffic.

GUE 2 and GUE 3 are ONLY ACCESSIBLE VIA ONE LANE ROADS, which would require widening and utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

The POTABLE WATER AND SEWER SYSTEM ARE NOT ADEQUATE for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions including during floods and power outages.

The GUE 2,3, and 4 PROPERTIES ARE WITHIN AREAS DOCUMENTED AS HIGH WILDFIRE DANGER, FLOOD PLAINS, AND EARTHQUAKE PRONE. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D which is the most severe. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. BUILDING IN FLOOD AND HIGH-FIRE ZONES IS CONTRARY TO THE COUNTY GENERAL PLAN.

SCENIC RESOURCES WILL BE ADVERSELY IMPACTED IN AN ECONOMIC AREA THAT DEPENDS ON REVENUE FROM TOURISM. Old growth redwoods and valley oak habitat will be destroyed to allow for

26.1

26.2

26.3

26.4

the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

THE REZONING OF GUE 2, 3 AND 4 ARE INCONSISTENT WITH THE GOALS OF THE COUNTY GENERAL PLAN, BAY AREA 2050, AND HOUSING ELEMENT POLICY.

26.6

cont.

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26.7

### Sincerely,

Deneene Bell | 24-year resident @ 16351 Cutten Drive, Guerneville, CA, 95446

## Date:

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave.. Santa Rosa, California 95403

Letter 27

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville. California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

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27.6

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27.7

Name: Denise Mobley
Address: 14746 Rio Nido Rd

From: Leila Allen <leilasallen@gmail.com>

Sent: Wednesday, February 1, 2023 9:52 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: "Upzoning" objection

#### Dear BOS.

I live on Giusti Rd. in Forestville. I understand and support the need for more housing, but it must be done in a way that does not put current residents at even greater risk from wildfire. There are only two roads in and out of Forestville: River Rd. and 116. If you increase our little community by 1,484 homes, that would bring an additional 3,000+ cars. If you include the prosed increase to Guerneville and Graton, those numbers become staggering. There is no way we could evacuate effectively.

If you allow this to proceed, you will be directly endangering our lives. You will be creating an even greater potential for gridlock in an emergency, setting the stage for an outcome like the Paradise fire. This is not objection because I do not want housing in my backyard. It is simply unsafe to allow an increase of this magnitude without assuring a safe passage out of town for all citizens.

I understand that there is a push from the State. Perhaps building more houses, and encouraging more people to live here is not the right step for California as a whole? It is unlikely that water will become more available throughout the State. It is unlikely that fires will stop.

Thank you, Leila Allen (Forestville)

Letter 29

Eric Gage at Permit Sonoma 2550 Ventura Ave. Santa Rosa, CA 95403

RECEIVED

FEB 1 4 2023

PERMIT AND RESOURCE

RE: Draft EIR Comments, Housing Element Update

The Neighbors of FOR-2 would like to present a response to the draft EIR: Housing Element Update. Our group consists of those living on Nolan Road, Giusti Road, Poplar Road, Ohair lane and Nicky Lane (FOR-2 Neighborhood).

The Neighbors of FOR-2 request that FOR-2 be removed from the rezoning plan for the reasons stated in the EIR found in Alternative 3. Alternative 3 - The 6 Rezoning Sites removed from this Alternative include FOR-2. "These 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. Under this alternative, the remaining 53 Rezoning Sites would be rezoned, per this plan, for future medium density development."

We believe that the cost of mitigating the environmental issues, traffic, public service and recreation, sewer and wildfire make the project too expensive to develop at the density recommended in the Plan. There is too great of a risk that the property will never developed or developed at a lower density leaving the County subject to the California Net Loss Laws and the property owner will be left with a site that cannot be sold.

General Overview of the Town Of Forestville According to the Sonoma County General Plan

The Land Use Element includes policies that affect the visual character of new development in the County. Objective LU-15.4 Maintain the "rural village" character of Forestville through design development standards that support small-scale development with substantial open space and native landscaping. Policy LU-15b: Require design review for major subdivisions within the Forestville Urban Service Boundary. Design review approval shall assure that: (1) Project scale and design is consistent with existing rural village character, (2) Project design gives priority to natural landscape over development, and preserves and enhances significant natural features, (3) The project retains open space amenities associated with a rural lifestyle, (4) The project provides for a variety of housing types and costs, (5) Where appropriate to the natural terrain, houses are clustered to maximize open space. To the extent allowed by law, require a long-term scenic easement for the undeveloped portion of the property, and (6) The project includes pedestrian access connecting new homes in a nearby commercial area.

The project slated for FOR-2 is inconsistent with the existing General Plan.

# Neighborhood (FOR-2 Neighborhood)

There are three streets that surround FOR-2: Mirabel Rd, Nolan Rd and Giusti Rd. There are approximately 85 homes and 180 residents living in this neighborhood. If FOR-2 is approved it would increase the housing density of the parcel from 7 homes to 283 units and increase resident numbers by 700. These would have to be multistory buildings blocking scenic vistas and overlooking backyards. Impacts would also include noise levels and nighttime light and glare. The FOR-2 Neighborhood is a walking neighborhood and not just for its residents, people come from other areas just to walk here. There are no sidewalks and very narrow shoulders as well. Due to the entrance and exit locations for the FOR-2 project, traffic increases on Nolan Road and Giusti Road would increase significantly making walking in the area less safe and desirable.

29.1

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The EIR also states that there is a school across Mirabel Road from FOR-2 however this is not true. The Forestville Youth Park lies directly across Mirabel Road from FOR-2. If FOR-2 is developed traffic mitigation measures should be included to provide a safe and controlled crossing from the site to the Youth Park

29.3 Cont.

### Traffic

According to Sonoma County Statistics there are 6909 total trips per day on Mirabel Road in both directions. The speed limit, in the area of this project is 45 mph. There is a significant amount of truck traffic on Mirabel Road due to the rock quarries nearby. Any resident of the FOR-2 Neighborhood knows how dangerous it can be to enter and exit Mirabel Road via either Giusti Road or Nolan Road. Turning on to either Nolan Road or Giusti Road from northbound Mirabel Road can be frightening. There are no turn lanes and with traffic moving at 45 miles an hour and limited sight lines it feels like you will be rear ended before you complete your turn and exit Mirabel Road. Turning onto Giusti Road from Mirabel northbound also has limited site distance for vehicles approaching from behind. Entering Mirabel Road northbound from Giusti Road or Nolan Road also poses dangers due to limited site distances. The entrance from Mirabel Road to FOR-2 lies between Giusti Road to the north and Nolan Road to the south. This location has very limited site distance to the south on Mirabel Road and would not be a feasible exit point for the parcel. This would necessitate traffic to use Nolan and Guisti roads for access to Mirabel Road. At a conservative calculation of 5 trips a day per residence, the total traffic volume coming and going from the FOR-2 parcel would be approximately 4105 trips per day.

#### Public Services and Recreation

The community funded (no tax dollars) Forestville Youth Park would see a considerable increase in use that would lead to a physical deterioration of the facility. Pedestrians crossing Mirabel Rd to get to the park would be a significant safety concern.

### Sewer System

The 8" sewer line that would service FOR-2 currently ends approximately 600' south of the south east corner of the FOR-2 site. This 8" line runs from that location to the corner of Mirabel Road and Hwy 116. It then transitions to a 6" line running under HWY 116 for approximately 950' to First Street where it connects to the main line to the sewer plant. The EIR does not define if the 6" line is capable of handling the increased output from the FOR-2 project. If it is insufficient it would be imperative that any developer understand that to meet the density on this project that line would have to be reengineered and replaced under the direction of Cal Trans. Good planning for this project, should it be approved for development, should require that the developer provide appropriate connections so that the FOR-2 Neighborhood, approximately 85 homes, could at some point connect to the sewer system.

### Wildfire

FOR-2 is located 33 yards from a moderately high fire zone. The EIR States "The egress from this parcel would not allow adequate emergency access during evacuations. Access to FOR-2 does not meet County road standards of 20 feet in width or greater. Prior to approval of development on- and off-site improvements to County and/or private roadways could be required."

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29.6

Print Name	Address:
Frank Saiz	7070 Winter Orchard Lane
Signature Jean Est	Jorectville, CA 95436
Print Name	Address:
John Wilkinson	7635 Minsbel
John Wilkinson Signature Jh lasthin	
Print Name	Address:
KEN WRIGHTA	5961 ANDERSON RS
Signature Sulf	FORESVILLE CA 95436
Print Name	Address: 9677 RIO VISTA RD
TIM KAUN,	FORESTVILLE, CA 95436
Signature 7 m Kau	
Print Name	Address: Took to the took
Dave Doty	Forestville, Cd 95436
Signature Call	

Print Name	Address: 6350 Anderson Re
Zindsay Avnold	- Anderson Re
Signature L. Co	
Print Name	Address:
SUSAN DEHNAN	6350 VAN KEPPEC RD
Signature \( \lambda \( \lambda \)	Forestrille (A 95436
Print Name	Address:
Mervana Foremski	8800 green valley #31
Signature MA bremsia	54 bastupal Ca 954\$2-
Print Name	Address: 0100 HM APCE
NOAH TEWOW	ALL OIUINA
Signature	
- July	
Print Name	Address:
Amber Hernandez	125 Hilltop rd Forestville
Signature W	

Print Name	Address:
Taylor Neuberger	125 Hilltop rd Forestville
Signature /	
Print Name	Address:
Madeline Solomon	6794 Clara Lane Forestrille
Signature Madeline Solomon	
Print Name	Address:
POB AKINS	7410 Poplan Rs.
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Print Name  LAURI LUCK  Signature Mull	Address: 11931 Hillsida Rd Forzstville - CA 95436
Print Name Signature	Address: POB 1145 Forestuille Ca95436
Print Name Brian Whickler Signature Bule	Address: 8381 Vila Rd Ext Forestville 95°436
Print Name  William G. McKinke  Signature ( ) Color ( )	Address:

Print Name	Address:
Robin Dorn	8987 Trenton Rd
Signature Soli Dorn	Forestville CA 95436
Print Name	Address:
Elleen MOORE	8894 TRENTON Rd, Forestville 95436
Signature Lifean Moore	,
Print Name	Address:
KAMi Korreng	9180 Hwy 116
Signature	: Frestille CA 95434
5 790	
Print Name	Address:
Wansy Flowars 1	01023 Coven Rd
Signature Council	
Print Name	Address:
Brad Granier 61	073 Covey Rd
1 1	Lorestulk

From: Meagan Nolan <eeyore8021@aol.com> Sent: Wednesday, February 1, 2023 4:44 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Property at 6934 Mirabel

### **EXTERNAL**

To whom it may concern,

It is my understanding that the rezoning of the subject property is up for debate. As the co-inheritor of this property, I want to let it be known that there is no intention of selling our generations-old owned parcel.

My brother, Nicholas Pulley, as well as my mother as the owner of the property have also messaged with the same. We are in no way intending on selling any of this property.

If you have questions, you can reach me via this email or via cell phone at 805-431-4396.

Regards,

Meagan Nolan (nee Pulley)

Date: 02/01/2022

Letter 31

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Dear Mr. Gage,

Deal Wil. Gage,	
The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3-16500 Cutten Ct, and GUE 4-16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.	31.1
There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.	31.2
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Name: Neil Shevlin

Address: 16477 Cutten Dr, Guerneville, CA 95446

Date: 01/02/2022

Signature:

Date: 02/01/2022

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Dear Mr. Gage.

Dear Mr. Gage,	
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Name: Oscar Ayala

Address: 16477 Cutten Dr, Guerneville, CA 95446

Date: 02/01/2022

Signature:

From: Rio Olesky <riolesky@sonic.net>

Sent: Wednesday, February 1, 2023 12:55 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Planned development in Forestville

#### **EXTERNAL**

I am writing to protest the planned development in Forestville. This is the wrong plan in the wrong place. Here are my reasons:

> The streets encircling FOR-2 (Guisti/Nolan/Mirabel) are not built to withstand this type of quantitive developing. They are the same streets I played with childhood friends on in the early 1970's. They are one lane each way, no space for going around, not good for emergency evacuation situations, not built for dense populations. These are small country roads built to sustain neighborhood housing, at most, single family homes suburban in nature. They are not built nor would logic say they are prudent for a development the likes of rezoning specified as FOR-2 units. There is no mention that these are small country roads, where pedestrians and bicyclists often very little room for error. That description seems glaringly omitted for a project of such large changes discussed. That point actually goes for the parcels throughout much of Forestville as well as many others.

>

> I've seen nothing in the document that speaks to what would be done with respect to urban renewal effects for the people displaced to enact these potential build-outs, displacing locals, loss of character, threat to local business and the introduction of community conflicts, pollution-related health conditions, around town parking needs and sanitization challenges. This feels omitted, as does any mention of an infrastructure plan to accommodate the potential influx such as roads that are simply not built to accommodate such a large increase.

33.2

33.1

> > Where is the mention of how the county plans on widening roads, adding left turn lanes, round-a-

their toxic nature (and possibly the cost of remediation).

bouts and crosswalks for public safety on roads that are used by commuters, visitors, pedestrians and gravel trucks all coming through town in an environment that is only 1.7 miles to get through town (Speer's Market @ one end of Mirabel Road to the Elementary School on the other side of town).

33.3

> Where is the study for the safety of it's citizens just trying to get through the day without a horrible accident when there's an extra thousand or so cars and pedestrians jaywalking, risking their lives, with such a large increase of traffic on such a small stretch of travel. I am gravely concerned about the implications. These are urban services as much as sewer and water are per: page xviii yet there is no study about this as far as I'm able to tell.

33.4

> There's the discussion of no feasible mitigation measures available for the elements that would damage the scenic route along FOR-1, FOR-3, FOR-5. They would create detrimental significant and unavoidable impacts whereas other areas would be far less significant along the 101 corridor.

33.5

> FOR-1, FOR-5 and FOR-6 are all listed as being on "Existing Hazardous Material Contamination". Tables 4.9-1 and 4.9-2 on pages 4.9-1 thru 4.9-3. I have not been able to find a study in this EIR as to what the health risks to pending future potential residents, students located .1-.2 miles from the sites, and to the surrounding community during the excavation and build would at risk to. If I'm not mistaken, some of these properties were once considered by the Elementary School nearby and decidedly declined due to

>

> I also am not seeing any study of the risk of these hazardous elements ending up in the watershed in Forestville (all sites) for Lower Russian River and sub-watershed to Green Valley Creek and ground water basins - especially in an area notorious for flooding when rains really kick in as they did in 1940, 1955, 1964, 1986, 1995, 1997, 2006, 2019, 2023 - this isn't an unknown problem nor is it going away drought or no drought.

33.6 Cont.

We clearly need more affordable housing in Sonoma County. But to put the brunt of that on the small community of Forestville, by definition and by law a small, rural town is unfair.

Rio Olesky 6357 Van Keppel Rd. Forestville, CA 95436

## County of Sonoma Planning Commission

RE: Draft EIR Comments Housing Element Update

My husband and I have been residents of Forestville for 43 years and raised 2 children here who attended the local schools.

We are not opposed adding housing to Forestville, however, we are strongly opposed to some of the proposed locations.

The 6898 Nolan Road property is definitely one of those that is not appropriate for high density housing. It is a 14 acre property that is surrounded by single family houses and their backyards. Our concerns include traffic density in the neighborhood as well as availability of water. There is no sewer system in place in the neighborhood.

The 6555 Covey Rd property seems a proper location as it is near downtown. Also the 6220 Hwy 116 property seems acceptable.

But by no means should there by the increase in total units that is being proposed. Forestville does not have the infrastructure for a 50% increase in population.

Just rezoning one vineyard property in the Forestville area would solve the housing issue as well.

Please listen to the citizens of Forestville and not increase the population drastically as is preliminarily being proposed.

Sincerely,

Sally Percich Robert Percich 7486 Poplar Drive Forestville, CA 95436 34.1

34.2

34.3

3//

From: Sean Maley <smaley@guaranteemortgage.com>

Sent: Wednesday, February 1, 2023 2:46 PM

To: Eric Gage <Eric.Gage@sonoma-county.org>; PermitSonoma-Housing <PermitSonoma-

Housing@sonoma-county.org> **Subject:** FW: opposition letter

Letter 35

# Hi Eric,

Hi Eric,	
I am Sean Maley and live at 16390 Laughlin Road in Guerneville. Thank you for taking the time to talk to	
me today. I just want to put in writing why I oppose the affordable housing projects slated for Laughlin	35.1
Road and Cutten Drive. Here are my comments and concerns:	II
How will the county deal with the flooding on Armstrong Woods Road if we all have to evacuate? Also,	25.2
Armstrong Wood Road is heavily traveled in the summer with tourists to the forest.	35.2
Fire risk is only getting worse. Evacuating this neighborhood now is even tough to due, let alone with another 200 plus homes built would be catastrophic.	35.3
Laughlin Road and Cutten Drive are very narrow in some spots, for only 1 car to pass. How will they	ا محا
solve this?	35.4
Traffic around this neighborhood is a nightmare when it is crush season. I can't imagine another 200	35.5
plus cars around here.	00.0
Laughlin Road dead ends which makes the egress/ ingress problem of evacuation even more difficult.	35.6
How does the county plan on addressing the present condition of the sewer system which has problems	25.7
dealing with the current level of homeowners now?	35.7
Respectfully Submitted,	
Sean Maley	
415 845 9700	
word.	

From: Janice Stenger < janicestenger@yahoo.com>

Sent: Thursday, February 2, 2023 2:39 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** We can't build our way out of this.

### **EXTERNAL**

When I was a kid, there were about 20000 people in Santa Rosa proper, murders were almost unknow, housing was affordable, growth was slow and easy to digest.

### So myfirst questions are:

In a 1/2 mile road, we are expected to take in about 500 people. Isn't it true that if any state or federal money is involved these cannot be held for local people only, or returning people that were born here and couldn't continue here because the lack of available housing in their price range? So in reality we could be building new housing for people from every state in the country and ever county in the state.. is that true?

Also isn't true that developers can get a "pass" and build higher cost housing.? that a trailer park could be sited there?

36.1

From: Kelly <klly jyc@yahoo.com>

Sent: Thursday, February 2, 2023 11:36 AM

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

Cc: Omar Percich < percichomar@gmail.com >

Subject: For todays housing meeting

#### **EXTERNAL**

Please forward to appropriate individuals. I am working or not able to be on the call today.

Good afternoon, my name is Kelly Joyce and I am a resident of Forestville. My family moved from

thousands more people and at the same time be able to safely evacuate in the event of a natural

disaster. People that actually live here understand how far off this proposal is to the current reality of

Windsor three years ago to Conor court which is located off Highway 116 and across the street from the proposed development on packinghouse Road. I have sent several emails over the years to both 37.1 Caltrans and county officials pertaining to the extreme safety concerns I have for this location as my daughter is not able to even cross the street to go 20 feet to school in the morning safely. When we drive her to school in the morning, it typically takes five minutes just to turn left to go straight across the street. Addionally, Highway 116, right in front of the proposed Packing House Road development, floods, multiple times a year completely cutting off access in both directions. Does California need more housing? Yes. However; It is highly concerning that the carts being put before the horse by proposing a 37% increase in Forestville's population with obviously minimal thought/planning put into the feasibility given current infrastructure. How does the county move forward with rezoning proposals without even having a plan for the required infrastructure changes? Our town is not setup to accommodate

Thank you,

our country existing infrastructure.

Kelly Joyce

37.2

37.3

From: Louis Hughes < louis@portalais.com >
Sent: Thursday, February 02, 2023 1:16 PM
To: Eric Gage < Eric.Gage@sonoma-county.org >
Subject: Multiple Housing Units Planned for Forestville

Letter 38

Hello Mr. Gage,

I understand that you have an information Zoom meeting coming up in about a half hour regarding the planned or proposed building of multiple unit housing for Forestville.

My family began in Forestville in the late nineteenth century and with my grandchildren here, we represent 6 generations in the community.

I have to voice my opposition to this proposal to add so many residents to a small community with very limited resources and infrastructure to support.

This plan needs to be thought out more thoroughly.

It simply feels like a state mandate is being implemented and shoved upon communities where it does not fit and I could be wrong about this.

Thank you for your careful consideration to this matter.

**Louis Hughes** 

5950 Hughes Road, Forestville

Louis Hughes 447 Aviation Blvd. Suite 3 Santa Rosa, CA 95403 707-575-0255



38.1

From: Lucy Hardcastle < lucybhardcastle@gmail.com>

Sent: Thursday, February 2, 2023 1:42 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Housing element rezoning

#### **EXTERNAL**

#### Forestville

One of the biggest quality of life issues for the hamlet of Forestville is quickly becoming traffic and parking in the downtown area. With the current plans for upgrading sidewalks and crosswalks currently at TPW, more parking spots will be eliminated.

39.1

Adding 635 or so housing units close to the hub of town will easily result in gridlock and overcome the towns ability to handle the flow of traffic. With quarry trucks in the mix that means more diesel particulates contaminating the air Three local restaurants depend on outdoor seating to make ends meet.

39.2

Affordable housing is welcomed when well planned. It's actually preferable to McMansions for this funky town. Let's plan this well vs shoving numbers at a town that doesn't have the infrastructure to handle even a portion of the units slated.

39.3

Lucy Hardcastle, president of the Forestville Planning Association.

From: MARY MOUNT <mmmary13@comcast.net>

Sent: Thursday, February 2, 2023 12:14 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Regarding additional Guerneville Low Income housing

# **EXTERNAL**

As usual, the county wants to dump their "shit" in the lower river basin of Forestville and Guerneville.  This time in the form of low income housing in an <u>already blighted area.</u>	40.1
Laughlin and Cutten are narrow roads with no ability to widen either one. Laughlin, especially, being on the cusp of Fife Creek and a Highway.	
Laughlin is a dead end road, as is Armstrong Woods Road, leading into a National Park.  Armstrong Woods Road floods.	40.2
Evacuation would be a disaster, not to mention the incurring insurance rates from recent nearby flood and fire.	
Our sewer system is outdated and would need a complete overhaul.  What are we thinking, here?	40.3
That's right, we are thinking, dump it onto the lower river. Won't work, take it back to Santa Rosa and Windsor and Healdsburg. Plenty of open space there.	40.4

M.E. Mount

From: Nick Pulley <bassman.pulley@gmail.com> Letter 41

Sent: Thursday, February 2, 2023 11:41 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** FOR-2 rezoning response

Eric,

We are Nick Pulley and Kristen Krup and we live on the Van Keppel Apple Orchard in the middle of the Nolan/Mirabel/Giusti block of town (FOR-2 in the zoning plan). We moved here 5 years ago and have been on a mission to revitalize this property.

A little history...Nick's great grandfather, Cornelius Van Keppel, started planting Gravenstein, Golden Delicious, Red Rome and Bartlett Pear trees in 1911. His daughters, Joyce and Barbara and their husbands, Hoyt Bockes and Herman Wiebe, lived on the orchard until their passing. The property is still owned by Nick's family, but the orchard was left unmaintained aside from yearly disking until we moved in spring 2018. We have been pruning trees, planting new trees and other annually producing plants, building vegetable beds, and clearing blackberries, poison oak and other overgrowth since we moved in. Since we are both fully employed as educators and performers we do as much work as we can on the property during weekends/summer vacation so while progress has been slower than we would like, we are very proud of what we've been able to accomplish so far.

We recently became aware of the rezoning plan this past week. While this information was startling in terms of the scale that the county wishes to use the land (283 new houses?!), to us it's nothing new that people want to use the land for housing. City planners and housing project managers have been contacting our family for decades. Thankfully there has been no mention of eminent domain in any of their recent communication.

Let us be clear in no uncertain terms: **WE ARE NOT SELLING THE ORCHARD**. We plan on continuing to restore and expand the agricultural and environmental function of the land, with hopes of selling food to local stores and individuals in the near future, and eventually retiring here. This property has been in the family for 5 generations and will continue to be so. **We also hope that this rezoning doesn't impede on our ability to use the land for agriculture.** 

If you have any questions you can email any of us listed below.

Nick Pulley - <u>Bassman.pulley@gmail.com</u>
Kristen Krup - <u>Klynnkrup@gmail.com</u>
Karyn Pulley (off site, owner) - <u>kdpmick@aol.com</u>

41.1

From: Tim Patriarca < <a href="mailto:tim.patriarca@gmail.com">tim.patriarca@gmail.com</a>>
Sent: Thursday, February 2, 2023 8:29 AM

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

Cc: James Wang < james.howard.wang@gmail.com >

Subject: Re: Public Comment on Sonoma County Housing Element Update, GRA-4

#### **EXTERNAL**

To Permit Sonoma,

We are writing to express our strong opposition to the proposed rezoning of 3280 Hicks Road (GRA-4) in unincorporated Sonoma County near Graton.

We agree with the idea of increasing Sonoma County's housing stock, but we believe that growth needs to be done in a way that takes into consideration the safety of existing and potential new residents, the sustainability and capacity of areas being developed, and the rural aspects specific to this particular proposed area.

Regarding safety, the proposed site is bordered by Hicks Road, Jeannette Avenue, and a small lane used as a driveway for two houses. None of these streets have sidewalks or shoulders, nor do they have any lighting. Both streets are in disrepair and have steep drainage canals along the side, requiring a fair degree of caution and awareness so as not to trip or fall off the road. These streets are not safe for unsupervised children, nor are they safe for pedestrians of any age when it is dark. With the narrowness of the streets, cars traveling within the speed limit (25 mph) still pose a major risk, and this rezoning would introduce a sharp increase in both the number of pedestrians and drivers.

Regarding sustainability and capacity, the proposed rezoning poses many detrimental threats. The majority of the area's residents share the groundwater provided by our wells. This development would put further strain on a resource that is already in danger. Secondly, due to the narrowness of the streets and the drainage canals, there is no street parking whatsoever. There are also no grocery stores or pharmacies within walking distance, which means all residents in the area are dependent on cars for transportation. The area is simply not equipped to absorb a large increase in auto-dependent residents, and it will be especially difficult for any potential residents without access to a car.

Regarding the rural aspects of the area, the properties surrounding this parcel are open and natural. Three of the four sides of the site share a border with large parcels of open space, two of which include historical apple orchards, and there are many more similar parcels along Hicks Rd and Mueller Rd. These rural properties provide an environment that promotes wildlife and a healthy ecosystem. We regularly see foxes, deer and other wild animals, which is a major draw for those of us who live here. The proposed site has heritage oaks and Gravenstein apple trees within its open space; not only would these historic trees be torn down, the disruption will have hazardous effects on the wildlife and natural ecosystem. The residents here are attracted to the area because of the open space and rural nature, and a dense housing development is the antithesis of that spirit. How is the proposed development appropriate for this site?

Finally, it is our understanding that the current property is already zoned to add more houses to the property than it currently has. We are certain that the city of Sonoma can provide much needed housing

42.1

42.2

42.3

42.4

42.5 cont.

for its residents in appropriate sites, where new residents are set up for success. But this plan does not take into consideration the safety of the residents or the lack of everyday needs in this area for a much larger population. For all the reasons described above, we urge you to preserve the zoning of 3280 Hicks Road (GRA-4) as it currently is.

Thank you for your time and consideration.

Sincerely, Tim Patriarca and James Wang

On Thu, Feb 2, 2023 at 8:28 AM Tim Patriarca < <a href="mailto:tim.patriarca@gmail.com">tim.patriarca@gmail.com</a>> wrote: To Permit Sonoma,

We are writing to express our strong opposition to the proposed rezoning of 3280 Hicks Road (GRA-4) in unincorporated Sonoma County near Graton.

We agree with the idea of increasing Sonoma County's housing stock, but we believe that growth needs to be done in a way that takes into consideration the safety of existing and potential new residents, the sustainability and capacity of areas being developed, and the rural aspects specific to this particular proposed area.

Regarding safety, the proposed site is bordered by Hicks Road, Jeannette Avenue, and a small lane used as a driveway for two houses. None of these streets have sidewalks or shoulders, nor do they have any lighting. Both streets are in disrepair and have steep drainage canals along the side, requiring a fair degree of caution and awareness so as not to trip or fall off the road. These streets are not safe for unsupervised children, nor are they safe for pedestrians of any age when it is dark. With the narrowness of the streets, cars traveling within the speed limit (25 mph) still pose a major risk, and this rezoning would introduce a sharp increase in both the number of pedestrians and drivers.

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Regarding the rural aspects of the area, the properties surrounding this parcel are open and natural. Three of the four sides of the site share a border with large parcels of open space, two of which include historical apple orchards, and there are many more similar parcels along Hicks Rd and Mueller Rd. These rural properties provide an environment that promotes wildlife and a healthy ecosystem. We regularly see foxes, deer and other wild animals, which is a major draw for those of us who live here. The proposed site has heritage oaks and Gravenstein apple trees within its open space; not only would these historic trees be torn down, the disruption will have hazardous effects on the wildlife and natural ecosystem. The residents here are attracted to the area because of the open space and rural nature, and a dense housing development is the antithesis of that spirit. How is the proposed development appropriate for this site?

Finally, it is our understanding that the current property is already zoned to add more houses to the property than it currently has. We are certain that the city of Sonoma can provide much needed housing for its residents in appropriate sites, where new residents are set up for success. But this plan does not take into consideration the safety of the residents or the lack of everyday needs in this area for a much larger population. For all the reasons described above, we urge you to preserve the zoning of 3280 Hicks Road (GRA-4) as it currently is.

42.5 Cont.

Thank you for your time and consideration. Sincerely, Tim Patriarca and James Wang

### Date:

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Dear Mr. Gage,	
The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3-16500 Cutten Ct, and GUE 4-16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.	43.1
There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.	43.2
GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.	43.3
The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.	43.4
The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.	43.5
Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."	43.6
The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.	43.7
I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.	43.8
	The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3-16500 Cutten Ct, and GUE 4-16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.  There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.  GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.  The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.  The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.  Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."  The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General

Name: ADELE WESTLING

Address: 16160 LAUGHLIN RD. GUERNEVILLE, CA 95446

Date: FBB-1, 2023

Signature: Calle Width

From: andreaoreckfa <andreaoreckfa@aol.com>

Sent: Friday, February 3, 2023 10:04 AM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org > **Subject:** Housing Element planned for Sonoma County is a colossal mistake!

### **EXTERNAL**

An intent to develop sign was just placed on a hillside overlooking the small inland hamlet of Bodega. It announced a 45 unit housing complex to be built there. Where's the water coming from? There is no sewage treatment plant for that many people there in this sensitive water shed area.

440

In Sebastopol 2 beautiful old homes and apple orchards bave been demolished to make ready for a 164 unit housing complex on Bodega Hwy. Traffic on this road already becomes backed up for miles on this road.

44.2

This is insane.

We cannot let the State pressure us into destroying the beauty of our unincorporated areas to meet a growth plan that is only promoting vast over polulation.

14.3

Yes, we need more affordable housing. But not at the expense of reducing the quality of life for the current residents of our county.

It is time to organize and push back!!

Thank you, Andrea Oreck

103 Morris St Sebastopol, Ca 95472 707 695-6288 Letter from Becky: Dear Sonoma County,

I have been looking through the Housing Element Update Draft Environmental Impact Report and have some grave concerns as it pertains to the future of Forestville, were these plans to go through in full as is. Thank you for welcoming community feedback and taking the various community's character into account. I'm sending in the same letter for each parcel in case they end up in different files down the line pertaining to each property and end up going to different developers. Thank you for your understanding.

In section: Environmental Impact Analysis Public Services and Recreation (aka: 4.15-11), I see that it states, in the first paragraph, that it "would not increase the total population served by more than 10 percent, with the exception of the Forestville sites. This is pertaining to Fire Districts. There are a few issues here. Forestville is being put forth to take on an undo burden of the state's quota in comparison to other unincorporated areas. While others are looking at 10% or less (per your document) Forestville is looking at 25%. This is unsettling to say the least. Please see section 2-26 for the info:

Growth of: FOR-1, FOR-2, FOR-3, FOR-4, FOR-5 and FOR-6: Draft impact report 2-26 on page 101 of the document.

Total population allowed under current designation: 167 Total population under proposed designation: 1,652

The current population of Forestville, as defined by the boundaries of the Grammar School is 6,771. The addition of 1652 residents would be a population increase of nearly 25%. Forestville would have the greatest number of proposed new occupancies/population in the County with the exception of the city of Santa Rosa which is much better equipped for such a drastic influx vs the small community of Forestville who still have the same sized roads they did when I grew up there back in 1971. There is not the infrastructure nor the services in place to accommodate this kind of growth and it is not right to put such a burden on one community in contrast with what is being put on others. The difference of 10 vs 25 percent is not insignificant, it isn't small and unlike the EIR states -- it would be dominant vs "could be dominant". There is simply no way to believe it would not be dominant given the unit #'s proposed vs what the landscape actually is. Unless the proposed developments are single story ranch like homes, there is no "could" about it. See table 4.1-6 in section 4.1-51 for further comparisons.

Also of note regarding errors in the document is the statement on 4.1-18 (page 127) in the first paragraph about FOR-2 is "On Mirabel Road, a school is directly across the street from FOR-2." This is simply not the case. There is no school across Mirabel from FOR-2. The only schools in Forestville are the now-defunct El Molino High School @ 7050 Covey Rd. and the Elementary School, now known as Forestville School & Forestville Academy, down the hill off 116 @ 6321 Hwy 116, ironically by some of the other proposed locations.

The streets encircling FOR-2 (Guisti/Nolan/Mirabel) are not built to withstand this type of quantitive developing. They are the same streets I played with childhood friends on in the early 1970's. They are one lane each way, no space for going around, not good for emergency evacuation situations, not built for dense populations. These are small country roads built to sustain neighborhood housing, at most, single family homes suburban in nature. They are not built nor would logic say they are prudent for a development the likes of rezoning specified as FOR-2 units. There is no mention that these are small country roads, where pedestrians and bicyclists often very little room for error. That description seems

45.1

45.2

glaringly omitted for a project of such large changes discussed. That point actually goes for the parcels 45.3 cont. throughout much of Forestville as well as many others. I've seen nothing in the document that speaks to what would be done with respect to urban renewal effects for the people displaced to enact these potential build-outs, displacing locals, loss of character, threat to local business and the introduction of community conflicts, pollution-related health conditions, 45.4 around town parking needs and sanitization challenges. This feels omitted, as does any mention of an infrastructure plan to accommodate the potential influx such as roads that are simply not built to accommodate such a large increase. Where is the mention of how the county plans on widening roads, adding left turn lanes, round-a-bouts and crosswalks for public safety on roads that are used by commuters, visitors, pedestrians and gravel trucks all coming through town in an environment that is only 1.7 miles to get through town (Speer's Market @ one end of Mirabel Road to the Elementary School on the other side of town). 45.5 Where is the study for the safety of it's citizens just trying to get through the day without a horrible accident when there's an extra thousand or so cars and pedestrians jaywalking, risking their lives, with such a large increase of traffic on such a small stretch of travel. I am gravely concerned about the implications. These are urban services as much as sewer and water are per: page xviii yet there is no study about this as far as I'm able to tell. There's the discussion of no feasible mitigation measures available for the elements that would damage 45.6 the scenic route along FOR-1, FOR-3, FOR-5. They would create detrimental significant and unavoidable impacts whereas other areas would be far less significant along the 101 corridor. FOR-1, FOR-5 and FOR-6 are all listed as being on "Existing Hazardous Material Contamination". Tables 4.9-1 and 4.9-2 on pages 4.9-1 thru 4.9-3. I have not been able to find a study in this EIR as to what the health risks to pending future potential residents, students located .1-.2 miles from the sites, and to the surrounding community during the excavation and build would at risk to. If I'm not mistaken, some of these properties were once considered by the Elementary School nearby and decidedly declined due to their toxic nature (and possibly the cost of remediation). 45.7 I also am not seeing any study of the risk of these hazardous elements ending up in the watershed in Forestville (all sites) for Lower Russian River and sub-watershed to Green Valley Creek and ground water basins - especially in an area notorious for flooding when rains really kick in as they did in 1940, 1955, 1964, 1986, 1995, 1997, 2006, 2019, 2023 - this isn't an unknown problem nor is it going away drought or no drought. It's noteworthy that in section 4.15.1a: Fire Protection for the EMT call response times are prior to the now combined departments. Guerneville, Larkfield and Forestville have all consolidated into Bennett 45.8 Valley, Bodega Bay, Mountain Volunteer, and Windsor FPDs. I don't see any study pertaining to the ratio of calls per capita and if what the combining of districts as well as the increase of population would mean for that ratio. With respect to greenhouse gas emissions, page 556 of section 5.2.1 correctly calls out "Additional vehicle trips associated with the proposed project would incrementally increase local traffic and regional 45.9

air pollutant and greenhouse gas emissions." "These are considered irreversible environmental effects."

The last paragraph of that section goes on to say, "CEQA requires decision makers to balance the

benefits of a proposed project agains it's unavoidable environmental risks in determining whether to approve a project. the analysis contained in the EIR concludes that the proposed project would result in significant and unavoidable aesthetic, cultural resources, greenhouse gas emissions, hazards, transportation, utilities and wildfire impacts. Although development facilitated by the project would be required to implement mitigation measures, impacts would remain significant and unavoidable due to the irreversible loss." With all these potential rezone projects in what are zoned as Rural Residential and Low Density, does it not make more sense to seek locations for housing that is more directed to areas and communities that are not so car dependent? In particular for the low income population, does it not make more sense for them to have housing opportunities in communities that have better price points in urban/suburban areas with things around them? In implementing the proposal as it is, we are also pushing the people that need it the most into situations where they have to drive further when gas prices are among the highest levels the last few years.

45.9 cont.

The EIR calls out that Forestville has stores and restaurants. It does not call out that it offers one small-family type grocery store, one Mexican grocery store that has a sitting area/restaurant, one pharmacy, one gas station, one expensive fancy restaurant coupled with a couple casual spots being the local drive in, a coffee shop with sandwiches and a pizza joint. There's a bakery, there's a wine tasting place, there's one hardware store and all these places are great but they're not built to sustain the kind of growth that Forestville is now being considered for. Where are an additional 1,600 people going to park? How are they going to go to one of the 3 restaurants that might be open to serve them (one is closed at 2pm). That growth, that population needs more support than is currently able to be offered in this town. It's a half hour drive to: Costco, Target. It's a 15 minute drive to Safeway, Walgreens, Coddingtown.

45.10

This community is built for people to pick up those last little things on their to-do list, it is not, nor has it ever been the community that serves to support a day to day way of life where you can get everything you need in the one mile that goes from one end of town to the other.

45.11

I understand that implementing this plan is not a choice you made and that it is being dictated to you. I know this is not an easy process and I don't want to see things get worse than they already are. Nobody wants the County to be sued by the State, nor does anyone want another builder frenzy free for all to occur in Sonoma County as it has in other places where the governing body did not meet the State's demands, we do respectfully request equality within the obligations and to not have a tiny town like Forestville to be pushed beyond the brink of what it is realistically able to handle. If all of these build outs were to occur, it would be too much for the area and the community to absorb. It is only 1.7 miles from one end of 'town' to the other, it's akin to me trying to stuff my post-pandemic size 12 body into my old size 6 jeans... the math just isn't there.

45.12

I implore you to opt for your Alternative choice where do not choose to rezone all 6 parcels for Forestville, and I implore you to consider doing the same for the ones that have documented historical toxic hazardous situations especially as they are so close to the Elementary School when children are clearly proven to be more at risk to lung problems as they are still growing.

45.13

Please give due consideration to avoinding FOR-1, FOR-2, FOR-3 FOR-5, FOR-6 at the minimum and move those project's potential population to a part of the unicorporated county that is better for the people in need of more affordable housing as well as the small communities that aren't prepared to accept the inflow from a practical, geographical, economical, services and logistical egress perspective.

Please set out to find parcels that can meet the counties needs that the State has put your feet to the

fire for and find territories that fall in the "Less than Significant", "Less than Significant with Mitigation" or "No Impact" vs the very many "Significant and Unavoidable". Not an easy task but detrimental otherwise.

Thank you for your time in reading this and giving consideration to the macro of the micro picture of a massive endeavor. Much appreciated..

Respectfully, Becky Boyle Forestville, California

--

Synde Acks, Psy. D. License Psy27309 435 Petaluma Blvd, Suite 136, Sebastopol, CA 95472 (707)387-0245

Pronouns: She, Her

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From: DURS KOENIG <durs@comcast.net> Sent: Friday, February 3, 2023 8:00 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Housing Element Update DEIR

# **EXTERNAL**

Ladies & Gentlemen,

I am writing to you from Forestville. The rezoning to allow a potential 50% increase to Forestville's population by 1,652 (Total Population [Change] Under Proposed Designation p. 2-26 or 100) is ill-advised.	46.1
While supportive of affordable housing, straining our roads and services by a significant amount will diminish Forestville's character.	46.2
My concerns specifically are traffic and police services. We don't want more traffic. Forestville vibrates from the rumble of traffic during commute hours. Police services are provided by the Sonoma County Sherriff department. There are very few patrols in the West County. Increasing population in Guerneville. Forestville and Graton will certainly require more resources from the	46.3

Sincerely, Durs Koenig Forestville, CA

Sherriff.

Date: 2 3 2023

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3-16500 Cutten Ct, and GUE 4-16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.	47.1
There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.	
GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.	47.2
The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.	47.3
The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.	47.4
Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."	47.5
The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.	47.6
I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.	47.7

Name: GEAN DO

Address: 14756 MARYS LAWE, GUERNEVILLE CA 95446

Date: 2/3/2023

Signature:

To:17075653778

02/03/2023 11:01

Received

Date:

From:

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Letter 48

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48.7

Name: Mary Helt Address: 16542 Laughlin Rd Guerneville CA 95446

Signature: MA

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

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Mary Server Story

49.7

but Schepps Roberta Schepps Address: 16403 cutten dr. guerneville Ca 95446

Date: feb 3, 2023 Signature: Bokepps

From: Stacie Gradney <stacieleelee@gmail.com>

Sent: Friday, February 3, 2023 12:49 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Fwd: Forestville West County Zoning for low income housing

50.1

build at that location???? The school is right below it. How is that tiny school going to have room for over 500 families with children??? And the high school that was closed???? Forestville does not have El Molino anymore. That location is now Laguna which is a continuation school. Can Analy handle more students???? Analy can barely handle what they have adapted taking Forestville High School Students as well as ALL of the west county out to Ft. Ross.

really think about that. The vector unit?????? That building and ground below and around that building is so contaminated its deadly hence the reason it has been sitting there untouched. How are you going to

Regarding the Forestville zoning idea I think housing in Forestville is not a reality. Forestville is a very small community. Having a developer develop low income housing or any type of large dwellings should

50.2

I would rather see you develop a place where the kids can go. There is no place in Forestville the kids can go. There is nothing to do in Forestville. All the families you are inviting into Forestville will have nothing to do. This is where trouble starts.

What about a skate park??? Develop a skate park on one of those zones. What about leaving it as it is?? Let nature take its course.

Letter 50

This will drive a lot more people out of California. Low income housing surrounded by million dollar homes?? Value of their homes will go down.

Everything sounds good and looks ok on paper but it's the reality of this which will be regrated years down the road. The traffic is another one.

Just keep things the way they are. Look at a skate park in your zoning area. Think of the impact on our current residents.

Developers are looking at the \$\$\$\$.

Lets be real and re consider our small west coast counties. There are other places to build. Regards,

Stacie,

From: Dr Synde Acks < <a href="mailto:drsyndeacks@gmail.com">drsyndeacks@gmail.com</a>>
Sent: Friday, February 03, 2023 10:53 AM

**To:** Susan Gorin <a href="mailto:Susan.Gorin@sonoma-county.org">Susan.Gorin@sonoma-county.org</a>; David Rabbitt <a href="mailto:David.Rabbitt@sonoma-county.org">David.Rabbitt@sonoma-county.org</a>; Shirlee.zane@sonom-county.org; Pat Gilardi@sonoma-county.org</a>; Andrea

Krout < Andrea. Krout@sonoma-county.org >; tracy.cunha@sonoma-county.org; district4

<<u>district4@sonoma-county.org</u>>; Jenny Chamberlain <<u>ichamber@sonoma-county.org</u>>; district5

<<u>district5@sonoma-county.org</u>>; Leo Chyi <<u>Leo.Chyi@sonoma-county.org</u>>; Eric Gage <<u>Eric.Gage@sonoma-county.org</u>>; Lynda Hopkins <<u>Lynda.Hopkins@sonoma-county.org</u>>

**Subject:** Forestville Concerns

#### **EXTERNAL**

Sonoma County Representatives,

I very much appreciate the attached letter written to you by Becky, copied below. Please read that first before considering my additional comments. She did a beautiful job of writing out in legalese some of the dilemma. I'd like to speak to you and frank terms about the problems that would manifest from going forward with building the low income housing in Forestville and/or Guerneville. Simply put, moving approximately 1500 people in low-income housing capacity into Forestville, and 500 into Guerneville, will overwhelm the town and set up people in low income housing for unnecessary hardship.

51.1

First and foremost, between May and September without any changes to the current population in Forestville, the regional parks of Steelhead Beach and Sunset Beach are inundated beyond capacity. For five months of the year, this looks like people walking up and down River Road with their children, toddlers, flotation devices, and river outing items in a concentrated way that is similar to leaving a concert at a stadium; there are a constant flow of people who walk along River Road. Despite the new regulations not to have alcohol there, observation as well as the ongoing liter on the trails demonstrates drinking alcohol (not to mention ingesting cannabis) continues to happens at the river. When you have an inundated area with intoxicated people, accidents happen. Accidents occurring in overoccupied areas without the necessary officers to intervene become death sentences waiting to happen. Again, that's what it looks like right now before any housing has shifted. When driving past those beaches right now during the summer times, we generally can't drive faster than 15 or 20 miles an hour on the 45 Hour speed limit road. Aside from the threat imminent in the overuse of the regional parks to people, the wildlife also is threatened. The toxicity levels of the Russian River have been beyond recommended levels for years ever since they formally made those beaches regional parks.

51.2

As for our current peace officer situation, it's important to recognize we only have two officers covering between Jenner and the Forestville area. If there should be an accident to an individual, or God, for bid a more significant crisis, the time it takes to get into or out of the area will equate to precious time being lost getting help, particularly if officers (fire department and/or sheriffs) may be all the way in Jenner at the moment of the crisis. Currently, Forestville fire department is considered a volunteer fire department and it has been merged with several others, which is more described by Becky. So if there is a crisis of that nature on River Road, there's no promise about how long it will take for help to arrive.

51.3

Now, when you consider our already serious situation, imagine how much more challenging it will be with the addition of 2000 people in west county. That is frightening to say the least.

51.4

Imagine we forward in time and you approve the housing being proposed. Forestville and Guerneville flood. Becky listed the floods that were the highest however, we have many, many more

floods than that. The areas that you guys are proposing, the low-income housing he located is either in the flood area or located where they would be trapped in or out of Forestville by the flooded streets.

The canning area down by First Street would be barricaded by the flooded streets by Forestville elementary school/Academy, near 6130 Guerneville Road. The low-income housing residents moving in may or may not understand that if they drive through those waters, their cars could be destroyed, and they could drown. There were multiple drownings which happened three weeks ago. Nearly ever year by my house on Sunridge, at least one car ends up stuck because someone tried to drive through the flooded streets. The incidents of street flooding can occur much lower than the flood stages at the river. Three weeks ago when those incidents occurred, the water at Hacienda bridge was only between 29 and 33.67 feet at Hacienda Bridge.

51.4 Cont.

Aside from my own personal experience, it is worth noting that my day job psychologist providing Medi-Cal services, I am exposed to individuals who live in low-income housing who tell me explicitly about their struggles. Finances, transportation, and basic survival needs are always pertinent. The stress, fear, sadness, frustration, and overwhelm they experience are heartbreaking. The thousands of dollars I have spent in the last three years paying for hotel rooms when we were evacuated either because of the fires or the floods would be impossible for to my low-income clients to shell out because they generally have less than \$100 in the bank at any given time. When my clients have more than that, it's generally just before rent is due or the money in their account is set aside for necessities, like utilities, or groceries. Moving impoverished people into areas which have predictable environmental crisis would be unnecessarily setting these people up. It's just poor planning. My client in Guerneville just lost all of her groceries when they lost gas and electricity for five days three weeks ago; then, they received \$50 to replace the items lost as if that were sufficient. The problem they experienced was a week before the city was shut down for the major impact of the flooding.

That's the kind of flooding that we get every year. The years we experience what has been dubbed the "hundred year" flood are simply years more people get impacted and obviously more intensely impacted. The flooding of the roads occur at least once if not more than that each year. If individuals in low-income housing can't afford a hotel on the days they can't drive home, they're more likely to drive through the flooded areas to get home just because that would give them a place to be. In the areas like down by First Street, when homes become flooded in islands, the low-income residents who stay will need to find parking above the flood plain, somewhere away from the home while they're flooded in because that will all be underwater. Where will they go? Forestville was not built to be anything other than a simple town on a road with one lane each direction. The amount of parking that will need to be accommodated is far more than what the area can accommodate.

While I'm describing these points of crises, I haven't described all the fear, sadness, panic, and helplessness people experience during these times. We wait watching the water rise, wondering if the power will go, wondering what will happen next. Those of us in the flood plain, like myself, empty our basements and yards to salvage what we can knowing what will happen will happen. As a home owner, I choose to stay here because I'm in a family home, one I can't have elsewhere. People with low-income housing have to go where there are openings. They have significantly fewer options.

My experience personal experience trying to figure out what to do being responsible driving my 9 year old daughter to and from school in those circumstances, deciding when the roads will be safe, trying to determine if it is worth the risk to have my daughter in school that day is not unique. Less than three weeks ago, I had a multiple clients talking about how cold they were, how scared, how powerless they felt, watching the water levels would rise, where they were afraid to lose more than just the hundreds of dollars worth of food that rotted during the power outage. The people on disability often earning no more than \$700 a month, who are not allowed to save more than \$2000 if they are able, are unnecessarily challenged by this type of crisis.

Absorbing those kind of costs is not something responsible planners should be asking for those citizens; they are already dancing with impoverishment. It's overwhelming to me that this would be on the docket, knowing the quality of life being considered for many people I know and care about.

The housing opposite Forestville Park would not be in flood territory. However, they would be in the same position of having to figure out if they could stay somewhere else or beef let it in when the waters rise on 116. Again, these are individuals that become unable to pay rent, if they can't work. If they've got nowhere to go because they're flooded out, then they're homeless during that time.

51.5 cont.

It confuses me that Guerneville or Forestville are considered options because of these circumstances. Aside from the excessive amount, it costs to drive back-and-forth due to gas costs, the climate change issues for people who are impoverished, would set them up.

While, I am not in the business of real estate or anything like that, I do wonder if there are less concerning areas in Petaluma, Rohnert Park that could be alternatives which would allow people some options preventing them from facing the threats associated with flooding, fires, and being trapped on a one lane each direction road during times of crises without sufficient access to public services, like enough firefighters or peace officers, should the circumstances be required?

51.6

We continue to struggle out here without any changes regarding tourists littering and treating the area without respect. I'm hoping you're hearing in my letter the obstacles indicating the proposed low-income housing solutions would be a very poor solution for the people who would move in, for the town, as it is, for the river, and the state of our local protected species. It is scary because I know homelessness is a real problem. Unfortunately, moving people into an area where we know they will have problems. Feels like a horrific political choice and I'm not sure why.

51.7

Thank you for considering what I've had to say. Both as somebody who cares for my town and my home, as I am blessed to live in a house that my great uncle Henry built, and as a local professional, who works with many people who are living below the poverty line, I hope there is a solution to keep our area, beautiful and sustained, while we figure out how to manage the natural disasters, homelessness, and the crazy economy of this area. I wish you the best, but I beg of you not to make the problem worse with a solution that would cost a ton of money only to buy problems.

Synde Acks-Stewart 8801 Marianna Drive Forestville, CA 95436 (707)887-7556 Letter from Becky: Dear Sonoma County,

I have been looking through the Housing Element Update Draft Environmental Impact Report and have some grave concerns as it pertains to the future of Forestville, were these plans to go through in full as is. Thank you for welcoming community feedback and taking the various community's character into account. I'm sending in the same letter for each parcel in case they end up in different files down the line pertaining to each property and end up going to different developers. Thank you for your understanding.

In section: Environmental Impact Analysis Public Services and Recreation (aka: 4.15-11), I see that it states, in the first paragraph, that it "would not increase the total population served by more than 10 percent, with the exception of the Forestville sites. This is pertaining to Fire Districts. There are a few issues here. Forestville is being put forth to take on an undo burden of the state's quota in comparison to other unincorporated areas. While others are looking at 10% or less (per your document) Forestville is looking at 25%. This is unsettling to say the least. Please see section 2-26 for the info:

Growth of: FOR-1, FOR-2, FOR-3, FOR-4, FOR-5 and FOR-6: Draft impact report 2-26 on page 101 of the document.

Total population allowed under current designation: 167 Total population under proposed designation: 1,652

The current population of Forestville, as defined by the boundaries of the Grammar School is 6,771. The addition of 1652 residents would be a population increase of nearly 25%. Forestville would have the greatest number of proposed new occupancies/population in the County with the exception of the city of Santa Rosa which is much better equipped for such a drastic influx vs the small community of Forestville who still have the same sized roads they did when I grew up there back in 1971. There is not the infrastructure nor the services in place to accommodate this kind of growth and it is not right to put such a burden on one community in contrast with what is being put on others. The difference of 10 vs 25 percent is not insignificant, it isn't small and unlike the EIR states -- it would be dominant vs "could be dominant". There is simply no way to believe it would not be dominant given the unit #'s proposed vs what the landscape actually is. Unless the proposed developments are single story ranch like homes, there is no "could" about it. See table 4.1-6 in section 4.1-51 for further comparisons.

Also of note regarding errors in the document is the statement on 4.1-18 (page 127) in the first paragraph about FOR-2 is "On Mirabel Road, a school is directly across the street from FOR-2." This is simply not the case. There is no school across Mirabel from FOR-2. The only schools in Forestville are the now-defunct El Molino High School @ 7050 Covey Rd. and the Elementary School, now known as Forestville School & Forestville Academy, down the hill off 116 @ 6321 Hwy 116, ironically by some of the other proposed locations.

The streets encircling FOR-2 (Guisti/Nolan/Mirabel) are not built to withstand this type of quantitive developing. They are the same streets I played with childhood friends on in the early 1970's. They are one lane each way, no space for going around, not good for emergency evacuation situations, not built for dense populations. These are small country roads built to sustain neighborhood housing, at most, single family homes suburban in nature. They are not built nor would logic say they are prudent for a development the likes of rezoning specified as FOR-2 units. There is no mention that these are small country roads, where pedestrians and bicyclists often very little room for error. That description seems glaringly omitted for a project of such large changes discussed. That point actually goes for the parcels throughout much of Forestville as well as many others.

I've seen nothing in the document that speaks to what would be done with respect to urban renewal effects for the people displaced to enact these potential build-outs, displacing locals, loss of character, threat to local business and the introduction of community conflicts, pollution-related health conditions, around town parking needs and sanitization challenges. This feels omitted, as does any mention of an infrastructure plan to accommodate the potential influx such as roads that are simply not built to accommodate such a large increase.

Where is the mention of how the county plans on widening roads, adding left turn lanes, round-a-bouts and crosswalks for public safety on roads that are used by commuters, visitors, pedestrians and gravel trucks all coming through town in an environment that is only 1.7 miles to get through town (Speer's Market @ one end of Mirabel Road to the Elementary School on the other side of town).

Where is the study for the safety of it's citizens just trying to get through the day without a horrible accident when there's an extra thousand or so cars and pedestrians jaywalking, risking their lives, with such a large increase of traffic on such a small stretch of travel. I am gravely concerned about the implications. These are urban services as much as sewer and water are per: page xviii yet there is no study about this as far as I'm able to tell.

There's the discussion of no feasible mitigation measures available for the elements that would damage the scenic route along FOR-1, FOR-3, FOR-5. They would create

detrimental significant and unavoidable impacts whereas other areas would be far less significant along the 101 corridor.

FOR-1, FOR-5 and FOR-6 are all listed as being on "Existing Hazardous Material Contamination". Tables 4.9-1 and 4.9-2 on pages 4.9-1 thru 4.9-3. I have not been able to find a study in this EIR as to what the health risks to pending future potential residents, students located .1-.2 miles from the sites, and to the surrounding community during the excavation and build would at risk to. If I'm not mistaken, some of these properties were once considered by the Elementary School nearby and decidedly declined due to their toxic nature (and possibly the cost of remediation).

I also am not seeing any study of the risk of these hazardous elements ending up in the watershed in Forestville (all sites) for Lower Russian River and sub-watershed to Green Valley Creek and ground water basins - especially in an area notorious for flooding when rains really kick in as they did in 1940, 1955, 1964, 1986, 1995, 1997, 2006, 2019, 2023 - this isn't an unknown problem nor is it going away drought or no drought.

It's noteworthy that in section 4.15.1a: Fire Protection for the EMT call response times are prior to the now combined departments. Guerneville, Larkfield and Forestville have all consolidated into Bennett Valley, Bodega Bay, Mountain Volunteer, and Windsor FPDs. I don't see any study pertaining to the ratio of calls per capita and if what the combining of districts as well as the increase of population would mean for that ratio.

With respect to greenhouse gas emissions, page 556 of section 5.2.1 correctly calls out "Additional vehicle trips associated with the proposed project would incrementally increase local traffic and regional air pollutant and greenhouse gas emissions." "These are considered irreversible environmental effects." The last paragraph of that section goes on to say, "CEQA requires decision makers to balance the benefits of a proposed project agains it's unavoidable environmental risks in determining whether to approve a project, the analysis contained in the EIR concludes that the proposed project would result in significant and unavoidable aesthetic, cultural resources, greenhouse gas emissions, hazards, transportation, utilities and wildfire impacts. Although development facilitated by the project would be required to implement mitigation measures, impacts would remain significant and unavoidable due to the irreversible loss." With all these potential rezone projects in what are zoned as Rural Residential and Low Density, does it not make more sense to seek locations for housing that is more directed to areas and communities that are not so car dependent? In particular for the low income population, does it not make more sense for them to have housing opportunities in communities that have better price points in urban/suburban areas with things around them? In implementing the proposal as it is, we are also pushing the people that need it the most into situations where they have to drive further when gas prices are among the highest levels the last few years.

The EIR calls out that Forestville has stores and restaurants. It does not call out that it offers one small-family type grocery store, one Mexican grocery store that has a sitting area/restaurant, one pharmacy, one gas station, one expensive fancy restaurant

coupled with a couple casual spots being the local drive in, a coffee shop with sandwiches and a pizza joint. There's a bakery, there's a wine tasting place, there's one hardware store and all these places are great but they're not built to sustain the kind of growth that Forestville is now being considered for. Where are an additional 1,600 people going to park? How are they going to go to one of the 3 restaurants that might be open to serve them (one is closed at 2pm). That growth, that population needs more support than is currently able to be offered in this town. It's a half hour drive to: Costco, Target. It's a 15 minute drive to Safeway, Walgreens, Coddingtown.

This community is built for people to pick up those last little things on their to-do list, it is not, nor has it ever been the community that serves to support a day to day way of life where you can get everything you need in the one mile that goes from one end of town to the other.

I understand that implementing this plan is not a choice you made and that it is being dictated to you. I know this is not an easy process and I don't want to see things get worse than they already are. Nobody wants the County to be sued by the State, nor does anyone want another builder frenzy free for all to occur in Sonoma County as it has in other places where the governing body did not meet the State's demands, we do respectfully request equality within the obligations and to not have a tiny town like Forestville to be pushed beyond the brink of what it is realistically able to handle. If all of these build outs were to occur, it would be too much for the area and the community to absorb. It is only 1.7 miles from one end of 'town' to the other, it's akin to me trying to stuff my post-pandemic size 12 body into my old size 6 jeans... the math just isn't there.

I implore you to opt for your Alternative choice where do not choose to rezone all 6 parcels for Forestville, and I implore you to consider doing the same for the ones that have documented historical toxic hazardous situations especially as they are so close to the Elementary School when children are clearly proven to be more at risk to lung problems as they are still growing.

Please give due consideration to avoinding FOR-1, FOR-2, FOR-3 FOR-5, FOR-6 at the minimum and move those project's potential population to a part of the unicorporated county that is better for the people in need of more affordable housing as well as the small communities that aren't prepared to accept the inflow from a practical, geographical, economical, services and logistical egress perspective.

Please set out to find parcels that can meet the counties needs that the State has put your feet to the fire for and find territories that fall in the "Less than Significant", "Less than Significant with Mitigation" or "No Impact" vs the very many "Significant and Unavoidable". Not an easy task but detrimental otherwise.

Thank you for your time in reading this and giving consideration to the macro of the micro picture of a massive endeavor. Much appreciated..

Respectfully, Becky Boyle Forestville, California

--

Synde Acks, Psy. D. License Psy27309 435 Petaluma Blvd, Suite 136, Sebastopol, CA 95472 (707)387-0245

Pronouns: She, Her

From: Linda Hunter < lynnhunter@comcast.net> Sent: Saturday, February 4, 2023 11:14 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: DIER affecting Laughlin Road area and Armstrong Woods Road area in Guerneville.

#### **EXTERNAL**

The proposed number of housing units is far to great for this small area and would require new roads, infrastructure, dear lines, water sources all on flood pond land and wildlife hazard areas. Please offer other areas for considering expansion. This plan would also severely affect property values for existing homes in this declared scenic route area!

52.1

52.2

Submitted by lynnhunter@comcast.net

Letter 53

From: lynn woolley <lynnbw@att.net>
Sent: Saturday, February 4, 2023 3:20 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Attn: Mr. Eric Gage, Project Planner

#### **EXTERNAL**

Re: Rezoning of DEIR, GUE 2-16450 Laughlin Rd.; GUE 3-16500 Cutten Ct.; and GUE 4-16050 Laughlin Rd. located off of Armstrong Woods Rd., Scenic Corridor in Guerneville, CA Attached letter signed and dated today, February 4th, 2023

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM. Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

Date: February 4, 2023 Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403 Dear Mr. Gage, The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of 53.1 properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California. There are many specific adverse effects noted in DEIR report that will impact the health and safety of 53.2 current residents as well as the additional prospective 588 residents allowed by the proposed rezoning. GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed 53.3 upgrades and road closure/s will severely impact the emergency egress for residents. The potable water and sewer system are inadequate for the proposed growth. The sewer line located 53.4 next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages. The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or 53.5 completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons. Scenic resources will be adversely impacted in an economic area that depends on revenue from 53.6 tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed." The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 53.7 2050, and Housing Element Policy. I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 53.8 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California. Name: LYNN WOOLLEY Address: 16427 MELODY LANE, GUERNEVILLE, CA. 95446

Date: 02/04/23

Signature: Affirm Moollef

From: lynn woolley <lynnbw@att.net> Sent: Saturday, February 4, 2023 4:03 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Re: Sonoma County Housing Element Updates. Rezoning of DEIR, GUE 2-16450 Laughlin Rd.;

GUE 3-16500 Cutten Ct.; and GUE 4-16050 Laughlin Rd. located...

### **EXTERNAL**

attn: Mr. Eric Gage, Project Planner

Dear Mr. Gage,

Please email me updates on matters pertaining to the above referenced Sonoma County Housing Elements.

Thank you.

Lynn Woolley
Lynnbw@att.net

541

From: Michael

Sent: Saturday, February 4, 2023 1:16 PM

To: Permitsonoma-housing@sonoma-county.org < Permitsonoma-housing@sonoma-county.org >

Subject: Sonoma county housing element, Eric Gage

My name is Michael Gomez; my house is located on 188 Academy lane in Boyes Hot Springs. I am writing to you in order to express my opposition to the proposed zoning changes for my property (agu1) and my neighbor (agu2) both of these properties have existing development constraints. The newest burden imposed on my property occurred last year (2022) when Sonoma sewer and water installed a sewer easement across my property, this easement is 15ft wide and is located north to south across the full with of the property. I have been informed by Sonoma sewer and water that no trees or landscaping are to be on this easement or in the vicinity of the easement This in effect renders part of my land a landscape barren sewer roadway! Now Permit Sonoma plans to zone for 20 units per acre, there by ending my singlefamily home use, this I view as a first step toward the taking of my property. There are additional constraints on both Agu1 and Agu2, that being both properties are bordered by Sonoma creek to the west and Lily creek to the east. The presence of these creeks requires a 50ft riparian set back from each creek further, reducing the use of the property. Because of these facts I believe the proposed new base zoning of R2 is not a good fit in this area. The Boyes Springs area is already receiving a great deal of new housing, these two properties should not be part of an enormous increase in use. The proposed zoning change is not a good fit for the land, not a good fit for the surrounding neighborhood and not for the environment. I am concered this zoning change targets my property for development and will bring unwanted pressure on me to give up this house! Thank you for this opportunity to state my concerns. Respectfully, Michael Gomez

55.1

55.2

55.3

From: Olga Gishizky <olgalev387@gmail.com> Sent: Saturday, February 4, 2023 12:46 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** DER- stop unsustainable "housing" growth in Agricultural Unincorporated "West COUNTY "Sonoma due to "capacity limit" of water resources in drought- fire / climate change times!

# **EXTERNAL**

We on River Drive are inundated as is more congestion with population density will be unbearable 1)Regarding unsustainable groundwater well water siphoning by the new development housing is an untenable future.	56.1
2)Creating urban density sprawl housing in unincorporated west county where already transportation traffic accidents are causing fatalities is not "environmentally" friendly.	56.2
3)The environmental impact statement study regarding "air quality" and "noise pollution " from cars & radios (already a summer issue) will be exacerbated with crowd density and violence being the fallout.  4)THE business "services" needed for newbie, multi-use housing 'occupants '& hotel /airbnb "visitors"	56.3
are not a community aesthetic of our 'quality of life' of our agricultural zone residents that live in FORESTVILLE for "quiet enjoyment".	56.4
5) As is during the summer, Our River Drive becomes a literal parking war zone - treaspassing, driveway blocking, ,vandalism, loitering, littering and physical threats to riverfront property owners. *ADDING more "access users" via mega projects will make a volatile situation worse.	56.5
6) Suggest: County devise an outlet for "recreation impulses"/ need	
A) reopen Cooks Campground as Coventure with County like Johnsons Beach B)assist Burkes Canoe to divert the on the River "water inner tube floaters" that prevent& block	
residents from swimming upstream causing congestion and harass wildlife and riverfront private property occupants	56.6
C) HAVE RANGERS PATROL BY BOAT FROM FORESTVILLE- Guerneville and monitor the drunk brawls and keep current residents safe from bad, "nuisance behavior"	
7) Urban sprawl is not a healthy outcome	56.7
When a location is pushed beyond capacity.	
Vty,Olga Gishizky 10536 River DRIVE	
FORESTVILLE, CA	
95436	

Date:

Letter 57

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Dear Mr. Gage,	
The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3-16500 Cutten Ct, and GUE 4-16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.	57.1
There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.	
GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.	57.2
The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.	57.3
The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.	57.4
Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."	57.5
The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.	57.6
I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.	57.7

Name: Patrick ReesInk
Address: 14733 Janet Lm.
Date: Z-4-Z3
Signature: Patrick Rewsink

Date:

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

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GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

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The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

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Name: JIII Reesink

Address: 14733 Janet Lane
Date: 2-4-2023
Signature: fillf. Roesenk

Robin Bens 6302 Forestville Street Forestville, CA 9436 (707) 321-2948

February 4, 2023

Eric Gage Permit Sonoma 2550 Ventura Avenue Santa Rosa, CA 95403

Letter 58

Re: "Draft EIR Comments: Housing
Element Update"
Unincorported Areas Housing
State Clearinghouse ID:
2022060323: Forestville,CA

Dear Mr. Gage

In response to a letter dated December 28, 2022, I am sending my comments. I have concerns for our little town of Forestville if these housing projects are allowed to continue.

Forestville has maintained its small town quaintness for as long as I have been a resident, which has now been almost 55 years. Its my forever home and I would hate to see it change its unique charm and hometown flavor.

Here is a list of some reasons that I feel these project should be halted:

Environmental impact on the communities - wetlands, creeks (Jones

creek), water run-off and natural habitat life.

Public Safety for residents and town.	visitors coming a	and going into (	our little
Transportation issues - County	hus services limit	tations already	cat in

place will become burdened with increased resident populations

Traffic numbers on Hwy 116, Covey Road, Mirabel Road, River Road and side streets leading onto and off of these main roads will be greatly affected in adverse ways.

58.4

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58.1

58.2

Gas station is limited to just one in town.	58.5
Public Schools: Since the closing El Molino student body numbers have already increased at Analy. And the single elementary/middle school will become overcrowed as well.	58.6
Parking issues already in Forestville is very tight and frustrating at best. Increasing the number of residents will only impact what little we have already.	58.7
Our water and sewer systems will become overtaxed and burdened by additional housing in our communities.	58.8
Lack of any real grocery store within town proper is a conern. The one store already in place will become over burdened by excess consumers.	58.9
Safety from a lack of upgraded side walks and cross walks will be a major issue as more people will use our little town. At times, Forestville has an issue of cars not stopping for people crossing our streets and what streets we do have have pot holes and uneven pavement at cross walks.	58.10
Limits on UpZoning for RV parking and "ADUs" will need to be addressed.	58.11
These, Mr. Gage, are, I'm sure, just the beginning of the list of concerns I have can think of why Forestville should not be considered an unincorporated neighborhood for constructing 440+/- units of affordable housing.	58.12

Sincerely

Robin Bens

Date:

Mr. Eric Gage

Permit Sonoma, Project Planner

2550 Ventura Ave.,

Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

Tanet han

Date:

Letter 59

59.2

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Date:

02/05/2023

Letter 60

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Door Mr. Gage

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.  GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.  The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.  The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.  Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."  The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.  I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 La	Dear Mr. Gage,	
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Name:

Address:

Patricia Kremer 16445 Cutten Drive

Date:

February 5, 2023

Signature:

From: Patti Sinclair <agourmet2@gmail.com> Sent: Sunday, February 5, 2023 10:42 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Fwd: Fw: Draft EIR Comments: Housing Element Update

Letter 61

61.1

61.2

61.3

61.4

February 5, 2023

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave. Sant Rosa, CA 95403

Mr. Gage,

The community surrounding Laughlin Road in Guerneville, CA opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE-2 16450 Laughlin Rd, GUE-3 16500 Cutten Ct., and GUE-4 16050 Laughlin Rd., located off Armstrong Woods Road, Scenic Corridor in Guerneville, CA.

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents, as well as the additional prospective of 588 residents allowed by the proposed rezoning.

GUE-2 and GUE-3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closures will have a negative impact on the daily lives of current residents and will severely impact the emergency egress for residents.

The increased traffic on Laughlin Rd, the only access to the elementary school, which always has numerous potholes will further deteriorate and will likely cause weekday traffic jams during the school year. In addition, the left and right from Laughlin to Armstrong during this time will also cause traffic jams/delays.

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE-2 and GUE-3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages. Also, the cost of upgrading the sewer system will most likely increase the sewer taxes of all residents which have already been burdened with sewer tax increases year over year.

The GUE-2, GUE-3, and GUE-4 properties are within areas documented as high wildfire danger, flood plains, and earthquake prone. They are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

61.5

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

61.6

The rezoning of GUE-2, GUE-3, and GUE-4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

61.7

I, as an individual, and we as a concerned community, sincerely express discontent for the lack of clear up front notification and inclusion in the early processes and oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE-2-16450 Laughlin Rd, GUE-3-16500 Cutten Ct., and GUE-4-16050 Laughlin Rd, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, CA.

61.8

Sincerely,

Patricia Sinclair 16510 Cutten Dr. Guerneville, CA From: r.grandmaison@comcast.net < r.grandmaison@comcast.net >

Sent: Sunday, February 5, 2023 1:30 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Personal Opposition to the Housing Project Proposed for 14156 Sunset Avenue, Guerneville, CA

# **EXTERNAL**

Permit Officials,

As a local resident, and one particularly adjacent to the proposed project, I stand opposed to approval for this 30 unit housing project for many reasons.

I have lived at 14160 Sunset Avenue for over 30 years. I have seen many great changes in the	1
community, and while I welcome new residents and development (I am an educator and an architect, C22127) and see the urgent need for affordable housing, placing this project with its proposed density	62.1
on the top of the Highland Terrace subdivision is a very bad idea. The roadways in our neighborhood, and Sunset in particular, is very narrow, without any sidewalks, driveway curb cuts, accessibility cuts, or gutters. Streets are so narrow that often cars must negotiate a backup routine for one driver to allow for	62.2
an upward driving vehicle to pass. Often emergency vehicles, like the local fire trucks and ambulances, are blocked due to parked cars and must blare horns to alert local residents to move their vehicles before they can move forward on their route. This could be a life-endangering situation if the result of this project means more cars on an already heavily used and impacted roadways. In the summertime, as	62.3
visiting guests swell the local population, it's even difficult to find parking in the area on the lower neighborhood streets due to events in town and the vacation rental situation. Delivery trucks often	62.4
refuse to make deliveries on Sunset and nearby streets due to the narrowness of the roads and the slope of the roadways.	62.5
As mentioned, there are no sidewalks or gutters anywhere in the neighborhood until the downtown area is reached. Residents will have to walk on uneven pavement, repaired of many years, by	62.6
Sweetwater Springs Water District. Street lighting is so bad in some areas that, given the tree canopy, one must walk some areas in near pitch blackness.	62.7
Please do not allow this project to move forward in development. Surely there are better suited areas for this kind of density that will also give the residents more opportunity for engagement in the local town and make available to them resources that will otherwise require increased pedestrian and	62.8

Sincerely,

Robert Grandmaison 14160 Sunset Avenue Guerneville, CA 95446 (707) 290-3084

vehicular access on already potentially dangerous roads.

Date:

Letter 63

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Dear Mr. Gage,	
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GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.	63.2
The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.	63.3
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Name: Susan Ament

Signature:

Address: 14742 Marys Lane Date: Coverne ville, CA 95446

From: Janice Stenger < janicestenger@yahoo.com>

Sent: Monday, February 6, 2023 4:13 PM

To: Lynda Hopkins < Lynda. Hopkins@sonoma-county.org>

**Cc:** PermitSonoma-Housing <PermitSonoma-Housing@sonoma-county.org>

**Subject:** Housing Element

#### **EXTERNAL**

I cannot get this to go to Erik...it keeps bouncing back. Could you possibly forward it??? When I was a kid, there were about 20000 people in Santa Rosa proper, murders were almost unknown, housing was super affordable, growth was slow and easy to digest, traffic.?.farmers would sometimes drive tractors down 4th street. So some of my questions are:

In a 1/2 mile road, we are expected to take in about 500 people and as a result the people already here will bear the brunt? Will the quality of our life be the same? Will redwoods be slaughtered? Can my kids ride their horse down the road? Can my renters 8 year old ride her bike? Will deer and all the little animals still use the paths they've used for centuries and sleep in my apple orchard.? Isn't it true that if any state or federal money is involved, these cannot be held for local people ONLY, or returning people that were born here and couldn't continue here because lack of available housing (in their price range?) So in reality, we could be building new housing for people from every state in the country and every county in the state? Is that true? People are fooled again to think it is okay because all of them will get a new condo or a tiny house or a trailer.

When they built Fife Commons (in the flood plain) we knew lots of young Guerneville adults that probably qualified for an apartment, but it wasn't a case of choosing from only Guerneville or perhaps Guerneville and Monte Rio low income citizens; it was come one, come all and get on the very long list. One extraordinary wonderful local disabled kid who has led a heroic life, tried but no; there was no carve out for the people who have lived here forever and are known to us. So will these hundreds of dwellings you envision be for our town's families?

Guerneville was always the cheapest place to live and the Sonoma County Social Services pointed people over here for decades because of that. No year-round jobs here. We contemplate the exact reason the housing prices jumped and I only guess it's the second homes that stand empty, the lack of bare land inventory, the California population going from 13 million to 40 something million. Is it California's job to provide homes for everyone that wants to live here? And where in the Constitution is this promised?

There's much conversations lately about poor people who live in a food desert...but isn't that what the West County here has become with only one food market from Hacienda to the coast? Also isn't it true that developers can get a "pass" and build higher cost housing? Or even put in a trailer park?. This EIR violates many of the objectives of the General Plan, is it now defunct? Also assumes it knows better than the Cal Fire, Lafco, Water Agency and a multitude of apparatchiks that have busily fenced us all in for years. Wouldn't you say that if Sacramento makes the rules with out our input, that we are in the same place as the 13 colonies that fought with the British because of taxation without true representation?

Janice Stenger

64.1

64.2

64.3

64.4

64.5



# Santa Rosa

his to him?

Date:

Letter 65

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

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65.2

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65.3

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65.4

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65.7

Name:

Address: 14712

lane

Date:

2-6-23

Signature:

From: Ken Billheimer <kenbillheimer@yahoo.com>

Sent: Monday, February 6, 2023 10:24 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Proposed Housing on Sunset Avenue, Guerneville

#### **EXTERNAL**

RE: Proposed Housing on Sunset Avenue, Guerneville 6 February 2023

I live at 14182 Woodland Drive, Guerneville. This is the house which is just below the turn on Sunset Drive for the proposed development of 30 units of housing for 78 people.

I understand the need for affordable, high-density, low-income housing. I am socially conscious and not a "not in my back yard person." However, I vehemently oppose development of housing up the hill from Woodland Drive. It is an impractical location in an area with a one lane road in both directions of approach. In attempts to negotiate the turn directly above my house, it requires a sharp right turn and then often backing up in order the make the turn. It's not a safe turn under any circumstance. It would not be unlikely for a car to lose control and come down the hill into my house in an attempt to negotiate that turn.

66.1

An approach to that same turn by going North at the top of the hill onto Woodland would bring traffic in front on my house. It is not safe from this direction either. The road is too narrow. The bottom of my stairs go directly into the street and it's a blind spot. If a person does not stop and look into the street (as children and grandchildren often don't), it is an accident waiting to happen which could result in injury or even death. People speed on that street regularly. Someone is going to get hit by a car. There is no possible way to widen Woodland at that point without being in my living room.

During the last fires, we evacuated two times. This evacuation was mandatory, and we complied. In the event of evacuation from this neighborhood, there are two possibilities: Woodland to Armstrong Woods Road and Morningside Drive down to Highway 116. Morningside Drive to Highway 116 is a dangerous and narrow one lane road. It is NOT possible for two cars to pass. One must back up. To evacuate using this road is completely impractical. Conservatively, I would think 78 new people would add 50 cars to the neighborhood.

66.2

It makes more sense to build affordable housing in an area of Sonoma County where there are jobs not tied to a seasonal tourist economy. It just doesn't make sense to build housing where there are no jobs. I don't mind my tax dollars being spent on affordable housing; however, it should be built in an area where there are jobs and infrastructure to support it. If it is in Guerneville, it needs to be built in an area that people can access public transit or even practically be able to walk to the store. It is impractical to think someone with health issues could walk down and back up Woodland from the proposed location to go shopping. The road is steep and a challenge even for someone who is physically fit.

66.3

I request that all the parties considering this location for building new housing give some consideration to the practicality of the location.

Respectfully,

Kenneth Billheimer

Kenneth Billheimer, Au.D Audiologist, Consultant Somewhat Retired Inquiries Welcomed From: Maggie Mayo <maggiemayo@gmail.com> Sent: Monday, February 6, 2023 8:19 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Draft EIR Comments: Housing Element Update

Dear Mr. Gage,

We are at 20553 Birch Rd, which is next to the SON-1 through SON-4 properties that are subject to the Housing Element. We only recently learned of the Housing Element by way of the December 28, 2022 notice of availability of the Draft EIR. I had hoped to attend Thursday's hearing but unfortunately was not able to.

I have a few questions/comments about the proposal. If easier to discuss over the phone, my number is 415-722-5274.

We have a well that we share with our neighbor, and I believe others in the area are on well
water too. Has there been any analysis on the impact of this proposed construction and future
use of the land on existing wells in the area?

67.1

Letter 67

• Based on my review of the documents, it sounds like the proposal works as follows: parcels labeled SON-1 through SON-4 in the draft EIR are currently RR and the proposal is to change the zoning to R2, which the proposal contends under Government Code section 65913.5 would allow up to 10 dwelling units to be built on each parcel, and then the proposal contends that number would be doubled to twice what is provided for under Government Code section 65913.5 to 20 dwelling units per parcel under Sonoma's "Rental Housing Opportunity Area Program." Is that correct? If so, how do SON-1 through SON-4 qualify under Government Code section 65913.5? Is it in a "transit-rich area" or an "urban infill site"? And how does the Sonoma "Rental Housing Opportunity Area Program" to double the allotment provided for under that Government Code when the express language of the statute provides for zoning a parcel for "up to" 10 units of residential density?

67.2

• Are there requirements to maintain a certain amount of green/open space? If so, what are those requirements?

67.3

• Will there be limitations on building height?

67.4

Thank you for your time. Best, Maggie Mayo 415-722-5274

Letter 68

From: Patricia Kremer <patricia.kremer33@gmail.com>

Sent: Monday, February 6, 2023 8:49 AM **To:** linda.hopkins@sonoma-county.org

Cc: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Draft EIR Comments: Housing Elements Update

Dear Linda,

RE: Proposed rezoning for affordable dense housing: GUE 2, GUE 3, and GUE 4.

The community surrounding Laughlin Road and Cutten Drive strongly opposes this rezoning. Especially the loop around Cutten Drive (GUE 3). This is a one-lane road and would severely negatively impact our community: traffic, water, sewer, our beautiful redwoods, and emergency egress for residents.

Every resident of Cutten Drive has purchased property to be in a R1 zoning area. Surely there must be a better place to build affordable dense housing, with better access, such as on River Road?

68.2

Please keep me posted on any developments. Patricia Kremer 16445 Cutten Drive Guerneville

Thank you,

#### Patricia Kremer

Hospitality & Special Event Professional "Delightful Experiences Await..."

Phone: (707) 477-2546

https://www.linkedin.com/in/patricia-kremer-5a12a21b/

68.1

Letter 69

From: Stacie Gradney <stacieleelee@gmail.com>

Sent: Monday, February 6, 2023 2:58 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject:



Here are some screenshots from discussion in Next Door App. Comments are growing.

This about zoning forestville for developers to build housing for a town that is NOT fit for over populating.

I think you need to start getting the community involved. Every person in forestville needs to know what you are trying to do. You already took our high school.

69.1



1d Like <u>Reply</u> <u>Share</u>

building homes stimulates human population growth... That's how it works, not the other way around.

· Fircrest

1h Like Reply Share

Forestville is way too small an area to allow that

many more people.

2d **b** 5 **b** Like Reply Share

· Guernewood Park

To better explain the reasons for the enlargement of population is because there are almost 3,000 people who need more help than yourself, and who are within this county alone. The population density of Santa Rosa, county...

· Forestville

homelessness is probably a tragedy we will never end. Right now, I've heard affordable housing is termed 2400.00 monthly rent. I hope to be proven wrong because that's... See more 1d 1 Like Reply Share

Author · Green Valley Rd

Over crowding an already small community is not going to help. Like I said a duplex here and there forestville can handle but an apartment complex for 500 families?... See more

1d 2 Like Reply Share

Forestville

The Planning Commission is looking for comments that are site-specific to be addressed in the final Environmental Impact Report later this spring. Here is a link to the DRAFT EIR/ https://permitsonoma.org/longrangeplans/proposedlong-rangeplans/housingelement. Please send your only-locals-know comments siting specific pages and items to: Planner@sonoma-county.org and SIGN UP for email UPDATES at: https://service.govdelivery.com/accounts/CASONOMA/subscriber/new?topic\_id=CASONOMA\_393

1d Like Reply Share

Mhon

When are we going to learn? We can't just add and add people and buildings to already small communities? Where will they go? I don't know, but there... See more

Like Reply Share

· Forestville

This is why Permit Sonoma is asking for your feedback. This process is data-driven from the state down. It NEEDS neighbors to tell P.S. what it needs to know and does not have suffi... See more

1d 💚

Like Reply

**Share** 

· NW of Downtown

I came to Sebastopol in 1974, you can just imagine what's happened to it since then! I don't want to go online and read pages and pages and try to do it all by computer. I'm old.

23h

Like

Reply

**Share** 

· Joy Ridge

Prove up a sustainable water source and also improve the infrastructure BEFORE construction vehicles are crowding the narrow county roads and highways.

1d



Like Reply

<u>Share</u>

This is why Permit Sonoma is asking for your feedback. This process is data-driven from the state down. It NEEDS neighbors to tell P.S. what it needs to know and does not have sufficient staff to review every site a... See more

1d : 2 Like Reply Share



Building homes stimulates human population growth... That's how it works, not the other way around.

1h Like <u>Reply</u> <u>Share</u>

Fircrest

With more people, you will have more pollution, traffic, crime, homelessness, noise, fire danger, climate degradation, destruction of the natural environment, more heat etc. Why would anyone want that? Because it'... See more

1h 1 Like Reply Share



Capitalism requires the destruction of nature and externalizes the costs to citizens.

1h Like Reply Share

Capitalism requires the destruction of nature and externalizes the costs to citizens.

1h Like Reply Share

Author · Green Valley Rd

I feel like this will be slipped under the rug like a lot of things that happen around here. This idea/plan is not suitable for any of our west county communities. Like our h... See more

<u>1h</u> <u>Like Reply Share</u>

· Fircrest

because they want the money.

They don't care about us or our wonderful small towns. (edited)

1h in Like Reply Share

· Forestville

While you are writing the Planning Commission about what you DON'T want, please write them about what you DO want so they have guidance as they evaluate planning for our future. They need input but it can't be all complaints. They need to hear from people about community-based SOLUTIONS as well (edited)

# THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

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**Environmental Planning** 

3028 Warm Springs Road Glen Ellen, CA 95442 (707) 935-9496

Email: vicki\_hill@comcast.net

February 6, 2023

#### **DELIVERED VIA EMAIL**

# Please distribute copies of this letter to all concerned County staff & Decision Makers.

RE: Comments on Sonoma County Housing Element Draft EIR, specifically regarding Glen Ellen parcels, # 054-290-057 and # 054-290-084 (GLE-1 and GLE-2)

#### Dear PRMD Staff:

This letter contains comments regarding the Draft EIR for the Sonoma County Housing Element, including both general comments and specific concerns regarding the two properties in Glen Ellen proposed for rezoning in the draft Housing Element. The parcels are at the corner of Carquinez and Arnold Drive (Assessor Parcel # 054-290-057 and # 054-290-084, identified as GLE-1 and GLE-2 in the DEIR) and total a little less than one acre. These parcels were part of the "Rezoning Sites for Housing Project" and were included in the Draft EIR for that effort. **My comments on that previous EIR are attached and are hereby included in my comments on the Housing Element DEIR** since it appears that the Housing Element DEIR drew heavily from the Rezoning Sites for Housing DEIR. During that process, many people submitted comments with valid concerns regarding the inappropriateness of substantially upzoning these parcels (from 5 units to 22 units plus ADUs and density bonuses), which are outside of the urban growth boundary in the tiny village of Glen Ellen at an unsignalized intersection. It does not appear that previous comments were considered.

70.1

#### Please consider the requests expressed in this letter and in other community comments:

- 1) Remove the two Glen Ellen parcels from the rezoning list due to significant impacts identified in the EIR and other issues stated in this letter; and/or
- 2) Consider an alternative zone district that reduces the number of allowed units on the site and does not require a minimum number of units, as required by the WH zone.

As a professional land use planner and CEQA specialist, I have determined that there are numerous inaccuracies and inadequate or missing analyses in the Housing Element DEIR. My comments address: 1) absence of analysis of the appropriateness of applying the Workforce Housing Zone district; 2) infeasible and missing mitigation measures; 3) inadequate land use

policy analysis; 4) inadequate cumulative impact analysis; and 6) lack of consideration of feasible alternatives that would reduce impacts of the proposed project.

70.1 Cont.

#### **General DEIR Comments:**

1. Purpose and Need: There is no justification for including the Glen Ellen parcels, which are already developed. Also, up to 1000 homes have been approved a few blocks down Arnold Drive at the Sonoma Developmental Center (SDC). Glen Ellen has already absorbed many times more than its fair share of future housing whether or not the SDC development is counted towards the current RHNA.

70.2

2. Plan Inconsistencies: While the proposed rezoning of the Glen Ellen parcels may appear nonthreatening to those who are unfamiliar with the historic village, the rezone site represents a large part of the downtown core (which is only two blocks long) and will dramatically change it by tripling the existing number of housing units allowed. Furthermore, the Workforce Housing (WH) zone district REQUIRES a minimum number of units (16) so the property owner will have no choice but to overdevelop the property. The proposal is clearly inconsistent with the intent of the Glen Ellen policies established in the General Plan and Glen Ellen Development and Design Guidelines.

70.3

3. Land Use Impacts: The proposal for the two Glen Ellen parcels involves **inappropriate and** precedent-setting rezoning to a high-density zone district, which is out of scale and would result in significant adverse impacts on the small village of Glen Ellen.

70.4

4. Due to the Workforce Housing zone minimum development requirements (16 units minimum), the Glen Ellen parcels would have to be cleared of all vegetation, including large trees, which would render the site an eyesore and incompatible with the community character. There is no feasible way to develop a project of this density without significantly impacting community aesthetic character or conflicting with the Glen Ellen Development and Design Guidelines. 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 these mitigation measures. For this reason alone, an alternative lower density residential zone district should be considered.

70.5

• Cumulative Impacts: The DEIR cumulative impact analysis is flawed in that it does not consider the two massive projects in close proximity to rezoning sites in Glen Ellen and Sonoma Valley – the adopted SDC Specific Plan and the Hanna Center housing, hotel, and commercial development a few miles down Arnold Drive. Also, there is the Elnoka housing project in the north Sonoma Valley. The tiny village of Glen Ellen has now been required to accommodate up to 1000 housing units and as many jobs, as part of the SDC Specific Plan (a few blocks from the Glen Ellen parcels proposed for rezoning). With the large scale SDC development, it is clear that this semi-rural area (without adequate infrastructure, transit, and jobs) has taken on more than its fair share of housing and should not be required to accommodate even more housing that will contribute to the significant traffic impacts identified for the SDC Specific Plan. The cumulative impacts are widespread throughout Sonoma Valley. Arnold Drive simply cannot handle the level of traffic that will result

from cumulative development. The planned road connection from SDC to Hwy 12 is no longer part of the Specific Plan, except for emergency access.

There is no evidence that these large-scale developments were considered in the cumulative impact analysis for transportation, land use policy consistency, GHG, visual resources, public services (water, wastewater), or wildfire evacuation and emergency response. These projects are not included in the General Plan buildout or in the MTC regional plan as they are outside urban areas and not originally slated for development.

70.6 Cont.

5. Traffic Level of Service (LOS): Although CEQA no longer requires LOS analysis, the DEIR must consider consistency with adopted plans and policies. The existing General Plan contains LOS policies and standards, which will be violated with implementation of the Housing Element (and cumulative impacts).

70.7

6. ADUs: The DEIR does not consider the fact that many of the sites will qualify for the addition of ADUs.

70.8

#### **Specific Comments on Draft EIR**

• Page ES-2- "The project would implement existing General Plan Policies and Programs that require the County to identify urban sites near jobs and transit which may appropriately accommodate additional housing. The project would also identify appropriate sites on which to place the WH Combining District, which would allow the development of jobs and/or housing on the same site or within walking distance from one another. The WH Combining District is an overlay added to sites with non-residential base zoning to allow for housing to be built on sites containing or adjacent to jobs." This statement points out how incompatible the proposed WH zoning is for the two parcels in Glen Ellen, which are NOT in an urban area, are not near jobs, and are not near transit. Nor is there land to develop additional jobs on the same site or within walking distance. Glen Ellen is a rural historic village, not an urban center, and it is not near any incorporated urban area.

70.9

• Page ES-2: The proposed rezoning of the Glen Ellen parcels is in conflict with Project Objective #6, which calls for new housing in urban areas near jobs, transit, and services.

70.10

• Page ES-4, Alternative 3: The two Glen Ellen parcels should be added to the list of sites removed from consideration in this alternative, based on all of the comments regarding environmental constraints and the EIR's own findings of significant impacts.

70.11

Page 2-6, "All 59 Rezoning Sites are within General Plan-designated Urban Service Areas, and near incorporated areas, within voter-approved Urban Growth Boundaries." This is incorrect – the GLE-1 and GLE-2 parcels are not near incorporated areas nor are they near or within an Urban Growth Boundary. This incorrect assumption leads to a flawed analysis.

70.12

Table 2-3, Proposed Land Use and Zoning Districts: Why aren't the two Glen Ellen parcels
considered for R-2 zoning rather than the WH overlay? Clearly the WH overlay is not appropriate, as
pointed out in my earlier comments. WH zoning is for urban areas, with nearby jobs and transit,
neither of which exist at these sites. There is no explanation of why R-2 was not considered.
Further, the WH zone requires a minimum development, which would more than triple the number

	of existing units on the site, with limited roadway and access functions. Please consider a less	70.13 Cont.
	intensive zone district for these two parcels in the Final EIR.	
•	Table 2-4: The number of existing allowable units at the Glen Ellen parcels is incorrect in the table. There are 4 or 5 existing units, which is a reasonable number for the site and its location.	70.14
•	Page 4-1: "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." What are the X values?	70.15
•	Page 4-2, Cumulative: "CEQA analysis of cumulative impacts for a housing element is general in nature and considers cumulative development that could occur within the County to the extent it is reasonably foreseeable." Both the SDC Specific Plan and Hanna Center development are reasonably foreseeable projects and must be included in the cumulative impact analysis. Since neither of these major developments are mentioned in the DEIR, it appears neither were considered. The Hanna development has been in the works since 2004 and the County is well aware of it. The SDC Specific Plan process started in 2019-2020 and is now approved.	70.16
•	Aesthetics, Table 4.1-6: The table lists mitigation measures that don't exist. There are only two aesthetic mitigation measures.	70.17
•	Aesthetics, Impacts: Significant visual impacts are identified for the Glen Ellen parcels but no realistic mitigation measures are identified. Measure AES-1 calls for screening, but that is infeasible given the number of units that will be allowed and their proximity to public streets (Arnold Drive). Measures limiting building massing, staggered heights, building materials, and other design features should be included in the DEIR to partially reduce these significant impacts.	17.18
•	Aesthetics, page 4.1-54: " development facilitated by the project cannot be made to comply with subjective design guidelines" Please clarify what this means and why future development is exempt from design guidelines. Also, who determines which guidelines are objective vs. subjective? This seems to dismiss all relevant County policies and provisions.	17.19
•	It is not clear if the WH zone district will still require architectural review, which is critical in a place like Glen Ellen where specific design guidelines and standards are in place.	17.20
•	Table 4.11-3, page 4.11-37: "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." This assumption and dismissal without analysis is erroneous. While it is true that the transportation analysis is no longer required to address LOS, there is still a requirement, under CEQA, to assess the proposed project's compliance with adopted land use policies. The EIR fails to assess the project's consistency with General Plan policy LU-20gg, which calls for consideration of traffic congestion.	70.21
•	Table 4.11-3, Policy Consistency, page 4.11-37: There is no analysis of consistency with the Glen Ellen Development and Design Guidelines, which is required by CEQA. The table includes the following flawed statement: "The project does not propose development on these sites at this time	70.22

but rezoning to allow for medium-density residential development, and future projects would 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, as only objective design standards would apply." As a program EIR, under CEQA, development at these sites must be analyzed and compared to existing policies. One cannot defer analysis to some point in the future, especially since future development will be exempt from CEQA. The General Plan policies regarding Glen Ellen and the Glen Ellen Development and Design Guidelines cannot be merely dismissed. The proposed rezoning will be in direct conflict with the guidelines and General Plan policies and this should be identified as a significant impact in the EIR. Who determines whether policies are objective or subjective? The full implications of applying the WH zone district must be evaluated in light of the many policies in this document. The proposed densification of the Glen Ellen parcels is clearly in conflict with existing policies and should be identified as a significant unavoidable impact.

70.22 Cont.

• Impact BIO-5, Heritage Trees: The impact statement for BIO-5 does not state what the impact is, just references county policies. Increasing the housing density on the two Glen Ellen parcels will require removal of several heritage trees. This is a significant unavoidable impact because it would be inconsistent with the County heritage tree ordinance. There is no way to avoid heritage tree removal under the densification of the parcels. There simply is not space. The DEIR defers analysis of heritage tree removal to individual projects, but individual projects will be exempt from CEQA.

70.23

• Cultural resources, page 4.5-11 – "Although there are no known historical resources on the Potential Sites, 35 of the sites contain buildings and/or structures that are over 45 years of age and may not have been evaluated previously for historical resources eligibility (Table 4.5-1 above)." I believe the historic structure on GLE-1 has been documented. It may be the oldest commercial structure in downtown Glen Ellen. This resource and its historic setting would be significantly impacted by redevelopment of GLE-1 and -2 allowed by the WH zone district. The EIR must address this historic resource in more detail. With the rezoning, there is no possible way to protect this resource.

70.24

• Land use section (and elsewhere) - There is no real analysis of the appropriateness of applying the Workforce Housing (WH) zone district to Glen Ellen's two-block long village. I am in full support of housing, especially affordable housing, but housing must be placed in an appropriate location that meets the needs of residents and does not further contribute to sprawl and associated impacts. There are county policies regarding city-centered growth, to discourage sprawl, reduce vehicle trips, and ensure that new residents have adequate access to services and jobs. The WH zone was intended for urban areas where jobs are available. Glen Ellen is not within an urban growth boundary, transit is all but non-existent, and there's no job center. This significant impact must be disclosed in the EIR, as applying the WH zone is inconsistent with the zone district's stated intent and inconsistent with other land use policies. Applying this zone in the village of Glen Ellen completely ignores the many policies in place to ensure good planning and protect land use integrity.

70.25

 Land use section – The Draft EIR fails to address the following policies. The WH ordinance requires that:

70.26

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

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

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

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

- Land use section, page 4.11-43 "Cumulative development, listed in Table 3-1 in Section 3, Environmental Setting, would be required to meet current applicable design standards and would undergo environmental review, including consideration of whether the projects would physically divide an established community." This is completely inadequate. The whole purpose of conducting a cumulative impact analysis is to determine whether other projects would create substantial impacts and whether the proposed rezoning would substantially contribute to those cumulative impacts. The EIR cannot postpone this analysis to some future time.
- Land Use: The density (22 homes plus ADUs plus density bonuses) would result in buildings with such a large mass and lot coverage that it would be completely out of scale and dramatically change the small village. There is no feasible mitigation for this impact. A previous proposal for the Glen Ellen parcels (for 15 units) was rejected by the Design Review Board because of the mass and scale issue. It's not possible to fit 22 homes onto the property without creating significant impacts. Furthermore, the WH zone district requires a minimum development density, which would be 16 units on the Glen Ellen site (composed of the 2 parcels). Therefore, the property owner couldn't redevelop with fewer units than that. There is no place in downtown Glen Ellen where housing density is the same as density allowed by the WH zone. For a larger urban area, the change would not be that significant. However, for the small Glen Ellen village, it represents a substantial increase in density. This is further exacerbated by the fact that the property across the street has already been redeveloped with 8 residential units and two more ADUs a substantial change to the village.
- The DEIR states that design review approval will still be required for all multi-family or mixed-use housing development of more than three units. Design review is limited to building and site design, architecture, colors, lighting, signs, landscaping and other design-related issues, **not consideration of density and intensity of development and associated impacts.** Once the rezoning is approved, properties may move forward with ministerial permits for increased housing. As part of the EIR, the County needs to address how future redevelopment allowed by the WH zone complies with General Plan policies/guidelines to protect Glen Ellen's semi-rural character.
- It appears that the Glen Ellen properties were included in the rezoning merely because the property owner had already applied for the WH zone. There is no evidence of an independent analysis of the appropriateness of this zone district for this site.

70.29

70.26 Cont.

70.27

 Project Alternatives - Despite previous requests (in comments on the Rezoning for Housing DEIR) to look at alternative zone districts for the Glen Ellen parcels that would still increase the amount of housing but be more consistent with the existing surrounding land uses, the EIR does not consider other zone districts. This could be corrected in the Final EIR, as a means to reduce impacts related to traffic, aesthetics, land use inconsistencies, historic resources, and fire risk.

70.31

• Growth Inducement – Applying the Workforce Housing Combining Zone in an area outside of an Urban Growth Boundary will set a significant growth-inducing precedent for future projects in downtown Glen Ellen. This impact has not been evaluated in the Draft EIR.

70.32

With the devastating loss of established neighborhoods during the 2017 fires, it is more important than ever to not overtax our rural infrastructure and resources. It is not understandable why the County would pursue rezoning this developed site in light of valid concerns expressed by the community. Please do not do any further damage to this rural area by upzoning these parcels. Tripling or quadrupling the number of housing units on this site will only add to the significant impacts caused by implementation of the SDC Specific Plan.

70.33

Please feel free to contact me if you have any questions or would like to discuss my comments.

Regards,

Vicki A. Hill, MPA

**Environmental Land Use Planner** 

i X Hill

# ATTACHMENT 1 PREVIOUS COMMENT LETTER ON REZONING SITES FOR HOUSING DEIR

Vicki A. Hill, MPA

**Environmental Planning** 

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

June 17, 2021

# DELIVERED VIA EMAIL Please distribute copies of this letter to all concerned County staff members.

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

Dear PRMD Staff:

This letter contains comments regarding the Draft EIR for the Sonoma County proposed Rezoning Sites for Housing Project, specifically regarding the two properties in Glen Ellen at the corner of Carquinez and Arnold Drive (parcels GLE-1 and GLE-2 on the County rezone map). As a professional land use planner and CEQA specialist, I have reviewed the above referenced Draft EIR and have determined that there are numerous inaccuracies and inadequate or missing analyses. My comments address: 1) absence of analysis of the appropriateness of applying the Workforce Housing Zone district; 2) infeasible mitigation measures; 3) inadequate land use policy analysis; 4) inadequate cumulative impact analysis; 5) insufficient analysis of significant environmental and land use policy impacts; and 6) lack of consideration of alternatives.

70.34

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

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

#### Specific Comments on Draft EIR

- Page ES-1 "Potential Sites are within Urban Growth Boundaries, near incorporated areas located in Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, and Sonoma." This statement is incorrect and misleading. Glen Ellen is not within an urban growth boundary and it's unlikely that sites in some of the other small unincorporated towns are within urban growth boundaries. Furthermore, Glen Ellen is not near an incorporated area. This points out the misunderstanding that somehow Glen Ellen is an urban area suitable for workforce housing.
- Page 2-1 "All Potential Sites are within General Plan-designated Urban Service Areas, and near incorporated areas, within voter-approved Urban Growth Boundaries." As commented above, this statement is incorrect and misleading, making the reader think that Glen Ellen is near an incorporated area and within an Urban Growth Boundary. This incorrect assumption provides the basis for an incomplete and inaccurate analysis of land use policy consistency issues.
- Page 2-18, Criteria for including sites in the proposed rezoning: "In addition to these criteria, the
  General Plan sets forth additional criteria to be used in considering which sites to rezone for housing
  (Housing Element Policy HE-2f and Programs 11 and 20). These factors include proximity to jobs,
  transit, services, and schools." Clearly the GLE-1 and -2 parcels are not consistent with this General
  Plan policy because they are not in close proximity to jobs, transit, or services.
- Aesthetics, page 4.1-59, Impact AES-3: "INDIVIDUAL PROJECTS IMPLEMENTED ON POTENTIAL SITES HAVE THE POTENTIAL TO ADVERSELY AFFECT PUBLIC VIEWS AND COMMUNITY AESTHETIC CHARACTER. IN URBANIZED AREAS, THE PROJECT WOULD CONFLICT WITH REGULATIONS THAT GOVERN DEVELOPMENT DESIGN STANDARDS. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION MEASURES INCORPORATED." The mitigation measures listed in the Draft EIR are either infeasible or would not reduce impacts to a level that is less than significant. Mitigation measure AES-1, Project Design Constraints, and AES-2, Structure Envelope Constraints, are not feasible because of the small parcel size, existing historic resources, and Workforce Housing zone minimum development requirements (16 units minimum). The property would have to be cleared of all vegetation, including large trees, which would render the site an eyesore and incompatible with the community character. There is no feasible way to develop a project of this density without significantly impacting community aesthetic character or conflicting with the Glen Ellen Development and Design Guidelines. 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 these mitigation measures.
- Cultural resources, page 4.5-11 "Although there are no known historical resources on the Potential Sites, 35 of the sites contain buildings and/or structures that are over 45 years of age and may not have been evaluated previously for historical resources eligibility (Table 4.5-1 above)." I believe the historic structure on GLE-1 has been documented. It may be the oldest commercial structure in downtown Glen Ellen. This resource and its historic setting would be significantly impacted by redevelopment of GLE-1 and -2 allowed by the WH zone district.
- Hazards, page 4.9-12 "Impact HAZ-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN ANY PHYSICAL CHANGES THAT COULD INTERFERE WITH OR IMPAIR EMERGENCY RESPONSE OR EVACUATION. THEREFORE, THE PROJECT WOULD NOT RESULT IN INTERFERENCE

70.34 Cont. WITH THESE TYPES OF ADOPTED PLANS. IMPACTS WOULD BE LESS THAN SIGNIFICANT." This finding that the impact is less than significant is flawed. The proposed rezoning will result in an increased number of people and vehicles in high fire hazard areas, which will impede emergency response in the event of a catastrophe such as wildfire. During recent fire evacuations, Arnold Drive and Highway 12 were severely impacted by Oakmont, Kenwood, and Glen Ellen residents fleeing the fire. People sat in their cars for hours, waiting to get out. Increasing housing density in these high-risk areas will exacerbate the emergency response impact.

- Land use section (and elsewhere) There is no real analysis of the appropriateness of applying the Workforce Housing (WH) zone district to Glen Ellen's 2 block long village. I am in full support of housing, especially affordable housing, but housing must be placed in an appropriate location that meets the needs of residents and does not further contribute to sprawl and associated impacts. There are county policies regarding city-centered growth, to discourage sprawl, reduce vehicle trips, and ensure that new residents have adequate access to services and jobs. The WH zone was intended for urban areas where jobs are available. Glen Ellen is not within an urban growth boundary, transit is all but non-existent, and there's no job center. This significant impact must be disclosed in the EIR, as applying the WH zone is inconsistent with the zone district's stated intent and inconsistent with other land use policies. Applying this zone in the village of Glen Ellen completely ignores the many policies in place to ensure good planning and protect land use integrity.
- Land use section 4.11, setting subsection In the setting section, there is no description of the Glen Ellen Development and Design Guidelines other than a passing reference in one of the General Plan policies. This important land use document should be described, with a clear presentation of its purpose and intent.
- Land use section 4.11, impacts subsection The Draft EIR fails to address consistency with the Glen Ellen Development and Design Guidelines in the impacts section. This consistency analysis is required by CEQA. It cannot be postponed until a specific project is proposed for the site. The full implications of applying the WH zone district must be evaluated in light of the many policies in this document. The proposed densification of the Glen Ellen parcels is clearly in conflict with the Glen Ellen Development and Design Guidelines and should be identified as a significant unavoidable impact.
- Land use section, page 4.11-38 One of the considerations, as outlined in General Plan policy LU-20gg, requires evaluation of "the compatibility of rural development with protection of agriculture, scenic landscapes, and resources." The Draft EIR fails to analyze consistency with this provision. Instead, the Draft EIR states: "The project does not propose development on these sites at this time but rezoning to allow for medium-density residential development. Future projects on these sites would be required to comply with the County Code and Glen Ellen Development and Design Guidelines, and compliance would be evaluated by the County during the project application and approval process." This statement represents postponing the analysis to a later time, which is not adequate under CEQA. There will be no subsequent discretionary analysis, as future projects will be ministerial and exempt from CEQA, according to the Draft EIR. No public decisionmaker hearing would be required and the public would have no real opportunity to weigh in on property proposals. Given the density allowed/required, one cannot assume that future projects will comply with General Plan policies and the Glen Ellen Development and Design Guidelines. The consistency analysis needs to be conducted for the current EIR, not delayed. The EIR must evaluate the full

70.34 Cont. buildout potential (including density bonuses, ADUs, etc.) that the Workforce Housing zone district will allow. The EIR needs to address how this buildout under the WH zone does or does not comply with specific growth policies and policies/guidelines to protect Glen Ellen's semi-rural character. The aesthetics analysis states that impacts are significant, but mitigable. As I described above, these mitigation measures are not feasible for the Glen Ellen parcels due to location, density, etc. Therefore, this land use conflict is a significant unavoidable impact.

- Land use section The Draft EIR fails to address the following policies. The WH ordinance requires that:
  - "(d) The proposed rezoning is consistent with the overall goals, objectives, policies, and programs of the General Plan and any applicable Area or Specific Plans as amended from time to time."

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

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

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

70.34 Cont.

- Land use section, page 4.11-43 "Cumulative development, listed in Table 3-1 in Section 3, Environmental Setting, would be required to meet current applicable design standards and would undergo environmental review, including consideration of whether the projects would physically divide an established community." This is completely inadequate. The whole purpose of conducting a cumulative impact analysis is to determine whether other projects would create substantial impacts and whether the proposed rezoning would substantially contribute to those cumulative impacts. The EIR cannot postpone this analysis to some future time.
- Land use policy consistency analysis In addition to inconsistencies with growth policies and the intent/purpose of the zone district, the very nature of the WH district is clearly in direct conflict with General Plan polices and the local Glen Ellen Development and Design Guidelines regarding density, mass, and scale. At a density of 24 units per acre, the proposed Workforce Housing would allow 22 units on the Glen Ellen property that is just under one acre (0.85 acre), representing a substantially increased density. The WH Combining Zone also provides for additional density allowed under the County's density bonus programs for affordable units.

**The WH zone would quadruple** the existing onsite density of 5 units. This density is not consistent with the limited roadway network and fire risk. Please note that over 180 homes in Glen Ellen burned in the 2017 fires; the only reason the village was spared was because of some brave local volunteers.

The density would result in buildings with such a large mass and lot coverage that it would be completely out of scale and dramatically change the small village. There is no feasible mitigation for

this impact. A previous proposal for the Glen Ellen parcels (for 15 units) was rejected by the Design Review Board because of the mass and scale issue. It's not possible to fit 22 homes onto the property without creating significant impacts. Furthermore, the WH zone district requires a **minimum** development density, which would be 16 units on the Glen Ellen site (composed of the 2 parcels). Therefore, the property owner couldn't redevelop with fewer units than that. There is no place in downtown Glen Ellen where housing density is close to density allowed by the WH zone. For a larger urban area, the change would not be that significant. However, for the small Glen Ellen village, it represents a substantial increase in density. This is further exacerbated by the fact that the property across the street has already been redeveloped with 8 residential units and two more ADUs are now proposed there - a major change to the downtown.

Rather than conducting this important policy consistency analysis now, the EIR assumes that future projects will comply with policies. However, as noted above, future projects will be ministerial with no CEQA required so there will be very little review. The Draft EIR states that design review approval will still be required for all multi-family or mixed-use housing development of more than three units. Design review is limited to building and site design, architecture, colors, lighting, signs, landscaping and other design-related issues, **not consideration of density and intensity of development and associated impacts.** Once the rezoning is approved, properties may move forward with ministerial permits for increased housing. As part of the EIR, the County needs to address how future redevelopment allowed by the WH zone complies with policies/guidelines to protect Glen Ellen's semi-rural character.

- It appears that the Glen Ellen properties were included in the rezoning merely because the property owner had already applied for the WH zone. There is no evidence of an independent analysis of the appropriateness of this zone district for this site.
- Project Alternatives Despite requests in my scoping comments to look at alternative zone districts
  for the Glen Ellen parcels that would still increase the amount of housing but be more consistent
  with the existing surrounding land uses, the EIR does not consider other zone districts. This could be
  corrected in the Final EIR, as a means to reduce impacts related to traffic, aesthetics, land use
  inconsistencies, historic resources, and fire risk.
- Cumulative Impact Analysis The cumulative impact analysis is inadequate, especially given the
  planned redevelopment of the Sonoma Developmental Center, which is required by State law to
  have a substantial housing component. Again, the County is postponing analysis that should be
  conducted now.
- Growth Inducement Applying the Workforce Housing Combining Zone in an area outside of an
  Urban Growth Boundary will set a significant growth-inducing precedent for future projects in
  downtown Glen Ellen. This impact has not been evaluated in the Draft EIR.
- History of concerns regarding GLE-1 and -2 Over the past several years, the GLE-1 and -2 property owner has attempted to redevelop the property at a higher density than is currently allowed. Dozens of community members submitted comments opposing the increased density on the site, referencing serious environmental concerns. It does not appear that these previous comments were considered when the County chose to include these parcels in the rezoning proposal nor were they considered when preparing the EIR.

70.34 Cont. My scoping comments requested inclusion of all of the previous comments, as well as comments made to the SVCAC in March 2019 regarding this property.

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

70.34 Cont.

Please feel free to contact me if you have any questions or would like to discuss my comments.

Regards,

Vicki A. Hill, MPA

id Hill

Date: 2/6/23

Letter 71

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

71.1

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

71.2

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

71.3

The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

71.4

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

71.5

The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

71.6

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

71.7

Name: William Helt
Address: 16542 Laughlin rd. Gweneville Ca.
Date: Z-Z-23
Signature: William Helt

From: acalhoun <acalhoun@sonic.net> Sent: Tuesday, February 7, 2023 3:44 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Cc: district5 < district5@sonoma-county.org>

**Subject:** Housing element Update

# **EXTERNAL**

Hello Eric Gage and Lynda Hopkins	
I am writing to express our concerns about stream lining permits for 635 new medium density housing units in Forestville. (To house approximately 1,652 more residents)	72.1
We am not opposed to some affordable housing, in fact we're all for it. We are opposed to the AMOUNT that is being proposed. If I am correct, this will DOUBLE our current population in 8 years. Please correct me if I am wrong.	
Will our current water supply be able to support this?	72.2
Will our current sewers support this amount of growth?	72.3
Will our current traffic pattern be disrupted?	
We have zero handicap accessible sidewalks.	72.4
I can't safely see to turn left on to Hwy 116 from my residence because of truck deliveries and high traffic times ( ie school times) right now.	
And my biggest beef is that I would LOVE to be able to build a granny unit on my almost 1/3 acre of land but the current permit process is OUTRAGEOUSLY DIFFICULT, because I am on septic.	72.5
How about making the permit process understandable and easier for us septic users? That might free up many diverse land opportunities?	
Thank you for listening.	72.6
Anne Marie and Eugene Calhoun ( current tax payers)	
6634 1st St. Forestville 95436	•

Letter 73

From: Becky Boyle <becky.boyle@gmail.com>
Sent: Tuesday, February 7, 2023 10:25 AM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>; Eric Gage

<Eric.Gage@sonoma-county.org>; Planner <planner@sonoma-county.org>

Subject: Fwd: Sonoma County Planning Commission & Board of Zoning Adjustments Meeting

Information Update

Hi,

I don't understand why the letter I sent you for the draft EIR was not included in Item 2. Have you really only received 3 letters about this?

I tried calling but that was challenging, thought I'd pop off this email, might try to swing by later in case that's easier.

Thanks,

**Becky Boyle** 

From: Betty Brachman <betty@thebrachmangroup.com>

Sent: Thursday, February 2, 2023 4:08 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Cc: Susan Gorin <Susan.Gorin@sonoma-county.org>

Subject: Comments on Sonoma County Housing Element proposed rezoning of parcels #054-290-057

and #054-290-084 (GE-1 and GE-2)

Dear Eric Gage and Permit Sonoma

I have lived in Glen Ellen since 1994. My address is now 1040 Robertson Road but the original address was 1010 London Ranch (same property but the county changed the address). I am a full time resident, pay taxes and vote in Glen Ellen.

Over the decades I have watched the deliberate negligence of Marty Winters with his properties referenced above. It has been a blight on our charming community that most residents take pride in preserving.

I have been through a major flood which destroyed my original home and two fires that came uncomfortably close. We are a strong-knit community and rely heavily on neighbors and our neighborhood, especially in times of crisis.. We all agree the county needs housing, but there are many other possibilities that do not involve desecrating what is left of our little village.

For those of us that evacuated in the middle of the night in 2017 with only Arnold Drive as an escape route, the concept of SDC's pending increase in density is frightening enough without adding more strain to an already overtaxed transportation crisis.

Mr. Winters reputation speaks for itself. I have been watching him deliberately allow the collapse of his houses for decades while relentlessly pursuing his personal ambition to develop in our little village. He has vacancies in his commercial spaces for years.. Needless to say, he does not live in Glen Ellen and has no interest in our community other than personal financial gain .

This is in contrast in the great pride our neighborhood has taken in re-building and surviving the challenges of the last few years. Although we are quite diverse as individuals, we are all united in loving our village and willing to lend a hand to help support each other. Mr. Winter's development project does not belong here.

I strongly request the County remove the two Glen Ellen parcels from rezoning consideration.

Please feel free to contact me if you have any questions.

Thank you

Regards,

# Betty Brachman

BRE#00671304
Real Estate Broker
P. O. Box 1523, Glen Ellen, CA. 95442
C 415.630.0222 | O 707.939.1050
Betty@BrachmanGroup.com | www.BrachmanGroup.com

From: Dan O'Leary <doleary11@hotmail.com> Sent: Tuesday, February 7, 2023 4:58 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Opposing the Rezoning of properties listed in the DEIR

#### **EXTERNAL**

To Whom It May Concern,

As a homeowner located in the area in question, please let this email certify my opposition to the proposed DEIR: **GUE 2** 16450 Laughlin Road, **GUE 3** 16500 Cutten Drive and **GUE 4** 16050 Laughlin Road, located off Armstrong Woods Road, Scenic Corridor in Guerneville, CA. Among many of my concerns are the following:

- The fire risk is only getting worse. Evacuating our neighborhood now is already challenging at best. The thought of adding an additional 200+ plus homes built would be catastrophic.
- This is also a factor with the flooding of Armstrong Woods Road if we all must evacuate. Armstrong Woods Road is already heavily traveled in the summer particularly with tourists traveling to the forest, hikes, etc.
- Laughlin Road is very narrow in some spots, allowing for only one car to pass.
- Laughlin Road dead ends, which makes the egress/ingress problem of evacuation even more difficult.
- The present condition of the sewer system in the area currently has its own set of problems dealing with the current level of homeowners.

While I am sympathetic to the need for affordable housing, this is simply not a good place to do it. Our homes and livelihood are already compromised every year dealing with fire and flood threats. Please do not allow this massive project to threaten not only the beauty of the area, but quite simply our safety.

Sincerely,

Dan O'Leary 14735 Carrier Lane Guerneville, CA 95446 415-889-0043 doleary11@hotmail.com

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave.. Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

76.1

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

76.2

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

76.4

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

76.5

The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

76.6

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

76.7

Grable W. Duvall Address: 16300 Cutten Ir

Date:

Signature:

Letter 77

From: <a href="mailto:kdpmick@aol.com">kdpmick@aol.com</a> <a href="mailto:kdpmick@aol.com">kdpmick@aol.com</a> > Sent: Tuesday, February 07, 2023 10:17 PM

To: Eric Gage < Eric.Gage@sonoma-county.org>; dsnorthern@sbcglobal.net

Cc: bassman.pulley@gmail.com; klynnkrup@gmail.com

Subject: FOR-2, potential rezoning site



Thank you for the opportunity to once again reach out to share my concerns regarding the proposed changes in property zoning for Sonoma County. I listened with intent, the zoom meeting held last week. I retreated from that meeting with mixed feelings, but felt that for the greater good, active listening and participation was done by those gathered and members present. This brings us forth, to this upcoming meeting, February 13th. Once again, it is imperative that I advocate for the land so wisely purchased and established by my Grandfather in 1911, from the original land owners of Forestville.

I must agree and ask like that of Mr. Carr, have committee members availed themselves by visiting the potential rezoning sites. What seems necessary to ask oneself and that of the committee, were the wisest sites selected, and based on criteria that might bring forth additional questions and concerns, prior to the Feb. 13th meeting. An example of question, in knowing that many of the sites do not have easy accessible water, sewer, roads, transportation, all of which would cost thousands, and yet within a few feet, yards, even a mile, there is viable land that would have easy access to those needed items. In examining the sites, were these questions asked as they pertained to each site.

I have read the lengthy report, and would like to share why I believe that the site I hold known as FOR-2 is not a desirable rezoning site.

Priority to all of the following reasons is the clear fact that I, as the owner of FOR-2, and subsequent generations to follow, have no interest in selling the land we own. As mentioned, we have owned this land since 1911, and while over time it has had great crop growth and production, low growth and production, and mediocre growth and production, what is constant is the fact that we have owned the land, worked the land, and it remains, a working Gravenstein apple orchard and vegetable farm. Currently, as previously stated in my first email, we are in the process of regenerating this land, a process begun in excess of five years ago.

Secondly, this land serves as water shed for the areas directly surrounding the proposed property. This is needed to maintain the existing permaculture, house wildlife, and maintain the ecosystem. The lack of respectfully interfacing with the permaculture, will increase and indeed incrementally damage the ecosystems and environment causing irreparable damage and significant effects to the ecosystem.

77.1

We have reason to believe and know, through the artifacts and mapping done, that our land at one time was home to several Native Americans who would travel along the coast as they passed from southern Sonoma County up the coast to Fort Bragg.

77.3

Fourth, the report mentions that if FOR 2 were to be rezoned, that due to the density factors, it would be a useful site only if mitigated use of appliances, plumbing, land use and landscaping, limited growth on each site, etc. were to be followed. Is this a wise use of land, and good land management? I don't believe so. How does the committee measure greenhouse gases, emission hazards, unavoidable aesthetic cultural resources, for an unknown date in the future. Further, if to be developed, how is that managed and by what agency?

77.4

Fifth, which is now becoming a long list of concerns and reasons why not to rezone my land, is where it is located....or more accurately, where it is not located. Currently, there is limited regional transit, no SMART, etc. If allowed to be rezoned, and subsequently if the property were to be deemed needed, there would be increases in pollutants, significant changes in air quality, needs for increased infrastructure which would include water, sewer, garbage, police/sheriff, fire, road enhancements, traffic increases, and this is the short list. Impacts and indeed far-reaching unknown changes do not allow for informed or adequate decision making to be made.

77.5

Sixth, in studying the charts, analysis, more suggested outcomes, I have not been able to determine that there are any valuable gains to have my land rezoned. What I have learned through the studying of that data, is that it is apparent that FOR-2 is **not** a viable or useful piece of property to be rezoned. I fail to see positive outcomes. Why I would embrace the rezoning of my property is currently lacking, hence why I do not support this suggested rezone plan for FOR-2. Instead, the report continually uses the phrase significant impact. Does that translate to the unknown reality of what significant impact is, and would the county only stop growth once reached, which often and sadly means that significant impact was reached long before it is deemed time to stop development.

77.6

In summary, please reconsider the potential rezoning of FOR-2, my land and that of my family. We again humbly ask, to remove our land from the list. Thank you again for your committee work and the opportunity to have this communication.

Sincerely,

Karyn Pulley

From: Kon Zaharoff <konzaharoff@comcast.net> Sent: Tuesday, February 7, 2023 12:00 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Attn: Eric Gage (FOR-2) Housing Update

#### **EXTERNAL**

Eric,

The owners of FOR-2 posted an e-mail comment after the recent Zoom meeting. Please see below.

Question: has the County responded to this email from the owners? Question: will the County be removing FOR-2 from further consideration?

From:

**Nick Pulley** 

To:

PermitSonoma-Housing

Subject:

FOR-2 rezoning response

Date:

Thursday, February 02, 2023 11:42:33 AM

**EXTERNAL** 

Eric.

We are Nick Pulley and Kristen Krup and we live on the Van Keppel Apple Orchard in the middle of the Nolan/Mirabel/Giusti block of town (FOR-2 in the zoning plan). We moved here 5 years ago and have been on a mission to revitalize this property. A little history...Nick's great grandfather, Cornelius Van Keppel, started planting Gravenstein, Golden Delicious, Red Rome and Bartlett Pear trees in 1911. His daughters, Joyce and Barbara and their husbands, Hoyt Bockes and Herman Wiebe, lived on the orchard until their passing. The property is still owned by Nick's family, but the orchard was left unmaintained aside from yearly disking until we moved in spring 2018. We have been pruning trees, planting new trees and other annually producing plants, building vegetable beds, and clearing blackberries, poison oak and other overgrowth since we moved in. Since we are both fully employed as educators and performers we do as much work as we can on the property during weekends/summer vacation so while progress has been slower than we would like, we are very proud of what we've been able to accomplish so far.

We recently became aware of the rezoning plan this past week. While this information was startling in terms of the scale that the county wishes to use the land (283 new houses?!), to us it's nothing new that people want to use the land for housing. City planners and housing project managers have been contacting our family for decades. Thankfully there has been no mention of eminent domain in any of their recent communication.

Let us be clear in no uncertain terms:

78.1

## WE ARE NOT SELLING THE ORCHARD

. We plan on continuing to restore and expand the agricultural and environmental function of the land, with hopes of selling food to local stores and individuals in the near future, and eventually retiring here. This property has been in the family for 5 generations and will continue to be so.

78.2 Cont.

We also hope that this rezoning doesn't impede on our ability to use the land for agriculture.

If you have any questions you can email any of us listed below.

Nick Pulley - <u>Bassman.pulley@gmail.com</u>

Kristen Krup - Klynnkrup@gmail.com

Karyn Pulley (off site, owner) - kdpmick@aol.com

From: Larry Martin <a href="mailto:larry@martinwinetravel.com">Letter 79</a>

Sent: Tuesday, February 7, 2023 5:24 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Forestville growth plan

#### **EXTERNAL**

To who it may concern; before initiating discussions on growth in this unincorporated area, please consider local traffic, water and sewage concerns.

Forestville has the capacity to accept some growth, but the density that has been suggested is beyond the town's capacity to accept without adding capacity and fundamentally changing the character of our town.

Sprawling growth as has been suggested is expensive and inefficient. Please add needed housing closer to major transportation corridors, and large sewage treatment plants, not in far flung rural areas.

Regards;

Larry Martin 6710 Ellen Lane, Forestville (707) 328-5341

February 7, 2023 Letter 80

Marilyn and David Kinghorn P.O. Box 949 Forestville, Ca. 95436

#### To Whom It May Concern:

We are writing in regards to the rezoning that is planned in Forestville. The rezoning has just recently come to our attention.

We have been told that everyone living within 300 feet of the areas to be rezoned received a notice of intention. We probably live 301 feet away so we were not notified. Everyone in the Forestville zip code should have received this information because everyone who lives in the area will be affected when and if development occurs.

We also realize that rezoning areas for affordable housing is State mandated. What we **don't** understand is why this seems to have taken our Board of Supervisors by surprise, and now there seems to be a rush to get it done ASAP. We elected our supervisors to anticipate and be prepared for just such occurrences.

There is no question that there is a need for affordable housing. Growth is inevitable. However, knowing that growth is inevitable doesn't mean that our supervisors get to engage in a haphazard scatter shot to decide where that growth should be. The argument that Supervisor Hopkins makes that we should quickly rezone and worry about potential problems when the development takes place is not only ridiculous, but it's irresponsible.

We would like to direct your attention to Forestville site FOR 1, the Electro Vector site. It is a hazardous waste site. While the location seems ideal for growth it is a HAZARDOUS WASTE site. It should not be rezoned until it is safely cleaned up. That clean up, incidentally, has been put off for too long and needs to be dealt with. We have lived on Hughes Road for 39 years and the site has never been taken care of despite the fact that a school sits right under it.

FOR 4 is another potential rezoning site which is directly east from site FOR 1. To rezone an area for dense housing so close to a hazardous waste site is unthinkable and irresponsible. There are several other environmental concerns with regards to site For 4. At least one creek runs directly through the area and overflows its banks in heavy rain. The access to this property is nothing but a narrow, dirt driveway that runs off of Van Keppel on a steep curve. With the resulting increase in traffic, this would result in a dangerous situation for cars, bikes, and pedestrians.

Again, we think it is negligent and irresponsible to rezone and expect developers to take care of or even be concerned with the complex issues that face a growing community.

Possible problems and environmental issues need to be addressed prior to rezoning.

Some concerns:

80.1

80.2

80.3

1) Utility wires – underground
2) Water – more storage
3) Sewer – is there adequate capacity. Many residents have septic tanks
4) Roads – the obvious is that they are not designed for an increased population

A question: several years ago there was discussion about making a bypass around the town of Forestville. Is that being discussed along with the housing rezoning?

80.4 Cont.

80.6

80.7

And a final question: Why is Forestville set to increase population by 25% rather than the 10% of other neighboring areas.

#### Final thoughts:

Along with increased housing there are quality of life concerns. We need some open space and parks. A neighbor has been working to develop a skatepark for the youth of our community.

Affordable housing should take into account those that are actually going to live in our area. With that in mind we feel that organizations like Habitat for Humanity needs to be a part of the conversation.

Our request of the Board of Supervisors is that you put some thought and planning into what you are trying to accomplish. Do not push through a set of haphazard rezoning sites because you have not done your homework and you have not involved the community in a responsible, meaningful way.

Sincerely,

Marilyn and David Kinghorn

From: Scott Lietzke <sdlietzke@gmail.com>
Letter 81

Sent: Tuesday, February 7, 2023 4:04 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Draft EIR Comments: Housing Element Update

# **EXTERNAL**

I recently came to know via neighbors about this housing plan. For Forestville, there are a number of issues that adequately address in the report:

• Inadequate mass transit

• No policing or public safety investment

 No infrastructure to support 1652 new residents including roadways, sidewalks, grocery stores where's the traffic mgmt plan

• Forestville is ill-equipped to evacuate a significant rise in population during an emergency... there are a very limited of roadways in and out of the area and no double-lane roads

I find it troubling the manner in which these decisions are made. This committee produces a 601-page document that is unreadable by the average resident. It feels intentional that you're keeping this process and program undiscoverable and extraordinarily cumbersome for the community to engage.

There's plenty of equity in representation from NGOs and the like, but it's missing a critical persona of the community, residents that don't have an organizational affiliation... that's representation from people who live in each district with a single concern: the future of their neighborhood and quality of life.

81.2

81.1

Finally, I find it disturbing that we must learn about these plans via word of mouth. I haven't seen or received any notice or outreach. It concerns me that these are done in backrooms and hidden from residents and voters... especially by unelected officials.

Scott Lietzke 9215 Carols View Lane Forestville, CA 95436 February 7, 2023

Permitsonoma-housing@sonoma-county.org

RE: Draft EIR comments: Housing Element Update

from: Stephanie Blumenthal, 3501 Ross Rd Sebastopol CA 95472 (P.O. Box 462 Graton CA 95444)

Following are my comments on the DEIR (3 pages).

# 1. GRA-2 (3400 Ross Road)

You are proposing, per page 2-24 of the DEIR, to change the zoning of GRA-2 from M1 (limited urban industrial) and F2 (flood pathway) to Workforce Housing, and further, to designate it for maximum "medium-density" housing of 24 units per acre(!). Nothing on this site has changed to justify this change. It has been used for limited urban industrial purposes since I moved here in 1987. While the site is not pretty, it serves its intended purpose and leaves the sensitive land it is on and surrounding land more or less intact. This "vacant land" has had friends or family members of the original owner, Tom Sullivan, living there as caretakers for years, including disabled people, hardworking truckers, and others, hence the provisional trailers. I believe this property is now part of a living trust. M1 zoning states that Development in the M1 zone is limited in scale by such factors as incompatible adjacent land uses and adverse environmental impacts.

82.1

The current F2 zoning for GRA-2 is because it does indeed lie within a floodway, and this is shown on your map of the site in the DEIR. F2 zoning states that no use shall be approved within the floodway that will significantly increase the flood hazard or significantly affect the carrying or storage capacity of the floodway. Further, it states that uses allowed within the base district with which this district is combined shall be permitted subject to the provisions of section 26-56-030, except that no new permanent structure nor structure intended for human occupancy shall be permitted within the floodway. Changing the M1, F2 zoning would be detrimental for additional reasons, towit:

82.2

GRA-2 is situated in a Riparian corridor, the Atascadero Watershed/marsh, which is home to a wide variety of water fowl, fish, reptiles and amphibians. Of these, coho salmon, steelhead trout, red legged frog and California freshwater shrimp are threatened or endangered species. There are also endangered plants in the area including the Pitkin Marsh Lily, which could be further endangered through development of this highly sensitive area and invasive plants. 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 increase flooding, and when we are facing climate change, this just doesn't seem to be in our best interests.

82.3

The northernmost end of the GRA-2 site is also a major point of drainage from Ross Road to the Atascadero watershed.

Ingress and egress to GRA-2 involves crossing the Joe Rodota bike path, which could increase the risk of pedestrian/cyclist-vs.-auto accidents.

2. <u>Sewer Hookup for all proposed Graton housing developments</u>
The DEIR states that sites were selected based on the availability of public sewer.

-Graton has a small, minimally accessible treatment plant. Its treatment capacity is 140,000 gallons per day (gpd) per LAFCO and the Graton Community Services District (GCSD).

-In 2018 there were 632 equivalent single family dwellings (ESDs) connected to Graton sewer, which per GCSD were estimated to generate 70,000 gpd of wastewater for treatment (using the GCSD's estimate of 110 gpd). This did not include wastewater from 10 units plus their ADUs that were built in Graton around this time.

-Also around 2017/18, it was proposed that Occidental's sewage (273 ESDs) be trucked to Graton. It was estimated this would add about another 30,000 gpd of wastewater for treatment at the plant. The idea of trucking sewage and offloading it into a "hole" at a Graton sewage lift station alongside a bike path (also, ironically, located at 3400 Ross Road) was not viable, and since then, the county has spent \$156,000 for a feasibility study to install a pipeline to bring sewage from Occidental to Graton. Funding for this project (around \$6 mil, I think) from the State Revolving Fund is anticipated in 2024, with construction to begin in 2026-2028. This will bring the Graton plant's daily wastewater treatment up to about 100,000 gpd.

82.5

-In 2020, the GCSD appears to have entered into an "out-of-district" agreement with Manzana Products on Green Valley Road and connected them to the Graton sewer. Their wastewater is estimated to be 37,000 gpd, which with Graton and Occidental would bring the plant to just about its capacity of 140,000 gpd.

-In addition, the 2020 General Plan recommends 33 existing residents in Graton be annexed into the district. I don't know that any of these folks have been connected as yet.

This does not seem to leave plant capacity for 5 "medium-density" housing developments of 20-24 units per acre.

## 3. General comments on all proposed Graton sites

There is no grocery store in Graton; the nearest one is 3 miles away. We already have traffic issues with large trucks going to and from Traditional Medicinals, Manzana Products, and various wineries traversing our narrow rural roads. We have water issues with new vineyards going in frequently; ask the people whose wells have run dry and had to drill new wells.

82.6

In closing, someone suggested we offer constructive feedback rather than simply voicing opposition. So, I spent the last couple of months trying to find a place for an old friend with limited income who had to short-sale her home of many years. There was plenty of availability in Santa Rosa with the many, many new developments going in, but the problem is that developers are only mandated to offer a percentage of affordable units. For example, one apartment building with 120 units had plenty of availability but only 16 units in an "affordable" price range; the rest were rentable at the market rate of \$32-3700 per month. Also, some of the cheaper apartments were for farm workers only or required a monthly income 2.5 times the monthly rent, which is a helluva' lot for seniors and service industry employees. Perhaps the governor needs to come down harder on the developers and landlords who are making tons of money off this megahousing push.

82.8

Thank you.

From: Alicia Chazen <aachazen@yahoo.com> Sent: Wednesday, February 8, 2023 1:59 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Draft Housing Element EIR - Forestville

# **EXTERNAL**

Eric,

I am a resident of Forestville and a member of the Forestville Planning Association. As you know, there has been a lot of conversation in the community regarding the possible re-zoning of 6 lots in Forestville and the potential impact of the re-zoning. I'd like to add my comments to be recorded and included in the staff/consultant report that is presented to the Planning Commission.

While it is clear that there is a desperate need for more and affordable housing in Forestville, Sonoma, and California as a whole, the proposed re-zoning of the 6 specific lots in Forestville is concerning. In my opinion, these are the most concerning issues:

83.1

- In an emergency, the evacuation corridors from Forestville are 116 and River Road, both of which are curvy, 2-lane roads. They would be crowded and potentially dangerous under current conditions. Adding up to 1,652 people would only add to that condition.
- The roads serving the proposed lots may not conform to Cal Fire and Fire Department requirements for access. I'm concerned that these two entities have not been consulted and asked for their analysis of the potential impact and non-conformity.
- It is not clear that our existing water and sewer infrastructures are adequate to support added development. I'd like to see the Water and Sewer district reports on this matter.
- |03.2
- It is my understanding that there have been requests in the past to expand the boundaries of Forestville, which were rejected due to there not being adequate infrastructure to support added housing units. This conflicts with the current proposal of adding up to 1,652 residents.

83.3

The 6 proposed lots in Forestville represent an outsized proportion of the number of potential units being proposed for the County as a whole. Considering our relative lack of infrastructure, why aren't Santa Rosa, Petaluma, Windsor and other larger, more developed communities taking more of the percentage?

83.4

My career is in residential construction, and I am a strong proponent of building more housing units in my community. I would like to see these units added in locations that do not have a negative health and safety impact on Forestville, and that are added in response to Forestville's identified needs and desires for community development.

Thank you, Alicia Chazen From: Amanda Shone <amandashone@gmail.com>

Sent: Wednesday, February 8, 2023 7:11 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Comments on Sonoma County Housing Element

## **EXTERNAL**

#### To whom it may concern:

I am writing on behalf of myself and my spouse who reside in Glen Ellen and have concerns with the requests that are being reviewed to rezone parcels 054-250-057 and 054-250-084 (GE-1 and GE-2). The current owner who is making these requests does not currently keep his properties in good habitable conditions and has proven he is not invested in the community with his past and current actions. Please take this into consideration with your decision making. The small village of Glen Ellen will be drastically changing in the near future with the SDC and the infrastructure etc. really isn't there for this kind of downtown population.

Thank you for your consideration, Amanda Shone and Caden Long

# Amanda Shone

Sotheby's International Realty 793 Broadway, Sonoma 95476 DRE# 01977204

Phone: 707-338-8241

E-mail: amandashone@gmail.com

From: Angelica Jochim <angelica.jochim@gmail.com>

Sent: Wednesday, February 8, 2023 11:02 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** housing unit development in West County

## **EXTERNAL**

To whom it may concern,

I am terribly concerned about the proposal to add 1,480 housing units to Forestville, as part of the 3,881 units proposed for unincorporated Sonoma county. Really?

I am all for workforce housing, yes, when it's thoughtfully planned and in keeping with the nature of the community. This plan though, is sloppy and badly thought out by people who do not know the area.

The number of housing units is far too many for a little town like Forestville, which has no infrastructure in place to accommodate them, and the locations are poorly chosen. Please scale down this plan, and take the time to create a plan for new housing that is harmonious with the local environment.

Thank you, Angelica

2/8/23 Date:

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

86.1

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

86.2

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

**|86.3** 

The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

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Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

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The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

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I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

86.7

Address:

TRUEEN L. LunigA 16399 WATSON Rd Guerrow The CA 95446

Date:

Feb 8, 2023

Signature:

Date:

Letter 87

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave... Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

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There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

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The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

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87.7

Name: Caitlin Marigola

Address: 16320 Valley LN Gueneville Date: 2/8/2023 Signature: Couth Manigold

Date:

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

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Name

Addross:

Wistople Do wolf 16320 Valley LN

Date:

2/8/2

Signature:

Date:

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

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89.7

Name: FRANK ZANCA

Address: 14725 JANET LANE, GUERNEUILLE

Date: 2/8/2023

Signature: Frank Janoa

From: hermanjh@aol.com <hermanjh@aol.com> Sent: Wednesday, February 8, 2023 3:03 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Cc: hermanjh@aol.com

Subject: Guernenville Four Locations Submitting my Objections to Rezoning those Parcels!

#### **EXTERNAL**

Dear Permit Sonoma.

I am submitting my Objection of the Rezoning of the properties listed in Sonoma County Draft Environmental Impact Report (DEIR) specifically, GUE -1 which is 14156 Sunset Ave., GUE-2 which is 16450 Laughlin Road, GUE-3, 16500 Cutten Court, and GUE-4 which is 16050 Laughlin road, and all in Guerneville. I have given my Objections on each parcel below. Thank you!

90.1

1. 14156 Sunset Ave., is located above the Guerneville Library, and off of Woodland Ave., in several areas only a single car access, as Woodland is a narrow county road way! As you approach the top of Woodland you take a right turn to Sunset Ave., which is a ridge top with about 12 house's currently in the neighborhood, and a little wider street and as you drive about two blocks there you hit a road way that is a dead end, where you come to the Subject property. Which consists of about 1.3 acres of land at the end of a mini country road. In order to exit the subject property you then go down Sunset Ave., to Morningside Drive, to Palo Alto, this road area is much of a single car access.

90.2

As I describe the ride going to the subject property, as I mentioned several times above the residents need to be very careful about going up and down this road. I feel the infrastructure, water, sewer, are major issues and even not possible, plus when we speak about evacuation from fire, would be a major problem, if there where more housing built in the neighborhood, the addition of more residents would be a major concerns. For the current location of this parcel, I would be totally be against this parcel being rezoned.

90.3

2. 16500 Cutten Court is a very light used road, plus currently has a single family dwelling on the land and sits on a level ridge top parcel with great views. To get to this site, You turn left off Armstrong Woods Road, on to Laughlin Road, a country road, where two cars passing each other can be a little tight, and then you drive up Cutten Drive, where some of the road, only has access for one car. As you get to the ridge top, there are about 18 homes in the neighborhood, and as you drive west on Cutten Drive, again is narrow in some parts, until you get to the subject property.

Based on the location, plus the infrastructure requirements, access, and the possible evacuation I find this property, to where it should not be re zoned.

3. 16050 Laughlin Road, is located right off Armstrong Woods Road, in fact it is the second property right off Armstrong. Please note that 16500 Cutten Court, access to that property is the same road, or Laughlin Road, where, currently this road is used for access, to enter the Guerneville Elementary School, which has 290 students and the school buses and parents bring there children to school already creates during the day heavy traffic. In addition Laughlin Road, is a artery of access, with about about 200 homes that already use Laughlin Road, plus the School parents, is a lot of traffic.

90.4

Now you consider rezoning Cutten and the subject property here with a possible 150 units, does not seem to Feasible. This subject property does consist of five acres and borders Fife Creek, which makes a good portion of this property in the 100 year flood zone. Plus on this parcel was to only have access off of Laughlin Road, would really cause and increase a traffic issue! If they only have one exit option?

I would be against any current rezoning of this parcel, yet I do feel you maybe could place some homes on this land but nothing then what is being considered. So Traffic, infrastructure, flood, as major issues, in addition I have seen that the current land takes much of the high water when there is possible flooding.

90.4 Cont.

4. 16450 Laughlin Road, again to access this property, you are coming from Armstrong Woods Road, on to Laughlin Road, and driving about a 3/4 mile to subject property, which again consists some parts of getting to the subject property in areas of only one car passing those areas of the road. Meaning that one car needs to wait as the other passes by. Again we are using a road to get to this property, and about 1/4 mile before arriving to this property is the second property being proposed and third is closer to Armstrong Woods road.

What is surprising, the rezoning the county is calling for is proposing some 200 plus units doubling the residents, in a neighborhood that its current residents are always careful on driving these roads.

I am also against the rezoning of this parcel for the reasons of infrastructure, flooding, traffic, and over populating the Armstrong Valley! The parcels, just do not pan out with the problems of the road, and even the possibility water and the connections of sewer.

I have lived in Guerneville, for 53 years and been a Real Estate Broker for 50 years. In that time have seen many changes and needs. Yet this proposal of rezoning, produce by PRMD is scary for the community and turly we do need affordable housing, but sorry to say the locations marked just will at this time not work, when you have them all on the North side of Guerneville, all having one car lanes.

In closing if you have any questions from me, feel free to call me at my cell at 707-953-1956 for further conversation as well.

Respectfully,
Herman J Hernandez
Hope this can help. Best, Herman
PS So sorry for the delay! Been overwhelmed with issues.

Herman J. Hernandez, CRB, SRES Broker-Owner Hernandez Realty Co. P.O. Box 105 Guerneville, Calif. 95446 Office Phone 707-869-3865 ext. 11 www.russianriverhomes.com CalBRE #00455770

From: Jonathan Teel <JTeel@alteryx.com>
Sent: Wednesday, February 8, 2023 7:57 AM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org> **Subject:** OPPOSING the Proposed DEIR GUE 2, GUE 3 and GUE4 Site Projects

# **EXTERNAL**

To Whom It May Concern,

As a homeowner located in the area in question, please let this email certify my opposition to the proposed DEIR: **GUE 2** 16450 Laughlin Road, **GUE 3** 16500 Cutten Drive and **GUE 4** 16050 Laughlin Road, located off Armstrong Woods Road, Scenic Corridor in Guerneville, CA.

I am extremely concerned about the following:

- This is also a factor with the flooding of Armstrong Woods Road if we all must evacuate.
   Armstrong Woods Road is already heavily traveled in the summer particularly with tourists traveling to the forest, hikes, etc.
- Laughlin Road is very narrow in some spots, allowing for only one car to pass.
- Laughlin Road dead ends, which makes the egress/ingress problem of evacuation even more difficult.
- The fire risk is only getting worse. Evacuating our neighborhood now is already challenging at best. The thought of adding an additional 200+ plus homes built would be catastrophic.
- The present condition of the sewer system in the area currently has its own set of problems dealing with the current level of homeowners.

While I am sympathetic to the need for affordable housing, this is simply not a good place to do it. Our homes and livelihood are already compromised every year dealing with fire and flood threats. Please do not allow this massive project to threaten not only the beauty of the area, but quite simply our safety.

Sincerely,

Jonathan Teel | Strategic Account Executive

Alteryx, Inc.

p: 415-335-1656

jteel@alteryx.com | www.alteryx.com



Letter 92

From: Laurel Anderson <a href="mailto:lmanderson@tlc4kids.org">lmanderson@tlc4kids.org</a> Sent: Wednesday, February 8, 2023 5:55 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Housing element update

# **EXTERNAL**

Hello,

I live at 9771 Argonne Way, Forestville, CA. 95436

I do NOT support the proposal of new affordable housing units/complexes resulting in 1,652 new residents.

There are many alternate options. This city cannot support this many additional residents, nonetheless the environmental impact to the city of Forestville. Traffic, public water and sewage would affect our area greatly. This rezoning proposal would ruin this small community when there are larger areas that would not face such a substantial impact as the town of Forestville. This is historically known as, "Russian River Resort Area," even noted on Highway 101 signs. This would NOT be a vacation/resort area for visitors and residents if the rezoning and permit process were to proceed in the area of Forestville.

This area will not support this. We will stand strong and tall and will not allow proposals and rezoning solely based upon environmental impact.

Please consider this a community that cannot support a project of this magnitude.

Sincerely,

--

Laurel Anderson, MA
Social Worker
TLC Child and Family Services
821 Mendocino Ave,
Santa Rosa, CA 95401
Imanderson@tlc4kids.org



Letter 93

From: Leigh Hall <leigh.hall@sbcglobal.net>
Sent: Wednesday, February 8, 2023 2:47 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Comment on Sonoma County Housing Element proposed rezoning of parcels #054-290-057 and

#054-290-084 (GLE-1 and GLE-2)

### **EXTERNAL**

93.1

I request that you remove these two parcels from rezoning considerations:

1. These parcels are in the middle of our small town, which cannot be considered an urban area or an area near an urban area.

93.2

- 2. Public transportation is very limited.
- 3. The BOS just approved an EIR for at least 620 homes about 1 mile from these parcels (at the Sonoma Developmental Center) and the property directly across the street from these sites has very recently been built out to house a number of new dwellings, both of which will result in considerably more traffic and need for more resources in our small town.

93.3

I urge you to remove these parcels from the proposed rezoning.

Thank you for your consideration.

Leigh Hall Glen Ellen, CA From: Michael Cuoio <mcuoio@gmail.com> Sent: Wednesday, February 8, 2023 5:21 PM

Letter 94

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Comments on re-zoning of 6 lots in Forestville

# **EXTERNAL**

Attention; Eric Gage

Dear Sir,

As a citizen of Forestville and former member and president of the Forestville Planning Association, I wish to offer the following comments regarding the District 5 Draft Housing Element EIR.

I welcome the opportunity to provide more affordable housing to our middle-income citizens. They -- and their welfare -- play an important role in our -- and indeed in most -- communities. I do not, however, endorse moving forward with these plans until there is a concurrent commitment, funding, and approved plans to upgrade all of the infrastructure that would be impacted by the addition of hundreds to thousands of Forestville residents. Specifically, I request that the County and State implement the existing and approved plans to install a bypass system on Highway 116 in Forestville, the associated round-about at the intersection of 116 and Mirabel road, and already promised Transportation and Public Works upgrades to downtown Forestville, including crosswalk systems and sidewalks.

94.1

I also can envision impacts to our schools, which should be addressed if, and as, you move forward with the project.

94.2

Of course, there are many details to which I am not familiar and cannot rationally comment, but I do wish to emphasize here the responsibility of the State and the County to fully address, plan and fund for the inevitably required upgrades to all our local infrastructure.

94.3

Very Respectfully,

Michael Cuoio

From: Rick Sanfilippo <Rick@sanfilippoins.com> Sent: Wednesday, February 8, 2023 10:21 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Cc: corsanfilippo67@gmail.com; Lynda Hopkins < Lynda. Hopkins@sonoma-county.org >;

info@sweetwatersprings.com; steve@blackpawdog.com

Subject: Sunset Avenue, Guerneville 30 unit low income housing project

Importance: High

# **EXTERNAL**

Eric – my wife and I live on Woodland Avenue at Sunset Avenue.

What I am learning is that there's the consideration of putting a 30-unit, low income, housing structure on Sunset Avenue. My concerns and thoughts-

My concerns are the practicalities of the location itself. Did anyone actually drive to this site to see what is being considered? If not, I implore you to make the drive. I have a video that I can share taken from my cell phone from our small sedan. I'm lucky to keep the car on this one lane surface street without hitting an edge of the road. Now imagine with 30 units the number and size of vehicles that will be traveling up and down this hill. Imagine all the vehicles that must pull over to the side of the road, if they can find room!, to allow another car to go by. Congestion on a one lane road! This is what we deal with now on a daily basis without this structure! There is no way that, if this project passes, that all construction vehicles are going to make it up this steep hill to the project for how long? 2 – 3years? The construction vehicles will destroy our roads!

95.1

Weather, I'm sure has to be another consideration because of all the moisture, not only in the air but the ground as well from a ground stability standpoint.

We're going to lose our trees that have been there for 100 years? Not fair to the neighborhood.

95.4

My wife and I are extremely disappointed that we **received** absolutely **no correspondence from any government agency of this project!** Why is that? Is it because it's trying to be fast tracked and there's no kickback from the community? Is it because Guerneville is an unincorporated area, so we have less of a voice in the matter? As I understand it, Lynda Hopkins(supervisor to our area) has stated that her hands are tied. Why? She's our representative, our mouthpiece and she needs to step forward and voice the concerns of the community of this particular site. Don't say "your hands are tied". There's always something that can be done and as our representative, she needs to step up and do what she was voted in to do. I have no qualms about meeting the necessary people at the site for a calm, practical conversation.

95.5

<u>My thoughts</u>- This is not a case of NIMBY(not in my backyard). There are so many other sites in the Guerneville area that could accommodate this type of **structure....IN THE FLATS!** 

95.6

The Feds, the State, the County, whomever, were provided this money. I'm sure some of my tax dollars. I understand that they have to spend it, but use it wisely. Let common sense prevail here. Don't spend money just to spend money as only the government can.

Thank you for your time in this important/personal matter.

# Rick Sanfilippo

Rick Sanfilippo

Sanfilippo & Sons Insurance

P.O. Box 471

San Jose, Ca 95103

P - 408- 295-1195 X 235

License# 0540404

**From:** <u>r.grandmaison@comcast.net</u> < <u>r.grandmaison@comcast.net</u>>

**Sent:** Wednesday, February 08, 2023 12:10 PM **To:** Eric Gage < <a href="mailto:Eric.Gage@sonoma-county.org">Eric.Gage@sonoma-county.org</a> **Cc:** 'Dylan Smith' < <a href="mailto:dylan.smith@goat.com">dylan.smith@goat.com</a>

**Subject:** Objection to Proposed Housing Site GUE-1 for Rezoning Project

# **EXTERNAL**

Dear Mr. Gage,

I'm writing to you with concerns about the proposed site GUE-1 for the low-income affordable housing rezoning development that is being mandated by the State of California for development in unincorporated portions of our county. I believe the site is unsuitable for many reasons, including the following:

- 1. The site is currently being used heavily by the Sweetwater Springs Water District and has two large water tanks on the property, along with many accessory structures/buildings to provide water treatment and emergency power and fuel to power the pumps and related equipment for the facility. These two large tanks provide potable and fire-fighting water for all of Guerneville and placing many people on the same site would lessen the viable area for housing, as well as create the potential for vandalism or lack of immediate access to the water facility during times of maintenance and emergencies. My house is the nearest house to the current entrance to the site and I regularly see Sweetwater Springs employees in the small service trucks having to make 3-point turns on the narrow road into the facility many times throughout a work day. Having additional cars on the site could potentially serve as an obstacle for immediate access to the site, in particular during wildfire season. Security fencing around the facility deters vandalism currently- however, the lack of visibility provided by the topography and tree canopies provide even more.
- 2. The roads leading up to the site are all very narrow roads on hillsides, which would make widening them for two-way traffic impossibly expensive and difficult. Currently it's very common to encounter opposing traffic on Sunset Avenue and it requires one vehicle to stop, and back-up in reverse up the hill to allow the upward moving vehicle access to the site's driveway. Many of the roads in the neighborhood share this narrowness issue, often with houses within a few feet of the pavement, given their construction date prior to the creation of the Sonoma County building department.
- 3. None of the roads in the area have any sidewalk, curbs, or gutters or proper ADA-compliant curb cuts and approaches. The edges of the pavement area is also very uneven, often hidden by overgrowth of ivy and other vegetation or debris. Residents who walk the uneven pavement now (from continued repairs to the water and sewer systems) must negotiate their way on the asphalt on very uneven surfaces in some areas. We have witnessed people tripping and falling on the road from the condition. It is not a user-friendly road system for pedestrians, though it's heavily used by many for exercise, dog-walking, and the walk into town. This particularly true in the summer time during the peak of vacation rentals when larger groups of people use the roads as a walkway. Putting the vehicles in motion for 78 people/30 units, with that type of pedestrian use is an invitation to conflict and injury.

96.1

Letter 96

96.2

- 4. Though it's a quick and fairly convenient location for a walk into town, the same is not true for the return trip. According to the lidar contours from the Sonoma Vegetation Map site, the contour elevation of the site at the water towers is at 252' and the elevation at the bottom of the hill, where Woodland Drive meets Armstrong Woods road, is at 62'. The roads of Palo Alto and Woodland drive rise quickly from Armstrong Woods Road at an near 11.84% grade (740' run and 88' rise), exceeding an ideal maximum slope of 1:12 used for ramped access for wheelchair users. The elevation at the bottom of the hill, at Woodland Drive is shown as 62' from that same lidar map. Even a person in reasonably good physical shape might have difficulty with the walk. That is, of course, complicated by negotiating the pavement with oncoming vehicles, and inclement weather when it occurs. It looks conveniently located to downtown Guerneville, for shopping or work or bus stops, on a flat map, but when considering the elevational difference between the site and town, it tells a very different story. The other access road, Palo Alto Drive, is even narrower and more curved and as steep as the Woodland approach.
- 5. Given the roadway grades and the narrowness of the roads, many delivery vehicles have a difficult time negotiating the neighborhood. Semi trucks cannot make deliveries to the neighborhood. Any large construction vehicles will have to be severely limited or off-loaded in town and materials moved to the site via smaller shuttle trucks. Even the local fire trucks and ambulances have difficulties getting around the neighborhood, in part because people park along these narrow roads, further blocking access. I've heard our local fire department vehicles blaring their horns for long times trying to capture the attention of local residents to move vehicles that prohibit the movement of their emergency vehicles on our roads. I fear that with 78 people, guest parking may well overflow into the neighborhood, further complicating the situation- with the clear evidence of this happening during big summer events when visitors to the area look for nearby parking spaces in our neighborhood, making parking for local residents in front of their own homes, sometimes impossible.

I am an architect (C22127) as well as a long-time faculty member at Santa Rosa Junior College. I have lived in Guerneville for over 33 years and support changes that better the lives of others. I believe in high-density housing projects and recognize the immediate need and importance for housing for everyone in the county, regardless of economic status, but in particular for those who need accommodations due to lack of income or due to physical limitation of abilities. I would welcome such housing IF this site was appropriate for the location, but given all the issues above, and other less significant ones (like the dissimilarity to the current housing in the neighborhood) I must object to the proposed project on the GUE-1 site on Sunset Avenue in Guerneville.

Respectfully,

Robert Grandmaison, Architect (C22127) 14160 Sunset Avenue Guerneville, CA 95446 96.4

96.5

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

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The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

97.6

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

97.7

Name: Ashley Nolan
Address: 16300 Cutten Drive
Date: 2.9.2020
Signature: Oscilly & Moan

From: Doug Thorogood <a href="mailto:com/dmthorogood@yahoo.com/dmt

Sent: Thursday, February 9, 2023 2:25 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** 14156 Sunset Avenue, Guernevillle

# **EXTERNAL**

To Whom It May Concern - I am writing to express my great hope that you will not allow the development of a 30 unit property on Sunset Avenue. I can not think of a worse site for this proposal in all of Sonoma County. That hill, with its very narrow and quiet streets would be ruined with the addition of 78 people up that narrow and winding road.

There are numerous locations in Sonoma which are designed to accommodate that amount of traffic. Please vote against this development on Sunset and find a better location. Thanks very much for your time and consideration.

Doug Thorogood 14119 Palo Alto, Guerneville 98.1

Letter 98

From: jeanne beanne <jeannezbeanne@hotmail.com>

Sent: Thursday, February 9, 2023 6:01 PM

**To:** Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>; info@sweetwatersprings.com;

PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Low income housing on Sunset Avenue

#### **EXTERNAL**

I am writing about the proposed 30 units for 78 people at 14156 Sunset Avenue, Guerneville. This is a one lane road on a hill in a single family residential area.

I believe the low income housing is needed but I also believe this is an inappropriate place to build on such a scale. It would impact the roads and cause many

problems for the people who live on Morningside, Palo Alto, Sunset and Woodland Avenues. If this was only a few homes, like what is currently built here, it would

be doable but this scale is out of proportion of this area. Please find a better location to complete this project.

Thank you for your consideration,

Jeanne Reggio

Morningside Drive

Guerneville

From: Kenneth Koutz < khkoutz@gmail.com> Sent: Thursday, February 9, 2023 6:13 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Draft Environmental Impact Report Publication (DEIR)

# **EXTERNAL**

The changes in zoning proposed for Laughlin Road and Cutten Court in Guerneville were clearly developed by someone with no knowledge of or concern for the area. There are numerous problems:

- 1. Most of these streets are two lanes —or less —wide with no shoulders or pedestrian walkways.
- 2. All three lack a second way to leave the area. One road, the northern extension of Valley, is a poorly maintained private road, "paved" in dirt or whatever reused pavement that was available. There are many potholes. The road is frequently blocked by delivery trucks or smaller vehicles in various states of disrepair. It cannot be considered an escape route.

100.1

- 3. The only road that has two full lanes is the beginning of Laughlin Road. Some parts of the remaining roads are one and one-half lanes, at best. None of these have pedestrian or bike lanes.
- 4. The corporation yard for the adjacent vineyard, served by Laughlin Road, gets large, multi-trailer trucks, leaving no choice for cars on the road but to pull on to the unimproved dirt frontage —or down into a culvert.
- 5. These three roads share a common deficiency: they originate at or require the use of the exit road from Guerneville School. Imagine the turmoil of a forced evacuation of the area. Not only will you have 100s of vehicles leaving the newly built dense housing, you will have parents trying to get to Guerneville School to pick up their children.

100.2

6. Even if you ignore the restrictions to entry and exit from the immediate area, they all empty onto Armstrong Woods Road, virtually a dead end road. Turning north from Laughlin Road, the road ends at the Park. On paper, there are two roads off of Armstrong: Sweetwater Springs, a terribly windy road subject to potholes and mudslides, frequently closed. The other is Rio Nido Road. This is barely one lane wide. Cars sometimes must try to back up, if another car is encountered.

100.3

If you turn south onto Armstrong you may be no better off. Armstrong can be backed up from the River Road intersection. In winter, Armstrong can flood, making passage impossible.

Adding over 200 units, plus 200 or more vehicles, to already inadequate infrastructure is a recipe for trouble, even without the presence of the school. With the school, it is a recipe for disaster. If denser housing is required in Guerneville, there are many locations along River Road that do not pose this myriad of problems: across from Safeway there are burned out stores; behind the gas station in the same location, there is a lot that used to house a motel; along the "strip" leading into town there is at least one—and maybe more—vacant lots; west of central Guerneville on the south side of River Road is the large lot proposed for a hotel or glamping (residential units would be a much better idea); across the River on CA116 on the south side is a little used lot that seems to be—sometimes—agricultural. These locations also provide ready access to shopping, transit and medical needs.

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

Sent: Wednesday, February 22, 2023 11:08 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Cc: Eric Gage < Eric.Gage@sonoma-county.org>; Greg Carr < Greg.Carr@sonoma-county.org>; Larry Reed

<Larry.Reed@sonoma-county.org>; Martin Sessi <sessimest@aol.com>; Emma Mann

<soapcauldron@sonic.net>; Don Seppa <donseppa@gmail.com>; Lyndi Brown <lyndi@sonic.net>; R.

Savel <skypilot4u2@yahoo.com>

Subject: Attn: Eric Gage: #1 Penngrove PSZ comments - PRMD DHE DEIR - Permit Sonoma Rezoning

Housing SItes for Housing Update

# **EXTERNAL**

#### 2/22/22

Attn: Eric Gage
Permit Sonoma
2550 Ventura Avenue
Santa Rosa, California 95403.
(707) 565-1391
eric.gage@sonoma-county.org

Permit Sonoma Rezoning Housing SItes for Housing Update - DEIR comments

The EIR consultant stated that the agency (SCWA) "did not provide any system information" for the PSZ and relied on the 2016 SCWA SSPM update.

The 2016 SCWA SSPM sewer capacity evaluation only addresses constraints due to i/i sources <u>but does</u> not address the actual physical corrections needed as already identified in the SCWA 2002 PSZ update for PRMD's GP DHE.

The 2016 SCWA SSMP analysis is an i/i study, a single purpose exercise intended to identify areas of storm water infiltration into the collection system and pose future remedies. In that sense it is uni-dimensional and not intended to be used as a systemic multi-dimensional, multi variant systemic analysis.

The SCWA SSPM 2016 does not take into consideration the established existing baseline data regarding the physical limitations of the trunk line collection system and estimated capacity constraint under full land use build out conditions as identified in the SCWA 2002 system capacity evaluation, notably the "required" replacement of line "L", and line "P. as already identified in SCWA's 2002 PSZ system update for PRMD's proposed GP DHE (April 20, 2001)

The 1990 and SCWA's 2002 update have governed the limitations on any land use plan density increases in the PSZ since 1990. It established no extra hook ups for increased land use densities beyond what was established in the 1984 Penngrove Specific Plan and did not change during the 2020 County General Plan update and still exist to present day.

The County has no records of any significant land use density amendments to the General Plan or the Penngrove Specific Plan to increase parcel densities in the PSZ since 1984, <u>none</u>. The same land use element densities used during the 2020 General Plan update are still in effect now.

During the 2020 General Plan update PRMD used the latest PSZ figures from SCWA for PRMD's proposed GP DHE (April 20, 2001) SCWA reported - The current loading is calculated to be about 1,251

people based upon the current master list load of 471.29 ESDs using PRMD's SFD factor of 2.655 persons per ESD factor. For example: 471.29 ESDs X 2.655 persons per ESD = 1.251.12 people within the sewer district as of November 4, 2002.

The 2016 SCWA SSPM and PRMD DHE consultant used the 2016 ESD count of 517 ESDs, <u>however</u> SCWA's current 2021 ESD count is 550.

The County land use element estimates a population of 1300-1450 people at full build out conditions under existing collection system conditions.

Using PRMD's 2021 DHE EIR SFD factor of 2.6 people per ESD X 550 ESDs = 1430 people which is close to the maximum upper end of the limitations of 1300-1450 people for the existing system until the replacement of *line "L"*, and *line "P"* as identified in the 1990 study, SCWA's 2002 study update, 2020 General Plan Housing Element, and LAFCo.

The 2016 SCWA SSMP states: "The PSZ currently has an Agreement with the City for the City to treat the equivalent volume of sewage for a maximum of 3,000 people. 2010 Census <u>population</u>: **2,522** <u>people</u>."

However the "2010 Census population of 2,522 people" refers to the entire population in the Penngrove area outside the PSZ combined with the population inside the PSZ. How many people did the 2016 SCWA SSMP analysis assume were within the PSZ in 2016?

The 2016 SCWA SSMP states: The PSZ was built in 1992 however the 1st capacity study was done in 1990, two years BEFORE it was built? This is because the PSZ was built in 1975, not 1992!

There is substantial evidence on the administrative record concerning reasonably foreseeable "worst case" existing condition limitations of the sewer line collection system constraint as *indicated by PRMD's statement* in *Sonoma LAFCo's City of Petaluma MSR (Municipal Services Review).* "PRMD reports that to meet future demand, the existing trunk sewer line between Penngrove and Petaluma will require replacement." "According to the PRMD's calculations, the PSZ has adequate capacity (maximum service capacity for 3,000 people) with sewer line improvements."

The cost of replacement of *line "L"*, and *line "P"* has already been identified and included in SCWA's annual budget in the past. However subsequently the budget item was withdrawn diverting the funding in favor of pursuing other (i/i) storm water infiltration projects.

In addition to the General Plan land use densities, existing, and future "build out" estimated population numbers were also reported in the original 1990 PSZ capacity study, <u>and 2002 SCWA staff revision of the 1990 PSZ capacity study</u>.

The data used in PRMD's draft DHE EIR references the 2016 SCWA SSMP for the EIR capacity analysis. However the 2016 SCWA SSMP does not cite the existing, and future estimated, "build out" population numbers based on the land use densities allowed in the General Plan. If SCWA no longer follows its past practice of citing existing, and future estimated, "build out" population numbers than how many persons per ESD are assumed in the 2016 SSMP modeling analysis? This is essential information for an analysis to properly evaluate the existing system capacity when commenting on an EIR.

Does the SCWA SSPM 2016 update claim to establish a new, as of yet unidentified, population baseline over the prior Specific Plan land use element estimated amount of 1300-1450 people at full build out conditions?

101.1 cont.

SCWA anticipates a more complete comprehensive systemic analysis of the PSZ will be available when the City of Petaluma and SCWA do the new joint comprehensive update some time in the future.

101.2 cont.

There are two separate build out scenarios for consideration within the PSZ:

- 1) Under the current land use Plan for 1300-1450 people at full build out with the PSZ existing conditions needing collection system improvements.
- 2) Future build out to the maximum allowable sewer capacity entitlement in Petaluma at the treatment plant for 3000 people *AFTER* sewer collection system improvements.

The DHE EIR consultant notes: "The Penngrove sites may be viable if the capital improvement projects have been completed and it may require a revised agreement with the city of Petaluma for treatment"

101.3

- 1) Specify exactly which capital improvement projects are needed?
- 2) Specify revisions needed to the agreement with Petaluma for treatment?
- 6.0 Recommendations, page 20: The DHE EIR consultants claim that "high-level analysis investigation ... of the sewer system capacity and wastewater treatment capacity was performed, and continues "28 of the sites appear to have existing sewer infrastructure capacity in order to accommodate additional residential density due to the proposed re-zoning?

101.4

In the PSZ the DHE EIR consultant has conflated the wastewater treatment infrastructure in Petaluma available for the maximum allowable future sewer capacity entitlement for 3000 people at the treatment plant AFTER PSZ sewer collection system improvements ... with the existing PSZ limited capacity of the collection system infrastructure under the current land use Plan for 1300-1450 people at full build out until the collection system improvements are completed.

There should be a count of existing hook ups, an estimate of total hook ups needed for the land use plan FULL build out, <u>plus a reserve capacity maintained to allow for failing septic systems in the future</u>. This baseline information should be required <u>before ANY serious consideration is given to the idea of having "any extra excess capacity" for additional unplanned for new DHE housing projects.</u>

101.5

PSZ ratepayers are entitled to know if there are any anticipated proposed land use changes being considered that could adversely impact their ability to hook up in the future to the sanitation system they finance. If there is any mishap due to mistakes in properly calculating the existing condition capacity who will be financially responsible for the damages and repairs to the system?

Will developers of the DHE be required to post bond in case there are damages to the system? Will the PRMD DHE EIR analysis specify who or what agency(s) will be financially liable if their proposed DHE experiment fails the PSZ system?

Given the long standing existing physical conditions of the PSZ collection system constraints and that it is close to it's established estimated "full build out" capacity of 1300-1450 people RIGHT NOW, PRMD and SCWA staff should pursue implementation of General Plan policy PF1b, see attached, and consider moratoria on plan amendments and zoning changes in order to protect services to existing residents and entitlements to residents in the zone who have not hooked up yet.

101.6

Sonoma County General Plan Public Facilities and Services Policy PF-1b: Prepare or encourage the preparation of master plans or equivalent documentation for all wastewater management systems prior to approval of project facilities. Design and construct all facilities in accordance with General Plans of the applicable jurisdictions. In the event that a master plan or monitoring fails to show adequate facilities or supplies for planned growth, consider moratoria on plan amendments, zoning

changes, building permits or other entitlements in order to protect services to existing residents. The minimum contents necessary for an adequate master plan or equivalent documentation are:

- (1) Maps showing future service area boundaries, [1]
- (2) Forecasted growth that reflects all potential sources of future demand for facilities and the relationship to General Plan projections and limits, [5]
- (3) Projected service and facility needs, [1]
- (4) Estimated costs and revenues for needed improvements,
- (5) System design parameters and assumptions, [1]
- (6) A program for water use reduction, [SEP]
- (7) A program to reduce storm water infiltration, and [1] (
- (8) A program to monitor and account for amendments of the General Plan Land Use Map over time.

#### **Documents attached:**

- 1) Penngrove Sewer Zone (PSZ) Capacity Study updated November 4, 2002 (SCWA)
- 2) Sonoma County General Plan Public Facilities and Services Element (Page PF-8)

# Thank you.

#### Rick Savel

Marin LAFCo Commission, public member Penngrove Area Plan Advisory Committee, co-chair P. O. Box 227, Penngrove, CA 94951

Ph# 415-479-4466, no texting Email: SkyPilot4u2@yahoo.com

101.6 cont.

Letter 102

From: Mark Ballard <markb53@gmail.com> Sent: Thursday, February 9, 2023 5:14 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Forestville eir for 635 Housing Units

# **EXTERNAL**

I am a resident of this area. I think this is an excellent idea. West County is sorely in need of housing, especially affordable housing. The only issue I see is there may need to be an improvement in the traffic pattern, with that many additional dwellings and the increase in population. There may need to be a signal light at Covey and Front St. Although if the previously proposed forestville bypass it part of this improvement with the traffic circle any Mirabel Rd. and Front St. (hwy 116) a light may not be needed at Covey Rd.

102.1

Those are my thoughts. Thank you,

Mark Ballard 8230 Spring Dr, Forestville, CA 95436 7073219277

--

-Mark

From: MARY MOUNT <mmmary13@comcast.net>
Sent: Thursday, February 9, 2023 12:33 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Forestville housing proposal

# **EXTERNAL**

Absolutely Brilliant thoughts on high density low income housing in Forestville.	
NOT.  The proposal to build on narrow dead end streets with no viable sewer or decent	103.1
roads with ingress and egress. REALLY SMART.	
F. & F. Evacuations on Mirabel Road and Covey Road. You will be endangering lives by building more homes that tend to be evacuated.  DISASTROUS.	103.2
Placing low income housing should be in the INCORPORATED areas of our county; near stores, hospitals, culturally diverse schools and transportation. INCLUSIVITY not EXCLUSIONARY.	103.3
Healdsburg, Santa Rosa, Sebastopol and Windsor have all of these accoutrements.	
Guerneville, Forestville and Graton do not. PLAIN and SIMPLE.	103.4
Keep your poop out of the lower Russian River.	
We get enough of that when it floods.	

From: Michael Korreng < <a href="mailto:mkorreng@comcast.net">mkorreng@comcast.net</a>>
Sent: Wednesday, February 8, 2023 1:10 PM

To: PermitSonoma < <a href="mailto:PermitSonoma@sonoma-county.org">PermitSonoma@sonoma-county.org</a>>

Subject: New housing project in Forestville

# **EXTERNAL**

Hi, I am a Sonoma Co resident living near Forestville.

I do not have any issue with adding more housing in the area. I do have more than one request.

In Forestville Hwy 116 already has a fair amount of traffic. If you live in the area, it can be challenging to cross the street at one of the two crosswalks that do not have lights. I would ask that some consideration is made to improve that for our safety.

Hwy 116 and Mirabel road crossing should be improved. It can be dangerous when traveling west bound on Hwy 116 past Mirabel. Cars bolt out from Maribel onto Hwy 116 East bound all the time without waiting for Westbound traffic on Hwy 116 to clear. A light may be required once there is even more traffic.

Pedestrians do not have sidewalks. At a minimum, sidewalks should be added from the proposed housing into downtown and into all public transportation locations.

Designated parking should be added near the buss stop. People that use the buss will need more parking.

From Forestville, Michael Korreng 707 953 6981 104.1

104.2

**Planning Commission** 

RE: Re-zoning Change to GUE-4 (16050 Laughlin)

Dear Planning Commission,

Our home sits at 14759 Marys Ln Guerneville which is adjacent to the proposed zoning change GUE-4. We have owned our home since 1997. Our primary concern is the affect this zoning change and subsequent development will have on the future flooding in our neighborhood and specifically to our cherished home.

Why would up-zoning a property in an active flood zone on such a large scale be considered without any studies or flood mitigation for the surrounding neighborhood? I've reviewed the DEIR and do not see any reference to these studies.

During our ownership, we have had water surround (abut) our structure on two occasions. In addition, many other years we have had water on our parcel. Water rushes down Marys Ln. We have always been very concerned that additional development in our neighborhood would very likely put as at more risk of flooding inside our home and especially without a plan for the runoff from 100 additional homes on a lot that has historically aided in overflow (see attached photos).

It is very distressing to our family that nearly 100 homes could be built adjacent to us on the other side of Fife Creek with no consideration to the impact on the neighbors flood risk. The parcel at 16050 Laughlin Rd has ALWAYS provided a natural aid in overflow from Fife Creek, allowing for additional runoff and water storage. It's reasonable to conclude that a project of this scope will severely impact the surrounding homes. Please require the DEIR to include any flood mitigation studies.

See attached video of water rushing into 16050 Laughlin during a heavy rain event just adjacent to Marys Ln. I've also included photos of various flood events in the neighborhood.

Please take our concerns into consideration and feel free to reach out to discuss. Also, please remove this property from consideration until flood mitigation plans can be provided to prevent our homes from additional inundation due to a project of this scale.

Thank you,

Paige MacDonell

Cc: Lynda Hopkins



Water from Fife Creek making way to overflow into 16050 Laughlin



Driveway into 16050 Laughlin just adjacent to previous photo



Armstrong Woods Rd at intersection of Laughlin



Intersection Laughlin & Marys Ln - water threatning to enter 14777 Marys Ln home



Water in garage of 14756 Marys Ln & threatning to enter home



Water rushing down Marys Ln & into school



From my porch 14759 Marys Ln right before evacuating

From: Patrick Waters <patrickswaters@gmail.com>

Sent: Thursday, February 9, 2023 9:28 AM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org> **Subject:** Fwd: Proposed Development of 14156 Sunset Ave Guerneville

# **EXTERNAL**

Sonoma County Permits - I am writing to express my great hope that you will not allow the development of a 30 unit property on Sunset Avenue. I can not think of a worse site for this proposal in all of Sonoma County. That hill, with its very narrow and quiet streets would be ruined with the addition of 78 people up that narrow and winding road.

There are numerous locations in Guerneville and other areas in Sonoma which are designed to accommodate that amount of traffic. Please vote against this development on Sunset and find a better location. Thanks very much for your time and consideration.

Pat Waters 14119 Palo Alto, Guerneville

From: Paul Paddock < paulpaddock@sbcglobal.net >

**Sent:** Thursday, February 09, 2023 3:22 PM **To:** Eric Gage < Eric.Gage@sonoma-county.org>

Subject: COMMENTS FROM THE OWNER REGARDING THE PROPOSED REZONING OF FOR-4

#### **EXTERNAL**

Dear Mr. Gage,

I own APN 083-073-010, referred to as Parcel FOR-4 in the EIR the County is doing for its Housing Element update of the General Plan.

During the Planning Commission's last meeting regarding the EIR, I indicated that the maximum density proposed for my property seemed clearly inappropriate. It would be inconsistent with surrounding parcel densities, and create the potential for significant traffic, and neighborhood changing impacts. Site specific challenges include access via a long, narrow easement, and possible issues regarding underlying soil conditions.

My neighbors have expressed serious concerns about the proposed density increase, and the type of housing proposed. They don't support it, and neither do I.

It is unfortunate, that my willingness to consider some increase in density, would trigger consideration of such a dramatic step-up in density. If I misunderstood the original outreach from the County, I apologize.

With that said, I am sensitive to the County's need to demonstrate its commitment to increase housing opportunities throughout the County. I may be supportive of a density increase that would be more compatible with my immediate neighborhood, community, and site conditions.

As I recall, it was indicated that public comments would be accepted until February 13th. I would be grateful, if you would enter this letter into the record.

If you, or any of the commissioners have questions about my parcel, or wish to discuss my position, please feel free to contact me.

Thank you,

Paul Paddock 707 450-5759

From: Rick Harrington <rhgtn@sonic.net> Sent: Thursday, February 9, 2023 4:49 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Draft: EIR--Housing

#### **EXTERNAL**

I am a homeowner/full-time resident at 14151 Woodland Dr and am writing to object to consideration of the parcel at 14156 Sunset Ave (directly uphill from my home) for development as multi-unit (as many as 30!) housing. I object because this parcel is already dedicated to its Best Use, i.e. water storage and treatment for all of central Guerneville.

The hilltop itself is unsuitable for the scope of the proposal. It would require removal of many trees and extensive engineering to support such construction. Access to this property is only by three narrow one-lane steep winding roads, none of which are in any condition to support the traffic of construction vehicles, nor of the additional auto traffic if these units were built out and occupied. A development of this sort is entirely out of character of this quiet neighborhood of small lots and single-family residences. It would destroy the quality of life and severely diminish the property values of this neighborhood. I recommend killing this project before it goes any further.

Rick Harrington

14151 Woodland Dr

Guerneville, CA 95446-9582

707-869-1808

Letter 109

From: SANDY STRASSBERG <sstrass22@att.net> Sent: Thursday, February 9, 2023 5:04 PM

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

Subject: Rezoning

**EXTERNAL** 

Dear Permit Sonoma,

I am writing in opposition to the proposed rezoning in Glen Ellen of the Marty Winters' property, parcel #'s 054-290-057 and 054-290-084.

We are a small town. A gem of a town facing huge changes with the development of SDC. This little town is not where increased housing should be. Please help us keep our town small.

After the corner across from these parcels was rezoned and built on, the streets are now lined with vehicles on both sides making it essentially a one lane road. There is not enough parking! There is not enough room on these little streets for more people and cars! Please put housing in urban areas!

Thank you,

Sandy Strassberg 13650 Gibson St. Glen Ellen

**From:** Sharon Smith <sharon@savorsmith.com> **Sent:** Thursday, February 9, 2023 6:49 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Cc: David Wakely <david@davidwakely.com>

Subject: Permit Sonoma / Planning - FOR-1 FOR-2 FOR-3 FOR-4 FOR-5 FOR-6 - Alternative: fewer

rezoning sites.

#### **EXTERNAL**

Dear Sonoma County,

We want to add our voices to the concern for our Forestville. Others may be more detailed in their letters to you. My husband and I want to state that we are shocked at the huge amount of housing that 110.1 is being considered for our little rural burg. We do know that housing is needed, but the amount that has been designated to Forestville is huge. It is frightening to think the build outs will grow our population by 25%. It is more than the other neighborhoods that are being considered and we worry about them too. As our neighbor Becky Boyle wrote "the document does not speak to what would be done with respect to urban renewal effects for the people displaced to enact these potential build-outs, 110.2 displacing locals, loss of character, threat to local business and the introduction of community conflicts, pollution-related health conditions, around town parking needs and sanitization challenges." We couldn't agree more. As she also mentioned the county needs to plan widening roads, adding left turn lanes, round-a-bouts, traffic lights, street lights and crosswalks for public safety on roads that are used by commuters, visitors, pedestrians and gravel trucks all coming through town. We feel strongly that before building is decided upon, infrastructure needs massive improvement. Also this is a fire prone area. If anything there should be less housing in areas like this. How will evacuation routes be 110.3 determined and how much harder will it be for people to get out if needed if there are so many more properties? Is there enough water? Lots of questions and considerations. 110.4

Please consider all the impact this will have and please narrow the approach to our area.

Thank you,

Sharon Smith and David Wakely

Date: Fcb 9, 2023

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave... Santa Rosa, California 95403

We strongly oppose the rezoning of properties mentioned in the letter below and agree with all the serious concerns stated in this letter.

Letter 111

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

111.1

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

111.2

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

111.3

The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on eyacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

111.4

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

111.5

The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan. Bay Area 2050, and Housing Element Policy.

111.6

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

111.7

Name:

Susan and Ron Reed

Address: 16341 Valley Lane Guerneville, CA 95446

Date:

2/9/23

Signature: Susan Reed Ron Reed

February 10, 2023 Letter 112

Mr. Eric Gage Permit Sonoma Project Manager 2550 Ventura Ave. Santa Rosa, California 95403

Dear Mr. Gage,

I oppose the rezoning of GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, listed in the Sonoma County Draft Environmental Impact Report (DEIR).

I moved to my current home at 16190 Laughlin Road in May of 2014 having moved here from Colorado. There were three things I required of my new house; that it be on a reasonably flat lot, that it has sun, and that it be in a quiet neighborhood. My Real Estate Agent assured me that this was a quiet neighborhood and with the current zoning it would stay that way. This is a "dog walking" neighborhood with narrow streets and no sidewalks. Laughlin Road has a place where a redwood tree is close to the road and the roots make it a one lane road. This neighborhood was zoned the way it was for good reason. The streets are very narrow up Cutten Ct and the 16450 Laughlin Road where the horse pasture is. You will destroy this neighborhood if 315 people are added that would drive by my house on Laughlin Road. It would add dumpsters that would have to be emptied by very large trash trucks that would require them driving on multiple days each week. The construction of the housing would require large truck traffic for years that would disrupt our peace.

The Russian River Sanitation District has a difficult time handling the sewage it currently gets, there is no way it could handle the increased sewage that 588 people would bring. I currently pay \$1,774.00 a year for my service or \$147.00 a month this has gone up each year I have lived here, I am sure it will go up this year also. I am retired and live alone, that is a very expensive sewer fee. Doesn't seem to be a good place to put in affordable housing. My fear is that if it has to be upgraded the current residents will be stuck with the charges and not the developers or the new residents. In other words, the current residents will pay for the destruction of our neighborhood. Not to mention the addition of new waterlines and power lines that would be adequate to serve that many new residents, like I said, the construction could last for years.

I hope all of the people that will be voting on this rezoning know that Armstrong Woods Road is the ONLY way to evacuate these properties and it floods very often, even before the Russian River. GUE 4-16050 is obviously in a flood plain. To develop this property 105 units would have to be out of the flood plain, how are they going to do that without making other properties more likely to flood, including my house where flood waters have never reached the floor. Please do not make my house more likely to flood. All three of these properties are now absorbent land, with the number of units that the new zoning would allow, the lots would have to be almost all covered and nonabsorbent so ground water would not be recharged and our properties would see an increase in runoff.

The property that is closest to services is the GUE 4- 16050 and that is 3/4 of a mile to Guerneville, the other properties are further and on narrow roads. This is not a good neighborhood to add affordable housing where a good part of the population might not have vehicles. There is no bus service in this neighborhood and these streets are too narrow to allow for them. So the residents would have to walk a mile to get transportation services, food, doctors etc.

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I think that Sonoma County should think very hard about rezoning land against the wishes of the property owners. In the zoom meeting a property owner asked if he could add less units, first there was a yes then a no. I understand when a property owner wishes to rezone to add more units it is a big deal and is very difficult to do, the land was initally zoned that way for a reason. This is a very big deal and must not be rushed into because of the State. We need answers and there must be solid planning. It has been difficult for questions to be answered in this process, that scares me! I am retired and doing home improvements, I will put off some of my improvements to make sure I have enough money to enact litigation if this zoning gets passed.

112.6

Brad Wallace 16190 Laughlin Road Guerneville, CA 95446 wallacebrada@gmail.com 707-604-7330 From: Cassandra Shafer <cassandrashafer@sonic.net>

Sent: Friday, February 10, 2023 1:32 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Cc:** Susan Gorin <Susan.Gorin@sonoma-county.org>; Pat Gilardi <Pat.Gilardi@sonoma-county.org>;

David Rabbitt <David.Rabbitt@sonoma-county.org>; Andrea Krout <Andrea.Krout@sonoma-county.org>; Jenny Chamberlain <jchamber@sonoma-county.org>; Jenny Chamberlain <jchamberlain <j

county.org>; district5 < district5@sonoma-county.org>; leo.chul@sonoma-county.org

Subject: Draft EIR comment: Housing element Update

# **EXTERNAL**

To: Eric Gage

PermitSonoma-Housing@sonoma-county.org
Re: Draft EIR comment: Housing element Update

cc: Board of Supervisors and staff

In response to the County's proposal to re-zone central Forestville, I agree that affordable housing is an urgent need; however, I have some concerns so I am sharing my comments. I live at 6115 Van Keppel Road.

Water, Sewer, Wastewater Treatment:

Increasing housing density in California when our state regularly faces droughts lasting years makes water a central concern for re-zoning. Not only is water a concern for all of California, it is of special concern in West County and Forestville. Can the Forestville Water District support this increase in density? Currently, sewer access is not available at my address or for any site further east on Van Keppel Rd. Who will pay for constructing sewer lines to Site FOR-4? Who will pay for expanding the waste-water treatment capacity for the additional 635 units proposed? Will water rates be increased so that current customers are underwriting this new development?

# Access, Egress and Firestorms:

Sonoma County's recent history of firestorms are a central concern to re-zoning. Climate change forecasts that severe weather events will only become worse. My address received emergency alerts to evacuate during 2017, 2019 and 2020. There was stop-and-go stalled traffic on Hwy 116 for hours. Is it really desirable to increase housing density in West Sonoma County? If Sonoma County must increase affordable housing supply, doesn't it make more sense to increase housing density closer to the 101 corridor, where more emergency services already exist and emergency vehicle access would be easier, as would emergency evacuation?

Van Keppel Rd. has no outlet, but does have a number of dead-end roads branching off of it. The road itself is narrow and crumbling. It has 90-degree bends, which are blind. Neighbors already complain about speeding drivers who cut these corners, causing near collisions and killing pets. The first sharp bend off of Covey Rd is also a low dip that floods. How can the road itself support an increase from 5 residents to 185 residents on the FOR-4 site? Who will pay for it? How will it be engineered? Will taxes be increased so that current residents are underwriting improvements and services for this new development?

**Public Transportation and Commuters** 

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Another aspect of access is the poor public transportation to and from Forestville. Buses run infrequently and bus lines do not serve enough areas of our county. Although it is true that more people started working from home during the pandemic, many people still commute to work by car. This year, two of my housemates moved into Santa Rosa into smaller, equally expensive housing because they could no longer afford the gas to go to work every day. Increasing housing density in Forestville rather than along the 101 corridor may end up increasing greenhouse gases, or else unfairly target certain categories of employees who work on site, thereby privileging remote workers.

113.5

### Schools:

Increasing affordable housing in Forestville within walking distance of the elementary school and high school is a great plan. Increasing the population of families and school-age children would allow for the re-opening El Molino High School, which would be an effective use of existing facilities and re-vitalize our community. Is there any way to prioritize that families with children would receive first dibs on these new units? Or would such a priority violate Fair Housing law?

113.6

I have been teaching in Sonoma County for 20 years. This semester I am teaching in synchronous-online mode at SRJC via Zoom. Now that COVID concerns have eased off, I surveyed my students as to why they enrolled in this type of section, rather than an asynchronous, all-remote online class or an in-person class. Of the 3 answers students offered (work schedule, having young kids, and transportation issues), transportation was the most common reason by far. Nobody said they believed remote education was superior in quality. It seems they do want teachers, they do want classmates, they do want the structure of a regular meeting time, but they also like the convenience of not having to spend time or money driving. Housing within walking distance of schools is wonderful.

113.7

# Economic and Social Equity:

I have lived in Forestville for 23 years. A single year after buying this house, its value had increased so much that our family couldn't have afforded it. And yet, our family's income has not kept pace with the insane explosion of the California housing market. My husband died young. We have been living close to the poverty line for 20 years. I have taken in boarders/housemates to keep a roof over my children's heads. I agree affordable housing is an urgent need. I worry that decision-makers believe that anyone who currently owns property in Sonoma County is affluent and can afford to pay ever more and more. My property tax bill still lists 2 charges for Palm Drive Hospital, but that entity no longer exists. Why do we still pay the tax? My property tax bill lists charges for Measure H, more and more buildings at Santa Rosa junior College. Enrollment has dropped so low at SRJC that many faculty have had our workload and incomes severely slashed. I am lucky to teach one class this semester. Many students learn online. Many JC staff work from home. Do elected officials believe that construction is always the right choice? Is it time to re-think the old maxim that building growth is always good and will solve our problems? Is there really the population to support this call for more building? Can we balance sustainability and planetary survival concerns with economic equity concerns?

Best Practices: Centralize population density

Overall, I believe Sonoma County should delay re-zoning and new construction due to water limitations, firestorm emergency concerns, transportation/air quality issues, and uncertain

population. Any efforts to increase affordable housing should focus on the 101 corridor rather than West County, also due to water limitations, fire emergency concerns, and transportation/air quality issues. My father earned a Masters in City Planning and worked as a county planner in San Diego and Imperial Counties. As a child, I learned about best practices in urban planning, which recommend centralizing population density. If the County proceeds with re-zoning Forestville and increasing density in a small rural residential town, choosing sites that already have sewer infrastructure and road access on more than one side would be better than the FOR-4 site at the end of Van Keppel Rd.

113.8 cont.

113.9

Respectfully, Cassandra Shafer 6115 Van Keppel Rd., Forestville, CA From: David Kristof <davidakristof@icloud.com>

Sent: Friday, February 10, 2023 2:40 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Housing Unit Population Buildout Potential for Other Inventory Sites: SITE ELD-1

## **EXTERNAL**

February 10, 2023

Attention: PermitSonoma-Housing@sonoma-county.org

Regarding: Table 2-5 "Housing Unit Population Buildout Potential for Other Inventory

Sites" / SITE ELD-1

To Whom it May Concern,

We are writing this commentary on behalf of ourselves and adjacent neighbors that live on Brookview Drive and Oakwood Drive. It has come to our attention that an existing single family dwelling parcel at 15577 Brookview Drive (designated as **SITE ELD-1**) has been incorporated into the current Sonoma County "Housing Element Update/Draft Environmental Impact Report".

Since little to nothing in the DEIR elaborates any specifics to this particular location, we would appreciate feedback on the calculus that determined this particular site's inclusion in **Table 2-5 "Housing Unit Population Buildout Potential for Other Inventory Sites"**. Given the current vacuum of information, there is, to put it mildly, much consternation and outright concern over what is envisioned by the County in the near future.

On the surface, listing **ELD-1** to the County's potential buildout inventory is pure folly. And, we suspect addition of this location was truly only incorporated into the report to meet the minimum buildout requirements mandated by the State. We further suspect that by paying lip-service to State requirements, such an undisciplined approach could come back to bite those who saw fit to throw a placeholder "bone" into the works. Enough on such finger-pointing though! Please note, as the collective community, we do have legitimate concerns about the viability and use of this existing residential lot. Consider the following perplexities: Lot width with regards to minimal set-backs (available structure footprints hampered by such restrictions):

- a. Set-back from Sonoma Creek (east perimeter)
- b. Set-back from Madrone Creek (south perimeter)
- c. Set-back from adjacent neighbors (north & west perimeters)
- d. Set-back from street.

Environmental impacts to Sonoma & Madrone Creeks, including:

114.1

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114.3

a. Impacts on existing Sonoma Creek stream-bank revetment (note that Sonoma Creek, along	ł	
Brookview Dr., has had severe erosion mitigation over the last 60 years, with extensive repair work	114.5	
after high-water damages in 1965, 1997 & 2002).	İ	
b. Impacts caused by added storm drainage outflows (due to site hardening) and its negative effects on	114.6	
stream hydrology.	114.0	
c. Impacts on creek corridor/waterborne plants & animals (verified freshwater shrimp in Sonoma	–	
Creek are a registered endangered species).	114.7	
Off-street/On-street parking (the lot is in cul-de-sac with minimal street parking		
availability; added units = added vehicles = off-street parking & a driveway that eats	114.8	
into any potential building footprint).		
An inordinate increase in traffic throughout the neighborhood, but especially in the	114.9	
cul-de-sac where 15577 Brookview Drive is located.		
Historic neighborhood height limitations (several 2-story modifications have been		
· · · · · · · · · · · · · · · · · · ·	114.10	
permitted & built over the years, but the entire neighborhood is mostly long-	117.10	
established, single-story homes).		
Neighborhood infrastructure's inadequacy to incorporate added demands at		
proposed site, including:		
a. Added sewer connection (existing main sewer line is notorious for already backing up during high-		
rain events; the sewer line fails almost yearly with effluent flowing out of street man-holes and	114.11	
even backing up into toilets/bathtubs of homes in the cul-de-sac; the Sonoma Valley Sewage		
District has been fined multiple times for allowing high bacterial-count runoff to contaminate		
creek waters due to the inability of the existing sewer to handle any excessive flows).		
b. Degenerative asphalt street pavement (street is in abysmal condition that cannot handle the		
stresses of additional traffic, prolonged abuse by heavy construction equipment and associated	114.12	
patchwork of road-cuts due to new infrastructure tie-ins).		

Your return input would be most appreciated. Please advise.

Sincerely,
David & Barbara Kristof
15561 Brookview Drive
Sonoma, CA 95476
davidakristof@icloud.com
barbarakristof@icloud.com
(707) 996-8565 (home)

# MELODY CLARK 7680 GIUSTI ROAD FORESTVILLE, CA 95436

PHONE: (707) 887-1974 / CELL: (707) 480-0882 E-Mail: MelodyClark@comcast.net

# PermitSonoma-Housing@sonoma-county.org

Re: Draft EIR – Housing

Eric Gage, Planner

As a resident within two blocks of the proposed FOR-2 projects I have significant concerns about over-developing this location. I am also concerned about the disproportionate number of units that you have identified as potential locations for rezoning rural residential sites to accommodate high density housing, specifically in the west county areas of Graton, Forestville and Guerneville.

115.1

It appears that you have reduced our neighborhoods to "Inventory Sites" without regard to the neighborhoods and are proposing a bassackwards solution to the need for additional housing.

FOR-2 is a 13+ acre orchard encircled by 28 houses. The proposal of 238 units within this block of homes is unreasonable. How do you go from a site that currently permits 7 houses with private septic systems, to rezoning for 238 units in the middle of existing homes?

115.2

This is not an urban area. Our infrastructure is barely adequate for the existing homes in this area.

All of the homes west of Mirabel Road have individual septic systems. We have been told for many years that it is not feasible to expand the sewer system that exists east of Mirabel Road. It seems unlikely that you can wave a magic zoning wand and accommodate that many units into the existing system.

115.3

Mirabel Road is a major access road between Highway 116 and River Road. Those are the only two roads available for evacuation/access to Santa Rosa/Highway 101.

The two-lane road is narrow, lacks turn lanes, lacks sidewalks, gutters, curbs, drainage or lighting. Ingress/egress into the proposed development will be dangerous. Making a left turn onto Giusti without the increased traffic is already a problem.

115.4

All traffic from the existing homes on Nolan Road and Giusti Road can only leave this area via Mirabel Road which is already inadequate for vacating the area.

The report is incorrect about a school on Mirabel Road. That location is a park maintained 100% by the community. There are no HOA dues, county or state entities that contribute to the Youth Park. Who is going to put in crosswalks and safety features from FOR-2 to cross the street to the park on the busy and dangerous road?

What about services. While the report does mention we have some services, they are very limited. It is 8-10 miles to the nearest full-service grocery stores in Sebastopol or Santa Rosa. I already worry about the distance to shopping and health services when I am older. Public transportation is limited and unreliable.

115.6

Roads, water, waste management, community services are typically planned first. This is a plan that feels rushed so that someone doesn't loose funds. This does not seem like a benefit to the existing neighborhood or potential new neighbors.

115.7

Over the past 30 years I have noticed that the people that move to Forestville find the location desirable because of the low-density housing. One example is similar size homes within the Speer Ranch subdevelopment on 6,000 to 15,000 square foot lots have had less market appeal than homes in Forestville that are not within a "tract" style development such as the homes on Nolan and Giusti Road. A better place for higher density housing would be closer to community services, shopping, transportation, employment areas. Where is the employment for the 700+ what would move here?

115.8

One last issue in this area that is very personal to me. The cellular service reception is horrible. Many of us have tried different carriers only to find that the each have dead zones. My husband died on River Road because he could not get emergency service in one of those dead zones. His phone log showed numerous attempts to make calls.

115.9

Bringing hundreds of new people into this area, when the services are already inadequate is practically criminal.

115.10

Additional services and housing are definitely needed but should be planned, and not a desperate act because of mandates and funds. 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.

Thank you for listening to my concerns.

Sincerely,

Melody Clark

Letter 116

116.1

116.2

From: Kris Nevius < krispaperstudio@gmail.com>

Sent: Friday, February 10, 2023 4:11 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: DEIR

# **EXTERNAL**

We need more affordable housing, especially for the workers in the county. Graton is a smail community and that is the reason many of us live here. Adding 443 new houses to the community will strain the roads, the sewer system (or will they all be on septic?) and potentially change the feel of the community. This proposal has the feeling of some people who decided how many new dwellings needed to happen and then just looked around for potential empty lots to put as many as possible. Please consider reducing the number of proposed houses for Graton and for the other communities in Sonoma County.

Kris Nevius

Graton

RECEIVED

FEB 14 2023

PERMIT AND RESOURCE

MANAGEMENT DEPARTMENT

To: Eric Gage.

Permit Sonoma

2550 Ventura Avenue

Santa Rosa, CA 95403

RE: Draft EIR Comments: Housing Element Update

From: The FOR-2 Neighborhood

Date: February 10, 2023

Dear Mr. Gage,

This letter is intended to specifically address the significant impacts and insufficient analyzation found in the Sonoma County Planning Update Draft EIR as it relates to the FOR-2 site, a 13.5 acre parcel located at 6898 Nolan Road in the town of Forestville beginning on Page 4.

As neighbors of the FOR-2 site, the 222 residents who signed this letter believe that before the HCD, Sonoma County Planning Commission and the Sonoma County Board of Supervisors make any decisions on rezoning the parcels in Forestville they must first understand what the community of Forestville does and doesn't have to offer in the way of resources, services, transportation and infrastructure.

## Forestville California 95436

Forestville is a small rural town in West Sonoma County about 11 miles and a 20 minute drive from Santa Rosa, the nearest job center. The population of Forestville is considered to be about 3300 people following the general boundaries of the Urban Service Area. The Sonoma County Land Use Element, Policy LU-15g, states that the boundary of Forestville is that of the Elementary School District or approximately 6700 people. If all 6 sites, designated for rezoning in the General Plan Housing Element Update, were built to capacity the population of Forestville would increase by 1652 people according to the Sonoma County Update DEIR. This is 25% to 50% increase in population depending on which boundary is used. The proposed cumulative dwelling units added to the town of Forestville is 635. This is the largest number of proposed units and population increase, for any community, in the unincorporated area of the County, with the exception of the unincorporated area around the City of Santa Rosa.

The main road thru Forestville is HWY116 which becomes Front Street for the 3 blocks where most businesses are located. Front Street/HWY 116 is a narrow two lane State Highway built around the turn of the century. All of the side streets in this area are residential.

There are few formal, private business maintained parking lots on Front Street/Hwy 116. Street parking consists of parallel parking on the south side and a combination of parallel and diagonal

117.1

117.2

parking on the north side of the 3 block downtown area. Parking spaces are limited here and thus Downtown Park Open Space site is often used for overflow parking. The Downtown Park is located at the termination of the Joe Rodota Trail and is privately owned and maintained by a non-profit 501c3.

Sidewalks in the 3 block area of Front Street/HWY 116 are either nonexistent, non-contiguous or in extremely poor condition and dangerous. Limited sidewalks do exist from the intersection of Mirabel Road to the Forestville Youth Park. There are no other sidewalks in the neighborhoods that surround the downtown area. Walking the neighborhoods of Forestville requires walking on the narrow shoulders or in some cases in the middle of the road.

With the exception of the Joe Rodota Trail there are no bike lanes in the town of Forestville or surrounding neighborhoods.

Pedestrian or bicycle crossing Front Street/HWY 116, is facilitated by 2 uncontrolled crosswalks. One in the center of town and the other at Covey Road. The Forestville School District provides a crossing guard at the Covey Road intersection to facilitate the safe crossing of Front Street/Hwy 116 by school children. Crossing with or without a crosswalk or exiting a parallel parked car is dangerous on Front Street/HWY 116 due the road width, heavy traffic volume, including gravel trucks from the two local quarry's, as well as most vehicles traveling faster than the posted speed limit.

There is one informal southbound bus stop in the downtown area. The bus stops in the Front Street/HWY 116 southbound traffic lane, to load and unload passengers. Sonoma County Transit provides bus service to Forestville. Bus Route 20, Russian River/Santa Rosa Route, makes one pickup and one drop off a day in downtown Forestville. Bus Route 26, Forestville/Sebastopol/Cotati/Rohnert Park Route, also makes one pickup and one drop off a day in downtown Forestville.

For all intents and purposes the commercial area of downtown Forestville is built out. There are two commercial/industrial parcels available for development within or contiguous to the downtown area. The first parcel, 3.4 acres zoned PC, is located at the intersection of south side of HWY 116 at the Mirabel Road intersection. The other parcel, located at 6555 Covey Road, is currently being considered in the Draft Housing Element for rezoning (FOR-1). Also known as Electro Vector, the parcel is 2.86 acres and zoned MP, AH. This site is subject to unknown groundwater contamination from a previous industrial business on this site. Mitigations have been underway for quite some time and this site should be fully evaluated before it is removed from the Housing Element Update rezoning inventory (Alternative-3). One additional site with Industrial zoning, although not contiguous with Front Street/HWY 116, does exist. This site is also being considered for rezoning under the Draft Housing Element Update and is currently zoned M1. Designated as FOR-6 in the plan, it is 4.94 acres.

117.3 Cont.

Street lighting in Forestville is limited to the 3 blocks of the downtown area along Front Street/HWY 116. This allows the surrounding neighborhoods to very good Night Sky Viewing Areas with minimal light emissions.

117.5

New jobs in Forestville are few and far between. Those that do exist are generally minimum wage service industry jobs. This is largely due to the lack of sufficient commercial and/or industrial business. Forestville is a rural bedroom community.

117.6

Government Services in Forestville consist of:

- Sewer and Water Forestville Water District
- Schools Forestville Union Elementary School District K-8
- Fire and EMS Sonoma County Fire District Forestville Station
- Police Services Sonoma County Sheriff's Department
- Roads Sonoma County Road Department

Notable business/retail services are limited in the downtown area of Forestville, off street parking is either non-existent or limited at all of these sites, very little future commercial growth is possible:

117.7

The following business can be found in Forestville:

A package store, pharmacy, hardware store, bakery, coffee shop, post office, laundromat, real estate office, hair salon, gas station, bar, liquor store, dog groomer, antique store, winery, bicycle shop, auto repair shop and five eating establishments.

The following human services are available in Forestville:

A dentist office, a church, food bank, and a pharmacy.

There are no social services, medical facilities or broadband and very limited cell service within a ½ mile of downtown Forestville. The closest grocery store to downtown Forestville is 1.25 miles away.

The following Land Use and Housing statements, policies and objectives are relative to the discussion of all future development in the town of Forestville.

Reference: Sonoma County Land Use Element - Page Lu-81

Another issue in this area is growth and development in Forestville. Specific issues that need to be addressed include the amount of additional development that could be absorbed without changing the rural character or straining public services, how to make available commercial and industrial opportunities to provide local employment, and how to preserve the desirable environmental qualities of the area.

117.8

Objective LU-15.4

<u>Maintain the "rural village" character of Forestville through design development</u> <u>standards that support small-scale development with substantial open space and native</u> landscaping.

Reference: Sonoma County Land Use Element - Page Lu-82

Policy LU-15a: Policy LU-15a: Phase residential and commercial development within the Forestville Urban Service Boundary to allow the community facilities and services adequate time to absorb new growth, and to maintain the community character. For any project of 10 or more housing units, require a precise development plan or master plan that specifies the maximum number of new residential units to be built per year.

Policy LU-15b: Require design review for major subdivisions within the Forestville Urban Service Boundary. Design review approval shall assure that:

- (1) Project scale and design is consistent with existing rural village character.
- (6) The project includes pedestrian access connecting new homes in a nearby commercial area.

Reference: Sonoma County Draft Housing Element

Policy HE-2a: Enhance opportunities for affordable housing production on all appropriate sites with <u>adequate infrastructure and proximity to services</u> ...

Policy HE-3g: "Strive to focus affordable housing development in <u>moderate and high</u> resource areas well-served by public transportation, schools, retail, and other services.

Policy HE-5d: Strive to provide for senior housing needs. <u>Focus senior housing projects in areas well-served by transit, accessible sidewalks, and amenities...</u>

Policy HE-6f: <u>Provide high quality and equitable public services</u>, including public transportation, fire and police safety, crime prevention, parks, sidewalks, street lighting, and recreational facilities and programs in lower-resource areas through the use of place-based strategies and master plans.

# Response to DEIR - FOR-2 - 6898 Nolan Road

# FOR-2 Neighborhood

There are three main streets that directly surround FOR-2, Mirabel Rd, Nolan Rd and Giusti Rd. There are 5 additional streets that are accessed from either Giusti Road or Nolan Road and are also considered part of the FOR-2 Neighborhood; Nolan Ct., Niki Lane, Poplar Drive, Ohaire Lane and Chope Lane. There are approximately 85 homes and 180 residents living in this neighborhood.

117.8 Cont.

FOR-2 is a 13.5 acre parcel. All 4 sides of the parcel abuts the backyards of well-established single family, single story homes along Nolan and Giusti Roads. The maximum proposed density on the FOR-2 site is 283 dwelling units and 736 new residents. The FOR-2 site is currently zoned for 7 homes.

The FOR-2 Neighborhood is a walking neighborhood and not just for its residents, people come from other areas just to walk here. There are no sidewalks or on street parking in the FOR-2 Neighborhood. The FOR-2 Neighborhood is an excellent place to view the night sky due to the lack of any streetlights in the area.

There are 3 designated existing entrances/exits to FOR-2. One on the East side of the property on Mirabel Road, one on the south side of the property on Nolan Road and one on the West side of the property also on Nolan Road.

FOR-2 is a heritage apple orchard established by the current owner's family in 1911. The family has shared with the Neighborhood and the County, in person and in writing, they have no intensions of selling the property and wish to pass it down to future generations. See Attachment 1

### Question:

• The County will require a minimum of 2 entrances/exits to the FOR-2 site if it is developed. The 3 lots that make up the entrance/exits to FOR-2 have their own unique APN's (completely separate lots) and appear to be owned by the owner of FOR-2. If the County rezones FOR-2 without the owner's permission, what stops the owner from selling one or more of the 3 entrance/exit lots thereby land locking the property?

### **Reference: Executive Summary**

Alternative 3 (Fewer Rezoning Sites) – ES-3 Page 24

The Sonoma County Housing Element DEIR lists the FOR-2 site as one of the <u>six rezoning sites</u> that "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." The DEIR offers to remove these six sites, including FOR-2 as an alternative to the Plan. The following significant impacts are also associated with the FOR-2 site and not listed in the DEIR.

- 1. The parcel is considered by the California Department of Housing and Community Development (HCD) as being too large, over 10 acres, for an affordable housing development. (Page 6)
- 2. It is the largest project, 283 units/7736 residents, of all 59 sites proposed for rezoning in the unincorporated area of Sonoma County and it will increase the population size of the FOR-2 Neighborhood by 400%.

117.9 Cont.

- 3. There are significant sewer pipeline size and capacity issues associated with the FOR-2 Site. (Pages 19-20)
- 4. School crossing traffic signal(s), traffic signal(s), left turn channelization, road widening and site distance and setback mitigations will be needed, on Mirabel Road, Giusti Road and Nolan Road as a result of this project. (Pages 14-19)
- 5. The FOR-2 site is approximately 100' from a Moderate Wildfire FHSZ and approximately 1000' from a High Wildfire FHSZ. (Pages 20-21)
- 6. Substantial water runoff from this project flows thru seasonal creeks and riparian corridors, causing flooding in the homes on Mirabel Road and the backyards of homes along Sunridge Lane and Trenton Road before flowing into the Russian River without any filtration or other mitigations. (Pages 12-13)

7. There is no broadband and limited cell coverage at the FOR-2 site.

- 8. The property owner has repeatedly assured the FOR-2 Neighborhood, verbally and in writing, that the Family has no intentions of selling the property and intend to pass it down to future generations. (Page 22 and Attachment #1)
- 9. California No Net Loss Laws discourage Jurisdictions from considering inadequate or unsuitable sites as adequate or available to achieve RHNA quotas.

#### Question:

- Given the above information, and further justifications to follow, would it be appropriate for the HCD, Sonoma County Planning Commission or the Sonoma County Board of Supervisors to remove FOR-2 from the list of sites to be rezoned?
- If no please explain how the County of Sonoma plans to assume legal responsibility for traffic accidents, storm water runoff pollution, damage to biological resources, flooding and sewerage backups as a result of permitting this project without analyzing these issues and developing appropriate mitigations?

**Reference: Project Description** 

Comment: HCD Requirements

The DEIR identifies FOR-2, 6898 Nolan Road, 13.5 acres, as one of the 59 urban sites in the unincorporated area of Sonoma County for by-right, medium-density housing.

The California HCD, Realistic Development Capacity, Analysis of Sites and Zoning – Size of Sites States:

To achieve financial feasibility, many assisted housing developments using state or federal resources are between 50 to 150 units. Parcels that are large may require very large projects, which may lead to an over concentration of affordable housing in one location, or may add cost to a project by requiring a developer to purchase more land than is needed, or render a project ineligible for funding. A parcel smaller than one half acre or over 10 acres is considered inadequate to accommodate housing affordable to lower income households,

117.10 Cont.

unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible. Please note, for purposes of this requirement, "site" means that portion of the parcel designated to accommodate lower income housing needs. The housing element must consider and address the impact of constraints associated with small or large lot development on the ability of a developer to produce housing affordable to lower income households. To demonstrate the feasibility of development on this type of site, the following analysis is required.

An analysis demonstrating that sites of equivalent size were successfully developed during the prior planning period with an equivalent number of lower income housing units as projected for the site.

Evidence that the site is adequate to accommodate lower income housing. <u>Evidence could include developer interest</u>, potential for lot consolidation for small sites or lot splits or subdivision for large sites...

A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.

117.11 Cont.

#### Question:

• The site designated as FOR-2, APN 083-120-062, according to information provided in the DEIR, is 13.5 acres. According to the HCD any parcel over 10 acres is considered inadequate to accommodate housing affordable to lower income households. Has the County of Sonoma prepared sufficient documentation for the HCD to demonstrate the County's history of successfully developing sites of similar size, its potential for lot splits or subdivision or the existence of a proposal to develop the site in accordance with HCD requirements?

Reference: Sewer and Water

Comment: Urban Service Area Boundary

The Urban Service Area indicated on Figure 2-6 Forestville Inventory Sites – Page 2-14 would lead the reader to assume that both sewer and water are on site or adjacent to the FOR-2 site. This is not entirely true and the map is misleading. Existing domestic secondary water supply lines do run to the site and the surrounding streets of Nolan Road and Giusti Road. They are serviced by a water main on Mirabel Road. However, the existing sewer pipeline stops approximately 1100' south of the Mirabel Road entrance to the FOR-2 Site. Should the site be

developed the existing sewer pipeline would have to be extended, from its current location, approximately 1100', to the existing right of way to the site off of Mirabel Road.

117.12 Cont.

### Question:

• It would be appropriate for the County of Sonoma to place a footnote on the map to clarify this situation?

**Reference: Environmental Impact Analysis** 

Comments: Forestville, Page 4.1-18

FOR-2 is a large parcel west of Mirabel Road surrounded by single-family homes on large lots and zoned LG/116 but outside the SR designation. Views of the ridgelines and open spaces are not visible from the streets looking across the lot due to existing residential development, flat topography, and mature vegetation on all sides (Figure 4.1-14). On Giusti Road, residences are large, single-story, and designed in a vernacular suburban ranch style. They are situated close to the roadway and are landscaped 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, with fewer trees and some intermittent fencing. Residential development on both sides of Nolan Road is like that on Giusti Road, but with less unified design and landscaping. Overall, the area around the site exhibits visual unity as the homes are large and consistently feature mature landscaping. While the unity is high, the level of vividness is lower because the neighborhood does not offer expansive views or feature notable architecture. The site has moderate sensitivity and, depending on density and height, new development could be dominant.

Comments and Questions:

- 1. Any multi story, medium density development would be inconsistent with and pose a significant impact on the surrounding neighborhood where the majority of homes are single family/single story. In addition any construction over one story, would become the dominant feature in the neighborhood.
  - The last sentence in the paragraph should be corrected to read: Any construction over one story will be a dominant feature in the neighborhood.
- 2. The report is incorrect in stating that there are no ridgelines or opens spaces viewable from the neighborhood. There are expansive views of Mount St. Helena, the Santa Rosa foothills and portions of Trenton Hill and other closer ridgelines are visible from the upper areas of Nolan Road and Giusti Roads surrounding the site.

117.14

	<ul> <li>The EIR should be corrected to include the areas in which expansive views are available.</li> </ul>	117.14 Cont.
3.	The site is not flat as stated above but has a slope of 2 to 9 (generally 3 to 5 percent) percent as stated else ware in this report.	117.15
	<ul> <li>This statement should be corrected in accordance with the slope data provided elseward in the DEIR.</li> </ul>	177.10
4.	There are mature redwood trees on the property but they do not block views of the surrounding hillsides from all locations.	117.16
	<ul> <li>This statement should be corrected.</li> </ul>	
5.	The FOR-2 site is not directly across the street from a school. The Forestville Youth Park,	
	a privately owned 501c3 park, is directly across Mirabel Road from FOR-2 and was	117.17
	mistaken for a school.	17.17
	• This item should be corrected in the FIR.	

# Reference: Site Impacts and Recommended Mitigation Summary

The DEIR, Page 4.1-52 - The FOR-2 Site is listed with the following Impacts:

- Site Sensitivity Moderate
- Project Potential Dominance Dominant
- Potential Impact Significant

Comment: Site Sensitivity Impact

The density of this project is 200% greater than the surrounding neighborhood. The vast majority of homes in the neighborhood are single story/single story on ½ acre lots. Any building 2 stories or taller, with a density of up to 20 units per acre, will become the Dominant feature in the neighborhood and the Site Sensitivity rating in the EIR should reflect that impact on the neighborhood.

### Question:

 Based on the above information, the Site Sensitivity rating for FOR-2 should be changed from Moderate to Significant.

### Reference: Aesthetics

Significance after Mitigation, Page 4.1-58

With implementation of Mitigation Measure AES-2, impacts from light and glare would be reduced to <u>less than significant</u>.

117.18

Comment: Significance after Mitigation

This statement is not sufficient and does not adequately represent or analyze the current night sky conditions in this area. The FOR-2 Neighborhood, Nolan Road, Giusti Road, Niki Lane, Poplar Drive and Nolan Court do not have street lights as does most of the Forestville area. This area is considered by its residents as a Night Sky Viewing Area with minimal light emissions and our visitors often comment on the beautiful night sky that we have. Any construction over a single story will impact the Night Sky Viewing in this area simply from uncontrolled and unmitigated light emitted second or third story units and a dramatic increase in night time vehicle traffic (headlights). Further analysis should be conducted to determine the effects of light emission in the FOR-2 Night Sky Viewing area.

117.19 Cont.

### Question:

• In accordance with General Plan Goal OSRC-4, Preserve and maintain views of the nighttime skies and visual character of urban, rural and natural areas, while allowing for nighttime lighting levels appropriate to the use and location. The EIR should acknowledge the significance and existence of night sky viewing areas and the impact of significantly altering those existing sights by developing FOR-2. The current analysis is insufficient. What additional mitigations are necessary to maintain the existing levels of Night Sky Viewing in the FOR-2 Neighborhood?

117.20

### Reference Agriculture and Forestry Resources

Impact AG-1, Page 4.2-15: NONE OF THE REZONING SITES OCCUR ON LAND DESIGNATED AS PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE. THEREFORE, DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT CONVERT THESE TYPES OF LANDS TO NON-AGRICULTURAL USE.

All Rezoning Sites occur in County-designated Urban Service Areas, defined in the 2020 General Plan as geographical areas within the urban growth boundary of a city that are designated for urban development. Many of the identified parcels and their adjacent uses are currently zoned for rural residential or limited density, which in some cases means agricultural cultivation is currently underway; nonetheless, none of these lands are considered prime or important farmlands, as designated by the FMMP mapping program. The Rezoning Sites were selected out of dozens of possible sites in part specifically because rezoning them for higher density residential development would not convert productive, prime agricultural lands

The Sonoma County General Plan Goals:

Goal AR-3: <u>Maintain the maximum amount of land in parcel sizes that a farmer would be willing to lease or buy for agricultural purposes.</u>

Objective AR-3.1: <u>Avoid the conversion of agricultural lands to residential or nonagricultural commercial uses.</u>

Goal LU-9: <u>Protect lands currently in agricultural production and lands with soils and other characteristics that make them potentially suitable for agricultural use. Retain large parcel sizes and avoid incompatible non-agricultural uses.</u>

Objective LU-9.1: Avoid conversion of lands currently used for agricultural production to nonagricultural use.

It is a false statement to say that rezoning FOR-2 for higher density residential development would not convert productive, prime agricultural lands. The landowners have stated that this agriculturally important parcel has been used by the family since 1911. The California Department of Conservation's Interactive Map of Important Farmlands lists FOR-2 as Farmland of Local Importance. It was most likely excluded from the higher designations because it was not irrigated at some time during the four years prior to the mapping date of 2018. In fact, the property was listed as Prime Farmland up until 2004. The current owner wishes to rehabilitate the parcel into a more productive apple orchard.

## Question:

 The above information requires the EIR to address the mitigation issues and impacts of rezoning FOR-2, a Farmland of Local Importance, to higher density residential housing.

# **Reference: Biological Study Area**

Comment: Biological Study Boundaries, Page 4.4-5, Figure 4.4-4

The Biological Study Area – Forestville boundaries are not accurate in relation to the FOR-2 site, Figure 4.4-4 Biological Study Area - Page 4.4-5.

The majority of storm water runoff from FOR-2 that potentially affects biological resources flows north from the FOR-2 site and makes its way to the Russian River via unmaintained drainages ditches, seasonal creeks and riparian corridors to the Russian River. The effect to the biodiversity of these seasonal creaks, riparian corridors and the Russian River must be considered and investigated for Critical Habitat and Sensitive Communities.

### Question:

117.21 Cont.

117.22

• The Biological study area for FOR-2 should be expanded to include the ditches, seasonal creeks, riparian corridors from the site to the Russian River due to the increase runoff as a result of the development of FOR-2.

117.23 Cont.

Reference: Biological Resources

Comment: Correction

The DEIR statement, Forestville - Page 4.4-13, does not mention that the FOR-2 site is connected to the Russian River via the storm water runoff from the site.

117.24

#### Question:

• This should be corrected so sufficient analyzation can occur and mitigation measures identified in the EIR.

Reference: Cultural Resources

Comment: Cultural Sites

The FOR-2 site is located within a half a mile of a known Native American cultural site where an ancient lake existed and Native American Community existed. Archaeological reviews are required on development projects in the area. Native American artifacts have been found on the FOR-2 Site and in the surrounding area.

117.25

### Question:

• The EIR should state that this site is in proximity to a Native American cultural site and the possibility that artifacts and possibly human remains may be found on the site?

Reference: Hydrology and Water Quality

Comment: Storm Water Runoff

The FOR-2 site, is 13.5 acres with a slope of approximately 4.3% (52' in 1256') from the highest point on its western boundary (Nolan Road) to its lowest point at the intersection of Mirabel and Giusti Roads. Currently water runoff during heavy rainfall floods the crawl spaces and garages on the homes below the site and along Mirabel Road. One homeowner has installed a French drain to divert flows to the unmaintained drainage ditch on the west side of Mirabel Road. None of the current runoff is collected into storm drains. All runoff is uncontrolled and the vast majority flows along the west side of Mirabel Road downhill in a generally northerly

direction. The water from the FOR-2 site is collected in a concrete open collector between 7522 and 7566 Mirabel Road. The water then flows west in an open seasonal ditch/creek until it meets a "blue line creek" and riparian corridor also known as Sunridge Creek. This blue line creek crosses Trenton Road and runs behind the homes between Sunridge Avenue and Trenton Road. During heavy rains this creek inundates Trenton Road and the backyards and first floors of homes along Trenton Road and Sunridge Avenue. This runoff then makes its way to the Russian River without filtration or settling ponds.

The effect to the biodiversity of these seasonal creaks, riparian corridors and the Russian River must be considered and investigated for Critical Habitat and Sensitive Communities. Significant hard surfaces, incapable of absorbing water, will be created thru development on the FOR-2 site. 15 acres of land generates 407,000 gallons of rainwater per one inch of rain. Forestville receives an average of 41 inches of rain per year, non-drought years. That accounts for over 16 million gallons of water flowing from this site to the Russian River annually. Failure to identify the significant impacts and mitigation measures related to the storm water runoff from FOR-2 will impact biological resources and result in additional flooding of roadways and properties in the area

117.26 Cont.

# Question:

• The storm water runoff condition was not sufficiently analyzed in the DER to reflect the significant downstream effects of additional storm water runoff from the development of FOR-2. Further analysis and identification of mitigation measures must occur and be included in the EIR to avoid damage to the environment, biological resources and personal and public property.

Reference: Public Facilities and Services

Comment: Park Space and Funding

Page 4.15-8 - Policy PF-2c:

Use the following standards for determination of park needs: Twenty acres of regional parks per 1,000 residents countywide and <u>five acres of local and community parks per 1,000 residents in unincorporated areas</u>. A portion of State parklands may be included to meet the standard for regional parks.

Page 4.15-8 - Policy PF-2g:

Require dedication of land or <u>in-lieu fees</u> as a means of funding park and fire services and facilities.

#### Questions:

- There are no publically funded parks in Forestville. Please clarify if the full buildout in Forestville (1652 new residents) would require the addition of new public park space, how many acres and where it would be located, or if the existing two privately owned parks would qualify for the Policy PF-2c standard?
- The Forestville Youth Park is 7.93 acres and the Forestville Downtown Park is 4.26 acres and both are owned by non-profit organizations and available for public use. What population boundaries would be used to calculate population (PF-2c) and if in-lieu fees are obtained from the developer for parks do the existing privately owned parks receive that funding (PF-2g)?

Comment: Park Degradation

Impact PS-4, Page ES-38

The FOR-2 site is directly across Mirabel Road from the Forestville Youth Park. The FOR-2 Neighborhood is concerned that the Forestville Youth Park would see a considerable increase in use that would lead to a physical deterioration of the facility.

#### Question:

• What mitigation measures are in place if existing parks, Forestville Youth Park and the Forestville Downtown Park suffer degradation due to overuse? Both parks are privately funded and exist solely on donations. The addition of over 1600 new residents within a half mile of downtown Forestville will have an impact on these existing parks. An additional section could be added to the DEIR that address privately owned Parks and how new development could support them?

Reference: Traffic and Parking

Comment: Traffic Study

According to the County of Sonoma Traffic Counts (arcgis) there are 6909 total trips per day on Mirabel Road, in both directions. The speed limit on Mirabel Road, in the area of FOR-2 is 45 mph although vehicles drive faster than the posted speed limit in this area. Due to speed limit and vehicle traffic volume, including large gravel truck traffic, Mirabel Road is likely a Major Collector when compared to other roadways defined in the DEIR Existing Street Network.

117.27 Cont.

117.28

117.29

# Question:

• DEIR, Existing Street Network – Page 4.16-1 thru 4.16-5 - Mirabel Road is not listed in the Existing Street Network. This should be corrected in the DEIR.

117.30 Cont.

Comment: Mirabel Road/HWY 116 Intersection

At a conservative calculation of 5 trips per day per residence, including the existing FOR-2 Neighborhood and the proposed addition of 283 residences at FOR-2, the total trips per day coming and going from the FOR-2 Neighborhood would be approximately 4000, almost doubling the trips per day currently observed on Mirabel Road and significantly affecting the LOS rating of the Mirabel/HWY 116 intersection.

# According to the DEIR:

Peak Hour Traffic at the Mirabel/Hwy 116 intersection is 1040. <u>The cumulative total, including other River area rezoning projects is estimated to be 1782</u>. This a 70% increase Peak Hour Traffic for that intersection.

117.31

According to the County of Sonoma Guidelines for Traffic Impact Studies-Page 4,

If the project is located in a study area where one or more intersections are currently or projected to operate LOS E or Worse a Traffic Study is required.

Since the County has already determined that the intersection is failing, any development should be responsible for upgrades to the intersection due to increased Peak Hour Traffic. The last estimate available for a round-about at this intersection is 7.2 million dollars. The County has also considered a traffic signal at the intersection of River and Mirabel.

#### Questions:

 The DEIR is not clear whether traffic mitigations caused by the FOR-2 development, including the round-a-bout at Mirabel and HWY 116, as well as those on Mirabel Road and in the FOR-2 Neighborhood would be fully or partially the responsibility of the developer?

117.32

• The DEIR should require the need for a Traffic Study as a traffic mitigation requirement based on FOR-2's proximity to the Mirabel/HWY116 intersection due to the significant increase in trips per day that will be generated from the FOR-2 site and the substantial increase vehicle trips per day on Mirabel Road.

117.33

#### Comment: General Traffic Concerns

There are three existing access/right of ways to the FOR-2. One is directly off of Mirabel Road and two are off Nolan Road. Mirabel Road runs between River Road on the north end, a County Road, and HWY 116 on the south end, a State Highway.

There are two 4 way intersections between the northern border and the southern border of FOR-2. The intersection on the north side of FOR-2 is Giusti Road and Davis Road at Mirabel Road. The intersection on the south side of FOR-2 is Nolan Road and Speer Ranch Road at Mirabel Road. There are stop signs on Davis, Giusti, Nolan and Speer Ranch Road that control traffic entering Mirabel Road. Historically there have been serious accidents at the Giusti/Mirabel/Davis road intersections.

117.34 Cont.

There are no are no turn lanes, at either of the four way intersection on Mirabel Road and traffic site distances are limited at both intersections. Site distances are also limited at the Mirabel entrance to FOR-2. The distance, along Mirabel Road between the two 4 way intersections, Giusti/Davis and Nolan/Speer Ranch, is about 1000'. The Mirabel Road entrance to FOR-2 lies roughly in the middle of the two intersections.

As residents of the FOR-2 Neighborhood we would like to share how difficult it can be to enter and exit Mirabel Road safely via either Giusti Road or Nolan Road. With the absence of turn lanes, the current speed limit, limited sight distances and high vehicle and gravel truck traffic, movements onto and off of Mirabel Road are currently dangerous. We anticipate entering FOR-2 from the designated right of way off of Mirabel Road will be equally dangerous.

117.35

In addition the County of Sonoma Guidelines for Traffic Impact Study Thresholds provide some references to possible mitigation measures that will be needed as the result of the planned development of the FOR-2 site. (Thresholds, PG 10)

A project would have a significant traffic impact if it results in any of the following conditions:

- 1. On-site Roads and Frontage Improvements: <u>Proposed on-site circulation and street frontage would not meet the County's minimum standards for roadway or driveway design, or potentially result in safety hazards</u>, as determined by the County in consultation with a registered Traffic Engineer or Civil Engineer.
- 6. Vehicle Queues: <u>Project causes or exacerbates 95th percentile turning movement queues exceeding available turn pocket capacity</u>.
- 7. Signal Warrants: <u>The addition of the project's vehicle or pedestrian traffic causes an</u> intersection to meet or exceed Caltrans or CA-MUTCD signal warrant criteria.
- 8. Turn Lanes: The addition of project traffic causes an intersection to meet or exceed criteria for provision of a right or left turn lane on an intersection approach.
- 9. Sight Lines: The project constructs an unsignalized intersection (including driveways) and/or adds traffic to an existing unsignalized intersection approach that does not have adequate sight lines based upon Caltrans criteria for State highway intersections and AASHTO criteria for County roadway intersections.
- 10. County Intersection Operations: The County level of service standard for County intersection operations is to maintain a Level of Service D or better pursuant to General

Plan Policy CT-4.2. The project would have a significant traffic impact if the project's traffic would cause an intersection currently operating at an acceptable level of service (LOS D or better) to operate at an unacceptable level (LOS E or worse). If the intersection currently operates or is projected to operate below the County standard, the project's impact is considered significant and cumulatively considerable if it causes the average delay to increase by five seconds or more. The delay will be determined by comparing intersection operations with and without the project's traffic for both the existing baseline and projected future conditions.

11. County Roadway Operations: The County level of service standard for County roadway operations is to maintain a Level of Service C pursuant to General Plan Policy CT-4.1; or, for specific roadway segments, the level of service standard adopted in the General Plan Figure CT-3. The project would have a significant traffic impact if the project's traffic would cause a road currently operating at an acceptable level of service (LOS C or better) to operate at an unacceptable level (LOS D or worse).

Sonoma County Standards for Traffic Impact Studies, Page 15

The project applicant shall retain a registered Traffic Engineer who is licensed to practice in the State of California. A TIS may be prepared by a registered Civil Engineer that has demonstrated appropriate expertise to the satisfaction of DTPW and is licensed to practice in the State of California. Said Engineer shall conduct objective qualitative and/or quantitative analysis, and submit a written traffic impact study that includes each of the following areas that apply to the proposed project. Please note that when a concern is identified, the Engineer shall propose a solution and identify funding for the solution.

Vehicle Queues: <u>Identify situations where either the addition of project traffic causes or exacerbates 95th percentile turning movement queues exceeding available turn pocket capacity.</u>

Signal Warrants: <u>Identify situations where the addition of project vehicles or pedestrian</u> traffic will cause an intersection to meet or exceed Caltrans or CA-MUTCD signal warrant criteria.

Turn Lanes: <u>Identify situations where the addition of project traffic at an intersection, including project driveways, causes an intersection to meet or exceed criteria for provision of a right or left-turn lane on an intersection approach.</u>

#### Questions:

• The DEIR does not sufficiently analyze the effects of traffic mitigation measures relative to FOR-2 and their impacts the County's plans to extend the Joe Rodota Trail Bike Path

117.36 Cont.

along Mirabel Road between Hwy116 and Davis Road. How could traffic impact mitigations effect the plan construction of the Joe Rodota Trail in the area of FOR-2?

- 117.37 Cont.
- The FOR-2 site adds 736 new residents and approximately 500 cars to the FOR-2 Neighborhood. In the EIR will traffic signal(s), turn lane(s), improved intersection setbacks, improved sight distances, and or controlled crosswalks be required mitigations, on Mirabel Road and the in the FOR-2 Neighborhood streets?
- 117.38
- Are there any potential mitigations that are likely to increase traffic on Giusti Road and Nolan Road at the other two entrances to FOR-2?

117.39

#### Comments: Crosswalks

The DEIR insufficiently analyzes the need for a controlled crosswalk at or near FOR-2 that will allow adults and children cross Mirabel Road to access the Youth Park, walk or bike to town, walk to school or access bus stops.

See Caltrans or CA-MUTCD Page 835 Section 4C.06 Warrant 5, School Crossing

Support: 01 The School Crossing signal warrant is intended for application where the fact that schoolchildren cross the major street is the principal reason to consider installing a traffic control signal. For the purposes of this warrant, the word "schoolchildren" includes elementary through high school students.

Standard: 02 The need for a traffic control signal shall be considered when an engineering study of the frequency and adequacy of gaps in the vehicular traffic stream as related to the number and size of groups of schoolchildren at an established school crossing across the major street shows that the number of adequate gaps in the traffic stream during the period when the schoolchildren are using the crossing is less than the number of minutes in the same period (see Section 7A.03) and there are a minimum of 20 schoolchildren during the highest crossing hour.

117,40

#### Also See Permit Sonoma - Pedestrian Facilities

Policy 4.05 - Where discretionary projects in Urban Service Areas and unincorporated communities are found to create <u>additional demand for pedestrian travel, require the project to directly provide or participate in the funding of pedestrian improvements such as sidewalks, gap closures, steps, safety improvements, and/or trails that will improve pedestrian access to destinations located within ½ mile of the project site.</u>

Policy 4.08 - Provide high-visibility crosswalk marking at all intersections in Urban Service Areas, unincorporated communities, and wherever feasible countywide. Wherever possible, avoid mid-block pedestrian crossings, and where mid-block crossings are necessary, install signalization, refuge islands and signage warning vehicles to stop for pedestrians and watch for cyclists.

## Question:

• The FOR-2 Neighborhood would like to know what mitigations should be added to the EIR to allow the 736 new residents of FOR-2, including school children to safely cross Mirabel Road to attend school, visit parks, bike, and walk or obtain services including public transportation?

117.40 Cont.

Comments: Parking

There is a trend in the County to reduce parking spaces per developed unit in order to increase density and force occupants to use other forms of transportation (reduce VMTs). This option may work in urbanized areas with robust public transportation or within walking distances to essential services and work. Forestville is a rural community, there are few jobs available within walking distance of FOR-2. There is no industry, no available commercial land for future for development, minimal public transportation and no legal on street parking in the FOR-2 Neighborhood.

117.41

DEIR - Impact WFR-2, 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. Prior 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; however, widening County roads would not exacerbate fire risk.

# Questions:

The DEIR does not sufficiently analyze the lack of on street parking in the FOR-2 Neighborhood. Onsite parking should not be reduced for the FOR-2 development. How will the EIR mitigate the issue of assuring that there is sufficient parking on the FOR-2 site for a minimum 2 cars per unit due to the lack of robust public transportation?

117.42

 Residents of the FOR- Neighborhood are concerned about overflow traffic parking on our streets. What mitigations are included in the DEIR that will address this issue and who will enforce it?

Reference: Utilities and Service Systems

Comment: Sewer

The DEIR insufficiently analyzes the condition and size of the sewer pipeline serving FOR-2. The 8" sewer line that would service FOR-2 currently ends approximately 1000' south of the access easement at the Mirabel Road entrance to the FOR-2 site. This 8" line runs from this termination location to the corner of Mirabel Road and Hwy 116. It then transitions to a 6" line, running under the north side of HWY 116 for approximately 1000' to First Street, where it

connects to the main line to the sewer treatment plant. This line is gravity flow and not pumped. The EIR does not sufficiently analyze whether the 1000' of 6" sewer line has the capacity to handle the increased output from the FOR-2 project. A 6" sewer line carries one half the capacity of 8" sewer line. The FOR-2 Neighborhood is also aware that there have been problems with this 6" line clogging at or near 6661 Front Street/HWY 116 due to a low spot in the line. Failure to adequately estimate the capacity of the 6" sewer line with the increase demand associated with the addition of the FOR-2 development could result in the failure of the system or significant sewer spills at low points in the system.

117.43 Cont.

The Sonoma County Water Agency – Design and Construction Standards for Sanitation Facility, Page 20

B. Minimum Pipe Sizes - The minimum pipe size for main sewers shall be eight (8) inches except as noted below. The minimum pipe size for side sewers shall be four (4) inches or the same size as the building drain plumbing stub whichever is greater.

### Questions:

- Good planning for this project should include providing sewer access to the remainder of the FOR-2 Neighborhood which lies within or adjoining the boundaries of the Sewer District, does the DEIR adequately address this planning outlook?
- The FOR-2 Neighborhood should be added to the flow calculation when determining capacity of the, 1000' long 6" sewer pipeline, on Front Street/HWY 116. Has the County of Sonoma contacted the Forestville Water District to advise them of this planning issue and to assure it is included in any pipeline capacity calculations?
- If it is found that there are capacity issues related to the reduce size of the sewer line between Mirabel Road and First Street this should be included with mitigations in the
- If sewer line does need replacing who will be responsible for replacing 1000' of sewer. line under HWY 116 for a distance of 1000'?

117.47

#### Reference: Wildfire

Comment: Threshold, Page 4.19-24

### Threshold:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

117.44

117.45

Impact WFR-1 THE PROJECT INCLUDES REZONING SITES THAT ARE IN OR NEAR AN SRA OR VERY HIGH FHSZS, BUT DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT SUBSTANTIALLY IMPAIR AN ADOPTED EMERGENCY RESPONSE OR <u>EVACUATION PLAN</u>. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

117.48 Cont.

During our recent wildfire evacuations traffic has backed up on Mirabel Road south bound from the intersection of Mirabel Road/HWY 116 to Davis Road, approximately ½ mile. There are only 3 exits from FOR-2. Two of the exits are onto Nolan Road which is the closest proximity, west facing and south facing, of a wildland fire burning in the SRA. Using these exits would hamper the existing residents ability evacuate as well as put the evacuees of FOR-2 closer to proximity of the oncoming fire.

Question:

• The DEIR does not adequately analyze or provide sufficient mitigation measures relative to how an evacuation would occur, from the FOR-2 Neighborhood, with nearly 900 residents attempting to exit onto Mirabel Road at the same time while also attempting to merge with other evacuees. This certainly doesn't seem like a Less than Significant situation? These are issues that must be addressed in the EIR and not left to be dealt with after the project has been completed.

117.49

Comment: Wildfire Threshold, page 4.19-26

Threshold:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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?

Impact WFR-2 THE PROJECT INCLUDES <u>REZONING SITES THAT ARE IN OR NEAR</u>
<u>MODERATE, HIGH</u>, AND VERY HIGH FHSZS. DEVELOPMENT FACILITATED BY THE PROJECT
WOULD EXPOSE PROJECT OCCUPANTS AND STRUCTURES TO WILDFIRE RISKS FOR SITES
<u>LOCATED IN OR NEAR (WITHIN 2 MILES OF) SRAS</u> OR VERY HIGH FHSZS. WILDFIRE RISK
WOULD BE SIGNIFICANT AND UNAVOIDABLE.

117.50

When it comes to public safety, <u>SIGNIFICANT AND UNAVOIDABLE</u> do not belong in the same sentence, ever! There are always mitigations including not going forward with a project. The EIR should evaluate wildfire risk and mitigation options considering the knowledge gleaned from the recent devastating fires in Sonoma County.

The drainages directly west of FOR-2 are in a Moderate FHZ but are identical to those below Giusti Road designated a High FHSZ. A fire moving uphill from Martinelli Road will not differentiate between these two FHSZ's. It will run its course up slope seeking drainages where

rates of spread and intensity will increase. It is just as likely to arrive at Nolan Road as it is to arrive at Giusti Road. In this case a single ember could easily cross Nolan Road and ignite properties or landscaping in FOR-2. (Dan Northern, Forestville Fire Chief RET.)

117.50 Cont.

### Question:

• Given that Unavoidable is not an acceptable answer to a significant public safety issue what other wildfire mitigations are appropriate for the FOR-2 site, including removing the site from the Housing Element Update List?

117.51

Comment: Fire Hazard Severity Zone

FOR-2 is located 100 feet from a Moderate Fire Hazard Severity Zone and 1000' from a High Fire Hazard Severity Zone. The site is across the street from State Responsibility land on the West side of the site. The EIR, Page 4.19-26 States:

Access to FOR-2 ... does not meet County road standards of 20 feet in width or greater. Prior to approval of development 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; however, widening County roads would not exacerbate fire risk.

117.52

## Question:

• Who would fund the on and off site road improvements and traffic mitigation measures, to meet County and Cal Trans standards should the FOR-2 site be developed?

# **Comments: Removing FOR-2 from the Rezoning List**

A copy of the owner's letter to the County asking that the FOR-2 site be removed from the rezoning list is attached. The family clearly states that they have no intention to sell the property and in fact have other plans for it. The family has owned the property since 1911 and it has become their legacy. It is a heritage property that they intend to pass down to future generations. Rezoning this property would be against their wishes and ruin their ability to use in a manner for which it is currently zoned.

117.53

## Question:

Is it in the County's best interest to continue to rezone a property, against the owners wishes, knowing full well that the owner has no intention of selling the property that has been in their family since 1911 and that they intend to keep it in the family for future generations?

117.54

- Is there a process or policy to remove a property from the Housing Element Update at the owners request or if the County is aware that they have no intention of selling the property?
- If so who will make this decision and when will it be made?

Respectfully Submitted by the FOR-2 Neighborhood,

Susan and Kon Zaharoff 6875 Nolan Road Forestville, CA 95436 konzaharoff@comcast.net 707-800-2177 Sunoma and Dan Northern 6925 Nolan Road Forestville, CA 95436 <u>dsnorthern@sbcglobasl.net</u> 707-536-8991 Karen and Steve McDonald 6987 Nolan Road Forestville, CA 95436 smcdonald205@comcast.net 707-495-7371

#### Contacts:

CC: Sonoma County Board of Supervisors
Sonoma County Planning Commissioners

#### Attachment 1:

#### FOR-2, potential rezoning site

From kdpmick@aol.com

You eric gage@sonoma-county.org.dsnorthern@shcglobal.net

C: bassman jaulley@gmail.com; klynnkrup@gmail.com

Date: Tuesday, February 7, 2023 at 10:16 PM PST

#### Good Morning,

Thank you for the opportunity to once again reach out to share my concerns regarding the proposed changes in property zoning for Sonoma County. I listened with intent, the zoom meeting held last week. I retreated from that meeting with mixed feelings, but felt that for the greater good, active listening and participation was done by those gathered and members present. This brings us forth, to this upcoming meeting, February 13th. Once again, it is imperative that I advocate for the land so wisely purchased and established by my Grandfather in 1911, from the original land owners of Forestville.

I must agree and ask like that of Mr. Carr, have committee members availed themselves by visiting the potential rezoning sites. What seems necessary to ask aneself and that of the committee, were the wisest sites selected, and based on criteria that might bring forth additional questions and concerns, prior to the Feb. 13th meeting. An example of question, in knowing that many of the sites do not have easy accessible water, sewer, roads, transportation, all of which would cost thousands, and yet within a few feet, yards, even a mile, there is viable land that would have easy access to those needed items. In examining the sites, were these questions asked as they pertained to each site.

I have read the lengthy report, and would like to share why I believe that the site I hold known as FOR-2 is not a desirable rezoning site.

Priority to all of the following reasons is the clear fact that T, as the owner of FOR-2, and subsequent generations to follow, have no interest in seiling the land we own. As mentioned, we have owned this land since 1911, and while over time it has had great crop growth and production, low growth and production, and mediocre growth and production, what is constant is the fact that we have owned the land, worked the land, and it remains, a working Gravenstein apple orchard and vegetable farm. Currently, as previously stated in my first email, we are in the process of regenerating this land, a process begun in excess of five years ago.

Secondly, this land serves as water shed for the areas directly surrounding the proposed property. This is needed to maintain the existing permaculture, house wildlife, and maintain the ecosystem. The lack of respectfully interfacing with the permaculture, will increase and indeed incrementally damage the ecosystems and environment causing irreparable damage and significant effects to the ecosystem.

We have reason to believe and know, through the artifacts and mapping done, that our land at one time was home to several Native Americans who would travel along the coast as they passed from southern Sonoma County up the coast to Fort Bragg.

Fourth, the report mentions that if FOR 2 were to be rezoned, that due to the density factors, it would be a useful site only if mitigated use of appliances, plumbing, land use and landscaping, limited growth on each site, etc. were to be followed. Is this a wise use of land, and good land management? I don't believe so. How does

the committee measure greenhouse gases, emission hazards, unavoidable aesthetic cultural resources, for an unknown date in the future. Further, if to be developed, how is that managed and by what agency?

Fifth, which is now becoming a long list of concerns and reasons why not to rezone my land, is where it is located....or more accurately, where it is not located. Currently, there is limited regional transit, no SMART, etc. If allowed to be rezoned, and subsequently if the property were to be deemed needed, there would be increases in pollutants, significant changes in air quality, needs for increased infrastructure which would include water, sewer, garbage, police/sheriff, fire, road enhancements, traffic increases, and this is the short list. Impacts and indeed far-reaching unknown changes do not allow for informed or adequate decision making to be made.

Sixth, in studying the charts, analysis, more suggested outcomes, I have not been able to determine that there are any valuable gains to have my land rezoned. What I have learned through the studying of that data, is that it is apparent that FOR-2 is not a viable or useful piece of property to be rezoned. I fail to see positive outcomes. Why I would embrace the rezoning of my property is currently lacking, hence why I do not support this suggested rezone plan for FOR-2. Instead, the report continually uses the phrase significant impact. Does that translate to the unknown reality of what significant impact is, and would the county only stop growth once reached, which often and sadly means that significant impact was reached long before it is deemed time to stop development.

In summary, please reconsider the potential rezoning of FOR-2, my land and that of my family. We again humbly ask, to remove our land from the list. Thank you again for your committee work and the opportunity to have this communication.

Sincerely,

Karyn Pulley

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Print Name  Karen McDanald 6  Signature K McDeld	Address: 987 Nolan Rd. 1-27-23
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Print Name Elisa Baker	Address: 7423 POPLAR DR. 1/28/23
Signature Ceisa Rock	
Print Name ROGER STANCLIF	Address: Forestulle F 129 NOLAN CT 1/28/23
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Kirsten Franceschi	6874 Nolan Rd. Forestville, cA
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RHONDA PROVOST	7050 GINSTIROAD
Signature Rhonda Provost	

Print Name Kon Zaharoff	Address: 6875 Molan Rd
** **	Forestulle, CA
Signature K. 2 Cherry	1-27-2023
Print Name Susan Zaharoff	Address: 1-27-2023 6875 Nolan Road
Signature Allan Jahraff	Forestrille, CA 95436
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Karen Krell	10840 Notan Rd Forestuite CA 954360
Signature Karan Was l	1-27 - 2023
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Florentino Garcia	6854 Nolan Rd Forestville CA 95434
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Ken Jones	6975 Givsti Rd, Forestville
Signature Key Jane	6975 Givsti, Rd, Forestville 1-27-2023
Print Name	Address:
DOCORES VOIGHT	8000 SPEER RANCH RD, FORESTVILLE
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Print Name	Address:
Douglas Mark Dutina	6984 Nolan Road Forestville
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Print Name	Address:
Dawn Dutines	4824 Nolun Rd. Forstville
Signature	1-27-2023 CH

Print Name	Address:
Johannes HEMMEBEAGUE	6844 Nolon Road, Forestville, CA 9543
Signature M. A. H.	1/27/23
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Ryan Hennebergue	6844 Nolan Rd. Forestville, CA 95436
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Barbara Schwoerer	6815 Nolan Rd, Forestrille, Cx
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Print Name PAUL BY SIELD	Address: 7645 Giustille, CA954
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Diane Nelson	G341 Van Keppel Rd.
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Debra RYPKa 70	960'Houre Lane
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Print Name Dyana Foldvary	Address: 7381 Hidden Lake ra 953
Signature Alacha	

Print Name Timothy Allen	Address: 7581 Giusti Rd Forestville
Signature CM (llh	
Print Name Leila Allem Signature Jula Qu	Address: 7581 Giusti Rd. Fovestuille
Print Name GLENN Trowbadse	Address: 7000 Nolan Rd
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CRAIG R. LEVITT	7685 GIUSTI Rd. Forestwill
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COLLEGNE LOW	7767 Grusti Rd. Forestuille
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Gay Beyout	11140 Carya Rd, Forastville CA 95436
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Daryl Spyriter	11140 Cayon Pd Frestville, CA 75436
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Margaret Katta	7430 Hidden LAKE Rd.	
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From: Lorin Mcclendon < lorinmcclendon@sbcglobal.net>

Sent: Friday, February 10, 2023 11:28 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** New Dwelling Units Proposed for Forestvill

#### **EXTERNAL**

We are opposed to the 635 new dwelling units proposed for Forestville because of the dramatic Increase in population, the llimited transportation, our schools are not equipped to handle this influx and we agree with all of the reasons our District 5 Supervisor, Lynda Hopkins has stated for opposing this project. We need more affordable housing in our cities which have the infrastructure to support it.

118.1

Lorin & Rebecca McClendon 308 Conor Court Forestville Get <u>BlueMail</u> for Desktop From: Mark Dutina <markdutina@gmail.com> Sent: Friday, February 10, 2023 9:11 AM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Forestville #2 Nolan Road

#### **EXTERNAL**

Thank you for listening to our concerns. I purchased 6824 Nolan Road in March of 2022. My property backs up directly to FOR#2. I am definitely not against the development of low and medium income	119.1
housing. Here are my concerns for the development of this property. 1. Will crossing lights be placed to safely cross Mirabel and Giusti to get to Youth Park and El Molino H.S.? 2. What precautions will be	119.2
made to protect those of us who back up to this parcel? I am mostly concerned about dust due to health reasons and the noise pollution it will create. 3. Will there be added police protection due to the	119.3
increased number of people? Currently we are a small community that watch out for each other but	119.4
with the added people there is no way that we will feel safe. 4. Will stop lights be added at River road and 116 due to the increased traffic? Currently it is already very dangerous to turn off of Nolan onto Mirabelle with the speed at which people drive here. 5. With this large of an increase in the number of	119.5
people living here where will they work? Where will they shop? Where will they get medical services?  The only services near here are to drive to Sebastopol or to Santa Rosa. Is it your intention to create	119.6
another whole commuting area? 6. Where will the added number of people park? We have no street parking, no street lights, no sidewalks. Will this be safe? 7. Are you really willing to destroy another	119.7
healthy ecosystem? Many birds and mammals live and nest here. Where will they go? Where will the thousands of moles, voles and rats go? To our houses? Will you be helping us with this problem? 8. Will	119.8
the current owners of the property be forced to sell? Having spoken with them they have no intention	119.9
of this being anything other than an agricultural property. 9. According to the DEIR report there are many environmental tasks to overcome before this property could be developed. Are you taking this into full consideration? 10. Living here in forestville our water and sewage systems are already fragile.	119.10
What are the plans for this? Do you plan to use septic for this whole project? It seems impossible. In	119.11
conclusion, I love living here, I have become very active in volunteering to help in any way in this community. If this project goes through I will be forced to move. Not only would this be a very negative life-changing experience it would also be extremely costly for my wife and I. We bought our home recently at the high market. Will the county be reimbursing us for the loss when we sell our property? I have many more questions and concerns, but please consider the ones I have listed and remove the development of FOR#2 from your list. Mark Dutina 6824 Nolan road. Phone # 650-544-3208	119.12

From: Kathy R. <kbird@sonic.net>

Sent: Tuesday, February 14, 2023 12:55 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Cc: Eric Gage <Eric.Gage@sonoma-county.org>; Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>; Leo Chyi <Leo.Chyi@sonoma-county.org>; Susan Gorin <Susan.Gorin@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; James Gore <James.Gore@sonoma-county.org>; Chris Coursey <Chris.Coursey@sonoma-county.org>

Subject: Re: Housing Element Draft EIR, Objections, request for additional time for public review

#### **EXTERNAL**

I was alerted to this report a week ago and I'm very concerned about how this will change our town in Forestville. I have driven to and seen all of the sites they are proposing zoning changes to, and all but one of these sites are within a mile or two of each other and are on or near a Scenic Highway and will be seen from Hwy 116. Most homes in the area are single story. Having multi-story homes or apartments on any of these sites doesn't fit in with the character of the neighborhoods. How can any of these properties be built without significant improvements to Hwy 116 or Mirabel Rd? I haven't see any infrastructure to support the proposal. And the burden is unfairly put on Forestville. Also, have any of you walked along the sidewalks in downtown Forestville? Tried to safely cross the street here? The sidewalks and curbs are uneven and severely cracked too.

I'm asking for additional time for public review. It's a complicated document to go through and I have noticed multiple things in the report that are not correct or are concerning. For instance, one item in the report that caught my attention was it mentions a school on Mirabel Rd near the F2 site. There is no school on Mirabel, however, there is the Forestville Youth Park.

120.2

Thank you for your time and consideration to request additional time for public review.

Sincerely,

Kathy Rodrigues 10520 Woodside Dr. Forestville CA. 95436 120.1

Letter 120

### Sonoma County Planning Commission Feb 10, 2023

This submittal is in regards to the Draft Environmental Impact Report for the Sonoma County Area countywide housing element update.

For the following reasons, and in no particular order, I submit and strongly feel the parcel designated as *LAR-9* in the *Draft Environmental Impact* Report for the Sonoma County Area countywide housing update, should be excluded! This parcel is 5200 Fulton Rd Santa Rosa, Ca in the Larkfield area and designated a flood zone

121.1

- a) This properly not only flooded in 1995 and 2005 but was under mandatory evacuation in the 2017 Fire in the Larkfield area. It is in a flood zone. FEMA flood map included with this submission.
- b) The Mark West Creek setback, alone, would wipe out nearly the entire property from development either on the driveway or the private easement north of the driveway.

121.2

c) This property exits off Fulton Rd , to the east, onto a 25'wide, approx. 800' long dead in, with no turn around, on this private driveway easement. No parking is allowed on the easement driveway for emergency vehicle access . All parking, including guest parking, MUST be provided onsite of each parcel. Parking is NOT ALLOWED ON FULTON RD. Fulton Rd, during the morning and evening commute times, has a tremendous amount of traffic blocking this aforementioned driveway/intersection making ingress and egress onto this private driveway extremely difficult. This private driveway currently serves a population of 34. The proposed addition of a population of 66 would have a **significant impact** on this intersection!

121.3

Thank you
Mike Bojanowsk
PO Box 756
Healdsburg, Ca 95448
bbojanowsk@comcast.net
Ofice 707 433 5243 Cell 707 292 1690



FEMA's National Flood Hazard Layer (NFHL) Viewer

with Web AppBuilder for ArcGIS



122.1

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122.5

From: Mona Behan < monabehan@gmail.com > Sent: Friday, February 10, 2023 4:16 PM
To: Eric Gage < Eric.Gage@sonoma-county.org >

**Subject:** Sonoma County Housing Element Update: A Plea from Worried Residents

#### **EXTERNAL**

To: Eric Gage, the Sonoma County Planning Commission, the Board of Supervisors, and Mike McGuire

Subject: Sonoma County Housing Element Update

Date: February 10, 2023

My husband and I moved to Sonoma County in 2009. We've lived in a condo in Healdsburg, a house in Fountaingrove (may it rest in peace), back to a condo in Healdsburg, and then, finally and thankfully, to our house in Forestville in 2019.

We treasure our town (well, census-designated place) and our neighborhood for its peaceful rural character, friendly and caring residents, scenic backroads, connection to nature, and what perhaps best be described simply as elbow room. So you can imagine our dismay when we recently learned that the county is considering a proposal to rezone six sites in Forestville to allow medium-density housing, including a 14-acre apple orchard directly across the street from us. Currently, this site, FOR-2, is zoned for seven houses, each on a two-acre lot; the proposed changes would raise that number to a staggering 283 housing units with a possible total population of 736 residents.

Overall, if rezoned and built as proposed, the six sites in Forestville would drastically and forever change the nature of our rural community, and not for the better. The rezoning plan would increase Forestville's population by more than 1,650 people—roughly 25 percent—in a very short period of time. It would add congestion on our roads and modern, multi-story buildings completely out of character with our farmhouse-studded town. There would be tremendous impacts on our schools, water resources, parks, wildlife, and, alarmingly, wildfire-evacuation routes. The infrastructure costs would be astronomical to install the necessary sewer lines (most of us are on septic currently), sidewalks on Mirabel and other busy roadways, and stoplights or roundabouts to manage the dramatic surge in traffic, to name just a few considerations.

There are also a number of reasons why building higher-density housing in Forestville doesn't make sense for medium- to low-income households. We are in the boonies here, people, with spotty bus service, an almost 20-minute drive to a major grocery store like Safeway or a mall, and few employment opportunities in town.

Please understand that we acknowledge the need to add more affordable housing throughout California, including in Sonoma County, but the sites chosen for rezoning to accommodate medium- and high-density housing must be chosen with care, a respect for existing local character, and equity. To blend in with the community and provide easy access to essential

services, most of the sites should be close to urban centers. When one looks at the proposed rezoning in Sonoma County, it's a real head-scratcher: Sonoma town would get 78 occupancies and 202 residents; Petaluma would get 170 occupancies and 441 residents. How can it possibly be fair to add 635 new occupancies and 1,652 residents to tiny, rural Forestville, second only to the 1,022 occupancies and 2,656 residents proposed for Santa Rosa? Some new, well-placed building would certainly be welcome in our hamlet; just not the avalanche that was designated in the EIR.

122.5 cont.

We understand 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, as it has been since their forebears purchased it in the early 20th century. We hope that that is enough to remove this property from rezoning consideration, but if it isn't, we hope that common sense and parity are.

122.6

Thank you for considering our point of view. Forestville's motto is "The Good Life," and all of its residents would like to keep it that way.

Sincerely,

Mona Behan & Alan Crisp 6867 Nolan Road, Forestville, CA 95436 February 10, 2023 Letter 123

Att: Eric Gage

Re: Draft EIR Comments: Housing Element Update

Dear Eric and ladies and gentlemen,

I thank you, the Planning Commission, and all involved for receiving and reviewing our public comments. I thank LRRMC Lower Russian River Municipal Advisory Council and Land Use Committee for their recent Feb 9<sup>th</sup> zoom meeting and giving our community a chance to respond with questions and concerns regarding the DEIR's Housing Proposal.

I live in Forestville and appreciate this focus on low income housing yet, I see this proposal as not addressing the current needs of our small Forestville community. This proposal, with a possible increase in population of 1,484 for Forestville, would create a very challenging impact on this village town and change the character while not addressing needed improvements on the current infrastructure.. Decreasing the proposed density identified in this EIR for Forestville while finding alternatives to provide low housing here in our community is not an easy task but one that I support and encourage. A balance of low income housing with thoughtful consideration for what is here now while preserving its beauty and peacefulness is what I would like to see.

This DEIR proposal needs to address Forestville's current infrastructure needs. Adding such a huge increase with housing and people to this village town would intensify the problems we presently experience. Lack of sidewalks such as is the case on busy roads like Covey and Mirabel already prevents travel by walkers and bikers. Providing children, elders, handicapped and people of all ages in our community with safe sidewalks and streets is very important and would create less pollution from cars for transportation and is needed with current climate changes.

I am concerned about the increase in vehicles that would need to exit out of town using our two main arteries, River Road and Highway 116, during fire evacuations. This is unfortunately something that must be considered. I remember our first evacuation alert in 2016 and warnings we have had during most of the years that have followed. Evacuating twice made me experience the limits of the number of vehicles those two main exits can offer us all. Safely leaving our properties and homes during emergencies could be dangerously compromised with more residents and heavier traffic than we have experienced in the past years and it needs to be addresse

In Site 5 and Site 6 the proposed density increase could lead to many more cars needing to exit onto Highway 116 from Packing House Rd. for jobs and connections with local towns with larger stores, hospitals and amenities that our small town does not offer. I would describe Highway 116 as having narrow width lanes and am concerned about an increase in traffic from the proposed increase in population in that area. Infrastructure safety improvements for elderly and people with special needs may be needed at these sites and all the other sites. Other costly improvements may be necessary as well. The highest proposed density increase is with the FOR-2 Nolan Rd site which could necessitate major sewer pipe changes to be able to serve such a population increase. I see an unreasonable amount

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123.5

of stress that this all would add to this peaceful town with the very high population increases proposed by this DEIR.

123.6 cont.

I appreciate your consideration of my comments.

Thank you,

Nancy Dempster 6730 1<sup>st</sup> St. Forestville CA 95436 From: Robert Davis <badbob58@gmail.com> Sent: Friday, February 10, 2023 11:30 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Cc:** Robert Davis <badbob58@gmail.com> **Subject:** Forestville Rezoning for Housing

#### **EXTERNAL**

#### To Whom It May Concern:

I'll keep this short and to the point. After reading the DEIR, looking at the maps provided as well as Google Earth, I have to wonder why you would contemplate adding 571 housing units, with a population increase potential of 1,484 people, to a small unincorporated community like Forestville.

124.1

I don't believe our water or sewer system can handle that large of an increase. The current infrastructure (roads and services) do not support this large of an increase either. What may look good on paper, in reality, doesn't make sense when you take a closer look at it.

124.2

One other note. I found at least two errors in the Aesthetics section of the DEIR.

- 1. "On Mirabel Road, a school is directly across the street from FOR-2." That is not correct. The Forestville Youth Park is on Mirabel. The school is on Covey.
- 2. "FOR-4 is situated east of FOR-1 in an area accessible only by unpaved roads off Van Keppel Road." What is being referred to as an unpaved road off of Van Keppel is actually a private driveway.

124.3

I will not support this rezoning in its current form.

Thank you for your attention to this matter.

Sincerely, Robert Davis 6255 Van Keppel Rd. 707-328-2493 Hello Eric,

It was nice to put a face to your name and thank you so much for attending the recent meeting on Thursday evening regarding The Housing Element!

I very much understand there is a real need to build low income housing in the county including in unincorporated areas and have hopes people will come forward with more appropriate locations. I also understand it is an uphill battle and I applaud your efforts and commitment to get it right.

I have lived on Mirabel Road in Forestville for a decade. There are a number of pressing issues that already continue to go unaddressed here in our small community. I was surprised to read the proposed increase to the population of Forestville is, by far, the highest of any of the proposed sites and would include well over 1600 new residents to our small community. Krista raised a point in the meeting, and I too am interested and am asking how Forestville locations were selected as they would have the most impact to our population? Our residents here would be, by far, impacted more than any other location. I also want to speak to some of the resources already lacking in our small community such as water, sewage, accessibility to transportation, lack of sidewalks, poor road quality, insufficient access to police and shopping, traffic congestion. Mirabel Road, like so many others in the Russian River area already presents a real danger. Many roads, including Mirabel Road are in poor condition largely from lack of maintenance and exacerbated by recent storms and constant traffic. On Mirabel Road the conditions are already quite dangerous due to degraded road surface which poses an ongoing threat to bicyclists and pedestrians including our school aged children.

I help moderate a site called Next Door and another ongoing concerns voiced by local residents in Forestville is the drug and alcohol abuse plaguing our neighborhoods.

Of paramount concern for our residents is to have a safe and expedient evacuation plan in the event of a natural disaster. Having experienced this firsthand on several occasions, our ability to safely evacuate during an emergency is a concern of many, if not all, of my neighbors.

Eric, Forestville, as well as some of the other proposed locations, clearly lacks adequate infrastructure to move forward with the planned proposal. The issues I spoke of above, in my humble opinion, should all be addressed prior to the inception of any endeavor of that magnitude, especially here in Forestville due to our already inadequate infrastructure and safety concerns.

It is my understand that residents of a housing project, such as the one proposed in Forestville on Mirabel Road and the 116, would do much better in a more urban setting primarily due to lacking infrastructure and proximity to services.

In closing, I want to thank you for taking time to read this. I am aware many of the concerns have already been noted. I want to voice my concerns as well and wish I had more suggestions for more appropriate locations in this area.

I wish you the best in helping to resolve this in an equitable manner, one that would work for all of us. You can reach me via email or my landline if you have any questions.

My phone number is 707 887-1068.

Vekker Meller

Best to you,

Vikki Miller Forestville, CA

D'11 email a duplicate in the event this doeon't avive by the deadline.

125.1

125.2

125.3

125.4

125.5

125.6

From: ADELE turk <adeleturk@comcast.net>
Sent: Saturday, February 11, 2023 12:54 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

**Subject:** Draft EIR - Housing FOR-2

#### **EXTERNAL**

I live in Forestville on Guisti Road. I believe that is not a good area to put 283 houses There is no road access, side walks, sewer connection, street lights. There is no hospital in 10 miles or grocery store or street lights. The traffic is very heavy on Mirabel road, highway 116 and river road. Many heavy equipment trucks from the Rock Quarry and many cars coming up and down highway 116.

126.1

Putting 1652 population in an area where there are no jobs available is not a good idea. The solution I think is moving this proposal close to a a bigger town with adequate facility.

126.2

Adele Turk

# Alice Horowitz P.O. Box 1045 Glen Ellen, CA 9542 oneallicat@gmail.com

Letter 127

Feb. 11, 2023

## DELIVERED VIA EMAIL

## Please distribute copies of this letter to all concerned County staff & Decision Makers.

RE: Comments on Sonoma County Housing Element Draft EIR, specifically regarding Glen Ellen parcels, # 054-290-057 and # 054-290-084 (GLE-1 and GLE-2)

Dear PRMD Staff:

I am writing to voice my concerns about the Draft EIR for the Sonoma County Housing Element, specifically regarding the two properties referenced above owned by Mr. Marty Winters and located on the corner of Carquinez and Arnold Drive in the heart of downtown Glen Ellen. These parcels were identified as potential sites for upzoning during the "Rezoning Sites for Housing Project" and were included in the Draft EIR. During the Draft EIR public comment period, many people submitted comments with valid concerns regarding the inappropriateness of substantially upzoning these parcels, which are outside of the urban growth boundary in the tiny village of Glen Ellen at an unsignalized intersection.

As a 29-year-resident of downtown Glen Ellen, I have no objection to Mr. Winters improving his properties (they certainly are in great need of improvement)! However, the rezone sites represent a large part of the downtown core (all two blocks of it!) and will dramatically change the core by tripling the existing number of housing units allowed. The Workforce Housing (WH) zone district REQUIRES a minimum number of units (16), so the property owner will have no choice but to overdevelop the property. The proposal is **clearly inconsistent with the intent of** 

# the Glen Ellen policies established in the General Plan and Glen Ellen Development and Design Guidelines.

127.1 cont.

Furthermore, the DEIR cumulative impact analysis does not consider two huge projects in close proximity to the proposed rezoning sites in Glen Ellen and Sonoma Valley – the adopted SDC Specific Plan and the Hanna Center housing, hotel, and commercial development a few miles down Arnold Drive. How can it be that these two large-scale developments were apparently NOT considered in the cumulative impact analysis for transportation, land use policy consistency, GHG, visual resources, public services (water, wastewater), or wildfire evacuation and emergency response? How on earth is Arnold Dr. supposed to acommodate so much increased traffic on a daily basis, not to mention during an emergency evacuation?

127.2

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#### Please consider:

- 1. Removing the two Glen Ellen parcels from the rezoning list due to significant impacts identified in the EIR; and/or
- 2. Assigning an alternative zone district that reduces the number of allowed units on the site and does not require a minimum number of units, as required by the WH zone.

127.4

In closing, with the large scale SDC development, it is clear that Glen Ellen and the surrounding semi-rural area (without adequate infrastructure or transit) will be taking on more than its fair share of housing and should not be required to accommodate even more housing that will contribute to the significant and unmitigatable traffic impacts identified for the SDC Specific Plan.

Respectfully,

Alice Horowitz

Letter 128

From: Anna Narbutovskih <narbutovskih@comcast.net>

Sent: Saturday, February 11, 2023 3:51 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Proposed Housing Development in Guerneville

#### **EXTERNAL**

#### Permit Sonoma:

I'm writing to protest the proposed multi-family housing development in Guerneville located at 14156 Sunset Avenue which is property owned by Sweetwater Springs Water District. That location is on a narrow one lane road where it's absolutely impossible for two cars to pass. The car driving downhill has to back up several hundred feet around curves to the top of the hill without falling off the downhill side. Adding 30 units for 78 people will lead to many unhappy accidents.

128.1

Ten percent of the single family homes on this hill are Short Term Vacation Rentals (STVR). By my count that's 14 homes that could be rented to working families. Simply eliminating the despised STVR permits will account for half of the proposed units and add stability to the neighborhood.

128.2

We are clearcutting our forests for lumber to build houses and blasting our mountains for the limestone and shale to make concrete. We are destroying our environment and biodiversity to build new housing, releasing massive carbon and pollution in the process adding to climate change. Instead we should be repurposing existing buildings and building materials. Before building anything new, take an inventory of what we already have that can be repurposed and refurbished.

128.3

Please consider the environment and future generations before proceeding with this unwanted and unnecessary proposal.

Thank you,
Anna Narbutovskih
narbutovskih@comcast.net
14288 Woodland Drive
Guerneville, CA 95446

From: Becky Boyle <becky.boyle@gmail.com>
Sent: Saturday, February 11, 2023 7:55 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Cc:** Eric Gage <Eric.Gage@sonoma-county.org>; Susan Gorin <Susan.Gorin@sonoma-county.org>; Pat Gilardi <Pat.Gilardi@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; Andrea

Krout <Andrea.Krout@sonoma-county.org>; district4 <district4@sonoma-county.org>; district3

<district3@sonoma-county.org>; district5 <district5@sonoma-county.org>

Subject: DEIR - Housing Element Update - FOR-6 parcel

#### **EXTERNAL**

Dear Sonoma County,

I have concerns for the potential residents (health) and the county's pocketbooks (potential lawsuits) with respect to potential building of low, moderate and any housing for that matter that backs into the property facilitating a sewage treatment plant. GI and Sinus disorders in particular are a risk to people in close enough proximity especially as pollutants go airborne. It is worth noting in addition to a safe distance between sewage treatment plant to residents, the allotment for potential future needs changes the treatment plant will have over time. Especially in light of all the many proposals on the table, how is the current plant equipped to handle all the additional toilet flushes from 1,600 people? How many households are currently feeing into that system? Most of us are on septic. Few are on sewer. How will the potential future needs grow and what physical land footprint should be maintained to maintain the plant's needs?

129.1

I have concerns about the health and welfare of these potential residents as well as having concerns for the county in terms of optics of having designated low income housing right on top of a sewage treatment plant. What does that say about the very people we're supposed to be helping? I don't love this at all. Quite the contrary.

Respectfully, Becky Boyle Forestville, CA

In the scope of 'accidents happen' I am reminded of an event in Contra Costa County in October of 2022: <a href="https://www.sfchronicle.com/bayarea/article/Toxic-levels-of-hydrogen-sulfide-detected-near-17495401.php">https://www.sfchronicle.com/bayarea/article/Toxic-levels-of-hydrogen-sulfide-detected-near-17495401.php</a>

"Public health officials in Contra Costa warned people who live near the Crockett wastewater treatment plant that harmful levels of hydrogen sulfide were emanating from the facility on Friday, causing putrid smell to waft through the air, and potentially causing headaches or nausea. Residents recently began complaining about rotten egg odors that appear linked to an "ongoing operational issue" at the plant on 1801 Dowrelio Road, county health staff said in a notice Friday afternoon. It said that Bay Area Air Quality Management District monitors had found dangerous levels of hydrogen sulfide in the surrounding air. Although a foul smell alone doesn't indicate a public health concern, air monitors detected the chemical at high enough concentrations to cause symptoms, ranging from headahes and stomach aches to sore eyes. The risk of illness increases when people are exposed for longer periods of time, the notice said. It warned residents near the

plant to close windows and doors or consider leaving the area, noting that the gas tends to be more concentrated in the afternoon, as temperatures rise. Health officials also recommended carbon air filters and said anyone with severe symptoms should seek medical treatment. Masks do not provide an effective barrier against hydrogen sulfide, the notice advised."

Additionally, I came across this little blurb from the CDC. It is geared toward employees but does now specifiy what "around" means in "if you work around treated (class B) biosolids) so it stands to reason as toxins go airborne and into the ground as well, that humans "around" are also at increased risk of materials that can cause diseae.

https://www.cdc.gov/niosh/nioshtic-2/20039436.html

129.2 Cont.

Can sewage bacteria be airborne?

Abstract. Wastewater treatment plants (WWTPs) are major sources of airborne bacteria, which could pose health risks to WWTP workers and surrounding residents. In this study, air samples were collected from various treatment facilities of a typical WWTP.Feb 1, 2019

From: Becky Boyle <becky.boyle@gmail.com>
Sent: Saturday, February 11, 2023 6:13 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Cc:** Eric Gage <Eric.Gage@sonoma-county.org>; Susan Gorin <Susan.Gorin@sonoma-county.org>; Pat Gilardi <Pat.Gilardi@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; Andrea

Krout <Andrea.Krout@sonoma-county.org>; district4 <district4@sonoma-county.org>; district3 <district3@sonoma-county.org>; district5 <district5@sonoma-county.org>

Subject: Re: DEIR - Housing Element Update - FOR-4 parcel

#### **EXTERNAL**

Hi, So sorry, meant to include this also. Thank you, Becky

#### People also ask :

What is the width of a construction truck?

The Surface Transportation Assistance Act (STAA) of 1982 extended the same width requirement of 102 inches to commercial trucks. Oct 9, 2019



130.1

https://ops.fhwa.dot.gov > freight > size\_regs\_final\_rpt

On Feb 11, 2023, at 6:09 PM, Becky Boyle < becky.boyle@gmail.com > wrote:

Dear Sonoma County,

After walking around and talking to people in the surrounding neighborhood of FOR-4. There's a lot of confusion out there. The address of 6090 Van Keppel does not actually exist in terms of signage on Van Keppel, leaving many residents unsure as to where this plot of land is that the county is considering for re-zone. There's currently (per your DEIR) 2 houses on these 2 acres and the proposal reflects Occupancies of 71. From 5 people, to 185. Let me say that again, from 5 people to One Hundred and Eighty Five people. This is a rectangular 2 acre lot with no direct access to Van Keppel. There is a PRIVATE pebble rock/dirt driveway going that direction. There is a lot between FOR-4 and Van Keppel.

130.2

Van Keppel (in the stretch between Covey and the first hard left the road takes leading up to this private driveway) is only 16'10" in width. The pebble rock/dirt driveway's width is only 9'6". This is inadequate access for the scope of your proposed project especially when taking into consideration all residents only have Van Keppel as a one way in and out road. There are no shoulders. There are no turn outs. It's road meets grassy/mud ditch/property fence driving.

Enclosing some photos for clarity. I sincerely question that a parcel with no access to the street (an only one way in and out street) could be viable especially given a maximum road with of 16'10" (private driveway width 9'6") when the average construction truck is 102" (aka: 8'5") and lacking access to the lot. How will residents survive, how will the streets that are already suffering from erosion and cracking survive. How will people flee in the event of an all too common evacuation emergency. Those roads are not built to handle the weight load nor the flow that is being proposed. This should not be rezoned. This parcel needs to be excluded from any rezoning.

130.2 Cont.

Sincerely, Becky Boyle 10825 Canyon Rd. Forestville, CA

<IMG\_4786.jpeg>

<IMG\_4787.jpeg>

<Screen Shot 2023-02-11 at 5.57.47 PM.png>







From: Becky Boyle <becky.boyle@gmail.com>
Sent: Saturday, February 11, 2023 11:20 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: question, seeking clarification re: FOR-4

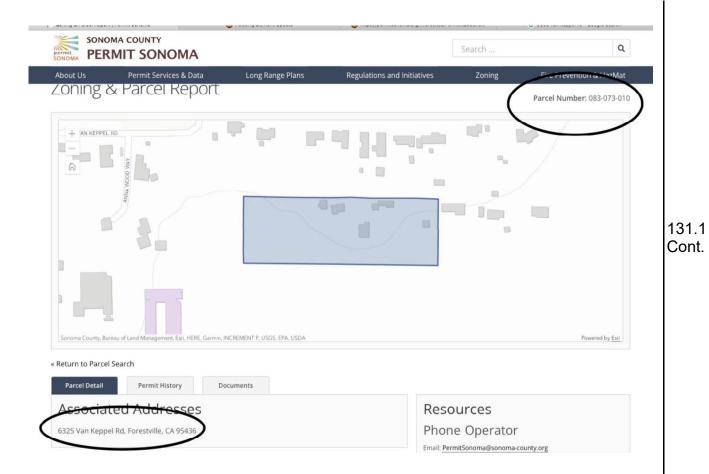
#### **EXTERNAL**

Hi,

My goodness, FOR-4 is an odd beast. The DEIR lists it as APN #083-073-010 and an address of 6090 Van Keppel Rd. However, your Zoning and Parcel Report for parcel APN: 083-073-010 lists that address as 6325 Van Keppel Rd. Can you please shed any light on this for us? Enclosing pic. I'm kind of assuming the 6325 Van Keppel address listed as associated is because you have to go through that address to get to this one but I am trying to confirm the APN # is accurate because there really does not seem to be a 6090 Van Keppel to be found aside from this rectangular lot and it does (based on overhead gps) appear to fit the description of being bordered by houses on one side, the school on the other, a few houses on the other side and AG on the other.... Seeking confirmation as things are kind of wonky re: lining up. Thanks.

Also, I'm wondering what the squiggly line going form bottom left to top right is. Is that a creek? Thanks, Becky Boyle

		주기 (원 주제기 (프리네)	
FOR-4	6090 Van Keppel Road	083-073-010	Forestville
	STATEMENT OF THE STATE OF THE	Sales University - 2015 to 1	T-141 - 1411



From: CL Tree < <a href="mailto:cltree2@gmail.com">cltree2@gmail.com</a>>

Sent: Saturday, February 11, 2023 5:48 PM

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

Subject: EIR FOR-1-7 - Lack of Access to Grocery Store via Safe Walkways

#### **EXTERNAL**

How will the proposed development of sites FOR1-7 address the issue of the lack of a nearby Grocery store. The small grocery store at the North end of Mirabel is the only grocery store nearby without driving out of town via a car or a bus. Mirabel does not have sidewalks or a bike path and pedestrians are at risk due to the Gravel trucks and other vehicles using Mirabel throughout the day. How will this be migrated with the proposed influx of population.

132.1

Thank you,

C.L. Tree 6610 Jim Court Forestville, CA 95436 From: CL Tree < <a href="mailto:cltree2@gmail.com">cltree2@gmail.com</a>>

Sent: Saturday, February 11, 2023 5:48 PM

To: PlanningAgency < <u>PlanningAgency@sonoma-county.org</u>> Subject: EIR FOR-1-7 - Sidewalk & Traffic Light Infrastructure

#### **EXTERNAL**

How will the proposed development of sites FOR1-7 affect the current lack of sidewalks & traffic lights be addressed?

Currently there are only small sections of sidewalk along one side of Mirabel and a haphazard sidewalk structure down main street. A pedestrian needs to currently tread carefully to avoid tripping downtown as there are several levels and folks often walk behind parked cars to walk on a level surface ... right next to all fashions of country drivers including Gravel trucks, pick up trucks and automobiles. An additional hazard for both walkers and drivers is the fact that there is no traffic light at 2 extremely dangerous corners — (Mirabel & Front St. and Covey and Front St.) How will this be migrated with the proposed increase of almost doubling the population of Forestville?

133.1

Thank you,

C.L. Tree 6610 Jim Court Forestville, CA 95436 From: CL Tree < <a href="mailto:cltree2@gmail.com">cltree2@gmail.com</a>>

Sent: Saturday, February 11, 2023 6:24 PM

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

Subject: EIR FOR-1-7 Traffic & Parking Infrastructure

#### **EXTERNAL**

How will the proposed development of sites FOR1-7 affect the need for both increased parking in general along with also thinking through the fact that Mirabel is a emergency corridor for both fire and sheriff vehicles. A quick exit and clearance strategy for emergency vehicles being called out is critical to rescue and disaster response efforts ... especially during the height of our summer season. We currently have traffic issues with rush hour traffic heading south ... waiting to turn left onto 116 ... that backing up to vehicles past the Water Company which is right next to the Fire Department. And during rush hour there is often a same scenario at the other end of Mirabel at River for cars trying to turn onto River. How will this be migrated and factored into the proposal to increase of almost doubling the population of Forestville?

134.1

Thank you

C.L Tree 6610 Jim Court Forestville, CA 95436

Letter 135

From: Cheryl A Franzini <franzini@sbcglobal.net>

Sent: Saturday, February 11, 2023 5:22 PM

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

Subject: Remove the two Glen Ellen Parcels from rezoning consideration

#### **EXTERNAL**

Attention: Eric Gage -

This is in reference to Sonoma County Housing Element proposed rezoning of parcels # 054-290-057 and # 054-290-084 (GE-1 and GE-2).

Our downtown Glen Ellen area is 2 - 3 blocks long. Densifying this area is not consistent with the general plan policies regarding Glen Ellen nor is it consistent with the Glen Ellen Development Guidelines. Glen Ellen is not an urban area and is outside the urban growth boundary. There are currently 5 dwelling units on the property now. If rezoning occurs it will increase density on the properties to 16 to 22 units, bringing more cars and people into the area. Also they plan on removing trees which would change the character of our downtown area.

In addition the EIR does not consider the cumulative proposed projects in our area i.e. the development of a minimum of 620 homes proposed for the Sonoma Developmental Center site, or the recent development on the north side of Carquinez in Glen Ellen, or the newly proposed building of 660 units and a hotel across from Hanna Boys Center.

Please remove these two parcels from the rezoning list and help keep the character and charm of out town intact.

Thank you for your consideration.

Cheryl Franzini-Pegan & Herb Pegan

(We are long time residents of Glen Ellen and we live in our home year round)

Sent from my iPad

Letter 136

From: Francisco Saiz <francisco.saiz@icloud.com>

Sent: Saturday, February 11, 2023 3:39 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>; district5

<district5@sonoma-county.org>; Leo Chyi <Leo.Chyi@sonoma-county.org>

**Subject:** Housing Element Update

Mr. Eric Gage 2550 Ventura Ave Santa Rosa, CA 95403

The need of affordable housing complexes in and around Forestville is always a challenge for Sonoma County to address whether it's Santa Rosa, Sonoma, Windsor or Healdsburg.

'Forestville' presents itself as the "Good Life" setting in a small town setting in a rural country site. I have examined the Housing Site Inventory that satisfies RHNA (Regional Housing Need Allocation) for the Forestville community.

Yes, I am amazed that a possible 635 new dwelling units are being proposed for Forestville that could add 1500+ people into the community with no infrastructure present to handle the population boom.

I presently live in Forestville. I enjoy the small rural community marked with narrow roads and tree lined passageways to modest homes in the area. The homes are all single story structures on small parcels or parcels with acreage. The light pollution is minimal here with no glaring pockets of light that eat away the night. We all pay property taxes to have the "Good Life" in Forestville.

I want to address the Forestville Inventory Sites FOR-1 and FOR-4 identified by Sonoma County Housing Element Update on page 2-14. Both of these sites will bordered Forestville Academy Elementary School. How can school security be maintained for this elementary school with a high density apartment complex so near? Will large metal fences be the barrier that separates

the elementary school from apartment complexes? How will the toxins on FOR-1 be handled during construction phase to ensure that the young and old around the site are safe? Where will the access to FOR-1 be created?

FOR-4 site is accessed by a small one lane gravel road that is flooded by any heavy January rains. The entry way to FOR-4 via Van Keppel Road off from Covey Road is a narrow road where all have to stop occasionally to allow a vehicle to proceed safely. This narrow lane to FOR-4 has always had to deal with excess rainwater drainage. This area represents a natural bog and a rainwater catch basin for runoff.

I feel that the Housing Element Update has failed to fully study or provide measures to prevent significant environmental and human harms that will result from the increased dwelling units for

Forestville. Allowing this dwelling sprawl to go forward violates decades of open space protection, town-centered growth and sprawl prevention. Forestville has enjoyed its open space.

This many apartment style units will present severe challenges with transit, infrastructures and community services. Traffic alone will be severely impacted if all proposed units are built.

Forestville will be forever change but not for the good of the community. I desire Forestville to be a community where all contribute to the community good. I want to see people paying property taxes that will allow future sensible growth. I do not want to see Forestville become a place for the needy, for the downtrodden or at risk population. Yes, there is a need for

136.1

136.2

136.3

136.4 Cont.

low income housing state wide but no hand outs are needed here. Nor do we need apartment complexes higher that two stories here with limited parking. We need sensible growth.

Frank and Norma Saiz 707.710.5966c 7070 Winter Orchard Lane Forestville, CA 95436

Richard Halgren/Julie Clark 7102 Winter Orchard Lane Forestville, CA 95436

Gino and Karen Franceschi 7134 Winter Orchard Lane Forestville, CA. 95436

Letter 137

From: Deb Votek <deblouvo85@sonic.net> Sent: Saturday, February 11, 2023 10:08 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Sonoma County Housing Element proposed rezoning of parcels # 054-290-057 and # 054-290-

084 (GE-1 and GE-2).

#### **EXTERNAL**

We respectfully request that you remove proposed rezoning of parcels # 054-290-057 and # 054-290-084 (GE-1 and GE-2). Currently five dwellings exist. Changing the zoning to allow between 16 and up to 22 dwellings violates both the General plan policies regarding Glen Ellen and the Glen Ellen Development Guidelines.

I have been a resident of Glen Ellen for 40 years appreciating the rural character of the town to raise a family.

Glen Ellen values our trees and our proximity to Jack London State Park. Glen Ellen is not located near an urban growth area. It is the small, (only two blocks) country feel of our town that invites tourists to enjoy nature and supports the restaurants and inns that provide jobs to residents who live here. Do not destroy our town by approving high density housing that the residents of Glen Ellen reject!

Sincerely,
Joseph & Deborah Votek

From: Kate Farrell < katefarrell@me.com>
Sent: Saturday, February 11, 2023 12:00 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Comments on Sonoma County Housing Element proposed rezoning of parcels # 054-290-057

and # 054-290-084 (GE-1 and GE-2).

#### **EXTERNAL**

Dear Sir or Madam,

I am writing in regard to the rezoning proposal for two Glen Ellen parcels that are under consideration.

As a county resident who travels up through the Glen Ellen corridor on a frequent basis, and who also lived through the chaos of the recent fires that affected the corridor, it is obvious that increasing housing density in the area is an unsafe and irresponsible idea. Increasing population density in this area puts residents at risk and make efficient evacuation near impossible.

138.1

Additionally, the infrastructure to support an increased population density does not exist. Schools, services such as police and fire, existing roads and access to water are already strained to their limits.

Nor does the proposal consider the the cumulative projects in the area, i.e. the development of a minimum of 620 homes proposed for the Sonoma Developmental Center site or 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.

138.2

I urge you to deny these proposals for Glen Ellen,

Thank you,

Kate Farrell

From: larry loebig <a href="mailto:larryloebig@gmail.com">larry loebig@gmail.com</a> Sent: Saturday, February 11, 2023 11:30 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Comments regarding EIR and FOR2 and traffic

# **EXTERNAL**

What impact on the flow traffic will the proposed development at FOR 2 have on the summer traffic or during a fire evacuation? How will this be mitigated?

From: larry loebig <a href="mailto:larryloebig@gmail.com">larry loebig@gmail.com</a> Sent: Saturday, February 11, 2023 11:45 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: EIR FOR 2 - sidewalks and infastructure

#### **EXTERNAL**

The EIR for FOR 2 sites the development of being walking distance to town and services. There are no maintained sidewalks - and very few services available. How will people walking to town with no maintained sidewalks be mitigated and what extra infrastructure will the county need to develop especially for ADA people?

140.1

How will the added residents affect The current public transportation system?

Thanks

From: larry loebig <a href="mailto:larryloebig@gmail.com">larry loebig@gmail.com</a>
Letter 141

Sent: Saturday, February 11, 2023 11:33 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: EIR FOR2 Sewer and Water

### **EXTERNAL**

What impact on the sewer and water in Forestville for the proposed development at FOR2?

How will the adverse effects of added water usage and sewage usage be mitigated?

Thanks

Larry Loebig 6610 Jim Court Forestville CA 95436

Letter 142

From: larry loebig <a href="mailto:larryloebig@gmail.com">larry loebig@gmail.com</a> Sent: Saturday, February 11, 2023 11:58 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Fwd: EIR FOR2 -7. Question re Electrical Infastructure

# Begin forwarded message:

From: larry loebig < <a href="mailto:larryloebig@gmail.com">larryloebig@gmail.com</a>>

Subject: EIR FOR2 -7. Question re Electrical Infastructure

**Date:** February 11, 2023 at 11:55:58 AM PST **To:** PlanningAgency@sonoma-county.org

We have a limited electrical delivery infrastructure in Forestville.

How will the development of sites FOR 2-7 affect the electrical grid infrastructure? How will the capacity be upgraded and be made safer? How will the increase in electrical demand effect the the grid in terms of fire hazard? How will this be mitigated?

142.1

#### **Thanks**

Letter 143

143.1

From: larry loebig <a href="mailto:larryloebig@gmail.com">larry loebig@gmail.com</a> Sent: Saturday, February 11, 2023 11:40 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: question regarding EIR FOR 2 - 7 and supply of gasoline

#### **EXTERNAL**

How will adding 1600 new residents effect the consumers need for Gasoline? This is a rural area and most people need automobiles to access services.

The Zoning department has just voted to ban any expansion or new construction for commercial gas stations in Sonoma County.

How will the current service station which gets very crowded - serve an additional 1600 new residents?

#### **Thanks**

From: larry loebig < <a href="mailto:larryloebig@gmail.com">larryloebig@gmail.com</a>>

Subject: EIR FOR2 -7. Question re Electrical Infastructure

**Date:** February 11, 2023 at 11:55:58 AM PST **To:** PlanningAgency@sonoma-county.org

We have a limited electrical delivery infrastructure in Forestville.

How will the development of sites FOR 2-7 affect the electrical grid infrastructure? How will the capacity be upgraded and be made safer? How will the increase in electrical demand effect the the grid in terms of fire hazard? How will this be mitigated?

144.1

Thanks

Letter 145

From: Nina Rosen <ninazrose@aol.com> Sent: Saturday, February 11, 2023 1:47 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Development

### **EXTERNAL**

Hello-

I live around the corner from your proposed development- please don't do this. A terrible location for it. 145.1 We don't want or need it.

Respectfully,

A long time Forestville resident,

Nina Rosen

Date:

Letter 146

Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ave., Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4-16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

146.1

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

146.2

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

146.3

The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

146.4

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

146.5

The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

146.6

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

146.7

Name: RICHARD EVANGELISTI

Address: 16387 MELODY LANE P.O. BOX 213 GUERNEVILLE CA.

Date: 2/11/23
Signature: Gechard Campelisti.

From: rod oneal <rod\_oneal@hotmail.com> Sent: Saturday, February 11, 2023 12:05 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** HOUSING ELEMENT UPDATE

I am happy to voice my total support for AFFORDABLE HOUSING COMPLEXES around downtown Forestville. I have been a resident since 2001 and recently there has been an explosion of AIRBNB type vacation rentals that reduce the ability of Sonoma County families to obtain housing and as such turn these units over to the rich who purchase these homes for wealthy vacationers. Are we more supportive of those visitors to our county than we are to residents who live here 365 days a year? I have vacation rental properties on BOTH sides of my home now and must face the possibilities of loud parties on a nightly basis.

147.1

As a middle class resident who struggles to keep up with the rising cost of living in California in general and the San Francisco Bay Area specifically, I support the addition of this housing in Forestville!

Sincerely,

RODNEY E. O'NEAL 8170 PARK AVE FORESTVILLE, CA 95436 From: Rory Pool <roryjpool@gmail.com>
Sent: Saturday, February 11, 2023 10:45 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >; Susan Gorin

<Susan.Gorin@sonoma-county.org>

Subject: Sonoma County Housing Element Comment

### **EXTERNAL**

February 11, 2023 From: Rory Pool 13588 Railroad Avenue Glen Ellen, CA 95442 roryjpool@gmail.com

Re: Comments on Sonoma County Draft Housing Element - Up-zoning downtown Glen Ellen parcels, #054-290 and #054-290-084

To: PRMD

I have lived on Railroad Avenue which is in close proximity to this proposed rezoning since 1975. I have watched as the Carquinez Avenue area has changed from semi-rural to now crowded and bustling because of increased density. To merge onto Arnold Drive from the bottom of Carquinez Avenue is already difficult. To impact this very area with even more parking and traffic is to create urban congestion that negatively affects all.

As an arborist, I object to the removal of so many mature trees to allow this project.

We just had a new, dense housing complex constructed on the north side of Carquinez, and the soon - to- be-developed SDC (Sonoma Developmental Center) housing will pour thousands of cars through this intersection regularly.

Please pump the brakes on the urbanization of my beloved town!

Thank you, Rory Pool Glen Ellen

Letter 149

From: Stacie Gradney <stacieleelee@gmail.com> Sent: Saturday, February 11, 2023 2:24 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: West housing

#### **EXTERNAL**

I think your housing development needs to be more realistic. There is so much west county cannot fulfill or offer low income housing, apartments, hud housing... whatever you think it is.

Our rural roads ... the water .. our school. I say school because Analy is the only high school. Can Sebastopol handle that?

Can our elementary schools handle more population in our small towns?? I think not.

Have you considered Windsor by the airport? You can zone away over there. Yea it's by an airport but it's affordable right?

I am sad to hear my friend on van keppel is worried about their view of apple orchards would potentially be apartments 

It makes me angry. Are you even from here? A local?

Look elsewhere

Develop where developing has already taken over. Chain stores and all. We love and support our mom and pop shops and enjoy our small rural town

Please hear the people Listen to the people Save west county Save forestville 149.1

From: Tammy Melton <tammy.melton1@outlook.com>

Sent: Saturday, February 11, 2023 1:22 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: NO

# **EXTERNAL**

We don't want Low-income Housing in Forestville

Sent from Mail for Windows

ATN: Eric Gage Letter 151

From: Greg Carr

**Subject: DRAFT EIR: HOUSING ELEMENT UPDATE** 

Thanks for the opportunity to comment on the above DEIR. Following are my comments:

In general, this is a thorough and professional effort to comply with CEQA. However, there are some changes that are necessary in order for certification.

1. Project Description. This section should be expanded in order to provide a more detailed description of the process that will be involved in the review of future development projects on the rezoned sites, including the type of public notice, the opportunities for public involvement, the required entitlements, the County's discretion to address issues not covered by mitigation measures, and the feasibility of imposing necessary and possibly costly infrastructure improvements.

**2. Impact BIO-4**. The conclusion that the project would not affect wildlife movement is based upon the fact that the rezoning sites are located within areas of existing development is questionable. Several sites are located along the outer edges of urban service areas that are relatively distant from existing development. It is likely that wildlife movement still occurs on or near these sites. GEY-1, and PEN-2, and 6 are examples. The FEIR should identify and address these potential impacts.

**3. Impact LU-2:** The DEIR is inadequate in its analyses of consistency with the County and City general plans.

-The DEIR fails to consider future project impacts on the applicable cities' plans and policies where rezoning sites are located within the cities' urban boundaries. The applicable city planning policies and land use designations, such as Petaluma's "Very Low Residential", Sonoma's "Gateway Commercial", and Santa Rosa's various designations, should be listed, described, and analyzed for consistency. The EIR should discuss the likelihood that any of these cities will extend utilities to sites within the UGBs when the proposed project is inconsistent with the applicable City General Plan.

-In addition, the DEIR fails to address consistency of the proposed rezonings with the countywide General Plan growth projections and potential buildout under the current Land Use Maps. The project is clearly inconsistent with this aspect of the General Plan and its policies and results in significant environmental impacts. The fact that the project is deemed consistent with Plan Bay Area 2040 is appropriate to identify, but is largely irrelevant to the discussion of consistency with the current General Plan and this impact.

Further, the DEIR fails to support its claims of consistency with several objectives and policies by stating that by virtue of being consistent with a majority of all policies means that it is consistent for purposes of this EIR. Affected objectives and policies include:

Objective LU-3.2 and Policy LU-3c limiting future growth to County Urban Service Areas;

151.1

151.2

151.3

151.4

Objective LU-4.1 requiring that infrastructure be available to serve projected development;

Objective LU-19.1 and Policy LU-19a and Objective LU-20.1 and Policy LU-2000 to avoid new urban uses within the respective Petaluma and Sonoma Urban Service Boundaries;

Objective CT-4.1 and Policies CT-4.2 and CT 4.3 requiring that a project meet certain traffic congestion levels of service.

151.5 cont.

The project is clearly inconsistent with these objectives and policies and the EIR should so state. Once the proper analysis is included, the EIR should then discuss the significance of these inconsistencies and recommend available measures that can be applied at a project level. For example, individual projects could be required to meet the above circulation policies.

**4. Impact PH-1.** The DEIR correctly points out that the project would result in population and housing that exceeds "established population and housing forecasts", but then incorrectly concludes that this is not a significant impact because a housing need has been identified. That rationale is irrelevant to the fact that the project is inconsistent with the County General Plan since no change in housing policy has been adopted. Table 4.14-4 should be amended to include countywide Population, Housing, and Employment projections from the General Plan. The conclusion regarding significance should be based upon the difference between these countywide projections with and without the project. The statement that the project is consistent due to the proposed General Plan and Zoning amendments is incorrect and should be modified to state that these changes would only operate as mitigation measures for the inconsistency.

151.6

**5. Impacts NOI-2 and NOI-4.** The DEIR asserts that these two potential noise impacts would be mitigated by mitigation measures NOI-2, 3, and 4. However, it is likely that nighttime noise from blasting and/or pile driving will not be fully mitigated by the proposed measures due to proximity to other noise sensitive land uses in the near vicinity of some of the sites. The DEIR should add an additional mitigation measure that imposes a prohibition on nighttime blasting and pile driving when necessary.

151.7

**6. Impact PS-3.** Table 4.15-6 should be modified to include the actual current enrollment numbers for each of the elementary school districts so that the projected changes are put in context.

151.8

**7. Impact TRA-1.** While the DEIR is not required to determine the traffic congestion impacts using the Level of Service metric, this impact threshold asks whether or not there is a 'conflict with a program, plan, ordinance, or policy addressing the circulation system...". General Plan Objective CT-4.1 and Policies CT-4.2 and 4.3 require that projects meet certain levels of service to avoid significant congestion. This conflict should be described, either here or under Land Use Impact LU-2 above, and mitigation should be included. This mitigation should establish that future projects are required to meet these objectives and policies.

151.9

#### 8. Section 5.1 Growth Inducement.

-Population Growth (Section 5.1.1). Similar to the above discussion under Land Use and Population and Housing Impacts, the DEIR does not provide an adequate analysis and rationale for the conclusion that the project would not be growth inducing. Without a proper analysis of the additional countywide growth that would result from the project compared to the countywide growth under the current General Plan, the impact is inconclusive. Use of Plan Bay Area or the RHNA for this analysis is inappropriate as the County General Plan has not adopted those plans.

151.10

-Removal of Obstacles to Growth (Section 5.1.3). The statement that all of the proposed rezoning sites are located in designated County Urban Service Areas is inaccurate. In fact, most of the sites are located within the Urban Growth Boundaries of Petaluma, Santa Rosa, and Sonoma, all of which are located outside of these urban service areas. Further, the statement that water and sewer extensions would not result in additional growth is also inaccurate as noted in the DEIR discussion of the need for significant extensions in some of the more outlying sites.

From: Alanna Spencer <spencer9148@icloud.com>

**Sent:** Sunday, February 12, 2023 9:51 AM

**To:** PermitSonoma-Housing <PermitSonoma-Housing@sonoma-county.org> **Subject:** Please reconsider the low income housing development in Foorestville

Please reconsider the low income housing development in Forestville. Impacts to applicable resources including adequate water, sewage, accessibility to transportation, poor road quality, insufficient access to police and shopping, traffic congestion as well as any potential dangers. Many roads in the Russian River area are in poor condition from lack of maintenance, recent storms, and constant traffic. On Mirabel Road, for example, the conditions are already quite dangerous due to the degraded road surface which poses a threat to bicyclists and pedestrians. Our ability to safely evacuate during an emergency is also of paramount concern.

152.1

Alanna Spencer Resident of Forestville, CA From: Ann Dexheimer <ann.dexheimer@gmail.com>

Sent: Sunday, February 12, 2023 4:17 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>; district5

<district5@sonoma-county.org>; Leo Chyi <Leo.Chyi@sonoma-county.org>

Subject: Draft EIR comments: Housing element update

# **EXTERNAL**

# To Whom It May Concern;

My husband and I found and bought our home in Forestville in 2010, moving here after two years of intense research of housing in Sonoma County for the ideal place for us. We chose Forestville because of its rural charms, getting an unexpected bonus with our friendly neighborhood and town.

I am writing to address the concerns I have with the rezoning of the six lots in Forestville. I tried my best to slog through the 600 page Draft EIR but after several hours, I got no further than page 235, which makes me wonder how many of the county residents who will be impacted by these proposed rezoning changes will have the patience to go even further!

Several concerns bubble to the top.

1. **The focus on unincorporated areas.** It seems to me that there is a huge infrastructure need in all the areas listed in the DEIR that would be more easily met in the urban areas of our county. Additionally, is there a reason that Sebastopol and Windsor were left off the list? Could it be possible that the sites were selected from areas where less pushback would be expected (fewer residents, lower income levels)? It makes no sense.

In my rural neighborhood that is adjacent to FOR-5 and FOR-6 there is a sharp road curve, an increasing number of speeding cars, and no sidewalks. Because I have a disability, profound bilateral hearing loss, I do not walk Packinghouse Road to get downtown or to the West County Trail; I drive to where there is adequate parking and safety for me from the worsening traffic on Packinghouse. The infrastructure for additional housing in my neighborhood does not exist; I cannot imagine how this will be put in place with adding over four hundred and fifty residents to such a small area.

- 2. **Transportation**. Public transportation is extremely limited in Forestville, which would force individuals to turn to cars to get to work, school, or shopping. This would greatly increase traffic on the Forestville section of 116, a State Scenic Highway.
- 3. **Limited shopping and services**. Forestville does not have a large grocery store, which forces residents to drive 6 or more miles to the nearest supermarket. Additionally, if these new dwellings are multiple stories, how will that impact our fire department in terms of equipment? If there is another evacuation due to fires or floods, how will this evacuation work with such limited roads and the additional numbers of residents?
- 4. **Forestville no longer has a high school**. This is another situation where families would have to turn to driving on 116 to take their children to Sebastopol for school.

153.3

153.2

153.1

5. **Forestville provides few employment opportunities.** Folks will have to drive out of the local area in order to reach their place of work.

The report is large in scope and I realize that there are many State requirements for the information needed to find sites for additional housing in our county. However, though I am familiar only with the sites that are near our home, I noticed several errors in just the small portion I read. For example, the pictures on page 128 of FOR 5 and FOR 6 (two sites near our home) seem to be incorrect. The pictures were taken from Google Earth so I assume that the people who were hired to compile this report did not actually go to these sites. The impact of rezoning will have a huge impact on almost any area that is selected. These errors make it difficult for me to trust that the information in the report is accurate.

153.5

I hope that the Planning Commission and the Board of Supervisors will take my comments into consideration when they meet to discuss the rezoning of the lots in Forestville. Please let me know if you have any questions.

Best regards,

Ann Dexheimer (Frank Hochman, spouse) 310 Conor Ct. Forestville, CA 925-922-1229 From: Arlene&Geo Irizary <irizary@juno.com> Sent: Sunday, February 12, 2023 8:48 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Housing Element: FOR-4

#### **EXTERNAL**

I support the development of housing for extremely low-income, low-income & moderate income people in Sonoma County. As a long-time resident of Forestville, I do not support the proposed site for 180 new residents, FOR-4, 6090 Van Keppel Road, Forestville for a number of reasons. First, the only current access to this site is a narrow 16' wide road & a private 9'6" drive-way; the property is one-way in/one-way out so is at huge-risk during any type of emergency (wildfire, earthquake, etc.) and will be nearly impossible for larger construction vehicles to access. What costs will be required re widened/improved road access? What infrastructure, if any, exists now for water/sewer hook-ups? hat are the costs associated with all of these needed infrastructure improvements? What about increased electric & natural gas access?

154.1

Please remove FOR-4, 6090 Van Keppel Road, Forestville from your Housing Element proposals.

Thank you, Arlene Irizary 8582 Trenton Road, Forestville, CA 95436 (707) 887-7451 or (707) 304-4216 From: Arlene&Geo Irizary <irizary@juno.com> Sent: Sunday, February 12, 2023 11:10 AM

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

Subject: Housing Element: FOR-1, Electro Vector, 6555 Covey Road, Forestville

#### **EXTERNAL**

# Dear County Planners;

As a long-time non-profit housing advocate/worker, I support the development of housing for extremely low-income, low-income, medium-income people in Sonoma County. I am shocked by the proposed increase of more than 1500 new residents to Forestville on top of our existing population of about 6,000 people. I do NOT support the proposed housing development, FOR-1, Electro-Vector, 6555 Covey Road, Forestville.

155.1

While the Electro-Vector site is close to the downtown & to Forestville School, the site's historic uses are well-documented; old-timers report deaths from cancer of many workers at that site due to toxic exposures. What will it cost to do all of the required assessments/remediation of any toxic or hazardous conditions on this site before development even begins? How will those costs be funded?

Please remove FOR-1, Electro Vector, 6555 Covey Road, Forestville from the Housing Element proposals.

Thank you, Arlene Irizary 8582 Trenton Road, Forestville, CA 95436 (707) 887-7451 or (707) 304-4216 **From:** Brice Dunwoodie <bdunwood@gmail.com>

Sent: Sunday, February 12, 2023 10:27 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Cc: Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>; district5 <district5@sonoma-county.org>

Subject: 6th Cycle Housing Element Update Project - Concerns & Questions



I would like to raise several concerns about the 6th Cycle Housing Element Update project. But before I articulate my concerns and questions I want to state that I fully support expanding housing and affordable housing in a manner proportional to the current population and in a manner that aligns new housing and the corresponding population growth with existing infrastructure and economic robustness.

### The first concern is the distribution of new housing units across the county by ABAG.

As a function of population, 6th cycle Housing Element project is increasing housing statewide by about 9% (1,341,827 new 6th cycle units \* 2.86 avg. household size = 3,837,625 more housed population. This is 9.7% of California's 2020 census population.).

The ABAG mandate for Sonoma County is about an 8.4% population increase, using the same approach. The mandate for Santa Rosa is 7.5%. And strangely, the mandate for Unincorporated Sonoma is also about 7.5%. The rural areas of Sonoma are being loaded at the same level as Santa Rosa – this defies common sense and defies basic urban planning best practices

156.1

As Lynda Hopkins noted in her February 1, 2023 newsletter, this load on West County is an "outrageous 654% increase over the last planning cycle."

I understand that Sonoma county is told what to do by the Association of Bay Area Governments (ABAG). But I think it's the county's responsibility to appeal these numbers and/or challenge them legally in Sacramento, if the appeals process does not yield satisfaction.

I am aware that Sonoma county has tried (unsuccessfully) to appeal the current allocations, but I want to ask -- given the extremely bizarre current allocations -- why further challenges have not been pursued? Is there no additional recourse available?

My second concern is how Sonoma leaders have distributed the new housing units across Unincorporated Sonoma. As I understand, these are local Sonoma county decisions, not ABAG decisions.

#### Consider these numbers:

- \* California is supposed to create housing for about 9% more people
- \* Sonoma county's target is housing for about 8.4% more people
- \* For Unincorporated Sonoma it's 7.5% more people

\* For Santa Rosa it's also about 7.5% more people

These percentages all look similar. But in Unincorporated Sonoma and especially West County – where local leaders make decisions – the numbers are quite different:

- \* The Guerneville expansion is about 40% more people (616 new units; 403% of the CA average by population)
- \* The Graton expansion is about 70% more people (443 new units; 403% of the CA average by population)
- \* The Forestville expansion is about 110% more people (1,484 new units; 723% of the CA average by population)

These growth numbers are absurd. None of these towns could possibly expand at these levels without huge infrastructure projects and robust urban planning processes. And then there's the question of urban planning best practices -- overloading rural areas with scant infrastructure and a pattern of natural disasters makes no sense either.

Please explain how the new housing unit allocations were decided upon for these towns and exactly who or what committee was responsible for approving these decisions.

My third concern is related to the selection of sites. I'm sure many residents of Sonoma are providing feedback on the site selections and questioning the wisdom and/or legality of some of these decisions. I won't go into the site level details except in one case. But I would like to have a few general questions answered:

- 1. How exactly were the Guerneville sites selected?
- 2. Who approved these sites and what criteria did this person or committee use to approve a site?
- 3. Some, if not all, of the Guerneville sites are privately owned. Does Sonoma county acquire prior approval from the site owners before approving a site for inclusion in the Housing Element plan?
- 4. I have personally seen a letter from Sweetwater Springs Water District objecting to the inclusion of site GUE-1 / Parcel # 070-070-040 in the plan. Why is this site still included in the current plan if the owner of the site objects to its inclusion? And will Sonoma county be removing this site from the current plan?

Thank you for your consideration and I look forward to your detailed responses to my questions.

Kind regards, Brice Dunwoodie 156.2 Cont.

From: Celeste Johansson < celestejohansson@gmail.com > Letter 157

Sent: Sunday, February 12, 2023 7:01 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Forestville development

#### **EXTERNAL**

Good morning, I wanted to submit my comment regarding the proposed development of 3500 medium density housing units in the county. I am a resident of Forestville, which is the proposed location of some of the units. Forestville is a small commuter town in the Russian river. Our existing community doesn't have much in the way of public transportation or road infrastructure and traffic congestion on our narrower roads already pose hazard to existing town residents during emergency evacuation periods, both for fire and flood.

157.1

The county's proposal would disproportionately raise the percentage of residents in Forestville as compared to other towns in the county without making any provision for increasing our fire or medical resources or infrastructure to accommodate those new families, nor is there space to add enough new stores or restaurants to account for such a large population growth to our town, even if ample resources for that kind of development were being provided. Which they are not, under this proposal.

157.2

The second largest concern is the toxicity of the proposed sites for the housing development. These sites had previously been rejected by other developers as being too expensive to clean in order to be able to build. Is the county planning to follow those same standards and clean the toxic soil before building houses, or are exemptions being issued to be able to get the projects done, which would mean potentially harmful materials will be allowed to remain at the sites for these new low income residents? We need to make sure that all housing in our town is safe, but no discussion of remediation is involved with this proposal.

157.3

I ask that the county address these concerns.

Sincerely, Celeste Johansson. From: Gay Knight <gknight1021@gmail.com> Letter 158

Sent: Sunday, February 12, 2023 3:14 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Re. Comments against Sonoma County Housing Element proposed rezoning of parcels #054-

290-057 and #054-290-084 (GE-1 and GE-2)

#### **EXTERNAL**

I am strongly and respectfully requesting that Sonoma County remove the two Glen Ellen parcels, # 054-290-057 and # 054-290-084, from rezoning consideration.

The proposed rezoning of our rural, unincorporated Glen Ellen community (which has a downtown area consisting of approximately two blocks) to a "high density" classification is completely inappropriate. It would result in the removal of the 5 dwelling units and trees currently on the targeted "rezoning area". Instead, a minimum of 16 units and a maximum of 22 units would be built. This would be extremely out of proportion and destructive to our small community!

A high density area implies an urban area populated by high-rise buildings with many units, located near job centers and served by dependable public transit. None of these are true of Glen Ellen. There is a clear reason that Glen Ellen has been classified as an unincorporated area, and an incomprehensible change to the classification at this time is definitely not warranted. It would be destructive to our small, connected community.

Please remove the two Glen Ellen parcels from rezoning consideration.

Sincerely,

Grace Knight
Glen Ellen resident

From: jeanne beanne <jeannezbeanne@hotmail.com>

Sent: Sunday, February 12, 2023 10:19 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Permit Sonoma ATTN. Eric Gage

Dear Mr. Gage,

I oppose the 16-22 unit development on Arnold Drive on parcels numbers 054-290-057 and 054-290-084. There is now not enough parking for the few businesses that already exist. Now cars are forced to park up the hills in our neighborhoods. It is a very small town and would change the character and charm or it. There is already plans to put 620 units in Sonoma Developmental Center which is in the middle of Glen Ellen. There is also a proposal of 660 units and hotel across from Hanna Boys Center.

159.1

Letter 159

This density without adequate transportation or near urban growth area or employment does not meet with the general plan policies of Glen Ellen. Please do not rezone our neighborhood and change the charming character of our small town.

Sincerely,

Jeanne Reggio Glen Ellen resident since 1990 From: Joshua Peterson <drjoshuabpeterson@gmail.com> Letter 160

Sent: Sunday, February 12, 2023 12:43 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Fwd: 14156 Sunset Ave. rezoning

# **EXTERNAL**

Distinguished servants of the people, I hope this email finds you all well.

I am writing to express my opposition to any rezoning of the parcel at address 14156 Sunset Ave. in Guerneville (aka GUE-1). The simple fact is that the infrastructure of this neighborhood cannot support the proposed development of a 30-unit structure. The entire area consists of one-lane roads. Adding some 60 more vehicles would make driving in and out difficult, and walking more dangerous than it already is.

The proposed parcel is full of trees. We don't need another Stumptown. Especially considering the recent landslide from this hill, removing a large number of trees could be quite hazardous.

Additional concerns that have yet to be addressed include water, power and sewage. Our energy grid is already strained. During recent storms, power was lost in the neighborhood for over five days.

No one is opposed to "affordable housing" (although I question why all housing isn't "affordable") units being built in the county, but the block of land on Sunset Ave. is not the right place for it. There are several underutilized blocks of land currently owned by the county in the downtown area that would be more appropriate.

The entire proposal smacks of poor (or nonexistent) planning and an absence of common sense. Sonoma County can do better, and its voters demand that it do so.

Cheers~

~Joshua Peterson

160.1

160.2

160.3

Letter 161

From: Kenneth Smith <kensmith@sonic.net> Sent: Sunday, February 12, 2023 8:50 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Forestville proposed zoning changes

# **EXTERNAL**

Permit Sonoma Housing:

I fear that the high density zoning proposed for the Forestville downtown area could lead to many deaths as this high population of people try to escape a wind-driven fire on our two-lane Highway 116 or the two-lane River Road. However I do support a much lower density zoning for low and very low density housing for our community.

161.1

I am a resident of Forestville living at 6636 1st Street.

Ken Smith

From: Laura Hanson <jumpbug@sonic.net> Sent: Sunday, February 12, 2023 12:22 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Proposed Units in Forestville

#### **EXTERNAL**

Mr Gage,

We are very concerned, and oppose the proposed rezoning of several sites in Forestville. Forestville is a small city not only in population but in infrastructure. The majority of our roads are one to two narrow lanes, without sidewalks. The majority of our houses are small and built on small lots with hillsides for backyards. We have limited nearby resources. Adding 1600 people to our community would stretch those resources to the max. Traffic would be hugely impacted, as would our water, and garbage. The construction of these huge buildings would not only fit in with our community, but would be disruptive to traffic flow for many years. We see so many new apartment complexes being built all over Santa Rosa, is there really a need for this kind of housing in rural Forestville? People move to Forestville to avoid all the urban growth, live out in the redwoods. Large apartment complexes are not what we would like to see in Forestville.

Respectfully The Hansons 8150 Park Ave Forestville

From: hughesroad@yahoo.com <hughesroad@yahoo.com>

Sent: Sunday, February 12, 2023 4:29 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >; Susan Gorin <Susan.Gorin@sonoma-county.org>; Pat Gilardi <Pat.Gilardi@sonoma-county.org>

Subject: Multi Housing Units in Forestville

### **EXTERNAL**

Hello Mr. Gage and Others,

Please receive my opposition to the planned developments proposed for Forestville. I can understand the need for affordable housing within Sonoma County however, this rural community is not fit for several of these planned multi-occupant dwelling's because 163.1 the Hwy 116 traffic, the lack of services and the unsuitable pedestrian facilities. Multi housing units are more suited for the urban areas of the county in my opinion. Thank you for your consideration.

Louis Hughes 5950 Hughes Rd, Forestville

From: Mary Anne <melodln12@comcast.net> Sent: Sunday, February 12, 2023 9:06 AM

To: Lynda Hopkins < Lynda. Hopkins@sonoma-county.org>

Cc: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: DraftEIR comments: Housing Element Update

### **EXTERNAL**

I, MaryAnne Gustafson, have lived in the Armstrong Valley for over 43 years at —16410 Melody Lane, Guerneville.

This area is unique in its beauty, lack of accessibility and likelihood of flood, earthquake and fire. It is NOT a place for 588 more residents!

Whoever chose these 3 areas hasn't looked into lack of expensive infrastructure needed, the adverse impact on this neighborhood's tranquility and inconsistency with the goals of the County General Plan, Bay Area 2050 and Housing Element Policy.

There are much better locations available if you look at downtown, or the LOK site. Please don't ruin this lovely family residential, non-dense area for future enjoyment.

Finally correct lack of notification and short response time for us who live here and want to protect this area.

MafryAnne Gustafson Sent from my iPad

From: Kelly Joyce <klly\_jyc@yahoo.com> Sent: Sunday, February 12, 2023 8:05 PM

**To:** PermitSonoma-Housing <PermitSonoma-Housing@sonoma-county.org>; district5 <district5@sonoma-county.org>; Leo Chyi <Leo.Chyi@sonoma-county.org>; Susan Gorin <Susan.Gorin@sonoma-county.org>; Pat.Gilardi@sonoma-country.org; David Rabbitt

<David.Rabbitt@sonoma-county.org>; Andrea Krout <Andrea.Krout@sonoma-county.org>; district4

<district4@sonoma-county.org>; Jenny Chamberlain < jchamber@sonoma-county.org>

Cc: Kelly Joyce <klly\_jyc@yahoo.com>; Omar <percichomar@gmail.com>

Subject: Comments Housing Element Update DEIR

Dear Planning Commission and Board of Supervisors,

The proposed re-zoning of the lots off Highway 116/Packinghouse Road in Forestville (FOR-3, FOR-5, FOR-6) are in an extremally dangerous area for pedestrians and bicyclist. It borders a 2-lane highway

without any sidewalks, bike lanes or crosswalks. It floods multiple times per year, is next to both a sewer and water plant, off a designated scenic highway, difficult to access by the fire department, would damage community character, affect existing nesting and foraging of wildlife, and obstruct views of current residents in an affluent neighborhood across the street on Conor Court.

The proposal for unincorporated Sonoma County is adding 3.2% of population overall but **Forestville is being tasked to increase population by 43.6%** when it has little to no infrastructure for its current residents. It is proportionally way out line when compared to some of the other towns such as Petaluma, Santa Rosa, and Sonoma where people have better access to everyday items also employment. I would also like to note that there are frequent power outages as the town is remote and having a high density residential area would be a challenge when we have outages that could be days due to trees falling or challenging landscape.

COMMUNITY			
PROPOSED TOTAL POPULATION	Current Population (Estimated)	Proposed Increase	Proposed Increase %
Glen Ellen	1,214	57	4.7%
City of Sonoma	10,644	202	1.9%
City of Petaluma	59,403	441	0.7%
Graton	1,743	466	26.7%
Geyserville	671	531	79.1%
Auga Caliente	3,554	579	16.3%
Pengrove	2,368	625	26.4%
Guerneville	4,747	666	14.0%
Larkfield	8,080	780	9.7%
Forestville	3,788	1,652	43.6%
City of Santa Rosa	176,938	2,656	1.5%
TOTAL	273,150	8,655	3.2%

Sewer & Water- Setback required.

**Scenic Corridor**--High sight sensitivity. There are currently million dollar homes across the street on Conor Court that have a view of these lots and the ridgeline of trees behind them.

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**Fire-** These lots are next to a high fire zone. Packing House Road is a narrow road. Existing residents find it very difficult to turn onto HWY 116 with existing traffic conditions. In the event of a natural disaster both

Packinghouse Road and HWY 116 would become a parking lot not allowing residence to evacuate. Sites are adjacent to high fire zones. I disagree with page 550 stating that emergency response would not be impacted.

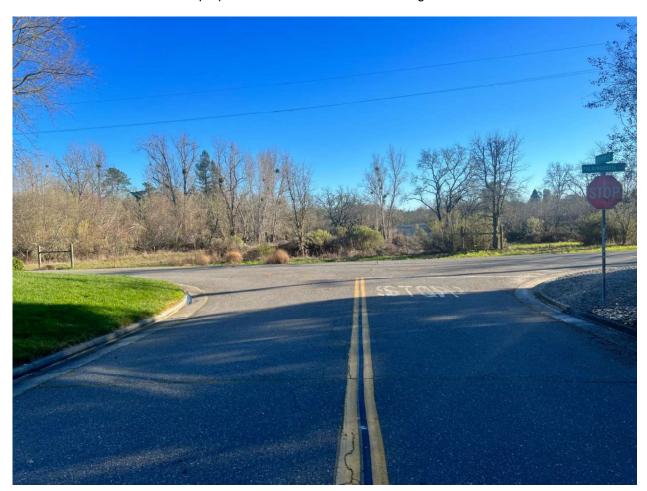
We can hardly get my daughter across Hwy 116 in the morning for school by car let alone try to leave all at once in the event of a fire.

**Community Character: Currently zoned to protect community characte**r and because of prime location, should be a property that can be used to benefit the entire community--not new residences. The children of

Forestville have nothing to do, nowhere to go. This would be a perfect location for the requested skate park, a dog park, and community garden.

**Lighting:** Installation of commercial lighting would negatively affect existing residences who moved to the country to enjoy the nights sky.

Photo below shows view of the proposed lots from the residential neighborhood on Conor Court.



Site impacts:

- Page 163 4.1 55 Marked High, Moderate and High, no mitigation measures available or 3 and 5 regarding scenic.

165.5

165.6

- Page 165 AES-3 5, 3, 6 would adversely affect public views, and community aesthetic charactereven with mitigation impacts would be significant and unavoidable.	165.7 Cont.
Wildlife corridor: Lots are a safe space from surrounding development to nest and forage, vernal pools are present. I have seen bob cats, deer, owls nesting, fox, coyote and many bird species.	165.8
Traffic: Would significantly increase traffic in the event of an emergency making it very difficult to evacuate.	
<b>DISAGREE</b> : Page 368 Haz 4development of these lots would require a police department and new infrastructure for safety of pedestrians.	165.9

DISAGREE: Page 550, It WOULD impact emergency response and evacuation plans significantly!

Pedestrian Safety- No sidewalks or bike lanes along HWY 116 or crosswalks to get to elementary school

**Pedestrian Safety-** No sidewalks or bike lanes along HWY 116 or crosswalks to get to elementary school up the street. Proposed lots located on right side of photo.

165.9 cont.

**Flooding-** This location floods annually, closing down at least one sometimes two lanes of 116. You can see the cone and flooding sign on the ground.

165.9 cont.



165.9 cont. Thank you,

Omar Percich & Kelly Joyce-Percich 305 Conor Court, Forestville

From: renee tchirkine < little\_rat@comcast.net> Sent: Sunday, February 12, 2023 7:33 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: housing element update

## **EXTERNAL**

2/12/2023

planner in charge

dear eric gage;

i am writing in regards to the proposed rezoning of unincorporated areas mandated by the state. i am speaking of forestville - particularly parcel FOR-2. 283 units in this residential neighborhood is inappropriate as well as dangerous. the major road (mirabel) is busy with gravel trucks speeding up and down this two lane road. the bottem of this road has our towns only small market and cars are backing out of the parking stalls into traffic all day long. **since there is no room for sidewalks on either side of the lower mirabel road stretch - how will the county provide sidewalks and areas to cross this potential freeway once development is in place?** 

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there is no high school, no major markets, care units, police force, or freeway access for at least 10 miles away. the carbon footprint that will be created with this re zoning proposal is appalling to even suggest straining our outer river area with this medium density housing location. **i am asking why arent** more of the major density units planned along the 101 corridor? that is where more major services are available, transit opportunities, as well as appropriate flat, wide open spaces with

safer road layouts, easier sewer attainability and police and medical available.

166.2

if FOR-2 is rezoned for medium density living - how will the construction process be handled? from june - august we have a huge, mismanaged amount of steelhead beach visitors illegally parking up and down the street from this area. they walk down the middle of mirabel to the river - with no sense of traffic whizzing by them. near collisions happen thru out the summer months, how will the county protect these tourist on the narrow 2 lane, no sidewalks or crosswalks to russian river less than a mile away?

166.3

lastly, my largest concern is the disproportionate population increase proposed by the county to rezone our town by 635 medium density units. forestville is a population of 4000 residents - this proposal will increase our town by an additional 1652 new residents (conservatively counting)! this is unfair, irresponsible and unsafe influx to the tiny town. **why is the rezoning numbers here in** forestville so lopsided compared to all the other area being considered? i am not opposed to affordable housing - sonoma county needs it desperately! i am asking you to provide development opportunities to house 10% of our population, 200 units (400 people). this is possible if FOR-3, FOR-5, FOR-6 are the ONLY areas slated for medium density. they are owned by the county,

walkable to main street, an easy access to hwy 116 and small enough percentage for responsible town growth. we need affordable housing and this option would be providing our share.

166.4 Cont.

i realize there are some hard decisions ahead. please listen, review and consider our concerns. 3500 units mandated by the state is just a series of numbers for the board - but its our magical west county that is at stake. balancing progress and a delicate ecosystem isnt easy but i trust the sonoma county planning department and our board of supervisors will make the correct responsible choices.

166.5

sincerely,

renee tchirkine

8664 marianna drive

forestville, ca 95436

From: r.grandmaison@comcast.net < r.grandmaison@comcast.net>

Sent: Sunday, February 12, 2023 8:47 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: DEIR Objection to GUE-1 Site for 30 Units

## **EXTERNAL**

February 12, 2023

Dear Mr. Eric Gage,

I am a local Guerneville resident of over 34 years, who lives across Sunset Avenue from the GUE-1 site. My house is the closest house on Sunset, nearest to the driveway entrance to the site. I am writing in objection to the proposed housing project on the GUE-1 site. I would request that this letter, after having attended a recent Zoom meeting for the public on February 9th, supplement any emails you may have from me that were sent before that meeting.

I am a licensed architect (C22127). I also an educator at Santa Rosa Junior College. I know all too well the urgent need in our community for affordable housing for low-income families and individuals. I'm delighted that SRJC will soon be opening a 350 resident student housing unit at the Santa Rosa campus. I know the constraints on housing, given the wildfires and lack of density in much of our housing communities. However, as an architect, I also know that there are many critical issues regarding the use of the GUE-1 site that simply appear not to have been taken into consideration when putting this property on the list of possible housing sites. I welcome the opportunity to bring some of the urgent ones to light in this email. Before that, I would like to bring to someone's attention an obvious error in the Draft EIR.

There is an obvious error in the photograph showing what purports to be the GUE-1 site in Guerneville. That photo, taken from Google Earth Streetview, is from a location just outside the Sonoma Landworks landscape supply yard on River Road and does not depict the GUE-1 site on Sunset Avenue. Were a photo from the site actually be shown, it would be clear that much of the site is currently occupied by two large water tanks and all the accessory buildings, water treatment equipment, as well as the emergency generator and fuel storage to run that generator in the event of the inevitable power outages we have on this heavily wooded hillside. These water tanks provide potable and fire-fighting water for all of the town of Guerneville- and yet the current, critically needed purpose of the site, seems to have been omitted in the site review within the Draft EIR. The photograph "Figure 4.1-4 Site GUE-1 from River Road, Looking West Past Construction Stockpile" does not contain any portion of the GUE-1 site nor any of the tree canopy on the property, even in the background elements in the photograph, and misrepresents the site.

I've reached out to Sweetwater Springs Water District and they have expressed to me that they have, on several occasions, asked for the site to be removed from the list of viable housing sites as they intend to expand the critical water treatment and storage capacity of the site in the future. Given that the entire town of Guerneville depends on those tanks and water treatment facilities for potable and fire-fighting water sources, it seems like a critical site to preserve- especially in light of the many wildfires we've faced recently. That critical current and future need for water would seem to be reason enough to

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167.3 Cont.

remove the property from the rezoning list and I am still dismayed that no mention of it appears in any real way within the Draft EIR.

Part of the spirit of providing affordable housing for low-income residents is to allow them to take advantage of public transportation and access to such facilities becomes essential for transportation to work places that may not be in their town. However, though this site looks close to the local town square with a bus shelter, it is anything but a leisurely walk to it. The elevation at the bottom of Woodland, along Armstrong Woods Road is around 62' above sea level. The elevation of the site, at the location of the existing water tanks, is about 252' above sea level. The horizontal distance is just over 2016 feet from the start of Woodland, along Morningside, up Sunset and then the last leg of the journey up the site driveway. That is an elevational difference of 190 feet, or the height of a 19 story building. In many locations the street slope exceeds a rise to run ratio of 1:8 for lengthy portions of the walk. Even bicyclists typically abandon trying to pedal up the hills and end up walking their bikes up the hill. Moving down the hill is easily accomplished from an exertion standpoint, though fraught with trip hazards, but working back up the hillside will not be an easy matter for many people. I suspect that will mean many of the locals may use their vehicles to drive downtown, to allow them to drive up the hill at the end of their bus commute after a day of work. I also suspect that many of those proposed residents would also likely drive to the local stores, such as Safeway, to shop after their first attempt at carrying heavy groceries up the equivalent of 19 flights of stairs, as the current local residents mostly do. It will be quite impossible to achieve walking surfaces that meet ADA compliance in spirit even were sidewalks, gutters, and curb transitions be a possibility in the final design. Residents on the hillside already use vehicles to shop in town due to the steep hillside climb when returning. I do not see why future residents would do otherwise and locating housing in such an elevationally challenging location, even with the close proximity to town, would defeat the "walkability" purpose for such a housing project. Those residents who use local transit or work downtown would likely often drive even such a short distance and would not only create more traffic on the narrow hillside roads, but would also eliminate much needed parking spaces in the heart of downtown Guerneville.

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The roadways in the area are very narrow in some locations. The pavement along Sunset, just before the entrance to the site, is as narrow as 9'-6" in some areas, with very few widths of pavement reaching anything even near 15'. Steep hillsides are adjacent to such areas on both the upslope and downslope sides of the roads and would require extensive retaining walls to allow for wider streets and sidewalks. Frequently, as in the case of the intersection of Sunset and Morningside, the narrow roadways are often bordered by existing houses or garages which are only a couple of feet from the paved surface. Widening the roadways to allow for two-way traffic and sidewalks would require demolition of existing residences and structures as well as necessitate extensive soil mitigation measures and extensive retaining wall systems that would be out of character with the neighborhood.

167.5

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. This means the driver backing up must also negotiate narrow curved roads until an intersection of a wider area allows for pulling off of the pavement onto a shoulder. It's not uncommon to regularly encounter Sweetwater Springs service vehicles on Sunset, requiring that reverse backup procedure, just before the driveway entrance to the GUE-1 site on Sunset. One of your own committee members attending the February 9th meeting stated that he had to do so for two different vehicles when he drove to visit the site.

Emergency vehicles often have a difficult time navigating through this neighborhood due to the narrow roadways being compounded by people parking at their homes alongside the roads. I'm quite certain the local fire department can attest to having to blare their vehicle horns on many occasions to alert local residents who are blocking their forward movement with parked vehicles. Delaying the quick response of emergency vehicles can be a life-threatening situation. And, with up to 78 more people on this hillside, the need for emergency vehicles and personnel would certainly be increased.

167.5 Cont.

Larger delivery trucks often cannot navigate the neighborhood and semi-trucks with trailers typically refuse deliveries to the area. I have had to make arrangements with delivery companies to meet them downtown to receive items because of this issue. A large truck and trailer which may try to make the delivery will most certainly obstruct traffic movement for access or egress from the hillside by other vehicles. This will be a problem for congestion in the future should drivers not be aware of the roadway conditions before proceeding up the hill, but could also be detrimental to emergency vehicle access and egress from the hillside in the event of mandatory evacuations.

Due to the somewhat brittle nature of redwood limbs, it's not uncommon to have power and data transmission problems in the area during storms or wind events. On January 4th of this year, during a weather event, the entire area of Guerneville was without power for a couple of days. My house and 135 homes on this hillside neighborhood were without power for 5 days. A tree from the uphill side of the roadway took down the power lines directly in front of my house and left all of us without power for those five days. Putting another 30 homes in an area that suffers from this potential problem isn't a good strategy for people heavily dependent on reliable power grids and communication lines. Those downed limbs and branches also cause road blockages and general difficulty for people trying to traverse the already constrained roads.

167.6

I hope for the above reasons, and the reasonable voices of other neighbors who object to this proposed location, presents a clear and obvious common sense objection to the location of such a project on the GUE-1 site.

167.7

I have enjoyed being a resident of Guerneville. Though it has some issues with vacationer traffic in the tourist season and issues with wildfires and flooding, it's still a wonderful place with much charm, natural beauty, and character. I welcome new residents and hope that suitable sites, where residents can use their vehicles, local transit, bikes, or walking to take full advantage of the shopping, beaches, library, churches, parks, and all that Guerneville has to offer, can be found without having to create more problems than they solve. I'm certain the GUE-1 site will not provide more solutions than problems and I therefore object to it.

Sincerely,

Robert Grandmaison 14160 Sunset Avenue Guerneville, CA 95446

Letter 168

168.1

168.2

From: Roger Peters <rjp2ca@aol.com>
Sent: Sunday, February 12, 2023 8:31 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Comment on Housing Element DEIR

#### Permit Sonoma,

Please include in the record the following comments and questions on the Draft Environmental Impact Report (DEIR) for the Housing Element currently under review.

- 1. Cumulative Impacts--general. The DEIR at pg 107 of 601 (using download page references) seems to take the position that since this is a broad planning document it is either not necessary, or not possible due to the generalize nature of the document (and thus too speculative) to actually try to assess the cumulative impacts of the housing projects identified. Given that specific sites were identified (e.g., SON 1-3 and Pet 1-4) it would be possible to assess the cumulative impact of surrounding and affected projects that are known, pending or reasonably foreseeable. The DEIR should indicate why it was not possible to take a conventional approach to assessing the cumulative impacts as applied to the specific sites identified. If this programmatic document is not going to be used for tiering or overriding the need for subsequent detailed project review of the sites identified, the DEIR should state that clearly. If it is going to used for that purpose what is the reason they were not analyzed in detail for forseeable, known and pending projects?
- 2. Cumulative Impacts/Year 2040 impacts--specific. For both VMT and intersection LOS the DEIR appears to rely on the July 2020 version of the SCTA travel demand model. (see DEIR appendices p 245 of 545 and 251 of 454). The SCTA travel demand model has not been made available for review, but is incorporated by reference in studies and in the text. Why does the DEIR not have a discussion of the July 2020 and any more recent model runs? At a minimum the list of approved, known or reasonably likely projects that correspond to the areas of the identified projects should be disclosed. So, for example, for the SON projects that bisect Verano Ave the DEIR should disclose whether the SDC and Hanna Boys projects are assumed to be operational in year 2040 and the impacts.

Are the adopted SDC Specific Plan project elements reflected in the SCTA project list for its July 2020 TDM? Is the Hanna Boys Project in the SCTA project list used for this DEIR analysis purposes, either 2040 base or for cumulative impacts? Hanna is listed as a "pipeline" project. See 12/30/22 Apprentices to HCD Review draft dated 12/30/22 at Tables 11 and 12 (pg 347 and 348 of 400). SDC is not mentioned. What assumptions were used for SDC and Hanna development in the DEIR?

- 3. Transportation and Traffic--why was a segment LOS analysis (vs intersection analysis) not done on the Son 1-3 Verano projects relative to the impacts of SDC and Hanna on Arnold Drive?
- 4. Population and Housing --Were the SDC and the Hanna Boys Center projects factored in as pipeline projects for purposes of the discussion of population and housing? If not, explain why not?
- 5. Wastewater Capacity to Serve for SON 1-3 and cumulative capacity--Was there a capacity to serve analysis requested from the SVCS for its 8th street east treatment plant for the cumulative combination

of the development of SDC, Hanna Boys Center and Son 1-3 and for year 2040 purposes? If not, why was that not requested? Is there presently adequate capacity at that treatment plant for those combined projects for 2040?

168.5 Cont.

6. PET 1-4 Transportation and Traffic Assessment/VMT #1--Did the DEIR assess any change in the immediate area VMT based on the elimination on the Bodega Market site proposed for housing development? If not, why not?

168.6

7. PET1-4 Transportation and Traffic Assessment #2--The DEIR has an intersection LOS for the Bodega Ave-Paula Road "intersection." Why was no intersection analysis done for the Bodega Ave and Cleveland Lane intersection? It seems as likely or more likely that traffic will flow out from and in to the PET 1-2 sites to Petaluma via Cleveland Lane than from Paula Lane. If that was not considered, why was that not considered?

168.7

Thank you for considering these questions and comments.

Roger Peters 515 Hoff Road Kenwood, Ca. From: Ron Redmon <ronredmon@gmail.com> Sent: Sunday, February 12, 2023 10:27 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org > **Subject:** The proposed apartment complex on Sunset Avenue in Guerneville

Thank you for taking time to hear from me and the other citizens. I only recently found out about this proposal since I am living in Santa Rosa, displaced by a fire that burned my home in Guerneville, so I was unable to attend the meeting last week.

First let me say how much I appreciate efforts to provide affordable housing in Sonoma County. I see this as a move toward a healthier economy for our county and a more compassionate environment in which to live. Having served as an alternate on the Municipal Advisory Council I have become very familiar with the efforts of the county to address our severe housing crisis.

I am a 40 year veteran Registered Nurse with a subspecialty in Community Health, spending my entire career here in the Lower Russian River. During that time I have been an advocate for the homeless citizens in our community, and have provided a music participation experience every week since 2012 at the Empowerment Center until interrupted by the COVID pandemic. I also have provided food, supplies, and jobs for homeless friends during that time. I have also rented a unit attached to my house during nearly all of my 48 years here, and always to renters on assistance. It's from this perspective that I share

my views about the proposed apartment complex.

Building an apartment complex at the proposed site is ill-conceived, mainly due to safety concerns as a result of overcrowding. I can't imagine anyone who has actually been to the site and observed the auto and pedestrian traffic on Woodland during a busy weekend would vote to approve this. All three roads that feed the hill are at least in some places a single lane wide, and have blind curves. The population of the hill has in my estimation nearly tripled since I moved here in 1976. Most of the growth has been from "summer cabins" being converted to year-around residences. Then the foot traffic has increased even more, since there is now a significant number of homes converted back to vacation rentals in the neighborhood now. When a house is used as a vacation rental, its occupancy is far higher than when the houses were used by a single family for their vacations. Since the tourists are not used to narrow roads and no sidewalks, they walk in groups of up to ten even around the blind curves. Adding housing for 78 people would probably DOUBLE auto and pedestrian traffic AGAIN!

An even bigger safety concern is what would happen in the event of a fire or earthquake. The narrow roads are very difficult for fire engines to navigate. My house on Sunset Ave. burned this past May. I'm in a fortunate location since the road branches out to Morningside right at my property, so three engines could get close enough to fight the fire. Farther up Sunset where the apartments are proposed, there is only this ONE ROAD and it is ONE-LANE. The fire department would probably want a dozen engines to fight a fire in a 35 unit apartment complex. It would be a catastrophe, especially when combined with 78 people trying to evacuate. PLEASE VISUALIZE THIS. The residents of this proposed complex would be put at significant risk, as well as those of us who already live there.

I know with most proposals there are those who simply say "not in my backyard". That's not where I'm coming from. I am concerned for both my current neighbors and those who would live in the apartment complex should it be built. There are far safer options; ones that are more like the Fife Creek Apartments and the new ones being built behind the Safeway. If you want some volunteer help to explore options please let me know. I would be happy to help and I have a lot of community-minded neighbors who would help as well.

Please support safer alternatives.

169.1

169.2

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With my sincere thanks, Ron Redmon

From: sachikow@mindspring.com <sachikow@mindspring.com>

Sent: Sunday, February 12, 2023 6:00 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Cc: Susan Gorin <Susan.Gorin@sonoma-county.org>

Subject: Fw: Comment on Sonoma Housing Element rezoning Glen Ellen

February 12, 2023

Re: Comments on Sonoma County Housing element proposed rezoning of parcels, specifically regarding Glen Ellen parcels #054-290-057 & #054-290-084 (GE-1 & GE-2)

To: PRMD Staff

Glen Ellen is a historical small town. Tourists come here to see the old historical area. There are historical buildings on the 2 parcels and it would be sad to destroy this history. People come here to visit Jack London and appreciate the older style. This town has a country character and is not urban. The vegetation and trees are old and a part of the way our town feels. To rezone and do this project, the trees would be removed and the plants. It would change the beautiful view and be bad for our

planet.

I love this place and have lived here almost 50 years.

Please take these two Glen Ellen parcels off the rezoning list.

Thank you,

Sachiko Williams

Glen Ellen

From: Sally Olson <snowgirl@sonic.net> Sent: Sunday, February 12, 2023 1:44 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Housing

The housing proposal for Nolan Road is not well thought out and would be a disaster. It is way too big and right in the back yards of existing residents. Adequate sewage and water is a big concern. Traffic would be a nightmare, and if there were an emergency requiring evacuation, such as a fire, there would be even more congestion. These housing proposals seem to be targeting the small town of Forestville. Please reconsider the housing at this location.

From: Soichiro Takahashi <greenfishtrading204@gmail.com>

Sent: Sunday, February 12, 2023 1:57 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Cc: Maureen.taber@ymail.com; Susan Gorin <Susan.Gorin@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; Andrea Krout <Andrea.Krout@sonoma-county.org>; district4 <district4@sonoma-county.org>; Jenny Chamberlain <jchamber@sonoma-county.org>; district5

<district5@sonoma-county.org>; Leo Chyi <Leo.Chyi@sonoma-county.org>

Subject: Draft EIR comment: Housing Element Update

#### **EXTERNAL**

Dear Eric Gage and Board of Supervisors:

My family and I are opposed to the proposal to build large housing complexes around the downtown area of Forestville.

Regardless of housing affordability, the increase in population does not suit our community. We are a very small town that values being small and intimate.

We do not desire a local police station, traffic lights, more larger roads, markets, a hospital etc. These things would be needed to support such growth in population size.

And like I said, we appreciate most of all our communities small size and intimacy we share with our current neighbors.

It would be a much better idea, and best use of money, to concentrate such housing structures in the Santa Rosa downtown area where employment is readily available and people can easily get to work even without a vehicle.

The real cost of living is not only housing fees, so it is naive to think that simply more affordable housing will equal a good life for those who move here. If you actually care about people, you know Forestville is not the suitable location for such plans.

Please seek locations that already have the proper services and employment available for the people who will be living in the proposed housing complexes. The small town of Forestville is not that location and will never be.

Sincerely,

Soichiro Takahashi 8416 Spring Drive Forestville, CA 95436

From: Tara Underly <tluus1@yahoo.com>
Letter 173

Sent: Sunday, February 12, 2023 9:13 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Forestville Re-zoning -Housing

#### **EXTERNAL**

Hello. I'm a resident of Forestville and bought here 7 years ago because it is a rural community, and zoning has been established to keep the community rural.

The proposed multilevel housing does not fit this community model - especially in zone 2 off Nolan rd.

173.1

In addition to the unreasonable units proposed for this development, there is not the infrastructure (sewage/water) and roads to meet this demand.

Housing is needed and I support development in a reasonable and logical way.

Thank you for your time.
Tara Underly
7518 Mirabel rd. Forestville.

From: Vesta Copestakes <vesta@sonic.net> Sent: Sunday, February 12, 2023 11:04 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: HOUSING ELEMENT DEIR comment - Forestville

## **HOUSING ELEMENT DEIR comment - Forestville**

February 11, 2023

### **COMMENTS** submitted by:

Vesta Copestakes, 9455 Argonne Way, Forestville, CA 95436 707-887-0253 - landline, 707-889-0069 - mobile, vesta@sonic.net - email

Like other Russian River resort communities, Forestville has a history of being affordable for young families because our hills are populated with former summer cabins becoming year-round homes. Many of these cabins have been purchased for Vacation Rentals so are being removed from potential affordable housing. This has contributed to lower student populations at our Forestville School campuses and therefore the consolidation of El Molino High School into Analy High School. *We welcome more families!* 

Our area, and specifically Forestville, has been Blue Collar for generations. **Workforce Housing** is encouraged and welcome by most residents who want our Blue Collar designation to remain into the future. We NEED affordable housing, specifically family-owned housing - rather than rental housing. Many years ago Burbank Housing established the Meadlowlark development on Pajaro Lane that has become an asset to our town. Unincorporated communities rely upon committed residents to maintain our home. Renters move on, homeowners stay and invest their time and energy in our community and schools.

Of the parcels submitted to Forestville for our review for potential affordable housing, four stand out as **POSITIVE assets: FOR-1, FOR-3, FOR-5, FOR-6** 

**FOR-2 and FOR-4 do NOT look like a good fit** for affordable housing units. Inadequate road access, sidewalks, crosswalks, and emergency evacuation challenges face both FOR-2 and FOR-4. Infrastructure to make these parcels function well in our community would be excessively expensive. The density proposed for these sites is unrealistic and would damage the character of these neighborhoods. Other residents are commenting on these two sites so I will leave details of why we oppose them to others.

**FOR-7** is just a horrible place to suggest people to live next to the gas station and carwash, but at least it's downtown with existing infrastructure. The added traffic to the intersection of Mirabe/116 might force the county to take another look at the roundabout design from many years ago. Add intersection improvement cost to FOR-2 and FOR-7.

**FOR-1, FOR-3, FOR-5, FOR-6** 

174.2

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**FOR-1** is included in Alternatives 1 & 2 but has been removed from consideration in Alternative 3, BUT it is a PRIME LOCATION for Senior and Family Housing. Since Electro Vector closed this plant, the building has become increasingly dangerous and an eyesore in our community. Placed next to the elementary school and right downtown, it has the potential to give residents an affordable place to live where they can walk to school, downtown businesses, our public parks, and churches. Most of the infrastructure needed for this property is nearby and/or in process and therefore more affordable.

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174.5

Mitigating the environmental hazards of this former power supply manufacturing facility is its greatest challenge. Other communities have established housing on similarly challenged properties by covering the impacted earth with concrete parking - some have added housing above parking as a way of separating residences from any contamination. No matter what method is used for mitigating hazards on this property, development of this land would be welcomed as a major asset to our schools and vast improvement of our downtown.

**FOR-3, FOR-5, FOR-6** are in close proximity to each other and have access into downtown via Forestville Street as well as Hwy 116. Two of these properties are county-owned and are being considered as the location for an Emergency Services Center. Being close to our elementary school and downtown is an asset for families and seniors. Again, infrastructure is nearby.

Our community is trying to incorporate a skatepark near downtown (<a href="https://www.forestvilleskatespot.com/">https://www.forestvilleskatespot.com/</a>) and it has been suggested that this property is a prime location for that park. If there needs to be a separator to keep housing a designated distance from the sewage treatment plant, we are suggesting that our skatepark and Emergency Services Center be that separator. There are grants available for our skatepark if we have a location, so we are anxious for this to happen. Family housing close to our school and skatepark would be a welcome addition to our town.

# Forestville needs affordable housing

As the Planning Commission moves forward with this process, please consider that Forestville needs affordable housing for young families and low-wage workers who serve our rock quarries and hospitality industry that dominates the Russian River. Our schools need more students in order to continue to serve families. This could be a win/win for us.

What is important to us is WHERE that housing is constructed. By keeping housing focussed near our downtown where Sonoma County Public Infrastructure has plans in the works for sidewalks between Mirabel Road and Covey Road along Front Street/Hwy 116, most of the infrastructure needed to support this new housing is either established or inprocess. This infrastructure improvement is already funded so should help keep developing properties in our downtown more affordable than in outlying parcels that require new infrastructure.

174.6

Please consider these suggestions as you make plans for the future of Forestville.

THANK YOU,

Vesta Copestakes, resident since 1990

-----

Vesta Copestakes 9455 Argonne Way, Forestville, CA 95436 vesta@sonic.net 707-887-0253 landline 707-889-0069 cell From: Vikki Miller < vikkilmiller@icloud.com> Sent: Sunday, February 12, 2023 6:06 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Attn Eric Gage

Hello Eric,

I submitted the previous email/letter to you prematurely and apologize for some of my uninformed comments/questions as I had not read through the DEIR and came into the process late. I now realize many of the locations were chosen because landowners submitted them back in 2019 as possible housing sites.

Additionally, It is my understanding the sewer and water system, despite the issues some residents in Forestville continue to experience has purportedly been adequately addressed.

175.1

The DEIR is lengthy and complex and a lot to get through. My focus is to go through the specific properties to be more specific and submit informed comments and suggestions about the best possible location.

Thanks for bearing with me Eric. One last email to follow.

Best to you, Vikki Miller To: Eric Gage

Permit Sonoma

From: William McAfee 16427 Melody Lane Guerneville, Ca. 95446

RE: Proposed Zoning change and development plans for the six properties listed below:

GUE-1 14156 Sunset Avenue 070-070-040 Guerneville

GUE-2 16450 Laughlin Road 069-270-002 Guerneville

GUE-3 16500 Cutten Court 069-280-043 Guerneville

GUE-4 16050 Laughlin Road 069-230-007 Guerneville

GUE-5 16451 River Road 071-180-014 Guerneville

GUE-6 17081 CA-116 071-200-003 Guerneville

The choice of these properties for the proposed use represents an example of the worst possible choices that I can imagine.

In the case of GUE 1-4, these sites are located on narrow roads that would require significant widening. This, along with other infrastructure upgrades would cause significant disruption to the residents of the neighborhoods. Additionally, the cost of these upgrades would be staggering. Besides road widening, there would be an increased demand for water which is crucial during a drought cycle. Sewage treatment capacity may also need to be increased.

These neighborhoods feature Redwood and other trees which would have to be removed which along with the increased population of the additional housing would ruin the character and ambiance of these peaceful rural communities.

The property on which I reside borders GUE 1 and 4. Twice in the last 4 years, our neighborhood has been forced to evacuate because of wildfires. During those evacuations, the flow of traffic on River Road and HWY 116 slowed to a crawl. We could conceivably be trapped in our homes because of increased population on Cutten and Laughlin rds. In the winter, the Russian River could flood causing more people to unable to travel to where they need to go.

I wholeheartedly and without reservation oppose the use of GUE 1-6 for the proposed changes in the DEIR.

Sincerely, William McAfee 176.1

176.2

176.3

From: Aaron Dornstreich <aedornstreich@gmail.com>

Sent: Monday, February 13, 2023 3:22 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>; Susan Gorin

<Susan.Gorin@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; district4

<district4@sonoma-county.org>; district5 <district5@sonoma-county.org>
Subject: Forestville Housing Element Update: Protest Against Rezoning

Dear Mr. Gage, Supervisors Gorin, Rabbitt, Gore, and Hopkins:

I was born and raised in Forestville and went through Kindergarten-12th grade in our beloved town. We own family homes and have re-invested into a another home to move my father-in-law into and an investment property that we rent to a lovely family

We are sickened by the proposal to fast-track the rezoning of Forestville in order to develop multiple apartment complexes in our small town! I write in STRONG protest to Sonoma County Planning Commission's proposed plan. Forestville unquestionably cannot withstand an influx of 1600+ new residents (and their vehicles) and it is frightening for all of us who call Forestville home to imagine the detrimental impact on our town.

We understand there is a state mandate to build affordable housing and want to know why is the county targeting unincorporated areas? And why on such an unreasonable scale?

Forestville has been my family's chosen home for fifty years because it was affordable, quiet, beautiful, and a safe. There also was space. Land surrounds our homes and we cherish that space. We have sacrificed many of the suburban or urban conveniences to enjoy this space and lower density community. If we wanted the convenience that surrounds higher density living perhaps we would have chosen to relocate to Windsor or Santa Rosa. Both wonderful locations but they are different choices than Forestville!

A town the size of Forestville is not equipped with the infrastructure to withstand such rapid population growth.

Specifically, in relation to **6555 Covey Road**, I am writing to ask:

- How will sewer and water be provided for?
- How will our modest, two-lane roads account for the increase in traffic?
- How will the State support the schools so that they can teach all of the new school-age children?
- How will law enforcement manage the commensurate increase in crime that inevitably comes with a new population?
- When the town has to evacuate for fire or flooding, how will our narrow roads manage the evacuation in a safe manner?

177.1

The health and safety of every current resident of Forestville is at stake. None of the <u>SEVEN</u> proposed complexes can be allowed to move forward as they are extreme in size and numerosity. The construction of such units will, without doubt, <u>destroy Forestville</u>.

Affordable housing is a State-Wide issue but pushing multiple high-density units into a very small town is not the answer!

177.3

We are disappointed with the incongruent nature of these plans into such a small hamlet that historically has not supported any similar projects. We invite you to consider the development of our County more thoughtfully!

Sincerely,

Aaron Dornstreich aedornstreich@gmail.com

From: Aaron Dornstreich <aedornstreich@gmail.com>

Sent: Monday, February 13, 2023 3:23 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>; Susan Gorin

<Susan.Gorin@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; district4

<district4@sonoma-county.org>; district5 <district5@sonoma-county.org>
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Specifically, in relation to **6898 Nolan Road**, I am writing to ask:

- How will sewer and water be provided for?
- How will our modest, two-lane roads account for the increase in traffic?
- How will the State support the schools so that they can teach all of the new school-age children?
- How will law enforcement manage the commensurate increase in crime that inevitably comes with a new population?
- When the town has to evacuate for fire or flooding, how will our narrow roads manage the evacuation in a safe manner?

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Affordable housing is a State-Wide issue but pushing multiple high-density units into a very small town is 178.3 not the answer!

We are disappointed with the incongruent nature of these plans into such a small hamlet that historically has not supported any similar projects. We invite you to consider the development of our County more thoughtfully!

Sincerely,

Aaron Dornstreich aedornstreich@gmail.com From: Aaron Dornstreich <aedornstreich@gmail.com>

Sent: Monday, February 13, 2023 3:28 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>; Susan Gorin

<Susan.Gorin@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; district4

<district4@sonoma-county.org>; district5 < district5@sonoma-county.org>
Subject: Re: Forestville Housing Element Update: Protest Against Rezoning

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A town the size of Forestville is not equipped with the infrastructure to withstand such rapid population growth.

Specifically, in relation to 6250 Forestville Street, I am writing to ask

- How will sewer and water be provided for?
- How will our modest, two-lane roads account for the increase in traffic?
- How will the State support the schools so that they can teach all of the new school-age children?
- How will law enforcement manage the commensurate increase in crime that inevitably comes with a new population?
- When the town has to evacuate for fire or flooding, how will our narrow roads manage the evacuation in a safe manner?

Affordable housing is a State-Wide issue but pushing multiple high-density units into a very small town is not the answer! The health and safety of every current resident of Forestville is at stake. None of the

179.1

179.2

<u>SEVEN</u> proposed complexes can be allowed to move forward as they are extreme in size and numerosity. The construction of such units will, without doubt, <u>destroy Forestville.</u>

We are disappointed with the incongruent nature of these plans into such a small hamlet that historically has not supported any similar projects. We invite you to consider the development of our County more thoughtfully!

Sincerely,

Aaron Dornstreich <u>aedornstreich@gmail.com</u>

179.3 Cont.

Letter 180

From: Aaron Dornstreich <aedornstreich@gmail.com>

Sent: Monday, February 13, 2023 3:25 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>; Susan Gorin

<Susan.Gorin@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; district4

<district4@sonoma-county.org>; district5 < district5@sonoma-county.org>
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A town the size of Forestville is not equipped with the infrastructure to withstand such rapid population growth.

Specifically, in relation to **6475 Packing House Road**, I am writing to ask:

- How will sewer and water be provided for?
- How will our modest, two-lane roads account for the increase in traffic?
- How will the State support the schools so that they can teach all of the new school-age children?
- How will law enforcement manage the commensurate increase in crime that inevitably comes with a new population?

180.1

• When the town has to evacuate for fire or flooding, how will our narrow roads manage the evacuation in a safe manner?

180.2 Cont.

The health and safety of every current resident of Forestville is at stake. None of the <u>SEVEN</u> proposed complexes can be allowed to move forward as they are extreme in size and numerosity. The construction of such units will, without doubt, <u>destroy Forestville</u>.

Affordable housing is a State-Wide issue but pushing multiple high-density units into a very small town is not the answer!

180.3

We are disappointed with the incongruent nature of these plans into such a small hamlet that historically has not supported any similar projects. We invite you to consider the development of our County more thoughtfully!

Sincerely,

Aaron Dornstreich aedornstreich@gmail.com

From: Aaron Dornstreich <aedornstreich@gmail.com>

Sent: Monday, February 13, 2023 3:25 PM

To: PermitSonoma-Housing <PermitSonoma-Housing@sonoma-county.org>; Susan Gorin

<Susan.Gorin@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; district4

<district4@sonoma-county.org>; district5 < district5@sonoma-county.org>
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181.1

Letter 181

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Specifically, in relation to **6090 Van Keppel Road**, I am writing to ask:

- How will sewer and water be provided for?
- How will our modest, two-lane roads account for the increase in traffic?
- How will the State support the schools so that they can teach all of the new school-age children?
- How will law enforcement manage the commensurate increase in crime that inevitably comes with a new population?

• When the town has to evacuate for fire or flooding, how will our narrow roads manage the evacuation in a safe manner?

181.2 Cont.

The health and safety of every current resident of Forestville is at stake. None of the <u>SEVEN</u> proposed complexes can be allowed to move forward as they are extreme in size and numerosity. The construction of such units will, without doubt, <u>destroy Forestville</u>.

Affordable housing is a State-Wide issue but pushing multiple high-density units into a very small town is not the answer!

181.3

We are disappointed with the incongruent nature of these plans into such a small hamlet that historically has not supported any similar projects. We invite you to consider the development of our County more thoughtfully!

Sincerely,

Aaron Dornstreich aedornstreich@gmail.com

From: Aaron Dornstreich <aedornstreich@gmail.com>

Sent: Monday, February 13, 2023 3:24 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>; Susan Gorin

<Susan.Gorin@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; district4

<district4@sonoma-county.org>; district5 <district5@sonoma-county.org>
Subject: Re: Forestville Housing Element Update: Protest Against Rezoning

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Specifically, in relation to **6220 Highway 116N**, I am writing to ask:

- How will sewer and water be provided for?
- How will our modest, two-lane roads account for the increase in traffic?
- How will the State support the schools so that they can teach all of the new school-age children?
- How will law enforcement manage the commensurate increase in crime that inevitably comes with a new population?
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182.1

Letter 182

The health and safety of every current resident of Forestville is at stake. None of the <u>SEVEN</u> proposed complexes can be allowed to move forward as they are extreme in size and numerosity. The construction of such units will, without doubt, destroy Forestville.

Affordable housing is a State-Wide issue but pushing multiple high-density units into a very small town is 182.3 not the answer!

We are disappointed with the incongruent nature of these plans into such a small hamlet that historically has not supported any similar projects. We invite you to consider the development of our County more thoughtfully!

Sincerely,

Aaron Dornstreich aedornstreich@gmail.com From: Aaron Dornstreich <aedornstreich@gmail.com>

Sent: Monday, February 13, 2023 3:31 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >; Susan Gorin

<Susan.Gorin@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; district4

<district4@sonoma-county.org>; district5 < district5@sonoma-county.org>
Subject: Re: Forestville Housing Element Update: Protest Against Rezoning

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A town the size of Forestville is not equipped with the infrastructure to withstand such rapid population growth.

Specifically, in relation to **6250 Forestville Street**, I am writing to ask

- How will sewer and water be provided for?
- How will our modest, two-lane roads account for the increase in traffic?
- How will the State support the schools so that they can teach all of the new school-age children?
- How will law enforcement manage the commensurate increase in crime that inevitably comes with a new population?
- When the town has to evacuate for fire or flooding, how will our narrow roads manage the evacuation in a safe manner?

183.1

Letter 183

Affordable housing is a State-Wide issue but pushing multiple high-density units into a very small town is not the answer! The health and safety of every current resident of Forestville is at stake. None of the <a href="SEVEN">SEVEN</a> proposed complexes can be allowed to move forward as they are extreme in size and numerosity. The construction of such units will, without doubt, <a href="destroy-forestville">destroy-forestville</a>.

183.3

We are disappointed with the incongruent nature of these plans into such a small hamlet that historically has not supported any similar projects. We invite you to consider the development of our County more thoughtfully!

Sincerely,
Aaron Dornstreich
aedornstreich@gmail.com

From: Aaron Mason <aaron.mason.sf@gmail.com>

Sent: Monday, February 13, 2023 3:59 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Housing Element Update / EIR Comment (Forestville)



My name is Aaron Mason and I'm a homeowner in Forestville, near some of the parcels being considered for re-zoning. If you don't want to read my whole email, I support allowing medium density housing to be built on all proposed Forestville sites except for FOR-4.

I have a long history with the town. I went to high school at El Molino, and own a house with a small vineyard next to my father, who also lives in downtown Forestville. My wife and two kids love the community we've built. I'm a nurse and I've lived in NY, Honolulu, and years abroad, and I believe there's something special about the town. I'm also a big proponent of adding housing to Forestville. I think that adding more families within walking distance to downtown will help build our community, and our tax base. I also believe in the value of walkable towns and cities. Forestville has been planning an update to the sidewalks and bike lanes throughout downtown, and stretching down both Covey and Mirabel roads, which would be a huge improvement. Having families living within walking distance of schools, public transportation and basic shops helps a place feel alive and connected. That's what I want for myself, the current residents of the town, and for new families we'd be welcoming in. I love some of the recent developments in downtown Graton, and hope for similar things in Forestville.

184.1

As such, I think it's a great idea to allow medium density housing on most of the proposed sites. Specifically:

- FOR-3, FOR-5, and FOR-6: These sites seem like a wonderful addition to the town. An easy walk to downtown, transit and schools.
- FOR-1: This would also be an amazing addition to downtown. The old Electro-Vector building
  has been sitting unused on such a wonderful site, between downtown and the elementary and
  high schools, that would be a lovely place to live. I would hope that connections to this site
  would be included in the proposed sidewalk and bike lane updates the town is considering.
  Seeing new homes instead of a crumbling factory would help justify the town slogan of "The
  Good Life"

184.2

- FOR-2: This is a little farther from downtown, but it's proximity to the youth park, high school, and the proposed sidewalk and bike lane improvements make this a solid site for development.
- FOR-7: Again very close to downtown, this seems like an excellent place for new families. I don't know why it's separated from the others, or why it's considered "Other Inventory", but it seems like a very convenient place to live.

However,

• FOR-4: This is the only parcel I have concerns with. In the interest of full disclosure, it's the closest to my home, but that has very little to do with my concerns. Of all the sites in Forestville, this one alone seems out of place. The parcel is surrounded by single family homes and sits at the end of a tiny dirt driveway. All of the others sit along established roads with an easy walk to downtown. I don't believe there's any plan to develop roads, sidewalks and other infrastructure to support the 71 units that would be permitted, and that much increased foot traffic would not be safe with the current state of Van Keppel Rd, and the small dirt driveway. Ultimately, building this parcel out would not help to build up the heart of downtown Forestville as a charming, walkable community.

184.3

Thanks again for hearing my thoughts and concerns. I imagine there are a lot of competing opinions out there but I appreciate you taking the time to listen to mine.

Cheers, Aaron Mason 5971 Green Lane, Forestville CA From: Amber Gray <tangoniner@icloud.com> Sent: Monday, February 13, 2023 4:36 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Housing Element DEIR for Forestville

Hello,

We am very concerned about the Housing Element DEIR for Forestville. Suggesting that a town of this size increase its population by 10-50% (depending on which numbers you use and how many sites might actually be developed) is very dangerous for many reasons related to all the suggested sites.

- Our infrastructure just isn't ready for that amount of growth.
- We have very few sidewalks, and the ones we have are in very poor shape. Improvements have been promised repeatedly but not delivered, so we have no hope that this will happen any time soon.
- Our sewer systems already have problems.
- Public transportation in this area is almost non-existent.
- There is very little work in this town, so people moving here would most likely be driving out of town to go to work, and with two-lane roads, that number of people would cause significant traffic problems on our small streets.

Elementary-age kids would have to be driven to school since walking along these roads is not safe for little ones, and with no high school here, parents of teens would have to drive their kids to/from Sebastopol every day.

• There is already limited parking in downtown Forestville; where are all these new people going to park if they go downtown?

We am not anti-growth but based on the characteristics of this town it seems that a reasonable expectation of growth over the timeline proposed in the DEIR would not exceed 10%.

Please do not destroy this town by blowing it up this way.

Thank you, Amber and Todd Gray 978 Esther Drive Forestville, CA 95436

Date:

Letter 186

Mr. Eric Gage

Permit Sonoma, Project Planner

2550 Ventura Ave..

Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

186.1

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

186.2

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

186.3

The GUE 2.3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

186.4

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

186.5

The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

186.6

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

186.7

February

often Dr. Everneville CA 95446

Signature:

16447 Cutten Drive. Guerneville, CA 95446

SAN FRANCISCO CA 940 15 FEB 2023 PM 3 L



Mr. Eric Gage Permit Sonoma, Project Planner 2550 Ventura Ale.

Santa Rosa, CA 95403

PERMIT AND RESOURCE MANAGEMENT DEPARTMENT COUNTY OF SONOMA

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From: Anne Kuschner <akuschn@comcast.net> Sent: Monday, February 13, 2023 3:03 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Cc: Anne Kuschner <akuschn@comcast.net>

**Subject:** regarding the Sonoma County Housing Element Draft EIR, which analyzes the impact of proposed rezoning of up to 59 sites in unincorporated Sonoma Countyy, to dense housing.

## To Whom It May Concern:

I have been a property owner and lived in Glen Ellen since 1981. I am writing to request that the County remove the two Glen Ellen parcels from rezoning considerations. My comments are specific to the Sonoma County Housing Element proposed rezoning of parcels # 054-290-057 and # 054-290-084 (GE-1 and GE-2).

187.1

The Glen Ellen properties on the list belong to Marty Winters, and are located on Arnold Drive, north of Marshall's Body Shop and the lower end of Carquinez. There are 5 dwelling units on the properties now, if the rezoning occurs as is planned, it will increase density on the properties to a *minimum* of 16 units and a maximum of 22!!.

Looking at past development proposals by the owner/developer, in order to build those 22 units, the majority of the buildings and trees would be removed.

Our downtown is about two blocks long. Densifying this area that is served by minimal public transit, not near a job center, and not near or adjacent to an urban growth area, is not consistent with General plan policies regarding Glen Ellen nor is it consistent with the Glen Ellen Development Guidelines. Glen Ellen is not an urban center and is outside the urban growth boundary. In addition, the EIR does not consider the cumulative projects in our area, i.e. the development of a minimum of 620 homes proposed for the Sonoma Developmental Center site or 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.De

187.2

Your decisions have the potential of creating a very negative impact on this small community without sufficient regard to the families and businesses that compose the community. We are already impacted by traffic and poor planning, please do not add to this scenario with irresponsible decision making. Community members who have lived in the greater downtown part of Glen Ellen are experiencing increased congestion and irresponsible intrusions on their properties because of poor planning.

Thank you for your consideration and responsible actions on behalf of sonoma county residents living in Glen Ellen.

Sincerely

Anne Kuschner 140 W Trinity Rd Glen Ellen, Ca. 95442

Letter 188

From: Aram Sarkissian <aramjames777@hotmail.com>

Sent: Monday, February 13, 2023 3:57 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Fw: Housing Element Update-Forestville FOR-2



Regarding the proposed rezoning of Forestville to include up to **1652** new residents, I'd like to first point out that as of the 2020 census the population of Forestville is **3788** people. Which means you are proposing increasing the size of our town by **50%**. An increase like this would seriously impact traffic, safety, and overall quality of life for our community.

188.1

Forestville simply does not have the infrastructure for growth like this, and there are communities with open space much closer to the 101 and public transportation, like Fulton. We have limited access to public transportation which is located on streets without sidewalks, an elementary school that is at capacity, no high school, few sidewalks, no access to medical and social services, limited sewer and water capacity and no police force.

# Regarding the rezoning of FOR-2 on Nolan

1.	Mirabel Rd. is a very busy and important 45 MPH thoroughfare, how do you propose to facilitate a safe flow of traffic for up to 736 additional cars entering the flow of traffic onto Mirabel Rd? Onto Hwy 116? Onto River Rd?	188.2
2.	Mirabel Rd only has a sidewalk on one side of the street heading towards downtown. How do you propose to keep the many pedestrians and children from this high density housing safe? On their way to Speers Market? On their way to the River?	188.3
3.	There is limited and infrequent public transportation in Forestville. Many of the residents, in the proposed high-density housing will surely rely on public transportation which is only accessible down a very busy Mirabel Rd. with no sidewalk and dangerous ditches on either side. What will you do to ensure the safety of the pedestrians and children on their way to the bus stop?	188.4
4.	What will you do to improve public transportation from Forestville to Santa Rosa and throughout the Russian River?	188.5
5.	What will you do to improve the local Elementary School, ensuring there are enough teachers to accommodate the influx of children?	188.6
6.	Our local Sewer and Water system would need to be upgraded to handle the extra residents, what will you do to upgrade and improve our local Sewer and Water system? How is Forestville water district supposed to accommodate 283 extra homes?	188.7
7.	Forestville doesn't have a police station, or much of a Sheriff's presence, how will you ensure that we receive the extra policing required for an additional 736 residents?	188.8
8.		188.9

It's a wildly inappropriate proposal for any of the small communities in unincorporated Sonoma County to increase their population by 50% and Forestville seems to be bearing the brunt of the current effort to rezone for affordable housing in Sonoma

County. I look forward to a sane and thoughtful process before you decide to rezone such a large swath of Forestville.

188.10 Cont.

Thank you, Aram Sarkissian 8004 Savio Ln. Forestville, CA. 95436 From: Aram Sarkissian <aramjames777@hotmail.com>

Sent: Monday, February 13, 2023 3:58 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Fw: Housing Element Update-Forestville FOR-4



Regarding the proposed rezoning of Forestville to include up to **1652** new residents, I'd like to first point out that as of the 2020 census the population of Forestville is **3788** people. Which means you are proposing increasing the size of our town by **50%**. An increase like this would seriously impact traffic, safety, and overall quality of life for our community.

189.1

Forestville simply does not have the infrastructure for growth like this, and there are communities with open space much closer to the 101 and public transportation, like Fulton. We have limited access to public transportation which is located on streets without sidewalks, an elementary school that is at capacity, no high school, few sidewalks, no access to medical and social services, limited sewer and water capacity and no police force.

# Regarding the rezoning of FOR-4 on Van Keppel

1.	Van Keppel is a narrow 1 lane road with several abrupt turns, seeing as it is barely suitable for the current flow of traffic, what will you do make this road safe and suitable for up to an extra 185 cars, plus their visitors?	189.2
2.	Hwy. 116 is a very busy thoroughfare, how do you propose to facilitate a safe flow of traffic, for up to 185 additional cars entering the flow of traffic onto Covey Rd? Onto Hwy 116?	189.3
3.	Van Keppel is a narrow rd without a sidewalk. How do you propose to keep the many pedestrians and children from this high density housing safe? On their way to Speers Market? On their way to the River?	189.4
4.	There is limited and infrequent public transportation in Forestville. Many of the residents, in the proposed high-density housing will surely rely on public transportation which is only accessible down a very busy Mirabel Rd. with no sidewalk and dangerous ditches on either side. What will you do to ensure the safety of the pedestrians and children on their way to the bus stop?	189.5
5.	What will you do to improve public transportation from Forestville to Santa Rosa and throughout the Russian River?	189.6
6.	What will you do to improve the local Elementary School, ensuring there are enough teachers to accommodate the influx of children?	189.7
7.	Our local Sewer and Water system would need to be upgraded to handle the extra residents, what will you do to upgrade and improve our local Sewer and Water system? How is Forestville water district supposed to suddenly accommodate 71 extra homes?	189.8
8.	Forestville doesn't have a police station, or much of a Sheriff's presence, how will you ensure that we receive the extra policing required for an additional 185 residents?	189.9
9.	How do propose to improve appropriate access to medical and social services for these high density housing residents.	189.10

It's a wildly inappropriate proposal for any of the small communities in unincorporated Sonoma County to increase their population by 50% and Forestville seems to be bearing the brunt of the current effort to rezone for affordable housing in Sonoma County. I look forward to a sane and thoughtful process before you decide to rezone such a large swath of Forestville.

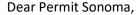
189.11

Thank you, Aram Sarkissian 8004 Savio Ln. Forestville, CA. 95436 From: Aram Sarkissian <aramjames777@hotmail.com>

Sent: Monday, February 13, 2023 3:58 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Fw: Housing Element Update-Forestville FOR-5



Regarding the proposed rezoning of Forestville to include up to **1652** new residents, I'd like to first point out that as of the 2020 census the population of Forestville is **3788** people. Which means you are proposing increasing the size of our town by **50%**. An increase like this would seriously impact traffic, safety, and overall quality of life for our community.

190.1

Letter 190

Forestville simply does not have the infrastructure for growth like this, and there are communities with open space much closer to the 101 and public transportation, like Fulton. We have limited access to public transportation which is located on streets without sidewalks, an elementary school that is at capacity, no high school, few sidewalks, no access to medical and social services, limited sewer and water capacity and no police force.

# Regarding the rezoning of FOR-5 on Packing House

1.	This site is a natural wetland, home to protected species. I assume you don't intend to diregard any environmental protection laws? When will you have an environmental report done here?	190.2
2.	Hwy. 116 is a very busy thoroughfare, how do you propose to facilitate a safe flow of traffic, for up to 151 additional cars entering the flow of traffic onto Covey Rd? Onto Hwy 116?	190.3
3.	116 is doesn't have a sidewalk. How do you propose to keep the many pedestrians and children from this high density housing safe?	190.4
4.	There is limited and infrequent public transportation in Forestville. Many of the residents, in the proposed high-density housing will surely rely on public transportation which is only accessible down a very busy Mirabel Rd. with no sidewalk and dangerous ditches on either side. What will you do to ensure the safety of the pedestrians and children on their way to the bus stop?	190.5
5.	What will you do to improve public transportation from Forestville to Santa Rosa and throughout the Russian River?	190.6
6.	What will you do to improve the local Elementary School, ensuring there are enough teachers to accommodate the influx of children?	190.7
7.	Our local Sewer and Water system would need to be upgraded to handle the extra residents, what will you do to upgrade and improve our local Sewer and Water system? How is Forestville water district supposed to suddenly accommodate 58 extra homes?	190.8
8.	Forestville doesn't have a police station, or much of a Sheriff's presence, how will you ensure that we receive the extra policing required for an additional 151 residents?	190.9
9.	How do propose to improve appropriate access to medical and social services for these high density housing residents.	190.10
s 2	wildly inappropriate proposal for any of the small communities in unincorporated	1
Ju	Trially inappropriate proposal for any or the ornal confinition in animodiporated	

It's a wildly inappropriate proposal for any of the small communities in unincorporated Sonoma County to increase their population by 50% and Forestville seems to be bearing the brunt of the current effort to rezone for affordable housing in Sonoma

County. I look forward to a sane and thoughtful process before you decide to rezone such a large swath of Forestville.

190.11 Cont.

Thank you, Aram Sarkissian 8004 Savio Ln. Forestville, CA. 95436

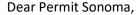
191.1

From: Aram Sarkissian <aramjames777@hotmail.com>

Sent: Monday, February 13, 2023 3:59 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Fw: Housing Element Update-Forestville FOR-6



Regarding the proposed rezoning of Forestville to include up to **1652** new residents, I'd like to first point out that as of the 2020 census the population of Forestville is **3788** people. Which means you are proposing increasing the size of our town by **50%**. An increase like this would seriously impact traffic, safety, and overall quality of life for our community.

Forestville simply does not have the infrastructure for growth like this, and there are communities with open space much closer to the 101 and public transportation, like Fulton. We have limited access to public transportation which is located on streets without sidewalks, an elementary school that is at capacity, no high school, few sidewalks, no access to medical and social services, limited sewer and water capacity and no police force.

# Regarding the rezoning of FOR-6 on Forestville St.

1.	How do propose facilitating the flow of traffic throughout Forestville to accommodate an extra 312 vehicles, bikes and pedestrians plus their visitors throughout Forestville? We have few sidewalks, no traffic lights (which we like!), no lit crosswalks, no bike lanes, and few sheriff patrols.	191.2
	Hwy. 116 is a very busy thoroughfare, how do you propose to facilitate a safe flow of traffic, for up to 312 additional cars entering the flow of traffic onto Hwy 116 right next to an elementary school?	191.3
3.	How do you propose to keep the many pedestrians and children from this high density housing safe crossing Hwy 116?	191.4
4.	There is limited and infrequent public transportation in Forestville. Many of the residents, in the proposed high-density housing will surely rely on public transportation which is only accessible down a very busy Mirabel Rd. with no sidewalk and dangerous ditches on either side. What will you do to ensure the safety of the pedestrians and children on their way to the bus stop?	191.5
5.	What will you do to improve public transportation from Forestville to Santa Rosa and throughout the Russian River?	191.6
6.	What will you do to improve the local Elementary School, ensuring there are enough teachers to accommodate the influx of children?	191.7
7.	Our local Sewer and Water system would need to be upgraded to handle the extra residents, what will you do to upgrade and improve our local Sewer and Water system? How is Forestville water district supposed to suddenly accommodate 120 extra homes?	191.8
8.	Forestville doesn't have a police station, or much of a Sheriff's presence, how will you ensure that we receive the extra policing required for an additional 312 residents?	191.9
9.	How do propose to improve appropriate access to medical and social services for these high density housing residents.	191.10

It's a wildly inappropriate proposal for any of the small communities in unincorporated Sonoma County to increase their population by 50% and Forestville seems to be

bearing the brunt of the current effort to rezone for affordable housing in Sonoma County. I look forward to a sane and thoughtful process before you decide to rezone such a large swath of Forestville.

191.11 Cont.

Thank you, Aram Sarkissian 8004 Savio Ln. Forestville, CA. 95436 February 13, 2023 Letter 192

## To Whom It May Concern:

We are Mary Neuberger and Arch Zellick of 6015 Hughes Rd. in Forestville and are longtime residents. Just recently (12 days ago) we heard about the rezoning plan being pursued by the County. This discovery came by way of a post on the Forestville Next-door website with a summary of the Housing Plan, a link to the Draft Environmental Impact Report (DEIR) and the Planning Commission of Sonoma County. After reviewing the DEIR and attending a Zoom meeting of the Planning Commission on February 2<sup>nd</sup> we have many concerns regarding the plan for Forestville. One major concern regards the lack of notification to the public. We were informed at the zoom meeting that everyone living within 300 hundred feet of an identified project site had been contacted by mail. We fit that criterion along with many of our neighbors, yet none of us received a notification. We find this to be a violation of the County's responsibility to notify its citizens of such sweeping actions. Referenced below are additional concerns regarding the impact on Forestville as a community and members of our Van Keppel neighborhood, which borders Zone FOR-4.

Forestville as a Community

Six sites have been identified in Forestville for potential rezoning (see Figure 2-6 pg. 89 DEIR). According to Table 2-4 the maximum number of new units in Forestville is 635. New residents would number approximately 1,487 at 2.6 people per unit, cars at 1.5 per unit is 745. Forestville has a population of approximately 6,000 and an addition of 1,487 people represents a 25% increase. No other community in West County is above 10%. Only Santa Rosa has a higher percentage increase in population and that city has far more infrastructure in place to accommodate the increase. Forestville is barely equipped to accommodate the population we have now.

192.2

1192.1

Our concerns listed below do not just affect current residents, but will impact our new residents as well.

1) There are only two ways to enter and leave Forestville - River Road and Highway 116. Since moving here, we have been evacuated several times and each time it has been a slow, scary and arduous process. We were fortunate to have been given an early warning and enough time to get out safely. However, as we all know (Tubbs Fire, Paradise...), we may not always have that luxury. Without significant changes to the existing infrastructure, the proposed increase in population density and vehicles puts us all at risk.

192.3

2) Other than Highway 116, Covey and Mirabel, most of our roads are small with no sidewalks and are not pedestrian friendly. Our Main roads have no stop lights and can

barely handle the traffic we have now. Again, without extensive infrastructure improvements, the safety of current and new members of our community will be compromised.

192.4 Cont

3) Forestville has no police department and is serviced by the Sonoma County Sheriffs department. We have one small fire station and another station several miles away in Graton. We have no medical facilities. In essence we have minimum public services for a community our size and certainly not enough to service 1,487 additional residents.

192.5

4) Local public transportation consists of one bus line that go through town. Though reliable, the service is minimal. No where near what is required to meet the needs of new residents who may wish to take public transit.

192.6

5) The downtown area has one gas station, one pharmacy, one small store (Speers), two restaurants, one taqueria, a laundry mat, a hardware store, a bank, a coffee shop, a liquor store and NO HIGH SCHOOL. The closest supermarket is in Sebastopol, a 15-20 minute drive and, since the closure of El Molino, the traffic on 116 to Sebastopol in the morning and afternoon has increased dramatically.

192.7

6) If units are constructed in our 6 zones at the maximum density per acre the buildings would have to be 2 or 3 story apartment complexes. There are currently only a couple of 2 story buildings in town and all of them are downtown. To place such structures in our residential neighborhoods would be completely out of step with the character of our community.

192.8

7) I don't see an analysis as to capacity of our sewer and water infrastructure to handle the needs of a maximum build out of our six zones.

192.9

# Van Keppel Neighborhood (Zone FOR-4)

One of the sites, designated FOR-4, 6090 Van Keppel Rd., is a privately owned 3 acre parcel between Van Keppel Rd. and the soccer field at Forestville School. It is accessed via a gravel driveway easement. The medium density, medium to low-income development would increase the number of units in FOR-4 from approximately 90 to 161 (78%), and increase the neighborhood population from approximately 234 to 418 (79%). At 1.5 cars per unit it is an addition of 90 vehicles (50% more traffic). Considering that the whole of the proposed population is 25% over current numbers, this puts a huge and undue burden on this particular site. Not to mention the fact that Van Keppel is not a through road. One way in, one way out!

#### Concerns

1) With only one way to evacuate the neighborhood in case of fire, the increase of 79% in population and 50% in vehicle traffic is a huge concern. As it stands now, a rushed evacuation with the current population is quite problematic. With the proposed increases in cars and residents, it could be deadly.

192.11

2) Most homes in our neighborhood are on septic and public water. Do we have the capacity to supply water and sewer to the new units? How would these utilities be brought to the property? It appears that Van Keppel is the only road for access to the FOR-4 property, will the road be expanded? Is the sewer that currently serves some residents on Van Keppel be of sufficient size to accommodate an additional 69 units?

192.12

3) Zone 4 is bordered by residential properties to the East, West and North with Zone 1 to the Southwest of us. The Zone 1 property is the site of the abandoned Electro-Vector Plant. It is a registered toxic waste site. The regulatory oversight agency for the cleanup of this site is the North Coast Regional Water Quality Control Board. When contacted, we were informed by the agency that the site was still an active case and that they have, "been working hard trying to move this project towards cleanup and eventual closure" since 2008. The elementary school, whose property abuts Zone 1, has test wells around it to monitor the leaching of toxic waste from the site. Zone 4 is not far from Zone 1 and could be negatively impacted by the toxic waste in Zone 1. I saw no ground water contamination review in the EIR. Has that been reviewed?

192.13

4) There are two schools just to the south of FOR-4. The proximity of ongoing construction to the elementary school subjects the students to noise and airborne construction particulates during the buildout period.

192.14

5) The only entrance to the property is by an unimproved gravel driveway. This driveway exits Van Keppel at Van Keppel's lowest point as it traverses the neighborhood. There is a creek that drains approximately ½ of the Van Keppel neighborhood and it's exit point is the intersection of Van Keppel and the unpaved road. This area of Van Keppel floods on consistent basis during heavy rains. Without extensive drainage work the development of the FOR-4 would only exacerbate the flooding issue.

192.15

6) For the nine properties on the Northern and Eastern boundaries of the property, construction of multi-level apartment complexes would be like building a 30 foot wall at our property lines. Our neighbors to the north as the hill slopes upwards would also be affected by the height of such buildings. This type of structure is completely out of

character for our neighborhood and would diminish our right to quiet enjoyment of our property.

192.16 Cont.

We appreciate you taking the time to review our input. We are fully aware of the need for affordable housing in our County. We have adult children, nieces and nephews who are unable to find affordable housing in Sonoma, so are supportive of the cause. But the current plan for Forestville is not the best way to proceed for our community, our neighborhood and for the new residents envisioned in this plan. Stated in the DEIR, zones can be added or deleted by the Board of Supervisors. We respectfully request that zone FOR-4 be removed from consideration for rezoning and the remaining zoning plans for Forestville be amended to better reflect the character of our town, the needs of our current residents, and those of future members of the community.

192.17

Respectfully,

Arch Zellick and Mary Neuberger

6015 Hughes Rd. Forestville Ca. 95436 707-820-1476 From: audrey kung <audreyk@gmail.com>
Sent: Monday, February 13, 2023 4:18 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Objection to new housing at 14156 Sunset Ave in Guerneville

Hi there,

I am writing to express my objection to the proposal of 30 new housing units at 14156 Sunset Ave in Guerneville and hope you do not move forward with the permit for the following concerns:

- 1. Traffic safety of the roads in our neighborhood
- 2. Lack of water utilities

#### Traffic safety of the roads in our neighborhood

I'm sure you have all the measurements of Woodland Rd and Sunset Ave, which is the only entrance way to this location. With. no side walks, there is barely enough room for a car and pedestrian on the street, let alone two way car traffic. I walk up and down Woodland Dr multiple times a day, and pretty much every time I walk it, I have to jump quickly off the street into bushes to avoid getting hit by a car coming around the blind curvy roads. While driving this road, we constantly have to pull over into the bushes as well and have had many near miss accidents. Adding 78 new residents at this location and increasing the road traffic is just an accident waiting to happen.

#### Lack of water utilities

With Guerneville being required to add hundreds of new units, it will require major new infrastructure changes for basic utilities like water, sewage and power. The location at 14156 Sunset Ave currently belongs to Sweetwater springs, the main water storage/fire protection of Guerneville. They sent a letter (attached) stating that they intend to use the land for future water storage and expansion. Seeing as there will definitely need to be expansion to support all of the new housing units elsewhere, it makes absolutely no sense to take land away from the water utilities company.

Thank you for your consideration, Audrey Kung 14021 Woodland Dr, Guerneville 193.1

Letter 193

193.2

From: Barbara Delonno < jarbarabean@comcast.net>

Sent: Monday, February 13, 2023 4:43 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Draft EIR comments: Housing element Update

## Dear Mr Eric Gage,

I'm writing you because several days ago I heard about the proposal to rezone 59 areas in Sonoma County to allow more housing density to help achieve the mandated housing goals from the state.

I have comments in general and comments about where I live, in Forestville. I am disturbed to see some of the new housing in Santa Rosa. For instance, the houses built off of Guerneville Road near Fulton. They are all attached, have no trees, no yard to speak of, and no privacy.

## Community Character

I would like to see more affordable housing in Forestville, but not at the expense of the character of our community. It is frustrating that the only way that has been figured out to build "affordable housing" is to cram in twice as many dwellings as the place is zoned for. The county doesn't lose, the developers don't lose, but the community loses. My husband and I moved here to Forestville with our three children in 1983. We were renting in Occidental and looking for a house. We came here for the affordable housing. It was cheap because it was a small modest house on a small lot. Our house is 967 square feet. The lot is 50' x 85.' Sometimes we were crowded while the kids were growing up, but we worked it out, saved a lot of money and had a nice life by being okay with a small house. We have a little yard, a deck and a little garden space. We have a Douglas fir tree, a fig tree, an apple tree and a cherry tree. What is nice about Forestville is that it's more out in the country than Santa Rosa or Sebastopol, yet it's not too far away. I want more families to have a chance at this good lifestyle. But the kind of housing this housing element proposal would create sounds like it would be the kind with no human habitat; for example no trees and outdoor space for the people. People don't move to Forestville to live in city style housing. There is no city here. The "urban" part of Forestville is about 3 blocks long! We have one gas station and one park. We don't have any stoplights. We don't have movie theaters or many stores. People move here to be closer to nature.

I wonder about the wisdom of trying to move so many people to Forestville. If full buildout were achieved it would raise our community population by 50%. In the rest of the county I have heard the increase is more like 10%. Why is Forestville slated for so much growth? And why so much growth that isn't really good for families? When you put in 20 units per acre, where do the kids play outside? Where can you plant a tree or some tomatoes? My house is on approx. 1/10 of an acre. It's a small lot. This proposal puts two "dwellings" on my lot. Forestville 2, on Nolan Road could get 283 dwellings! It is surrounded by houses with a good amount of land around them. I think the difference

194.1

194.2

	_
between the two would be aesthetically shocking. This would be a good place to put a normal Forestville neighborhood. (10 units per acre)	194.3 Cont.
Some people will want a place to live where they don't have to keep up a yard. But eve if housing is built at greater density without personal outdoor space, I want there to be "human habitat" as part of the housing- some place to be outside, in a garden or a courtyard or on a deck. Our long range planning should take into account people's health and well-being.	n 194.4
Does this proposal really "Provide housing development opportunities throughout the urban areas of the Unincorporated County near jobs, transit, services, and schools?" Are there really many jobs near here? The 20 bus goes through Forestville 10x per day but it takes 50 minutes to get to Coddingtown, (a 20 minute drive,) so I think most people who move here will be driving to work.	, 194.5
Water We have been told year after year to conserve more water. People have saved about a much as they can save. How will there be enough water to support all of this new housing? Does the state mandate housing regardless of water shortage? Could the county make all of these dwellings with graywater systems to help with the water situation?	s 194.6
What about increasing the affordability of this housing by installing solar panels? This could bring the homeowner's costs down.  Thank you for your consideration,	194.7

Barbara Delonno 8175 Park Avenue Forestville CA 95436 jarbarabean@comcast.net From: William Avellar <wavellarg@gmail.com> Sent: Monday, February 13, 2023 4:10 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Cc:** district5 < district5@sonoma-county.org>

Subject: Housing element Update

With regard to; Forestville Inventory Sites Figure 2-6 6898 Nolan Road AKA; FOR-2 previously known as Van Kepple's Property

In Forestville California, I remember a project that was all set to develop that area several years ago and it was not allowed because there was not enough sewer capacity to handle it.

If there was not capacity for that one area of development we certainly do not have capacity for areas: FOR-1, FOR -2, FOR-3, FOR-4, FOR-5, FOR-6, and FOR-7.

People who live here currently enjoy; small town living, beautiful scenery, knowing their neighbors, and very importantly a low crime rate.

All of these would be jeopardized by these projects.

Sincerely,

Bill Avellar 6856 Lois Lane Forestville, CA 95436 Sent from Mail for Windows

From: Bob and Lucy Hardcastle <bobbyloren@icloud.com>

Sent: Monday, February 13, 2023 3:17 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Rezoning in Forestville

#### **EXTERNAL**

A 43.6% increase in a small towns population in order to allocate mandated housing units does not take into consideration the towns ability to support this growth. Our roads are challenged as is. A developer would need to put in a round about at Mirabel and 116 to avoid major traffic slowdowns. The town simply can't handle these numbers. Bob Hardcastle.

Sent from my iPhone

Letter 197

From: Bonnie <bonniesmith@sonic.net>
Sent: Monday, February 13, 2023 1:38 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Proposed Housing on Sunset Ave

## **EXTERNAL**

We are writing to express our concern about the multi unit housing to be located on Sunset Ave. The narrow one lane roads would present dangerous traffic conditions.

Thank you for your consideration

197.1

Bonnie Smith Gary Digman

Sent from my iPhone

From: Brenda Stivers <stiversinsurance@live.com>

Sent: Monday, February 13, 2023 7:08 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** opposition to the rezoning of properties

I'm a resident of Cutten Drive and want to voice my concern and strong opposition to the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3-16500 Cutten Ct, and GUE 4-16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

The response that the community and residents are hearing at meetings is not acceptable. We are being told that, for GUE 3 specifically, this property has been previously considered and because nothing happened then, then it's likely that nothing will happen now. I question why this property remains under consideration given all of the obvious issues surrounding it. I can think of at least 8 other viable sites in Guerneville that would be better fits for proposed affordable housing (near Safeway, Ferrell Gas site, large fields off of 116 are just a few examples). It is apparent that very little thought and time went into selecting the Guerneville properties. Perhaps in the future the planning committee can tap into the expertise of long-time residents of Guerenville to identify more viable sites.

There are many specific adverse effects noted in the DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning. Here are a few of my concerns, specifically related to GUE 3.

\_\_\_\_\_

#### Infrastructure

#### Roads

GUE 2 and GUE 3 are accessible via one-lane roads that will need utility upgrades. The needed upgrades and road closures will severely impact the emergency egress for residents. Cutten Drive is a one-lane road that climbs up a ridge and is already dangerous for residents to navigate. There is a large Redwood on Laughlin that cannot be passed by 2-lane traffic. That redwood would need to be removed to widen the road to allow for needed traffic flow. Road work in these areas will need to be addressed before any construction can be considered, as heavy machinery can not safely make it into these areas without causing severe access issues and major disruption to residents.

198.2

198.1

Sidewalks & Bike Lanes

There are no sidewalks or bike lanes in our rural community. Increasing the foot traffic in these areas without sidewalks will result in many accidents and injuries. It is already dangerous, especially for summer visitors, who do not understand the intricacies of navigating these roads with small amounts of traffic.

198.3

## Water and Wastewater

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages. Additionally, the grade of GUE 3 will make it near impossible to add proper sewage to this area without significant development costs.

198.4

# **Health & Safety**

The GUE 2,3 and 4 properties are within areas documented as high wildfire danger, flood plains, and earthquake-prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons. We have been evacuated for significant amounts of time in 2018, 2019 and 2020. Most recently, with the rain and wind, we were without power for over 7 days on Cutten Drive.

198.5

The nearest hospitals are at least 30 minutes away and our ambulance service is often overextended, especially dealing with the homeless community. Many low-income residents are elderly and it would be irresponsible to house them in an area that is so isolated from reliable emergency health services.

Additionally, Guerenville will need to increase the amount of law enforcement and emergency response given the significant increase in residents. I've seen little discussion or plans surrounding this issue.

# **Biological Resources**

For GUE 3, future development facilitated by the project will impact special status species and their habitat during construction and/or operation. Development on this site would require the removal of redwoods and this meadow is a known habitat for California Quail, California Grey Foxes and Osprey.

198.6

GUE 3 is also adjacent to existing agricultural uses, and Mitigation Measure AG-1 would require an agricultural protection buffer for future development.

#### **Visual Assessment**

For GUE 3, Site Sensitivity should be high and not moderate and and Visual Dominance should be considered Dominant. Old-growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high-density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed." There is no way to develop this property without removing a significant number of trees.

198.7

In the DEIR, "Figure 4.1-5 GUE-2 and GUE-3 Looking Westward from Cutten Avenue" is misleading and there should be additional photos of this property to fully show the immense beauty of this valley view - a pillar of the visual character of our community.

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The rezoning of GUE 2, 3, and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

198.8

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California. I hope to continue discussions in future meetings.

198.9

16430 Cutten drive Guerneville Brenda C Stivers (Medicare agent) Bus # 707–604-7111 stiversinsurance@ live.com From: Bee Cee <burt.sag@gmail.com>
Sent: Monday, February 13, 2023 4:34 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Draft EIR - housing

I live at 7446 Poplar Drive, Forestville, just around the corner from the proposed site FOR-2 at 6898 Nolan Road.

The total proposed increase in population for Forestville is significant: 39% -- greater than any other community in Sonoma. My concerns are that the infrastructure of this small, semi-rural community will need to be changed substantially to accommodate such an increase.

Additionally, my specific concerns about the 700+ increase in residents in FOR-2 are safety-related.

Every time I am about to pull out from Giusti Road or Nolan Road onto Mirabel Road, the main link between 116 and River Road, I have to be extremely watchful because all day long there are large gravel trucks speeding back and forth from the two quarries on 116 to various construction sites up North. This is, of course, in addition to the regular traffic. There are no traffic lights anywhere on Mirabel. And when pulling out from Nolan, there is a large hill to the North, blocking one's view of any fast-moving vehicles heading towards 116. An increase in population and accompanying traffic will result in accidents, unless significant mitigation takes place. And on these back roads (Giusti and Nolan), there are a number of residents who walk their dogs, jog, etc. and there are no sidewalks. Again, increased traffic will result in pedestrian accidents.

\*\* As a resident of Forestville I am very concerned about the impact of traffic safety that will result in this 39% population increase \*\*

I also have many questions about sewage, water drainage, fire safety, evacuations, etc. which I'm sure are being detailed by others.

No question that Sonoma County needs increased affordable housing. And no question that Forestville could accommodate some of that increase with modest enhancements of the infrastructure. But the current plan of radical population increase will not only impact the safety of our residents, but will forever change the nature of this community.

I urge you to reconsider both the size and location of these changes.

Thank you, Burt Cohen Forestville, CA 199.1

From: Anne Watson <chuckandanne33@gmail.com>

Sent: Monday, February 13, 2023 11:05 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Comments on Sonoma County Housing Element proposed rezoning of parcels #054-290-057

and #054-290-084 (GE-1 and GE-2)

Our "downtown" here in Glen Ellen is about two blocks long, not near a job center, doesn't have adequate roads or public transportation, and does not fit the State's definition of an urban growth area. We believe, as former leaders in creating the development guidelines, that this rash proposal for rezoning to increase density was not well-thought out or properly considered for our small town in the long-term. It does not take in consideration the cumulative projects in our area. We oppose approving the environmental Impact report.

200.1

Letter 200

Charles and Anne Watson

From: Chris Romano <cromanosf@gmail.com> Sent: Monday, February 13, 2023 4:41 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Cc:** Stephen Marchi <leomarchi@gmail.com> **Subject:** Sonoma County Housing Element



It comes as a disappointment that so many of us have been kept in the dark about the Sonoma County Housing Element, which we have now learned is a regularly scheduled process every 8 years. None of this should have been sprung on us at the last minute, as it has. We feel pretty let down and blindsided that no meaningful community feedback or consultation has taken place.

We own our home and live full time on Sunset Avenue in Guerneville. We love living here and love our community. Like you, we are also supporters of more housing in the broader community. We also support higher density in the downtown district similar to most downtowns in Sonoma County where there are 3 or 4 stories above the street level with easy access to shops, transport and jobs.

201.1

We knew nothing about the fact that Sunset Avenue is being considered as a site for rezoning medium density housing until this week when seeing it by chance, buried in a post on Facebook. After speaking to a lot of people in our neighborhood it became clear that none of them knew anything about it either.

We do not support the draft 6th Cycle Sonoma County Housing Element, and wish to register our strong opposition to the inappropriate and disproportionate burden of new housing being proposed for Guerneville. We wish to also specifically note my objection to the inclusion of Sunset Avenue in the Housing Element.

Here are the reasons for our objection:

## 1. Lack of meaningful community consultation.

No one in the immediate neighborhoods have been directly notified or properly consulted. We have also not been briefed on why the County thinks these are appropriate sites in Guerneville. There has been an enormous lead time to hold proper community meetings and share draft proposals and justifications with all affected communities. Instead, it appears only a very small group of people who are involved with the MAC seem to have been part of this process locally. There is no doubt that members of the MAC are lovely, kind and good hearted volunteers, but they aren't properly equipped to represent the views of our community on this matter.

## 2. Sweetwater Springs does not support this rezoning.

Sweetwater Springs, the owners of the Sunset Avenue land being proposed, have shared a letter with Permit Sonoma and our neighborhood noting they do not support the inclusion of their land in the Housing Element. A copy of this letter is attached for your reference. They note that their land is important to keep vacant for them to potentially expand their water supply for future generations. This is the main source of water for the town and provides essential fire fighting capacity. It beggars belief that they would not have been consulted when preparing this draft Housing Element.

201.3

# 3. The proposal places an unreasonable and disproportionate load of new housing on the Guerneville area.

By adding 616 new units and potentially 1762 new residents, you'll be increasing the population of our town by as much as 37%. A disproportionate increase of population by this size and concentration in Guerneville would have an adverse impact on the very people we seek to assist by constructing low income and worker accommodation. There aren't enough jobs in Guerneville to sustain this increase, even in our peak summer tourist season. By contrast, the proposal to increase housing in Santa Rosa is one fifth of the burden on Guerneville on a per capita basis of population.

201.4

## 4. Lack of appropriate road infrastructure.

Almost all of the sites proposed in Guerneville (with the exception of the site next to Safeway) are serviced by small one lane roads. The Sunset Avenue site is particularly bad as the road is steep, one lane and has a sharp hook turn in the upward direction making it difficult to access. It's precarious to drive along this street now if another car comes in the opposite direction. Adding this development, and the influx of cars it would bring in this location would be dangerous and irresponsible.

201.5

## 5. Fire and evacuation risk.

As noted above, the Sunset Avenue site is serviced by a small goat track of a road. An increase in population and cars at this site would not be safe and not only put the lives of people at this development at risk, but potentially many neighbors too. Our ability to evacuate via the small one lane roads servicing our neighborhood would be significantly hindered. The flood risk associated with Armstrong Woods Road is an additional concern that remains unaddressed by this proposal.

201.6

## 6. Impact on local neighborhood.

The size of this development proposal for Guerneville and Sunset Avenue specifically is significantly out of character with the local neighborhood. There are no other medium density sites nearby - it is surrounded by single homes. The noise both during construction and as a result of nearly doubling the population of our neighborhood will have a significant negative impact. The site is so steep that families with children or pets would also not have yards for recreation. It's hard to imagine how parking will be able to be accommodated at this site either, meaning potentially 78 cars will be parked along the roadside further affecting fire, evacuation safety and local amenity.

201.7

Thank you for your consideration of our concerns. We are really hopeful that a more sensible Housing Element can be adopted by Sonoma County and we look forward to your response.

Sincerely

W. Chris Romano 415-637-9345 From: Christine Johansson <cajohansson@yahoo.com>

Sent: Monday, February 13, 2023 11:29 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Affordable housing plan for West County

housing than some of the places that were proposed.

My husband and I live in Guerneville and are very supportive of having housing that is affordable for workers. However, there are some major concerns we have about the proposed plan for our area. 202.1 1. The primary concern is the fact that our infrastructure does not support a lot of the larger projects. Many of our roads are essentially one lane roads (that are in terrible shape) that have to accomodate 2 lanes of traffic. Also, sewer and water systems are not adequate for the number of houses planned (and 202.2 flooding is always a concern). 2. Safety is a huge issue. Our narrow, winding roads are in disrepair. Often one road is the only way in and out of an area. If a wildfire required an immediate evacuation, there is no way large numbers of people would be able to get out in time. We live in the Vacation Beach area and even when the summer 202.3 bridge is up, we know that, in an emergency, if we tried to drive out of here we would die stuck in a line of traffic like the people in Paradise. Adding large numbers of people to areas that cannot safely handle the number of people they already have is dangerous and irresponsible. 3. Guerneville, Monte Rio and Rio Nido have a number of houses that used to be occupied by people who live and work in Sonoma County. This was one of the last affordable areas in the county which is why we were able to afford to buy here. Unfortunately, in the last few years there has been very uneven (or nonexistent) oversight of permitting for short term rentals. It is hard to reconcile this push to build more housing while at the same time watching family homes get taken off the market and turned into AirBnB's. We live in one of the many neighborhoods that has been completely hollowed out by this 202.4 process. There are dozens of houses on my street that sit vacant half the year because they are short term vacation rentals. I understand that we need to accomodate tourists and some effort has been made to change the system that created this problem, but I would suggest that local government put a complete moritorium on all new short term rentals until we have achieved some of the goals of affordable housing for residents. 4. How much effort has gone into making it easier for people to add ADU's to their property? The 202.5 permitting process is often a huge, expensive block to people who want to do this so I am wondering if this could be streamlined or incentives could be created to make this process less daunting? Also, septic/sewage issues can be a problem, but I think the county was looking into allowing composting 202.6 toilets that use newer technology which would be a huge help. 5. Rather than building new, dense housing projects in remote parts of West County, how much research has been done to see if there are existing structures in town that could be renovated? I have 202.7 lived in many small apartments that were single houses that had been divided into 2-3 living spaces. I can think of a number of emply lots and buildings in Guerneville that might be better suited for creating

In short, we need to do something about affordable housing, but can we be a little more creative than building large housing projects in a couple locations? Many of us are in favor of doing something to help the problem, but what is being proposed is not tenable given the needs and limitations of our community. I am no fan of endless meetings, but allowing concerned people who live here and know the area a chance to voice their ideas and suggestions is needed before any further steps are taken.

202.8

Thank you.

Christine Johansson and Greg Kerlin

Letter 203

From: Cynthia Berman < cberman16330@comcast.net>

Sent: Monday, February 13, 2023 9:28 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: No New Buildings

#### **EXTERNAL**

This is NOT a smart or clever plan!! In fact, it is the polar opposite!!

Here in Guerneville and Forestville we not only DO NOT have the infrastructure to support this plan!!
Flooding, fires, and roads abounds.

1 can picture the mayhem as too many cars and panicked residents are trying to abide the evacuation order during fire season! No Way Out!!!! Armstrong Woods Rd and River Roads have been transformed into a giant parking lot....this chills me to the bone!!

NO NO NO!!!!!!!!

Cynthia Berman, Ph. D

Sent from my iPhone

From: DAN NORTHERN < dsnorthern@sbcglobal.net >

**Sent:** Monday, February 13, 2023 3:11 PM **To:** Greg Carr < <u>Greg.Carr@sonoma-county.org</u>>

Subject: Draft EIR Comments: Housing Element Update Forestville

To: Planning Commissioner Carr

RE: Draft EIR Comments: Housing Element Update

From: Dan and Sunoma Northern

Date: February 10, 2023

Dear Commissioner Carr,

My name is Dan Northern. My wife Sunoma and I live at 6925 Nolan Road in Forestville where we have been residents, with our family, for 30 years. This letter is in response to the Sonoma County Housing Element Update DEIR.

#### **HCD Guidelines**

The Sonoma County Housing Element Update - DEIR fails to sufficiently analyze to what extent individual parcels meet the HCD Guidelines for Low Income Housing.

Housing Element Site Inventory Guidebook Government Code Section 65583.2 - Page 9

HCD Best Practices for selecting sites to accommodate the lower income RHNA: When determining which sites are best suited to accommodate the RHNA for lower income households, the jurisdiction should consider factors such as:

- 1. Proximity to transit.
- 2. Access to high performing schools and jobs.
- 3. Access to amenities, such as parks and services.
- 4. Access to health care facilities and grocery stores.
- 5. Locational scoring criteria for Low-income Housing Tax Credit (TCAC) Program funding.
- 6. <u>Proximity to available infrastructure and utilities</u>. Site Inventory Guidebook Page 10 May 2020
- 7. Sites that do not require environmental mitigation.
- 8. Presence of development streamlining processes, environmental exemptions, and other development incentives.

Comment: HCD Site Selection Factors

Forestville currently has 2 SCTA bus routes that serve the community. They each drop off and pick up once per day. Although there are informal bus stops within a reasonable proximity to the proposed developments in Forestville, this can hardly be considered a robust transit system

where stops occur every 15 minutes or so. Nor can it be considered a preferred method to travel to and from work, health care or other essential services in other portions of the County. In regards to access to high performing schools. While "high performing" is not currently a rating system for schools in the State of California, I would assume the Forestville Union Elementary School District would meet this requirement. On the other hand Forestville recently lost its high school, El Molino, forcing students to travel to Sebastopol, Windsor or Santa Rosa to attend school.

While it is difficult to determine what a "high performing job" would actually be, we can evaluate jobs in general in Forestville. For the most part there are none and the few that do exist are mostly minimum wage service jobs. Forestville is not a job center, is not close to a job center and that is not likely to change for one simple reason. There is very little undeveloped commercial or business space left in the town of Forestville. Manufacturing companies, offices and retail locations need employees. These are all things that grow the local economy and help it to thrive. There are only three vacant commercial/industrial zoned lots in Forestville that are contiguous to or within a half mile of the downtown area, that are not already developed. Two of these sites are scheduled to be rezoned, to residential development, under the Housing Element Update, FOR-1 and FOR-6. One additional parcel is available on the south side of HWY116 across from Mirabel Road. This site is not in the Housing Element Update DEIR because it is already zoned for residential mixed use. It is my understanding that it will also be available for affordable housing at some point. If these sites are rezoned the ability to add jobs and essential services, health care, grocery stores, social services will be completely eliminated in the town of Forestville. There is simply no remaining space, unused lots or property, for commercial or business growth and the addition of jobs and services for a growing population. I understand the push by the State of California to convert vacant or unused commercial space or property to residential zoning in order meet its housing needs and it make sense. Forestville is not the place to impose this philosophy.

Forestville has two privately owned parks within ½ mile of the downtown area. These parks are maintained through private donation and fund raisers. Two separate 501c3's own these parks and neither receives public funds for the operation and maintenance and both struggle to find funding under increasing usage.

The only health care facility in Forestville is a dentist office. We have no medical, mental health or urgent care facilities. While the community needs these services where will we find the land to put them? Residents of Forestville travel to Sebastopol, Santa Rosa, Guerneville and beyond to access health related services.

Forestville has one grocery store which is 1.25 miles from the downtown area. It is not safely walkable or bikeable from any of the proposed sites, FOR-1 thru FOR-6. The County is planning to extend the Joe Rodota trail from downtown Forestville to Steelhead Beach. This path will make walking to the grocery store possible but the path will not be ADA compliant or accessible due to very steep grades.

At least some of the proposed sites in Forestville will require environment mitigation such as FOR-1 and FOR-2. FOR-1 has a ground water contamination issue. FOR-2 has a significant storm water runoff issue that effects blue line creeks, biologically diverse areas, flooding of low lying neighborhoods and the potential post development pollution of the Russian River.

204.1 cont.

Questionssable level for the community and who will pay for it? (HCD Best Practices

• The public transportation component of the DEIR does not provide a mitigation for the lack of adequate public transportation in Forestville. What mitigations measures should be included in the EIR that would bring the public transportation element up to practical — Factor

204.2

1)

• The DEIR should fully analyze the contamination issue on the FOR-1 site to determine if that sight might actually be useable for housing or Workforce Combining District development. There are "urban legends" about contamination levels at that site that may or may not be true. A combination of housing and commercial space on this site would be beneficial to the community and should be further investigated. What can be done to determine if this site can be mitigated so that it can be safe if developed? (HCD Best Practices – Factor 7)

204.3

• The FOR-6 Site is currently zoned industrial. Does it make sense to rezone one of the last parcels available in the town of Forestville for residential use when that site could help the community meet is needs for more jobs and businesses in the future? (HCD Best Practices – Factor 2 & 3, Jobs, Services)

204.4

• What additional mitigation measure can be included in the EIR to assure that the two privately owned parks in Forestville don't fail due the overuse and degradation due to a lack of funding? (HCD Best Practices – Factor 3)

204.5

#### **Forestville - Other Site Issues**

Comment: Sites FOR-1 thru FOR-6

The DEIR did not sufficiently analyze even the basic issues that could impact the ability to successfully develop Forestville Sites 1-6.

FOR-1 – 6555 Covey Road – APN 083-073-017

• This site is known to have ground water contamination from a previous business. The contaminated water runoff has been tracked to the Forestville Union Elementary School District site. It has been monitored for since 2008 by PES Environmental. PES Environmental provides quarterly reports to the School District. Information relative to contamination at this site is readily available.

204.6

For-2 - 6898 Nolan Road - APN 083-120-062

There are several know significant issues with this site.

- Excessive storm water runoff affects blue line creeks, riparian corridors, biological sites, causes home flooding and creek bank erosion before reaching the Russian River unfiltered.
- Traffic safety issues relating to the entrance and exiting of the property from Mirabel Road.

- No crosswalks in the area allowing residents to safely cross Mirabel Road.
- Close proximity to High and Moderate Fire Severity Zones and State Responsibility Lands.
- The addition of over 700 residents and their effect on evacuation plans for the neighborhood.
- Sewer line capacity issues exist between the site and the main sewer line at First Street in downtown Forestville.
- The owner of the property has sent a letter to the County stating that the family has no intention of selling the property and plans to pass it down to future generations has not been sufficiently analyzed.
- The 3 entrance/exit sites are all separate parcels with separate APN's allowing the owner(s) to sell them off separately causing the property to be land locked.

#### FOR-4 – 6090 Van Keppel Road – APN 083-073-010

• This site is not located directly off Van Keppel Road. The site is land locked and accessed only thru an adjacent property, APN 083-070-009. The adjacent property is not owned by the owner of APN 083-073-010.

FOR-3 - 6220 Highway 116 N — APN 084-020-004 and FOR-5 - 6475 Packing House Road - APN 084-020-003

- The Forestville Skatespot, skateboard park, is planned for either site FOR-3 or FOR-5. In addition, the County is also planning to use a portion of one of these two sites for the storage of emergency disaster supplies. These two programed projects will impact the density of at least one of these sites.
- Both of these sites are within 300' of the Forestville Water District Sewer Treatment Plant. In order to avoid Environmental Justice issues surrounding the placement of low-income housing close to a sewer treatment plant the density on one or both of these projects may need to be reduced.

#### FOR-6 - 6250 Forestville Street - APN 084-020-011

- This site is currently zoned for industrial development and is one of the last vacant commercial/industrial properties that can be developed as such in the town of Forestville. Removing rezoning commercial/industrial sites in Forestville will absolutely limit the community's ability to enhance services and create long term job opportunities.
- This site is adjacent to the Forestville Water District Sewer Treatment Plant. In order to avoid Environmental Justice issues surrounding the placement of low-income housing close to a sewer treatment plant the density of the project may need to be reduced.

204.7 cont.

204.8

204.9

204.10

We should not be dealing with significant and obvious issues that impact the ability build at the densities desired or to build at all on the parcels here if Forestville. In addition while other communities were represented on the Housing Advisory Committee the River, including Forestville, area was not. The unique character of our communities cannot be adequately assessed simply by viewing Sonoma County Active Map or Google Earth. You need local knowledge and local input.

204.12

204.13

I have heard the theory that if we build more housing units more business and jobs will follow. I challenge you to find a location in Forestville to build additional parks, business, commercial or industrial facilities especially after the Housing Element Update rezoning occurs.

#### Questions:

- The DEIR must further analyze the Forestville to develop appropriate mitigations measures, recommend reduce densities or consider the abandonment of projects.
- The DEIR should include a matrix that compares and rates each site against the HCD Guidelines above, essential features such as accessibility and their proximity to other known environmental, County Plans, Policies, Goals and Objectives as well as physical factors that might reduce, limit densities or eliminate the site from the rezoning list all together.
- If such a matrix was completed by the HAC it should be included in the EIR.

#### Forestville - Density Concerns

Comment: Densities

Most of the people we have talked to, in Forestville, are supportive of affordable and low income housing in our community. Their concerns revolve around the availability of services and jobs, infrastructure needs and the densities that are being proposed. If you live in Forestville you have no control over infrastructure, street and road maintenance, safe cross walks, street lighting, bike paths and sidewalks. We have been trying to work with the County to make safety improvements in these areas for years with little progress. One of our biggest hurdles is the fact that State Highway 116 runs right through the middle of our town and Cal Trans is slow and difficult to work with.

204.14

Housing Element Site Inventory Guidebook Government Code Section 65583.2 - Page 13

Step 2A: Does the parcel's zoning allow for "at least" the following densities?

- For an incorporated city within a nonmetropolitan county and for a nonmetropolitan county that has a metropolitan area: sites allowing at least 15 units per acre.
- For an unincorporated area in a nonmetropolitan county not included in the first bullet: sites allowing at least 10 units per acre.
- For a suburban jurisdiction: sites allowing at least 20 units per acre.

• For a jurisdiction in a metropolitan county: sites allowing at least 30 units per acre.

Housing Element Site Inventory Guidebook Government Code Section 65583.2 - Page 10

#### Step 7: Environmental Constraints

...However, local governments will find it beneficial to <u>describe site specific</u> <u>environmental conditions when demonstrating site suitability and realistic buildout capacity of each site</u>, as these types of impediments to building must be considered when determining how many residential units can be developed on the site.

204.15 cont.

It is hard to believe that the unincorporated area of Sonoma County is considered a suburban jurisdiction under the HCD Guidebook (20 units per acre above). It seems that the unincorporated area of Sonoma County fits the description of "unincorporated area in a nonmetropolitan county". In any case the density of 20 units per acre in rural Sonoma County is excessive. It appears the only rationale for this density is to achieve the housing unit numbers required by HCD. Maximum Affordable Housing densities in the rural areas of Sonoma County should be reduced to a level that the environment, infrastructure, jobs and services can handle without breaking the community.

#### Question:

• Page 10, gives the County the ability to look at each site in order to determine the appropriate density, "realistic buildout capacity". Site specific information should be incorporated into the EIR rather than taking the "one size fits all approach".

204.16

#### FOR-7 - Mirabel Road/Hwy116

#### Comments:

This parcel is mentioned in several locations and maps but there does not appear to be any reference to rezoning the property. We know that it belongs to the Robinson Family who own the Rotten Robbie gas station next door and that they have plans to expand the station. This has led to confusion in the community.

204.17

#### Question:

• Should it be removed from the DEIR or information regarding rezoning it be included?

#### Project Dispersement - Page 4.14-8

Development facilitated by the proposed project is intended to be dispersed throughout the County to create managed and planned levels of growth in specific areas. As discussed in Section 4.14, *Utilities and Service Systems*, the Rezoning Sites are near mostly developed areas supported by existing infrastructure that would be sufficient to serve the additional housing units. The project would not create or require the construction of new roads or major infrastructure, or directly or indirectly induce unplanned population growth.

This statement is completely false as it relates to the proposed rezoning, infrastructure needs and increased population in Forestville. The proposed rezoning in Forestville will increase the town's population between 25% and 50% depending on the boundaries used. The number of units proposed for Forestville is second only to the unincorporated area around the City of Santa Rosa. All 6 Forestville sites are within ½ mile of downtown, highly concentrated in a small community. The FOR-2 site is the largest proposed development in all of Sonoma County. The DEIR identifies the potential need for a round-a-bout at Mirabel/HWY 116. The FOR-2 site will require significant traffic mitigation infrastructure on Mirabel Road and adjacent side streets. FOR-3, 5 and 6 will require an entrance/exit to State Hwy116 and other significant traffic mitigation infrastructure. We are aware of a sewer pipeline issue that could require replacing 1000' of sewer line running under HWY 116 in order to serve the increase flow from FOR-2. These seem like significant infrastructure improvement.

204.18 cont.

#### Question:

• We don't know if Forestville is impacted more than other unincorporated communities but statistically it can certainly be proven. This is especially true when you consider the planned population growth per rezoning, 167 residents, vs the planned population post rezoning 1,652. The EIR should be updated to reflect that Forestville would be impacted by unplanned population growth.

204.19

• The EIR should be corrected to reflect what is contained else ware in the report and what is easily available from public records or just common sense.

#### **Forestville Schools**

DEIR Schools Page 4.15-15

Furthermore, 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). Therefore, impacts to schools are considered less than significant without mitigation.

204.20

#### Question:

• This seems to leave a question of what the impacts to Forestville Elementary are and why the DEIR considers them less than significant after calling out ... with the exception of Forestville Elementary. There should be an explanation and possibly a mitigation following this statement in regards to Forestville Elementary.

Respectfully Submitted,

Dan and Sunoma Northern 6925 Nolan Road Forestville, CA 95436 707-536-8991 dsnorthern@sbcglobal.net From: Dane Riley <danealanriley@gmail.com> Sent: Monday, February 13, 2023 1:11 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Cc: Lynda Hopkins < Lynda. Hopkins@sonoma-county.org>

Subject: Zoning Change to 6898 Nolan Road

To the Sonoma County Planning Commission:

This is in regard to the zoning change to the property surrounded by Giusti Road, Nolan Road, and Mirabel Road. The property being considered for a zoning change is not big enough to park enough cars at one per unit, let alone the two cars most units will have. Giusti Road and Nolan Road are not wide enough to allow parking on both sides of the street, and in some places on either side. This will result in problems for emergency access. This is a fire area, and parking on both sides of the street would not allow fire engines or ambulances to get through.

205.1

Forestville has very few jobs, so almost all workers would have to commute. The only public transportation is the bus, and the routes the bus takes results in very long times. Almost everyone would end up commuting by cars, resulting in lots of cars competing for very few spots.

Thank you for your consideration,

Dane Riley

7635 Giusti Rd, Forestville, CA 95436

206.5

206.6

# DANIELM. BONTECOU

construct 635 new dwelling units in the town of Forestville, CA. As a

To whom it may concern.

resident of this community, I believe that this project would have a profound and negative impact on the character, quality of life, and overall health of our	206.1
town.	
First and foremost I would like to express my concern about the	
proposed expansion leading to an increase of our population by 50%. This level of growth is totally unacceptable, as it will put a strain on our already limited resources including schools, infrastructure, and emergency services.	206.2
Additionally, such a rapid expansion will have an impact on the town's character. One of the greatest aspects of our town is its "small town charm". With a downtown area of only 3 blocks long and no stop lights, we have very little traffic and the folks of Forestville like it that way. In fact, folks around here are shocked that our government is considering forcing this upon us. You won't find one resident who wants this expansion to occur.	206.3
I would hope that this fact alone would be argument enough to stop this planned proposal. I believe it is paramount to have the residents of our town be heard regarding this subject and NOT by some random zoom meeting which was unknown by most.	206.4
One of my major concerns is the processing of sewage generated by	

Am writing to express my deep concerns about the proposed plan to

One of my major concerns is the processing of sewage generated by these new dwelling units. With such a large increase in the town's population, it is crucial that proper sewage processing facilities are in place to avoid contamination of the Russian River, which is a source of the drinking water for many residents and also a critical habitat for various species of fish and wildlife. So, if there is a plan to build all of these units, where will this mystery sewage treatment plant be built? The problem is compounded by the fact that this proposal has homes being built in 6 different locations in town. How will the waste be handled?

Another concern is the availability of water. With 635 new dwelling units, the demand for water in the town will significantly increase. I would like to know where the additional water will come from to meet this increased demand. This new development will undoubtedly put a strain on our very limited water resources. How does our government plan to create a source of water where one does not exist?

In conclusion, I strongly believe that the proposed development of 635 new dwelling units if Forestville would have a profound and negative impact on our community. I urge you to consider the concerns of the residents of Forestville and to reject this proposal.

206.7

Thank you for your time and consideration.

Sincerely,

Daniel Bontecou

From: davdoty@comcast.net <davdoty@comcast.net>

Sent: Monday, February 13, 2023 4:55 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Draft EIR Comments: Housing Element Update Forestville

#### **EXTERNAL**

Hi Eric,

I have concerns about the number of New Dwelling units proposed for Forestville, 635. Apparently all of the units are multi story apartment units. Why must the units be 1/2 mile from the Forestville town center? Why are units not proposed for Healdsburg or Sebastopol? Why aren't the number of housing units and potential new residents not capped at a reasonable percentage of the current Forestville population? Forestville currently has 405 residential units on the sewer system. Building 635 additional residential units will require a doubling of the current sewer plant and some of the proposed housing locations are on land that would be needed for the sewer plant expansion.

My address is: 8894 Trenton Rd Forestville, CA 95435

Sincerely,

**Dave Doty** 

From: Dave Gebow <dgebow@comcast.net> Sent: Monday, February 13, 2023 4:56 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Draft EIR - housing - Sunset Ave Parcel, Guerneville

#### **EXTERNAL**

#### Hello-

Just wanted chime in on the Draft EIR - Housing Element. I agree that we all need more affordable housing in Sonoma County. I just have some concerns about site GUE-1 or the 14156 Sunset Ave site.

There are certain characteristics of this unique neighborhood that may be odds with the goals of the project.

#### Density-

- The Highland Hill neighborhood is comprised of all single family houses.
- 30 units and 78 residents sounds awfully large. Maybe half that or even less might be appropriate for the site.
- It's a very quiet neighborhood. I cannot imagine a project of this density maintaining that.

#### Vehicular Accessibility-

- Woodland Ave, Sunset Ave and actually the entire Highland Hill area is composed of shoulder-less single lane roads that often require us to back up to allow access to oncoming vehicles. I cannot image adding possibly 50-80 or more cars to the neighborhood mix. It would be a nightmare.
- Many residents have an excessive number of vehicles and park illegally and carelessly even so much that the trash trucks have to blast their horns to get people to move their cars. There is a real concern for emergency vehicles being able to get through in these situations. And any evacuations would be challenging.

#### Pedestrian Accessibility-

- Woodland Ave, Sunset Ave and Palo Alto Rd that all lead to the site are insanely steep roads.
- Any physically challenged/disabled people would find the hike up undoable.

Look at the Burbank development Fife Creek Commons recently built here. That was a site that made sense. And in an appropriate location. Walkable. Accessible. Disabled-friendly. Plenty of parking and the roads to handle the extra cars.

Site GUE-1 is anything but.

208.3

208.2

208.1

208.4

Dave Gebow 14140 Buttner Rd Guerneville, CA 95446

25 year resident of the Highland Hill neighborhood

From: D gold <goldy042@gmail.com>
Sent: Monday, February 13, 2023 4:40 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Housing element update

Im writing about changing zoning laws in forestville to allow for several large high density house development. I have great concerns on several issues. Water being the first very important issue. Where is this coming from for all these new units. Second traffic mitigation. How would so many residents be able to traverse the smaller roads only creating unmanageable situation in town. 1 new restaurant in town on the 116 has already caused issues during peak times and a new brewery on the way. Is any of that taken into consideration?

Davin Goldstein 9625 CA-116, Forestville, CA 95436 209.1

From: Dennis O'Rorke <daororke@aol.com> Sent: Monday, February 13, 2023 11:39 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Cc: LLoyd and Nhu Le Guccione < llbooks@pacbell.net>

Subject: RR HEP Official Comments

#### **EXTERNAL**

Decision makers,

Please, no more housing in flood prone areas. No gentrification housing, period.

Thank you for your time and attention.

Dennis O'Rorke 95462

Letter 211

**From:** Dennis Sharp <Sherwood\_Sharp@msn.com>

Sent: Monday, February 13, 2023 5:00 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

**Subject:** Housing Element update

Re 635 New dwelling units proposed for Forestville.

Proposing such a high percentage increase in the number of housing units in this community is a totally irresponsible proposal. This will put additional strain on schools and required services, and create downtown traffic problems.

Dennis Sharp 9452 Pajaro Lane Forestville.

From: Diana Hindley <diana.hindley@gmail.com>

Sent: Monday, February 13, 2023 1:46 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Comments on Sonoma County Housing Element proposed rezoning of parcels # 054-290-057

and # 054-290-084 (GE-1 and GE-2)

#### **EXTERNAL**

To Whom It May Concern:

As a 38 year resident of Glen Ellen, I am writing to vehemently oppose the dense rezoning of downtown Glen Ellen, namely parcels #054-290-057 and #054-290-084 (GE-1 and GE-2).

The urbanization of our tiny unincorporated village is unacceptable for these many valid reasons: traffic and safety (the neighboring intersection is already a dangerous crossing for pedestrians, and it is hazardous for cars to enter Arnold Drive from Carquinez St.); noise and pollution--both from construction and increased residents; the imprudent removal of 19 mature carbon sequestering trees (including a mature redwood) from the existing property; the loss of rural character in this small walkable community; the lack of local services, jobs, and adequate public transportation--to name a few--and significantly, this proposal is at odds with the General Plan policies and the Glen Ellen Development Guidelines.

It is ill-advised and will cause irreparable, long term damage.

I strongly urge that these parcels be removed from the county rezoning sites for dense housing.

Sincerely, Diana Hindley Z 1Z. I

212.2

212 3

Letter 213

From: don@donjackson.com <don@donjackson.com>

Sent: Monday, February 13, 2023 2:56 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Housing element update DEIR

## **EXTERNAL**

Mr. Eric Gage

2 5 5 5 5	
I am writing to you today to voice my opposition to the proposed mandated housing units Forestville, Guerneville and surrounding areas DEIR.	
I am a 70 year-old, third-generation Sonoma County resident and for the past 33 years I have lived outside of Forestville (on the Guerneville side, off of River Road) and have several issues that I want to address.	213.1
1) I understand that the state and then ABAG mandated the increase of high-density housing in the bay area counties, including Sonoma County. I also understand that PermitSonoma fought back against the disproportionately high amount of units in Sonoma County rural areas but lost in court. Thanks for the efforts!	a 213.2
2) Uncontrolled growth that can harm its host and provides no required function is called cancer in a physical body. This proposal seems to be that for these small communities, are in the case of Forestville, will more than double the downtown population, dramatically changing the culture, personality and functioning of the town in a very negative way.	nd 213.3
3) No notice! I just learned about these proposals by a friend letting me know, and I hear in a zoom meeting that notice was only required for residents that lived within 300 feet of the proposed development parcels. That would be fine for a unit or two, but this proposal IMPACTS THE ENTIRE COMMUNITY! And notice should have been sent to EVERYONE in the community. As an example, adding 660+ people to Guerneville, will dramatically impact to vehicle traffic on River Road, which can be terrible even now, k and I hate to think of what would be during summer or times of emergency, such as the common fires and floods an access by medical, police or fire personnel.	f 213.4 ne the 213.5
4) 635 units and 1652 people in downtown Forestville will clog Hwy 116 and make traffic and travelling through town a mess. Where are these people going during the day for wor The YMT (Yearly Miles Travelled) will increase substantially as there is no significant work be had in downtown Forestville, so this will create additional climate change /Co2 emission	rk? 213.6
in our small community. And if they all got electric vehicles, consider the peak electrical impact when they are home after work and need to charge their vehicles on the marginal electrical grid currently in place. There have been accidents on River Road, taking out a utility/power pole, causing power outages clear to the coast.	213.7
5) Where are the kids going to go to school?	213.8
6) What will be done to upgrade / enhance the local fire department, police (Sheriff), wat and sewer systems? Waiting for unspecified grants to come through after the new buildin are built and occupied seems crazy. Put the infrastructure in BEFORE the units are built.	

7) Disruption to the community during construction of these major projects. Building would probably be done during the summer for good weather, further adding to the load of tourist traffic and people load.

213.10

8) Forestville population as of 2023 is 3,255, which is 0.66% of Sonoma County's population of 490,000, so why should Forestville take on 1652 people. which is 51% or the current population! Outrageous! That same number of added people is only ).33% of the population of Santa Rosa, and insignificant amount for a city with significantly more resources and ability to absorb more people.

213.11

I appreciate your reading my input, encourage you to find a more viable solution and I look forward to your response.

Regards,

Don Jackson

Forestville, CA

Letter 214

From: Elizabeth Westerfield < westerfielde@gmail.com>

Sent: Monday, February 13, 2023 2:17 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Housing element Update

#### **EXTERNAL**

My name is Elizabeth Westerfield and I live at 8275 Grape Ave, in Forestville. I am concerned regarding rezoning of sites FOR 1-6 in Forestville. Specifically, I have questions concerns about FOR 2 6898 Nolan R.	
Traffic and safety: *Mirabel Road is essentially the only thoroughfare from River Road to 116. How do you prose to facilitate a safe flow of traffic for up to 736 additional entering and exiting Mirabel Road? Onto Hwy 116? Onto River Road?	214.1
•Mirabel Rd has only one sidewalk on one side of the street heading towards downtown from the Youth Park. How do you propose to keep the many pedestrians safe while walking to and from this much higher density housing development?	214.2
• Forestville has very limited and infrequent public transportation. How will this public transportation meet the needs of people without cars? With no sidewalk and dangerous ditches on most of Mirabel	214.3
Road, what will you do to ensure the safety of pedestrians and children on their way to the bust stop? On their way to the only grocery store, Speers Market? On their way to school?	214.4
Schools:  • What will you do to improve the local Elementary School, ensuring there are enough teachers and classrooms to accommodate the influx of children?  • What about the high school that is now closed? Is there a plan to bus students to Sebastopol?	214.5   214.6
Mark and Control	ı
Water and Sewer:  • Our local Sewer and Water system would need to be upgraded to handle the extra residents, what will	214.7
you do to upgrade and improve our local Sewer and Water system? How is Forestville water district supposed to accommodate 283 extra homes?	214.8
Services:	
• Forestville doesn't have a police station, or much of a Sheriff's presence, how will you ensure that we receive the extra policing required for an additional 736 residents?	214.9
• How do propose to improve appropriate access to medical and social services for these residents?	
These questions pertain to all of the proposed sites in Forestville!	214.10
The proposed rezoning of Forestville to include up to 1652 new residents. I'd like to point out that as of the 2020 census the population of Forestville is 3788 people. Which means you are proposing increasing the size of our town by 50%!	214.11

An increase like this would seriously impact traffic, safety, and overall quality of life for our community. Forestville simply does not have the infrastructure for this. We have limited access to public transportation which is located on streets without sidewalks, an elementary school that is at capacity, no high school, few sidewalks, no access to medical and social services, limited sewer and water capacity and no police force. It's a wildly inappropriate proposal for any of the small communities in unincorporated Sonoma County to increase their population by 50% and Forestville seems to be bearing the brunt of the current effort to rezone for affordable housing in Sonoma County.

214.11 cont.

214.12

Thank you,

Elizabeth Westerfield

**From:** Erin Jones <jonese85@gmail.com> **Sent:** Monday, February 13, 2023 4:55 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Cc: Audrey Kung <audreyk@gmail.com>

**Subject:** Affordable Housing Program Open Comments

### **EXTERNAL**

#### DEIR Review,

Erin E. Jones

14021 Woodland Dr. Guerneville, CA

I support the addition of low working-income home developments to maintain the needed cross-economic diversity in our communities. However, as other residents in the Guerneville vicinity have shared, I have concerns for the proposed 30 units on the Sweetwater Springs property off Sunset Avenue.	15.1
An addition of 30 houses in this immediate area would stress the already poor infrastructure – resulting	
in a 40% increase over the approximate 90 homes that currently comprise Flamingo Hill. Specifically:	
1. Roads are narrow ~ the largest entrances to this hillside area, Woodland Dr. and Palo Alto Dr.	15.2
permit only a single car to pass, the other vehicle needs to back up into a driveway or to an	10.2
acceptable passing spot off road. With the addition of more traffic, this area will become	
gridlocked. It's currently a nuisance during mornings and evenings and requires patience in the $$ $$	
summers when tourists visit Highlands Resort. There are no sidewalks, and walking down or up 1 21	15.3
requires great care as there are blind corners.	
2. No quick exit ~ Woodland, Palo Alto, and Morningside (barely navigable as is) are the only	15.4
access points to Hamiligo Hill — In an emergency such as a local file, it would be impossible to	
	15.5
for safety would be a significant investment. These are one lane in and one lane out roads. If	450
	15.6
residents are effectively moated.	
3. Tall redwood trees cover a significant portion of the hill and limbs/trees often fall on the powerlines. Last month's storm left all without power for 6 days – significantly longer than any 21	15.7
other immediate areas.	15.7
4. Building on the Sweetwater Water supply site would displace the current water tank which	
	45.0
we would supply water in a fire event. If this isn't replaced, then the current water capacity is	15.8
inadequate for an additional 30 homes.	
5. In addition to electric and water utilities being strained, the propane network feeding many of	
our homes on the hill would require rework, expansion, or an expensive upgrade to electricity to	
, , , , , , , , , , , , , , , , , , , ,	15.9
Please consider the above referenced, as well as other points my neighbors share in finding an	
appropriate location that would be less impactful to the Sweetwater springs location.	
Thank you,	

Letter 215

February 12, 2023 Letter 216

Eric Gage County of Sonoma PRMD

Re: December 2022 Sonoma County Housing Element Draft DEIR and Housing Element document comments

Dear Mr. Eric Gage and Rincon Consultants, Inc:

I requested more time to prepare comments but did not receive a response so I am sending what I have now to meet the deadline on the Notice of Availability, which did not list a 5pm deadline. Below are my high level comments on the DEIR and proposed Housing Element. There are several areas that do not meet the state regulations.

216.1

Housing is important in our county, but makings findings that Housing is more important than all of these significant and unavoidable impacts is going to be difficult. The County of Sonoma should be reducing significant and unavoidable impacts AND achieving the much needed housing goals which can be done if the correct housing locations are selected. Thoughtfully select appropriate locations for increased housing in order to reduce environmental impacts and develop near much needed services and appropriate infrastructure. These would include areas within the unincorporated Sonoma County lands within Urban Growth boundaries of the cities in Sonoma County, closer to the urban areas and available services, not 20-30 minutes outside any accessible services without transit to get to these services and without necessary infrastructure to develop these housing projects feasibly.

216.2

Title 7, Division 1, Chapter 3, Section 65580 of the Government Code states:

(e) The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors and community goals set forth in the general plan and to cooperate with other local governments and the state in addressing regional housing needs.

216.3

(f) Designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality's housing need for all income levels is essential to achieving the state's housing goals and the purposes of this article.

216.4

This DEIR does not adequately analyze economic, environmental, fiscal factors and community goals set forth in the General Plan for Sonoma County. Instead, this DEIR proposes to amend the General Plan to be consistent with the proposal without adequate analysis of the required areas. The proposal does not identify sites suitable, feasible for development since the analysis in many cases is deferred. Suitable and feasible means there are infrastructure and services in the proposed areas for housing which the sites in Forestville and Guerneville lack. Financial resources to make this happen are also not identified adequately as Section 65583 requires. Population and employment trends, Household characteristics are also required in this section of the code.

On ES-1, the project description claims that all sites are adjacent to or within Urban Growth boundaries or cities in Sonoma County but this is not true. Forestville and Guerneville and NOT adjacent to UGB for any city. The nearest UGB would be Santa Rosas which ends at River Rd just past Slusser Rd at Mark West Creek. This UGB is NOT adjacent to the proposed sites. ES-1 also does not describe the General Plan text amendments necessary to provide consistency throughout the GP. It only speaks of area plan amendments, but there are other GP texts that will also need to be amended to ensure consistency in	216.6
ES-2 states the project would implement existing General Plan Policies and Programs that require the County to identify urban sites near jobs, and transit which may appropriately accommodate additional housing. The Forestville and Guerneville sites do NOT have adequate jobs, or transit or schools as described in the Project Objectives. Rezoning these sites would be inconsistent with multiple existing General Plan policies as identified below and would actually encourage sprawl and loss of Ag land in direct conflict with the Project Objectives. More information below on these concerns.	216.8
Putting a disadvantaged population/community including low income residents, into rural areas without minimal services is just wrong. Creating more barriers to get to much needs services is the exact opposite of what HCD requires. The analysis in the DEIR does not adequately prove there are capacities for required services and jobs in the proposed locations.	216.10
Where's the analysis to show feasibility of these sites developing over the next 8 years? The following areas are lacking the analysis in the DEIR that the State Regulations require for all of the proposed Forestville, Graton, and Guerneville sites:  • Loss of industrial zoned land FOR #6: where is the replacement for loss of industrially zoned	216.11
<ul> <li>land? We already have a deficit in Forestville.</li> <li>Loss of State Farmland of Importance impacts on FORS #2: how is this being mitigated. The DEIR falsely states no impact on Ag which needs to be looked at again for the Forestville #2 site.</li> <li>Population Growth: this proposal is an Approximately 50% increase above current population using census data. This amount of increase without proper infrastructure will produce</li> </ul>	216.12
<ul> <li>detrimental impacts to these areas.</li> <li>Lack of access to services in Forestville and Guerneville: No jobs or limited growth potential, no commercial area or industrial to expand the site and services, and no near future solutions to providing much needed services for high density housing. Instead, this proposal proposes to develop way outside of the urban core which puts pressure on communities that are not yet prepared for development.</li> </ul>	216.14
<ul> <li>Biological Impacts: There is not adequate analysis for these impacts in the DEIR. Mitigations call for future study. At a minimum, an overall scan of the Natural Diversity database and the Santa Rosa Plain Conservation Strategy and a biologist high level review should be given to all proposed sites for rezone. If impacts may occur, the sites may be ruled out quickly. Why was high level analysis done for geology and soils but not biological impacts?</li> </ul>	216.15
<ul> <li>Significant unavoidable impacts: Utilities (water, wastewater, sewer where are the studies to show this capacity? All sites should be analyzed for utility service and capacity now, not later. All of the sites in Forestville would require offsite improvements and thereby are not feasible for development within 8 years:</li> </ul>	216.16

	0	Existing Pipe Sizing is not large enough (under 116 is 6 inch according to the Forestville	ı
		Water District and is undersized to serve this large of an increase)	
	0	Sewer-paper analysis only. An engineered analysis and study needs to be done now to	
		determine feasibility of increased density and the impacts on the system.	
	0	Stormwater capacity- this needs an engineered study now as well.	04040
	0	Water capacity-paper analysis only-fire flow and system capacity should be studied now	216.16 cont.
		not later to ensure feasibility of increased density before rezoning takes place.	COIIL.
	0	Water Quality impacts need more attention and analysis.	
	0	Drainage patterns cannot be assumed to be no impact at this stage.	l
•		impacts and VMTs: intersection at 116 and Mirabel is LOS F-impacts of VMT are	
	_	ant and unavoidable. This could be avoided by choosing a location closer to the urban	216.17
		f cities, rather that 25-25 minutes outside of them. This VMT impact is individual but also	
	cumula		
•		e impacts: are significant and unavoidable in these areas and this is another reason to	216.18
		er a different location.	
•		Services and Recreation and safety capacity: police/sheriff and Fire capacity for service	
		y is not adequate for these new developments. Staffing capacity is 25-30% below tly and taking on a larger population will not ensure coverage and safety for the	216.19
		unity. Why are public services analysis considered less than significant.	
		Relectricity: – broadband is not available in these areas in Forestville and Guerneville.	
•		st to bring it to all sites would be beyond what any of the development would be required	040.00
		ribute. What is the plan for access to internet and cable?	216.20
•		nd Recreation impacts: The County requirements 5 acres of park per 1K residents in	
		rporated areas would require another 10 acres of parks in Forestville if these sites are	040.04
		ed. This addition of housing units will increase need for additional recreation areas	216.21
		t identifying them.	
•		: bus lines are almost non-existent in Forestville and Guerneville. There is ONE bus that	1
		deep west county on Route 20. To get to Santa Rosa, you must first go all the way out to	
		Rio, back through Sebastopol, and then back into Santa Rosa. This is not a reliable, on-	
		us route that is able to provide consistent stops. The existing bus schedule offers 8-10	
		er day depending on the day pf the week and they are consistently late or sometimes do	216.22
	not sho	ow up . Where is the funding coming from to ensure this service is in place for the future	210.22
	develo	pment and additional consistent lines are provided? Access to services is required by HCD	
	and the	ese locations cannot provide that and the future developments cannot be fully burdened	
	with pr	oviding that either.	
•	Streets	and Infrastructure: Curb, gutter and sidewalks do not exist in Forestville and Guerneville	
	near ar	ny of the sites. The investment in this infrastructure for all of these sites will be beyond	
	the leg	al nexus for the individual projects to provide the link all the way to the transit and	216.23
	downto	own area. How will this be funded to ensure installation? Walking along Mirabel Avenue	
	or Arm	strong Redwood Rd are dangerous recommendations.	
•	Scenic	highway view Impacts: Several sites are on scenic highways (including Forestville #2) and	040.04
	would	create significant unavoidable impacts without mitigation.	216.24
•	GHG in	npacts: the greenhouse gases added by forcing this dense housing outside UGBs will	
	obviou	sly increase GHG impacts greatly. Why not look closer to UGB areas and those adjacent	216.25
		l l	

to UGBs to reduce the Vehicle Miles Traveled and reduce GHG impacts? There are other options near Fulton Rd that are 10-15 minutes closer to services and that have more consistent transit offered	216.25 cont.
<ul> <li>Schools impact: The increase in density provides no tax revenue because they are apartments/multifamily, but increased students will result in loss of basic aid at the Elementary school level which results in more students, less teachers, and less funding for those students. On Pg 478 of the DEIR-the impact in Forestville and Geyserville are significant impacts period. You can't make an assumption overall there is no impact for the County overall, when 2 communities are impacted significantly. El Molino High school was just closed and 556 students were combined into Analy High school in Sebastopol which is now at its capacity for high school students. Please identify accurate analysis for impacts on schools in Forestville and Guerneville.</li> </ul>	216.26
<ul> <li>Population growth estimates are off as they are based on county wide average per household, not low income increases/average in this county which is consistently higher than the average growth countywide. So in short, the estimates for growth of residents is flawed and much lower than the actuals for multifamily development.</li> </ul>	216.27
<ul> <li>Flooding Impact: Laughlin in Guerneville is inappropriate site as well as it floods regularly and is within a 100 year flood zone.</li> </ul>	216.28
<ul> <li>Hazardous Materials-FOR site #1 needs analysis. This site could impact the development and the development could impact the hazards onsite and remediation in process.</li> </ul>	216.29
This Proposed Housing Element and DEIR are inconsistent with State Regulations that require consistency with the General Plan in the following areas:  -Current housing element policy:	
HE-6f-Provide ghg quality and equitable public services in lower resource areasthis proposal is inconsistent with this policy by	216.30
He-2a-inconsistent-no available infrastructure	
He-3G-not well served services by public transportation, schools, retail, etc	
-General Plan polices for Forestville are inconsistent with this development proposal:	1
Into GP LU Element- Section 3.4 Russian River p81-forestville growth is an issue: rural character and public services, make commercial and industrial opportunities and preserve environmental qualities of the area	
LU-15.3-commercial centers and local serving to keep with character of community-this proposal is inconsistent with that	216.31
LU-15.4-Maintain rural village through design of small scale development with substantial open space and native landscape.	
Look at Wright Rd and Sebastopol Rd not rural areas without services necessary for dense development.	
While I feel all Forestville and Guerneville sites are not appropriate for high density housing of this size	

and scale, at a minimum, you should consider DEIR option #3 with Fewer Rezoning Sites and remove all

of Forestville or at least remove FOR sites #1, #2 and #4 as they are completely inappropriate for high density housing giving the surrounding land uses and contamination onsite.

216.31 cont.

Thanks for your time considering these comments. I hope you are able to re-evaluate the locations for future housing over the next 8 year period that are realistic, closer to much needed services, jobs and schools.

Please reach out if you have any questions regarding my comments.

Thanks,

quinan tayes

Gillian Hayes

CC: HCD

217.10

From: Greg Guerrazzi < gregguerrazzi@vom.com>

Sent: Monday, February 13, 2023 1:06 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Cc: Susan Gorin <Susan.Gorin@sonoma-county.org>

**Subject:** Housing Element DEIR Comments

Dear Planning Staff & Supervisor Gorin,

My comments are regarding the two Glen Ellen parcels (# 054-290-057 and # 054-290-084, items 65 and 66 in Housing Appendix Table) proposed for rezoning in the Draft Housing Element. These parcels were part of the "Rezoning Sites for Housing Project" and were included in the Draft EIR for that rezoning effort. During that process, many people submitted comments with valid concerns regarding the inappropriateness of substantially upzoning these parcels, which are outside of the urban growth boundary in the tiny village of Glen Ellen at an unsignalized intersection.	217.1
<ol> <li>Please consider the requests expressed here and in other community comments:</li> <li>Remove the two Glen Ellen parcels from the rezoning list due to significant impacts identified in the EIR and other issues stated in this letter; and/or</li> <li>Consider an alternative zone district that reduces the number of allowed units on the site and does not require a minimum number of units, as required by the WH zone.</li> </ol>	217.2
Glen Ellen and Sonoma Valley have now been required to accommodate approximately 700 housing units and as many jobs, as part of the SDC Specific Plan (a few blocks from the Glen Ellen parcels proposed for rezoning). With the large scale SDC development, it is clear that this area has taken on more than its fair share of housing and should not be required to accommodate even more housing that will contribute to the significant traffic impacts identified for the SDC Specific Plan. It will also require removal of several heritage trees. Furthermore, the property owner has not stated any intention to develop the property at the proposed density, which would be completely out of scale for the site and surrounding neighborhood. Densifying this area that is not served by existing or planned transit, is not near a job center, and is not near or adjacent to an urban growth area makes no sense from a land use planning perspective and would be in conflict with climate change policies.	217.3   217.4   217.5   217.6
Please do not do any further damage to this rural area by upzoning these parcels. Tripling the number of housing units on this site will only add to the significant impacts caused by implementation of the Specific Plan. Furthermore, the proposed rezoning is not consistent with General Plan policies regarding Glen Ellen nor is it consistent with the Glen Ellen Development Guidelines.	217.7
The proposal for the two subject Glen Ellen parcels involves inappropriate and precedent-setting rezoning to a high-density zone district, which is out of scale and would result in significant adverse impacts on the small village of Glen Ellen.	217.9
Due to the Workforce Housing zone minimum development requirements (16 units minimum),	217 10

the subject Glen Ellen parcels would have to be cleared of all vegetation, including large trees,

which would render the site an eyesore and incompatible with the community character. There is no feasible way to develop a project of this density without significantly impacting community aesthetic character or conflicting with the Glen Ellen Development and Design Guidelines. 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 these mitigation measures. For this reason alone, an alternative lower density residential zone district should be considered.

217.10 cont.

The proposed rezoning of the subject Glen Ellen parcels is in conflict with Project Objective #6, which calls for new housing in urban areas near jobs, transit, and services.

217.11

I reside at 13480 Mound Avenue, a street with access to Arnold Drive from Carquinez Avenue, the location of the subject parcels. Traffic at the Arnold Drive and Carquinez intersection cannot support the dense housing proposed for the subject parcels. This is already a dangerous intersection with a cross walk and many people visiting the restaurants at this location. The DEIR does not adequately address the impact on traffic, emergency evacuation, disturbance of existing residents and the historic village of Glen Ellen that the densification of the subject parcels would create. In 2017 it took us an hour to evacuate Glen Ellen. With the SDC Development, Elnoka Development on Hwy 12 in east Santa Rosa, and the proposed Hanna development at Arnold Drive & Agua Caliente Road, evacuation traffic and emergency service vehicle access will be greatly impacted in this area due to the densification of the subject parcels. The DEIR must consider and thoroughly evaluate the cumulative impact of these development proposals, several of which are already approved. Arnold Drive, and Hwy 12, through this area simply cannot handle the level of traffic that will result from cumulative development.

217.12

217.13

The subject rezone parcels represent a large part of the downtown core (which is only two blocks long) and will dramatically change our village. It is disheartening to see a proposal that is clearly inconsistent with the intent of the Glen Ellen policies established in the General Plan and Glen Ellen Development and Design Guidelines. With the devastating loss of established neighborhoods during the 2017 fires, it is more important than ever to not overtax our rural infrastructure and resources. It is not understandable why the County would pursue rezoning this developed site considering valid concerns expressed by the community. Please do not do any further damage to this rural area by upzoning these parcels. Tripling or quadrupling the number of housing units on this site will only add to the significant impacts caused by implementation of the SDC Specific Plan.

217.14

217.15

Please preserve the rural nature, wildlife and historic village of Glen Ellen and remove these parcels from the Housing Element densification.

Thank you.

Best Regards, Greg Guerrazzi (707) 935-1111

Letter 218

From: Harriet Katz <haarriet@icloud.com> Sent: Monday, February 13, 2023 12:30 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Housing!!!!

#### **EXTERNAL**

#### HELLO: PLEASE FORWARD TO APPROPRIATE COUNSEL MEMBERS

Building over 3000 new low income developments in Forestivlle is a travesty of humongous proportions for a small town such as ours, besides traffic congestion, and schooling, and more taxes to cover additional schools structiures, and higher water usage in this area you are taking away the enjoyment of life in this small town. An appropriate number to absorb would be commensurate with your proposal for Guerneville in the lower range of 500-600 is proably more feasible to absorb with the current infrastructure and resources that are already in place. You will be placing an ALBATROSS in our midst with such a huge amount of new homes. I strongly urge you to stop using our small town FORESTVILLE as you "dumping ground" for this development.

It should be more evenly and fairly distributed throughout the county and the incorporated areas as well.

I will be an active voter in the event you decide to neglect your duty to fairly distribute and clearly determine a more equitable proportionment.

Sincerely

Harriet Katz 8799 Marianna Dr Forestville

From: Janice Stenger <janicestenger@yahoo.com>

Sent: Monday, February 13, 2023 3:47 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Timberland...

#### **EXTERNAL**

---- Forwarded Message -----

From: Janice Stenger < <u>janicestenger@yahoo.com</u>>

To: PermitSonoma-Housing@sonoma-county.org <permitsonoma-housing@sonoma-county.org>

Sent: Thursday, February 2, 2023 at 03:00:30 PM PST

Subject:

**Impact AG-2.** None of the None required No impact

Rezoning Sites are situated in areas zoned for

in areas zoned for

timberland production (TPZ)

and, therefore,

development facilitated by

the project would not

conflict with existing zoning

for, or cause rezoning of,

forestland, timberland, or

timberland zoned

Timberland Production.

Development facilitated by

the project would not result

in the loss of forest land or

conversion of forest land to

non-forest use.

It may not be timberland but the carbon's gpt tp gp spmewjere!

Trees: There are at least 25 to 30 large redwood trees that sequester carbon and will for hundreds more years. They provide shelter and habitat for deer, bobcat, quail, foxes, skunks, raccoons, rabbits and uncountable migrating song birds..This year we've also had 100's of robins. The most in decades. Also along our un-named man made stream that flows on to Livereau Creek on the Korbel vineyard (that shares a contiguous fence with us), which was in the days before intensive degrading of the Russian River a historical spawning creek of the river. Livereau creek once was part of the "Big Bottom" where redwoods grew so thick you couldn't ride your horse through them.Or so said my grandfather. Will the our redwood trees be cut down? and all of them along Laughlin Road to facilitate sidewalks? And is that really "no impact"? Guerneville natives won't think so.

From: Janice Stenger < janicestenger@yahoo.com>

Sent: Monday, February 13, 2023 3:14 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** housing element

#### **EXTERNAL**

# The errors in the EDR that influence Stenger property:

Lead Agency Contact Person

Eric Gage, Planner Planning Project Review County of Sonoma

## 2550 Ventura Avenue Santa Rosa, California 95403 (707) 565-1236

From Janice Stenger (It's mesmerizing, the more I read, the more I find.)

No picture of our house and our land appear in the DEIR...The picture that is labeled for us is actually a second picture of Gue1.Doesn't that disualify us?

"GUE-2 and GUE-3 are on **UNDEVELOPED LANDS says** 

the EIR among single-family residences bordered by agricultural lands and wooded hillsides" (Figure 4.1-5). Nearby foothills are visible from the street through the undeveloped or sparsely developed adjacent lots. Site sensitivity is moderate and the zoning is LG/116 at both these sites; residential development and parked vehicles reduce the intactness of an otherwise vivid rural residential setting. The neighborhood has moderately high visual quality as residential development has unity in the varied architectural design and mature landscaping; the country lane style roadway has a degree of vividness that further contributes to the overall quality. Development in this area would likely be co-dominant with other residential" They don't mention the 2600 square foot house we built and where our children grew up or the darling two bedroom

220.1

cottage we rent below market value. I don't believe anyone even came down Laughlin Road with their trusty camera. (By the way, would you tear down my houses and barn and murder my redwoods?) Is that the plan? Guess the horses could go to the knackers.

220.2 cont.

220.3

I've lived in Guerneville all my life, my father was born here in 1908, my grandmother in 1880. Her mother walked across the plains in 1847, yes before the gold rush. My great great grandfather,born in 1799 owned much of what is now Austin Creek Reserve. His barn still stands there.

220.4

PS: I had to look this one up....do we have expansive soil? I know we have liquidfication..I've seen the old map.

220.5

**Expansive soil** or clay is considered to be one of the more problematic **soils** and it causes damage to various civil engineering structures because of its swelling and shrinking potential when it comes into contact with water. **Expansive soils** behave differently from other normal **soils** due to their tendency to swell and shrink.

We have chickens and have always had horses for 45 years and had two goats at one time. We are considering a flock of sheep in order to feed our family because of rising meat prices. We've had sheep on family property for years and years but lions depredation has made it impossible there.

220.6

What do you define as impossible. So setback from AG MUST be 200 feet unless that's impossible then it could be 100 feet??? Wow. It will block the view and it will take quite a bit of the property out of development.

Gu4 is not my property but there are issues with that as it was turned down for 17 houses a few years ago because of the Fife Creek which is a spawning creek of the Russian River and has

some other layer of protection granted to it during the last goround. You will have to look it up and perhaps speak with Ms. Luna the former leader of the Stewards of the Redwoods and Coast. Although your maps mysteriously show a thinner riparian setback as it comes to Laughlin Rd. the creek floods quite widely on that property and in the 86 flood our big pickup couldn't navigate the Armstrong Road Lauglin Road intersection and we had to turn back when the water passed the top of our tires. There was also talk of contamination thenthat originated at the County Yard that shares a fenceline with Gu4 on the north side I'm fairly sure the setback from creeks is about 100 feet isn't it? We have to protect our precious spawning creeks.

220.7 cont.

Thank you for accepting my feedback. I'm sending this to Lynda too.

Sincerely, Janice Stenger

From: Jared McConnell <jmcc18@icloud.com> Sent: Monday, February 13, 2023 6:57 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: No 1652 new units in Forestville

#### **EXTERNAL**

First of all I want you to know I 100% do not want these buildings built in our small city!	221.1
We do not have infrastructure here to support that many new residents!	
There are not very many jobs to be had here in Forestville!	
If people are low income, they might be looking for jobs why move them to a town where there are so	221.2
few?	221.2
Bare Necessities are more expensive here in Forestville like gas and food at the only grocery store in town!	
We do not have a good bus schedule for people to get to bigger cities where they may be working that is	221.3
convenient to support their work schedules.	
We would have to bus students all the way to Sebastopol what would cost taxpayers more money now	221.4
that El Molino High School has been closed down!	
The road in an out of Forceville sometimes flood in the winter and are not very good year round!	221.5
Why should we nearly double the towns population?	
How much crime would this bring to our small town?	
Who would pay for this?	221.6
How would this effect my home value?	
Are you going to allow me to build an ADU or two on my third of an acre property?	
I hope you read this, if you thank you & I also hope that you understand and realize that building these is	
a bad idea and I do not support it!	
11	

Sent from my iPhone

Jared McConnell- a Forestville resident.

From: Jaye Deane Griffiths < j.d.griffiths55@gmail.com>

Date: Mon, Feb 13, 2023, 10:04 AM

Subject: Draft EIR comments:Housing element update To: <<a href="mailto:Permitsonoma-housing@sonomacounty.org">Permitsonoma-housing@sonomacounty.org</a>>

Jaye Griffiths 14800 Armstrong Woods rd. Guerneville

Thank you for allowing me to share my experiences and concerns regarding the property at 16050 Laughlin rd. The parcel directly adjacent to my property.

Rezoning greatly affects the safety of our children walking to the elementary school. This is not a pedestrian friendly road, additional development will increase traffic and put our children at risk. The property has a limited entrance and a lack of infrastructure.  Will the school support additional attendance? Is there room and funds?	222.1
I urge you to celebrate the lives and safety of the children of our community in NOT supporting rezoning this parcel.	222.2
Flooding on Armstrong Woods rd due to Fife Creek overflowing is an ongoing problem. The property shares a several acre boundary with the creek. What impact will there be in disturbing the boundary of this length of Fife creek should there be development? How will hard surface run-off affect the flow? Is there an upgraded evacuation plan added to the rezoning plan? The only other way out is a very windy, narrow road often limited to one way traffic in hazardous conditions.	222.3
Has Fish and Wildlife been notified about development along the border of Fife creek?  The local water table is shallow. There is concern that evacuations might impact groundwater flow, levels, and quality and or contamination.	222.4
Will the proposed development affect the Historical Route? Is there consideration to the additional traffic affecting the State and National forest?	222.5 222.6
The impact to the already stressed local fire stations is of grave concern with the population increase, and additional traffic.	222.7
How does the population increase accommodate the infrastructure and the need for parking on streets that have no sidewalks? (Once again mentioning children walking to school and riding their bikes on these streets.)	222.8

The opportunity to share my view and experiences as a resident of Armstrong Valley is appreciated. Jaye Griffiths

From: Jim Smith <jorcsmith@sbcglobal.net>
Sent: Monday, February 13, 2023 12:24 PM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>; district5

<district5@sonoma-county.org>

Cc: Jim Smith <jorcsmith@sbcglobal.net>

**Subject:** Attn: Eric Gauge - Affordable Housing in Forestville

Hello Eric and Lynda, We are writing to advise the Planning Commission of our concerns about the proposed Affordable Housing Plans for our community of Forestville. Our family has resided in Forestville since 1945 and has always been involved in community activities. While we agree that affordable housing is needed in Forestville as well as every other community in Sonoma County we have concerns about the size of this overly ambitious plan. From reading the proposal in the Press Democrat it seems that Forestville will be taking way more than	223.1
their fair share of new housing units in the County.  We certainly feel that the three story "Human Warehouses" that Santa Rosa seems to be placing everywhere within their city limits would not be appropriate in Forestville.  We do have some questions regardless of which parcels are finally decided on;	
1. Can the the current utilities (water, sewer, power, roads, etc.) support these additional units without	223.2
major upgrades?  2. Has the increased vehicle and foot traffic been taken into consideration?	223.3
3. What will it cost to purchase a low or modest income home?	233.4
4. Where are the pedestrian crosswalk lights for Highway 116 in downtown that have been promised for many years?	223.5
5. Why wasn't the old Crinella property (Hwy. 116 & Mirabel Road) included in the plan?	223.6
We feel that FOR-1 location (old Electro Vector Plant and possibly burned out Community Church?) would be the best location for new housing. A toxic cleanup may qualify for state/federal funding to help the community.	223.7
Locations FOR-3,5,6 would be a good location if the land is not needed for Forestville Sewer Plant pond expansion.	223.8
Location FOR-7 would be a great stand alone property for this proposal.	
Location FOR-2 on Nolan Road is already zoned for housing but would not be good for such a high density plan without major infrastructure upgrades and cause a nightmare traffic problem on an already busy Mirabel Road.	223.9
Location FOR-4 on Van Kepple seems workable if it is the parcel shown on your map and not the one at the end of the road. It can possibly be combined with the FOR1 (Elecro Vector site) and enter off Covey	223.10

Sincerely, Jim and Cathy Smith 6288 Anderson Road Forestville, CA 95436 707-887-2988

Road.

jorcsmith@sbcglobal.net

From: ulla kiriakopolos <ujkiria@gmail.com> Sent: Monday, February 13, 2023 4:59 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Russian River Housing Element Project.

## **EXTERNAL**

The proposed Housing Project for the quaint little town of Forestville is out of scope, the infrastructures needed for such large scale projects are not available, no adequate roads, sewer, utilities etc., etc. As an example FOR-4, Van Keppel Rd is a narrow 2 lane road leading to a single way private driveway. FOR-2 is a quiet residential area with mainly one story homes.

I am opposed to this housing project, it is way too big for our little town.

224.1

Sincerely, John Kiriakopolos From: Josh Beniston < josh.beniston@gmail.com>

Sent: Monday, February 13, 2023 2:54 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Cc:** district5 < district5@sonoma-county.org>

Subject: Housing Element Update: Forestville Rezoning

#### **EXTERNAL**

# Dear Eric Gage and Permit Sonoma Authorities,

I am writing to comment on the scope of the plans that are currently on the table with Permit Sonoma regarding rezoning of parcels in unincorporated Sonoma county to provide high density housing. I have some concerns with the plans that have been released, as well as the overall process. I am particularly concerned about proposed changes to parcels in the Forestville area. I own a home in Forestville and have lived in the area for several years. I would like to express the following questions and concerns and would appreciate a response on any of these items.

1. Why is Forestville providing such a large percentage of the overall number of housing units in unincorporated areas in this plan?

The proposed plan would grow Forestville's population by a significant percentage (more than 30%?). Forestville's infrastructure is not set up to accommodate that kind of increase in population. As it now, Forestville lacks sidewalks, traffic lights and other road safety measures, and has minimal access to public transit to other areas. We already have real public safety risks associated with our main roads. Further, very few social services and basic needs such as medical care or grocery stores are available in Forestville. Many of the other unincorporated areas of the county seem better suited to accommodate this kind of growth. Areas around Sonoma county airport, Larkfield, unincorporated Petaluma all come to my mind as areas with much better infrastructure and access to services for growing populations and high density housing. Those areas already have roads and infrastructure that can handle more dense populations, and have better access to services and public transportation.

In summary – I think the percentage of housing units being proposed for Forestville needs to be reduced, and that some of those units should be shifted to areas that have better capacity.

2. Will there be additional land use planning, impact studies, and upgrades in infrastructure to go along with the proposed increases in housing?

See above. We will absolutely need upgrades to the road corridors impacted in the proposed plans in Forestville. I'm concerned that adding this much housing will cause SAFETY and congestion issues related to additional cars and traffic. Homeowners in Forestville have invested heavily in the area and in the county and deserve a reasonable planning process to make sure their community is prepared for additional population. We do not deserve a process that our own supervisor has publicly described as "absolute garbage"-describing the state's mandates in this area. The Sonoma county government needs to act however it can to make sure that our communities are ready to accommodate the growth proposed in this plan.

225.1

225.2

# 3. How and Why were these specific parcels selected?

I am not opposed to adding higher density housing in the Forestville area and growing the population. I fully support the development of some of these areas. I think that Packing House Rd and the Electro Vector site are obvious choices for multi-unit housing complexes. I would like to see those sites prioritized. The current status of the Electro Vector site represents blight and public health risk. It should be properly remediated and utilized for development, rather than being listed as a site most likely to drop out of this plan because of the potential for additional expense.

225.3

I have major concerns with the proposal of a 71 unit housing complex off of Van Keppel Rd (FOR-4). 71 units is way too high a number given again the lacking infrastructure for walking and driving, and the character of that neighborhood. There are not anywhere near 71 units currently in that neighborhood. It's too large a number and not appropriate. It represents a massive impact on the homeowners that surround that site. In my mind that proposal, and number of units, is totally inappropriate at that site given the infrastructure and neighborhood surrounding it.

225.4

Thank you for your consideration,

Joshua Beniston

6093 Van Keppel Rd

Forestville, CA 95436

707-540-4121

From: Judith Weller < weller judith@hotmail.com>

Sent: Monday, February 13, 2023 4:55 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** workforce housing Forestville

#### **EXTERNAL**

To whom it may concern,

I join with many others to express my understanding for the need for affordable, accessible housing in the Forestville area. However, I am opposed to this project for the following reasons including but not limited to,

Emergency evacuations: During the last two fire evacuations, it was bumper to bumper traffic on River Rd., Front St in Forestville, Hwy 116, Hwy 101 and Hwy 12. All routes we and hundreds of thousands of others used.

Parking and public services: During the summer vacation months, crowds come to enjoy the river. There are very limited to nonexistent services. Our local neighborhood streets are packed with illegally parked vehicles. Many of these folks use the bushes along the river and on our small neighborhood streets as toilets and leave heaps of garbage. Adding thousands of new residents their family and friends to the influx of the out of area folks just seems like a bad idea.

Emergency services: We have only one fire station in Forestville.

More often than not, our Sheriffs can't even respond to many of the calls they receive.

Local Grocery store: We have one market situated well away from the downtown Forestville area. It is NOT within walking distance of town. And the parking for this market requires negotiating the high-speed traffic on Mirabel rd.

Medial services: I'm not sure that we even have a clinic or doctor's office at this point.

Please scale this project way down or table it for the time being. Please don't put more pressure on our River communities than they currently have! The Forestville town and environs are not an appropriate location for this project.

Thank you for your consideration.

Judith Farina

11540 Sunnyside Ave. Forestville, CA 95436

226.1

226.2

226.3

226.4

226.5

226.6

Permit Sonoma
Attn: Eric Gage
2550 Ventura Ave.
Santa Rosa, CA 95403
Permitsonoma-housing@sonoma-county.org

Re: Sonoma County Housing Element: Parcels GRA-3 and GRA-5

Dear Sonoma County Board of Commissioners,

As an unincorporated Sebastopol resident, I have been following the housing element proposal with a special interest in land parcels Graton-3 (3155 Frei Rd) (GRA-3) and Graton 5 (8525 Graton Rd) (GRA-5). With this letter I, along with my neighbors, respectfully request that you review the reasons as to why the proposal to rezone the lots and pursue site development should be reconsidered and not pursued due to the various significant and unavoidable impacts it would have. This type of development is not in the best interest of our community and will negatively impact the area and quality of life of residents.

227.1

Please know that I (and my neighbors) are hardworking contributing members of the community. We have purchased homes in the unincorporated area of Sebastopol (Graton utilities) with the expectation of living in a semi-secluded rural area, with a higher level of privacy, and safety whilst being situated away from the heart of the town. None of us would like our property values to decrease and we hesitate even to add to the "not in our backyard" rhetoric but it is important that concerns are raised and addressed by the Commission.

227.2

Parcels GRA-3 and GRA-5 are two of the few parcel sites on the entire Sonoma County proposed map that have several significant and unavoidable mitigating factors. The County should focus on developing sites that do not have such a grave impact on the community, infrastructure, etc.

227.3

The following factors to be considered:

- Disruption of Scenic Route 116 (AES-2)
  - a. The rural beauty along 116 is unparalleled. Many travel from afar to be lost in the large trees, country-esq vibe that we call home. Adding various new units adjacent to 116 on both GRA-3 and GRA-5, with an expectation of 100-300 people would gravely diminish the scenic aspect that is to be protected. Not only homeowners but visitors would no longer be able to enjoy the visual beauty that has been kept for many years. With the proposed plan neighbors and visiting persons would possibly see an array of structures which would not be consistent with the idea of not impeding on the scenic route plan.

227.4

b. Have you had the opportunity to speak with the wineries that would be directly

affected by the proposed development? Sonoma County thrives on the wine business. The three tasting rooms that would be directly affected are visited by many not only for their wine but the scenic environment they currently are set in. By adding homes on the parcels adjacent to 116, wine visitors will lose the Sonoma County feel they pay to experience and enjoy.

227.5 cont.

# • Public Views blocked (AES-1)

a. The views from my backyard, neighbors and adjacent wine tasting rooms would be impacted. It is assumed that most of the trees would need to be removed. Therefore, our properties would no longer be shaded by the extremely mature trees. Our sights would be turned into numerous housing structures, windows and new residents would be able to look into existing backyards and directly into the homes themselves.

227.6

## • Noise, Trash, Traffic

a. With both parcels being developed a significant increase of daily noise, trash and people would be created in such a small area. Additionally, the increase in people and cars would be a traffic issue in an intersection that is not constructed to handle that much in its current state. The location is not currently set up for the increased traffic and parking if development were to occur. Increased traffic and congestion can cause additional stress on local roads and make it difficult for residents to get around. Adding additional traffic to an already small land area with a limited number of traffic lanes raises concern if we are ever evacuated again for fires or flooding. The safety of your residents should be a high priority. How does the county ensure that current residents and potential future residents will not be plagued by unsafe conditions (extreme traffic, chaos) in an emergency situation?

227.7

b. A desired result from the creation of new housing is to provide residents with a safe mode of transportation to get to and from work or school, whether that be by car, bike, walking or public transportation. With the parcels current state, there are no sidewalks and its lack proper traffic accommodations for anyone, including the handicap to safely walk. What does the county propose to create a safe traffic area if it is to be developed?

227.8

#### Water

a. All neighboring homes surrounding GRA-3 and GRA-5 are on wells. How would homeowners be ensured that our water supply would not be depleted with the proposed project? Will the units be connected to public utilities? (Per a recent conversation with a Sonoma County Board member we were advised housing units would need to be connected to public utilities. However, we would like confirmation).

227.9

#### Sewer

a. My property and surrounding lots utilize Graton utilities. It is our understanding that Graton sewer is unable to accommodate this magnitude of sewer hookups for the proposed plan developments. How would the proposed projects obtain sewer? Again, we were recently advised that new developments would be connected to public utilities and septic would not be permitted. Please confirm this is accurate.

227.10

## Safety

a. For those homes that will share a fence line with GRA-5 we question the level of safety. For years, many of us have lived in a secluded area and enjoy being in an incredibly safe environment, with little crime. However, with the addition of 100-300 people, the likelihood of increased crime is high. How will your current residents be assured that they will continue to be in a safe community with the anticipated number of people potentially moving into the parcels directly behind our backyards?

227.11

• GRA-3 and GRA-5 are technically a Sebastopol address and situated in unincorporated Sebastopol, why have they been classified as Graton for the housing project?

227.12

Although the below is not a part of the DEIR, it is important that it be addressed in this letter.

We would like to know what the proposed building plans are or could be. We have heard that the owners of GRA-5 are in the business of establishing small home communities. Please see the link below. <a href="https://www.twocrowshousing.com">https://www.twocrowshousing.com</a>

227.13

From their website, homes are not on permanent foundations and appear to be movable units with utility hook up capability. Spaces/stalls are rented out and have common bath houses. From research, their Guerneville site uses septic, and they have sex offenders possibly living on their sites.

If Sonoma County allows this type of community to be placed on these two parcels it goes against all that has been presented and should not be allowed.

Has the County thought about purchasing a large parcel of land for the projects? There are large areas of land for sale that we believe should be considered over the small lots proposed. Two are 1853 Cooper Rd or 7919 Occidental Rd in Sebastopol. The lot on Occidental Rd is closer to town for residents to obtain necessities and affects little to no current residencies. That lot could provide many homes for people if rezoned. By taking over fewer larger pieces of property for housing versus the numerous parcels proposed, less infrastructure would need to be changed/updated and less commotion per each site. A large parcel of land could be beautifully developed (with a community park, appropriate transportation accommodations and a unified housing design), to create a home those residents would feel proud to live in as well as maintaining the existing aesthetics.

227.14

We would greatly appreciate that parcels GRA-3 and GRA-5 be removed from the list and not be rezoned in the future. We have no problem with the parcels being in accordance with what it is already zoned for. Make them single residential homes (2- 3 homes with the possibility of each having an ADU) which can be purchased by families. This will add additional homes that are needed and keep the historical rural look of the highway design.

227.14 cont.

However, should Sonoma County or the State find the reasons brought forth not to be sufficient we ask that the county commit to invest in the below:

- Taller fencing around existing homes surrounding GRA-5; and
- Landscape to ensure the beauty of the are remains and assists in existing homeowners' sense of privacy (GRA-5 and GRA-3); and
- Any units built must be placed on permanent foundations. (I.e., no mobile home, RV, anything on wheels); and
- Ensure that public water and sewer be connected; and
- Ensure no bathhouses/common space bathrooms showers are allowed which would attract a transient population.

I strongly urge the County Commission to consider the long-term impacts of the housing development in small land areas and to reject any proposals that would result in the destruction of beauty of the area, overcrowding, and a decline in quality of life for residents. Your current community residents deserve better and I am confident that there are other ways to address our housing needs.

227.16

227.15

Thank you for your time and consideration.

K. Brooks 8543 Graton Rd.

From: Kat Deaner <kat.deaner@gmail.com> Sent: Monday, February 13, 2023 9:55 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Cc: district5 < district5@sonoma-county.org>

Subject: Housing Element Update: Forestville Rezoning-- FOR-4

## **EXTERNAL**

Dear Eric Gage and Permit Sonoma Authorities,

I adamantly oppose several of the rezoning sites in Forestville, CA, specifically FOR-4 (6090 Van Keppel Road). I understand there is a housing crisis in our county and we need to add additional affordable housing. However, the proposed increase of 1,650 residents (50% increase) in Forestville is absolutely ridiculous and negligent! There are already several safety issues with our current population including: lack of sidewalks, speeding cars, and no bike lanes. FOR-4 site is located in a neighborhood that will not be able to handle the proposed increase of 185 new residents. Van Keppel Road is already busy and unsafe at times for pedestrians and drivers. Additionally, a housing complex with 71 units does not fit the neighborhood. Way too dense!!

228.1

We need to be **mindful** in the growth of Forestville. Where is the thoughtful, community driven strategic growth plan? As a resident and tax payer, I would like to see a strategic plan which includes mixed use development and growth that makes sense with the culture and feel of the town. We need to make sure there are services available for an increase in population.

228.2

Sites FOR-1, FOR-3, FOR-5, and FOR-6 are on a main road, Hwy 116, and are more suitable for high density housing and mixed use. FOR-1 (6555 Covey Road- Elevtro Vector) is a great site for development. it needs to be cleaned up and remediated!! Pass this cost on to the developers who stand to profit the most off the development of the town.

228.3

Thank you for taking into consideration the voices of the residents!! It's imperative that we are **thoughtful** in development for safety, environmental and cultural reasons.

Sincerely, Kat Deaner 6093 Van Keppel Road Forestville, CA 95436 From: Kon Zaharoff <konzaharoff@comcast.net> Sent: Monday, February 13, 2023 12:11 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Draft EIR Comments: Housing Element Update

## **EXTERNAL**

Kon Zaharoff 6875 Nolan Rd Forestville, CA 95436

- please see attachment for the signatures that accompany these written comments. I tried to drop off all these originals at your office this morning but the door was locked. Not a good idea to have a comment period end on a County holiday.

229.1

To: Eric Gage Permit Sonoma 2550 Ventura Avenue Santa Rosa, CA 95403

RE: Draft EIR Comments: Housing Element Update

From: The FOR-2 Neighborhood

Date: February 10, 2023

Dear Mr. Gage,

This letter is intended to specifically address the significant impacts and insufficient analyzation found in the Sonoma County Planning Update Draft EIR as it relates to the FOR-2 site, a 13.5 acre parcel located at 6898 Nolan Road in the town of Forestville beginning on Page 4.

As neighbors of the FOR-2 site, the 222 residents who signed this letter believe that before the HCD, Sonoma County Planning Commission and the Sonoma County Board

of Supervisors make any decisions on rezoning the parcels in Forestville they must first understand what the community of Forestville does and doesn't have to offer in the way of resources, services, transportation and infrastructure.

## Forestville California 95436

Forestville is a small rural town in West Sonoma County about 11 miles and a 20 minute drive from Santa Rosa, the nearest job center. The population of Forestville is considered to be about 3300 people following the general boundaries of the Urban Service Area. The Sonoma County Land Use Element, Policy LU-15g, states that the boundary of Forestville is that of the Elementary School District or approximately 6700 people. If all 6 sites, designated for rezoning in the General Plan Housing Element Update, were built to capacity the population of Forestville would increase by 1652 people according to the Sonoma County Update DEIR. This is 25% to 50% increase in population depending on which boundary is used. The proposed cumulative dwelling units added to the town of Forestville is 635. This is the largest number of proposed units and population increase, for any community, in the unincorporated area of the County, with the exception of the unincorporated area around the City of Santa Rosa.

The main road thru Forestville is HWY116 which becomes Front Street for the 3 blocks where most businesses are located. Front Street/HWY 116 is a narrow two lane State Highway built around the turn of the century. All of the side streets in this area are residential.

There are few formal, private business maintained parking lots on Front Street/Hwy 116. Street parking consists of parallel parking on the south side and a combination of parallel and diagonal parking on the north side of the 3 block downtown area. Parking spaces are limited here and thus Downtown Park Open Space site is often used for overflow parking. The Downtown Park is located at the termination of the Joe Rodota Trail and is privately owned and maintained by a non-profit 501c3.

Sidewalks in the 3 block area of Front Street/HWY 116 are either nonexistent, non-contiguous or in extremely poor condition and dangerous. Limited sidewalks do exist from the intersection of Mirabel Road to the Forestville Youth Park. There are no other sidewalks in the neighborhoods that surround the downtown area. Walking the neighborhoods of Forestville requires walking on the narrow shoulders or in some cases in the middle of the road.

With the exception of the Joe Rodota Trail there are no bike lanes in the town of Forestville or surrounding neighborhoods.

Pedestrian or bicycle crossing Front Street/HWY 116, is facilitated by 2 uncontrolled crosswalks. One in the center of town and the other at Covey Road. The Forestville School District provides a crossing guard at the Covey Road intersection to facilitate the safe crossing of Front Street/Hwy 116 by school children. Crossing with or without a crosswalk or exiting a parallel parked car is dangerous on Front Street/HWY 116 due

the road width, heavy traffic volume, including gravel trucks from the two local quarry's, as well as most vehicles traveling faster than the posted speed limit.

There is one informal southbound bus stop in the downtown area. The bus stops in the Front Street/HWY 116 southbound traffic lane, to load and unload passengers. Sonoma County Transit provides bus service to Forestville. Bus Route 20, Russian River/Santa Rosa Route, makes one pickup and one drop off a day in downtown Forestville. Bus Route 26, Forestville/Sebastopol/Cotati/Rohnert Park Route, also makes one pickup and one drop off a day in downtown Forestville.

For all intents and purposes the commercial area of downtown Forestville is built out. There are two commercial/industrial parcels available for development within or contiguous to the downtown area. The first parcel, 3.4 acres zoned PC, is located at the intersection of south side of HWY 116 at the Mirabel Road intersection. The other parcel, located at 6555 Covey Road, is currently being considered in the Draft Housing Element for rezoning (FOR-1). Also known as Electro Vector, the parcel is 2.86 acres and zoned MP, AH. This site is subject to unknown groundwater contamination from a previous industrial business on this site. Mitigations have been underway for quite some time and this site should be fully evaluated before it is removed from the Housing Element Update rezoning inventory (Alternative-3). One additional site with Industrial zoning, although not contiguous with Front Street/HWY 116, does exist. This site is also being considered for rezoning under the Draft Housing Element Update and is currently zoned M1. Designated as FOR-6 in the plan, it is 4.94 acres.

Street lighting in Forestville is limited to the 3 blocks of the downtown area along Front Street/HWY 116. This allows the surrounding neighborhoods to very good Night Sky Viewing Areas with minimal light emissions.

New jobs in Forestville are few and far between. Those that do exist are generally minimum wage service industry jobs. This is largely due to the lack of sufficient commercial and/or industrial business. Forestville is a rural bedroom community.

Government Services in Forestville consist of:

- Sewer and Water Forestville Water District
- Schools Forestville Union Elementary School District K-8
- Fire and EMS Sonoma County Fire District Forestville Station
- Police Services Sonoma County Sheriff's Department
- Roads Sonoma County Road Department

Notable business/retail services are limited in the downtown area of Forestville, off street parking is either non-existent or limited at all of these sites, very little future commercial growth is possible:

The following business can be found in Forestville:

A package store, pharmacy, hardware store, bakery, coffee shop, post office, laundromat, real estate office, hair salon, gas station, bar, liquor store, dog groomer, antique store, winery, bicycle shop, auto repair shop and five eating establishments.

The following human services are available in Forestville:

A dentist office, a church, food bank, and a pharmacy.

There are no social services, medical facilities or broadband and very limited cell service within a ½ mile of downtown Forestville. The closest grocery store to downtown Forestville is 1.25 miles away.

The following Land Use and Housing statements, policies and objectives are relative to the discussion of all future development in the town of Forestville.

Reference: Sonoma County Land Use Element - Page Lu-81

Another issue in this area is growth and development in Forestville. Specific issues that need to be addressed include the amount of additional development that could be absorbed without changing the rural character or straining public services, how to make available commercial and industrial opportunities to provide local employment, and how to preserve the desirable environmental qualities of the area.

Objective LU-15.4

Maintain the "rural village" character of Forestville through design development standards that support small-scale development with substantial open space and native landscaping.

Reference: Sonoma County Land Use Element - Page Lu-82

Policy LU-15a: Policy LU-15a: Phase residential and commercial development within the Forestville Urban Service Boundary to allow the community facilities and services adequate time to absorb new growth, and to maintain the community character. For any project of 10 or more housing units, require a precise development plan or master plan that specifies the maximum number of new residential units to be built per year.

Policy LU-15b: Require design review for major subdivisions within the Forestville Urban Service Boundary. Design review approval shall assure that:

- (1) Project scale and design is consistent with existing rural village character.
- (6) The project includes pedestrian access connecting new homes in a nearby commercial area.

Reference: Sonoma County Draft Housing Element

Policy HE-2a: Enhance opportunities for affordable housing production on all appropriate sites with <u>adequate infrastructure and proximity to services</u> ...

Policy HE-3g: "Strive to focus affordable housing development in <u>moderate and high</u> resource areas well-served by public transportation, schools, retail, and other services.

Policy HE-5d: Strive to provide for senior housing needs. <u>Focus senior housing projects in areas well-served by transit, accessible sidewalks, and amenities...</u>

Policy HE-6f: <u>Provide high quality and equitable public services, including public transportation, fire and police safety, crime prevention, parks, sidewalks, street lighting, and recreational facilities and programs in lower-resource areas through the use of place-based strategies and master plans.</u>

# Response to DEIR - FOR-2 - 6898 Nolan Road

# **FOR-2 Neighborhood**

There are three main streets that directly surround FOR-2, Mirabel Rd, Nolan Rd and Giusti Rd. There are 5 additional streets that are accessed from either Giusti Road or Nolan Road and are also considered part of the FOR-2 Neighborhood; Nolan Ct., Niki Lane, Poplar Drive, Ohaire Lane and Chope Lane. There are approximately 85 homes and 180 residents living in this neighborhood.

FOR-2 is a 13.5 acre parcel. All 4 sides of the parcel abuts the backyards of well-established single family, single story homes along Nolan and Giusti Roads. The maximum proposed density on the FOR-2 site is 283 dwelling units and 736 new residents. The FOR-2 site is currently zoned for 7 homes.

The FOR-2 Neighborhood is a walking neighborhood and not just for its residents, people come from other areas just to walk here. There are no sidewalks or on street parking in the FOR-2 Neighborhood. The FOR-2 Neighborhood is an excellent place to view the night sky due to the lack of any streetlights in the area.

There are 3 designated existing entrances/exits to FOR-2. One on the East side of the property on Mirabel Road, one on the south side of the property on Nolan Road and one on the West side of the property also on Nolan Road.

FOR-2 is a heritage apple orchard established by the current owner's family in 1911. The family has shared with the Neighborhood and the County, in person and in writing, they have no intensions of selling the property and wish to pass it down to future generations. See Attachment 1

## Question:

• The County will require a minimum of 2 entrances/exits to the FOR-2 site if it is developed. The 3 lots that make up the entrance/exits to FOR-2 have their own unique APN's (completely separate lots) and appear to be owned by the owner of FOR-2. If the County rezones FOR-2 without the owner's permission, what stops the owner from selling one or more of the 3 entrance/exit lots thereby land locking the property?

# **Reference: Executive Summary**

Alternative 3 (Fewer Rezoning Sites) - ES-3 Page 24

The Sonoma County Housing Element DEIR lists the FOR-2 site as one of the <u>six</u> rezoning sites that "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." The DEIR offers to remove these six sites, including FOR-2 as an alternative to the Plan. The following significant impacts are also associated with the FOR-2 site and not listed in the DEIR.

- 1. The parcel is considered by the California Department of Housing and Community Development (HCD) as being too large, over 10 acres, for an affordable housing development. (Page 6)
- 2. It is the largest project, 283 units/7736 residents, of all 59 sites proposed for rezoning in the unincorporated area of Sonoma County and it will increase the population size of the FOR-2 Neighborhood by 400%.
- 3. There are significant sewer pipeline size and capacity issues associated with the FOR-2 Site. (Pages 19-20)
- 4. School crossing traffic signal(s), traffic signal(s), left turn channelization, road widening and site distance and setback mitigations will be needed, on Mirabel Road, Giusti Road and Nolan Road as a result of this project. (Pages 14-19)
- 5. The FOR-2 site is approximately 100' from a Moderate Wildfire FHSZ and approximately 1000' from a High Wildfire FHSZ. (Pages 20-21)
- 6. Substantial water runoff from this project flows thru seasonal creeks and riparian corridors, causing flooding in the homes on Mirabel Road and the backyards of homes along Sunridge Lane and Trenton Road before flowing into the Russian River without any filtration or other mitigations. (Pages 12-13)
- 7. There is no broadband and limited cell coverage at the FOR-2 site.
- 8. The property owner has repeatedly assured the FOR-2 Neighborhood, verbally and in writing, that the Family has no intentions of selling the property and intend to pass it down to future generations. (Page 22 and Attachment #1)
- 9. California No Net Loss Laws discourage Jurisdictions from considering inadequate or unsuitable sites as adequate or available to achieve RHNA quotas.

## Question:

- Given the above information, and further justifications to follow, would it be appropriate for the HCD, Sonoma County Planning Commission or the Sonoma County Board of Supervisors to remove FOR-2 from the list of sites to be rezoned?
- If no please explain how the County of Sonoma plans to assume legal responsibility for traffic accidents, storm water runoff pollution, damage to biological resources, flooding and sewerage backups as a result of permitting this project without analyzing these issues and developing appropriate mitigations?

**Reference: Project Description** 

Comment: HCD Requirements

The DEIR identifies FOR-2, 6898 Nolan Road, 13.5 acres, as one of the 59 urban sites in the unincorporated area of Sonoma County for by-right, medium-density housing.

The California HCD, Realistic Development Capacity, Analysis of Sites and Zoning – Size of Sites States:

To achieve financial feasibility, many assisted housing developments using state or federal resources are between 50 to 150 units. Parcels that are large may require very large projects, which may lead to an over concentration of affordable housing in one location, or may add cost to a project by requiring a developer to purchase more land than is needed, or render a project ineligible for funding. A parcel smaller than one half acre or **over 10 acres** is considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible. Please note, for purposes of this requirement, "site" means that portion of the parcel designated to accommodate lower income housing needs. The housing element must consider and address the impact of constraints associated with small or large lot development on the ability of a developer to produce housing affordable to lower income households. To demonstrate the feasibility of development on this type of site, the following analysis is required.

An analysis demonstrating that sites of equivalent size were successfully developed during the prior planning period with an equivalent number of lower income housing units as projected for the site.

Evidence that the site is adequate to accommodate lower income housing. <u>Evidence could include developer interest</u>, potential for lot consolidation for small sites or lot splits or subdivision for large sites...

A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, <u>a development affordable to lower income households has been proposed and approved for development on the site.</u>

#### Question:

• The site designated as FOR-2, APN 083-120-062, according to information provided in the DEIR, is 13.5 acres. According to the HCD any parcel over 10 acres is considered inadequate to accommodate housing affordable to lower income households. Has the County of Sonoma prepared sufficient documentation for the HCD to demonstrate the County's history of successfully developing sites of similar size, its potential for lot splits or subdivision or the existence of a proposal to develop the site in accordance with HCD requirements?

**Reference: Sewer and Water** 

Comment: Urban Service Area Boundary

The Urban Service Area indicated on Figure 2-6 Forestville Inventory Sites – Page 2-14 would lead the reader to assume that both sewer and water are on site or adjacent to the FOR-2 site. This is not entirely true and the map is misleading. Existing domestic secondary water supply lines do run to the site and the surrounding streets of Nolan Road and Giusti Road. They are serviced by a water main on Mirabel Road. However, the existing sewer pipeline stops approximately 1100' south of the Mirabel Road entrance to the FOR-2 Site. Should the site be developed the existing sewer pipeline would have to be extended, from its current location, approximately 1100', to the existing right of way to the site off of Mirabel Road.

## Question:

• It would be appropriate for the County of Sonoma to place a footnote on the map to clarify this situation?

**Reference: Environmental Impact Analysis** 

Comments: Forestville, Page 4.1-18

FOR-2 is a large parcel west of Mirabel Road surrounded by single-family homes on large lots and zoned LG/116 but outside the SR designation. <u>Views of the ridgelines and open spaces are not visible from the streets looking across the lot due to existing residential development, flat topography, and mature vegetation on all sides (Figure 4.1-</u>

14). On Giusti Road, residences are large, single-story, and designed in a vernacular suburban ranch style. They are situated close to the roadway and are landscaped 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, with fewer trees and some intermittent fencing. Residential development on both sides of Nolan Road is like that on Giusti Road, but with less unified design and landscaping. Overall, the area around the site exhibits visual unity as the homes are large and consistently feature mature landscaping. While the unity is high, the level of vividness is lower because the neighborhood does not offer expansive views or feature notable architecture. The site has moderate sensitivity and, depending on density and height, new development could be dominant.

## Comments and Questions:

- 1. Any multi story, medium density development would be inconsistent with and pose a significant impact on the surrounding neighborhood where the majority of homes are single family/single story. In addition any construction over one story, would become the dominant feature in the neighborhood.
  - The last sentence in the paragraph should be corrected to read: Any construction over one story will be a dominant feature in the neighborhood.
- The report is incorrect in stating that there are no ridgelines or opens spaces viewable from the neighborhood. There are expansive views of Mount St. Helena, the Santa Rosa foothills and portions of Trenton Hill and other closer ridgelines are visible from the upper areas of Nolan Road and Giusti Roads surrounding the site.
  - The EIR should be corrected to include the areas in which expansive views are available.
- 1. The site is not flat as stated above but has a slope of 2 to 9 (generally 3 to 5 percent) percent as stated else ware in this report.
  - This statement should be corrected in accordance with the slope data provided elseward in the DEIR.
- 1. There are mature redwood trees on the property but they do not block views of the surrounding hillsides from all locations.
  - This statement should be corrected.

- 1. <u>The FOR-2 site is not directly across the street from a school.</u> The Forestville Youth Park, a privately owned 501c3 park, is directly across Mirabel Road from FOR-2 and was mistaken for a school.
  - This item should be corrected in the EIR.

# Reference: Site Impacts and Recommended Mitigation Summary

The DEIR, Page 4.1-52 - The FOR-2 Site is listed with the following Impacts:

- Site Sensitivity Moderate
- Project Potential Dominance Dominant
- Potential Impact Significant

Comment: Site Sensitivity Impact

The density of this project is 200% greater than the surrounding neighborhood. The vast majority of homes in the neighborhood are single story/single story on ½ acre lots. Any building 2 stories or taller, with a density of up to 20 units per acre, will become the Dominant feature in the neighborhood and the Site Sensitivity rating in the EIR should reflect that impact on the neighborhood.

Question:

• Based on the above information, the Site Sensitivity rating for FOR-2 should be changed from Moderate to Significant.

**Reference: Aesthetics** 

Significance after Mitigation, Page 4.1-58

With implementation of Mitigation Measure AES-2, impacts from light and glare would be reduced to less than significant.

Comment: Significance after Mitigation

This statement is not sufficient and does not adequately represent or analyze the current night sky conditions in this area. The FOR-2 Neighborhood, Nolan Road, Giusti Road, Niki Lane, Poplar Drive and Nolan Court do not have street lights as does most of the Forestville area. This area is considered by its residents as a Night Sky Viewing Area with minimal light emissions and our visitors often comment on the beautiful night sky that we have. Any construction over a single story will impact the Night Sky Viewing in this area simply from uncontrolled and unmitigated light emitted second or third story units and a dramatic increase in night time vehicle traffic (headlights). Further analysis should be conducted to determine the effects of light emission in the FOR-2 Night Sky Viewing area.

## Question:

• In accordance with General Plan Goal OSRC-4, Preserve and maintain views of the nighttime skies and visual character of urban, rural and natural areas, while allowing for nighttime lighting levels appropriate to the use and location. The EIR should acknowledge the significance and existence of night sky viewing areas and the impact of significantly altering those existing sights by developing FOR-2. The current analysis is insufficient. What additional mitigations are necessary to maintain the existing levels of Night Sky Viewing in the FOR-2 Neighborhood?

# **Reference Agriculture and Forestry Resources**

Impact AG-1, Page 4.2-15: NONE OF THE REZONING SITES OCCUR ON LAND DESIGNATED AS PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE. THEREFORE, DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT CONVERT THESE TYPES OF LANDS TO NON-AGRICULTURAL USE.

All Rezoning Sites occur in County-designated Urban Service Areas, defined in the 2020 General Plan as geographical areas within the urban growth boundary of a city that are designated for urban development. Many of the identified parcels and their adjacent uses are currently zoned for rural residential or limited density, which in some cases means agricultural cultivation is currently underway; nonetheless, none of these lands are considered prime or important farmlands, as designated by the FMMP mapping program. The Rezoning Sites were selected out of dozens of possible sites in part specifically because rezoning them for higher density residential development would not convert productive, prime agricultural lands

The Sonoma County General Plan Goals:

Goal AR-3: <u>Maintain the maximum amount of land in parcel sizes that a farmer would be willing to lease or buy for agricultural purposes.</u>

Objective AR-3.1: <u>Avoid the conversion of agricultural lands to residential or</u> nonagricultural commercial uses.

Goal LU-9: Protect lands currently in agricultural production and lands with soils and other characteristics that make them potentially suitable for agricultural use. Retain large parcel sizes and avoid incompatible non-agricultural uses.

Objective LU-9.1: <u>Avoid conversion of lands currently used for agricultural production to</u> nonagricultural use.

It is a false statement to say that rezoning FOR-2 for higher density residential development would not convert productive, prime agricultural lands. The landowners have stated that this agriculturally important parcel has been used by the family since 1911. The California Department of Conservation's Interactive Map of Important Farmlands lists FOR-2 as Farmland of Local Importance. It was most likely excluded from the higher designations because it was not irrigated at some time during the four years prior to the mapping date of 2018. In fact, the property was listed as Prime Farmland up until 2004. The current owner wishes to rehabilitate the parcel into a more productive apple orchard.

## Question:

 The above information requires the EIR to address the mitigation issues and impacts of rezoning FOR-2, a Farmland of Local Importance, to higher density residential housing.

# Reference: Biological Study Area

Comment: Biological Study Boundaries, Page 4.4-5, Figure 4.4-4

The Biological Study Area – Forestville boundaries are not accurate in relation to the FOR-2 site, Figure 4.4-4 Biological Study Area - Page 4.4-5.

The majority of storm water runoff from FOR-2 that potentially affects biological resources flows north from the FOR-2 site and makes its way to the Russian River via unmaintained drainages ditches, seasonal creeks and riparian corridors to the Russian River. The effect to the biodiversity of these seasonal creaks, riparian corridors and the Russian River must be considered and investigated for Critical Habitat and Sensitive Communities.

#### Question:

• The Biological study area for FOR-2 should be expanded to include the ditches, seasonal creeks, riparian corridors from the site to the Russian River due to the increase runoff as a result of the development of FOR-2.

Reference: Biological Resources

Comment: Correction

The DEIR statement, Forestville - Page 4.4-13, does not mention that the FOR-2 site is connected to the Russian River via the storm water runoff from the site.

Question:

 This should be corrected so sufficient analyzation can occur and mitigation measures identified in the EIR.

**Reference: Cultural Resources** 

Comment: Cultural Sites

The FOR-2 site is located within a half a mile of a known Native American cultural site where an ancient lake existed and Native American Community existed. Archaeological reviews are required on development projects in the area. Native American artifacts have been found on the FOR-2 Site and in the surrounding area.

Question:

• The EIR should state that this site is in proximity to a Native American cultural site and the possibility that artifacts and possibly human remains may be found on the site?

Reference: Hydrology and Water Quality

Comment: Storm Water Runoff

The FOR-2 site, is 13.5 acres with a slope of approximately 4.3% (52' in 1256') from the highest point on its western boundary (Nolan Road) to its lowest point at the intersection of Mirabel and Giusti Roads. Currently water runoff during heavy rainfall floods the crawl

spaces and garages on the homes below the site and along Mirabel Road. One homeowner has installed a French drain to divert flows to the unmaintained drainage ditch on the west side of Mirabel Road. None of the current runoff is collected into storm drains. All runoff is uncontrolled and the vast majority flows along the west side of Mirabel Road downhill in a generally northerly direction. The water from the FOR-2 site is collected in a concrete open collector between 7522 and 7566 Mirabel Road. The water then flows west in an open seasonal ditch/creek until it meets a "blue line creek" and riparian corridor also known as Sunridge Creek. This blue line creek crosses Trenton Road and runs behind the homes between Sunridge Avenue and Trenton Road. During heavy rains this creek inundates Trenton Road and the backyards and first floors of homes along Trenton Road and Sunridge Avenue. This runoff then makes its way to the Russian River without filtration or settling ponds.

The effect to the biodiversity of these seasonal creaks, riparian corridors and the Russian River must be considered and investigated for Critical Habitat and Sensitive Communities. Significant hard surfaces, incapable of absorbing water, will be created thru development on the FOR-2 site. 15 acres of land generates 407,000 gallons of rainwater per one inch of rain. Forestville receives an average of 41 inches of rain per year, non-drought years. That accounts for over 16 million gallons of water flowing from this site to the Russian River annually. Failure to identify the significant impacts and mitigation measures related to the storm water runoff from FOR-2 will impact biological resources and result in additional flooding of roadways and properties in the area

#### Question:

 The storm water runoff condition was not sufficiently analyzed in the DER to reflect the significant downstream effects of additional storm water runoff from the development of FOR-2. Further analysis and identification of mitigation measures must occur and be included in the EIR to avoid damage to the environment, biological resources and personal and public property.

Reference: Public Facilities and Services

Comment: Park Space and Funding

Page 4.15-8 - Policy PF-2c:

Use the following standards for determination of park needs: Twenty acres of regional parks per 1,000 residents countywide and <u>five acres of local and community parks per 1,000 residents in unincorporated areas</u>. A portion of State parklands may be included to meet the standard for regional parks.

Page 4.15-8 - Policy PF-2g:

Require dedication of land or <u>in-lieu fees</u> as a means of funding park and fire services and facilities.

## Questions:

- There are no publically funded parks in Forestville. Please clarify if the full buildout in Forestville (1652 new residents) would require the addition of new public park space, how many acres and where it would be located, or if the existing two privately owned parks would qualify for the Policy PF-2c standard?
- The Forestville Youth Park is 7.93 acres and the Forestville Downtown Park is 4.26 acres and both are owned by non-profit organizations and available for public use. What population boundaries would be used to calculate population (PF-2c) and if in-lieu fees are obtained from the developer for parks do the existing privately owned parks receive that funding (PF-2g)?

Comment: Park Degradation

Impact PS-4, Page ES-38

The FOR-2 site is directly across Mirabel Road from the Forestville Youth Park. The FOR-2 Neighborhood is concerned that the Forestville Youth Park would see a considerable increase in use that would lead to a physical deterioration of the facility.

## Question:

• What mitigation measures are in place if existing parks, Forestville Youth Park and the Forestville Downtown Park suffer degradation due to overuse? Both parks are privately funded and exist solely on donations. The addition of over 1600 new residents within a half mile of downtown Forestville will have an impact on these existing parks. An additional section could be added to the DEIR that address privately owned Parks and how new development could support them?

Reference: Traffic and Parking

Comment: Traffic Study

According to the County of Sonoma Traffic Counts (arcgis) there are 6909 total trips per day on Mirabel Road, in both directions. The speed limit on Mirabel Road, in the area of FOR-2 is 45 mph although vehicles drive faster than the posted speed limit in this area. Due to speed limit and vehicle traffic volume, including large gravel truck traffic, Mirabel Road is likely a Major Collector when compared to other roadways defined in the DEIR Existing Street Network.

## **Question:**

 DEIR, Existing Street Network – Page 4.16-1 thru 4.16-5 - Mirabel Road is not listed in the Existing Street Network. This should be corrected in the DEIR.

Comment: Mirabel Road/HWY 116 Intersection

At a conservative calculation of 5 trips per day per residence, including the existing FOR-2 Neighborhood and the proposed addition of 283 residences at FOR-2, the total trips per day coming and going from the FOR-2 Neighborhood would be approximately 4000, almost doubling the trips per day currently observed on Mirabel Road and significantly affecting the LOS rating of the Mirabel/HWY 116 intersection.

# According to the DEIR:

Peak Hour Traffic at the Mirabel/Hwy 116 intersection is 1040. The cumulative total, including other River area rezoning projects is estimated to be 1782. This a 70% increase Peak Hour Traffic for that intersection.

According to the County of Sonoma Guidelines for Traffic Impact Studies-Page 4,

If the project is located in a study area where one or more intersections are currently or projected to operate LOS E or Worse a Traffic Study is required.

Since the County has already determined that the intersection is failing, any development should be responsible for upgrades to the intersection due to increased Peak Hour Traffic. The last estimate available for a round-about at this intersection is 7.2 million dollars. The County has also considered a traffic signal at the intersection of River and Mirabel.

#### Questions:

- The DEIR is not clear whether traffic mitigations caused by the FOR-2 development, including the round-a-bout at Mirabel and HWY 116, as well as those on Mirabel Road and in the FOR-2 Neighborhood would be fully or partially the responsibility of the developer?
- The DEIR should require the need for a Traffic Study as a traffic mitigation requirement based on FOR-2's proximity to the Mirabel/HWY116 intersection due to the significant increase in trips per day that will be generated from the FOR-2 site and the substantial increase vehicle trips per day on Mirabel Road.

Comment: General Traffic Concerns

There are three existing access/right of ways to the FOR-2. One is directly off of Mirabel Road and two are off Nolan Road. Mirabel Road runs between River Road on the north end, a County Road, and HWY 116 on the south end, a State Highway.

There are two 4 way intersections between the northern border and the southern border of FOR-2. The intersection on the north side of FOR-2 is Giusti Road and Davis Road at Mirabel Road. The intersection on the south side of FOR-2 is Nolan Road and Speer Ranch Road at Mirabel Road. There are stop signs on Davis, Giusti, Nolan and Speer Ranch Road that control traffic entering Mirabel Road. Historically there have been serious accidents at the Giusti/Mirabel/Davis road intersections.

There are no are no turn lanes, at either of the four way intersection on Mirabel Road and traffic site distances are limited at both intersections. Site distances are also limited at the Mirabel entrance to FOR-2. The distance, along Mirabel Road between the two 4 way intersections, Giusti/Davis and Nolan/Speer Ranch, is about 1000'. The Mirabel Road entrance to FOR-2 lies roughly in the middle of the two intersections.

As residents of the FOR-2 Neighborhood we would like to share how difficult it can be to enter and exit Mirabel Road safely via either Giusti Road or Nolan Road. With the absence of turn lanes, the current speed limit, limited sight distances and high vehicle and gravel truck traffic, movements onto and off of Mirabel Road are currently dangerous. We anticipate entering FOR-2 from the designated right of way off of Mirabel Road will be equally dangerous.

In addition the County of Sonoma Guidelines for Traffic Impact Study Thresholds provide some references to possible mitigation measures that will be needed as the result of the planned development of the FOR-2 site. (Thresholds, PG 10)

A project would have a significant traffic impact if it results in any of the following conditions:

- 1. On-site Roads and Frontage Improvements: <u>Proposed on-site circulation and street frontage would not meet the County's minimum standards for roadway or driveway design, or potentially result in safety hazards</u>, as determined by the County in consultation with a registered Traffic Engineer or Civil Engineer.
- 2. Vehicle Queues: <u>Project causes or exacerbates 95th percentile turning movement queues exceeding available turn pocket capacity</u>.
- 3. Signal Warrants: <u>The addition of the project's vehicle or pedestrian traffic causes an intersection to meet or exceed Caltrans or CA-MUTCD signal warrant criteria</u>.
- 4. Turn Lanes: The addition of project traffic causes an intersection to meet or exceed criteria for provision of a right or left turn lane on an intersection approach.
- 5. Sight Lines: <u>The project constructs an unsignalized intersection (including driveways) and/or adds traffic to an existing unsignalized intersection approach</u>

- that does not have adequate sight lines based upon Caltrans criteria for State highway intersections and AASHTO criteria for County roadway intersections.
- 6. County Intersection Operations: The County level of service standard for County intersection operations is to maintain a Level of Service D or better pursuant to General Plan Policy CT-4.2. The project would have a significant traffic impact if the project's traffic would cause an intersection currently operating at an acceptable level of service (LOS D or better) to operate at an unacceptable level (LOS E or worse). If the intersection currently operates or is projected to operate below the County standard, the project's impact is considered significant and cumulatively considerable if it causes the average delay to increase by five seconds or more. The delay will be determined by comparing intersection operations with and without the project's traffic for both the existing baseline and projected future conditions.
- 7. County Roadway Operations: The County level of service standard for County roadway operations is to maintain a Level of Service C pursuant to General Plan Policy CT-4.1; or, for specific roadway segments, the level of service standard adopted in the General Plan Figure CT-3. The project would have a significant traffic impact if the project's traffic would cause a road currently operating at an acceptable level of service (LOS C or better) to operate at an unacceptable level (LOS D or worse).

Sonoma County Standards for Traffic Impact Studies, Page 15

The project applicant shall retain a registered Traffic Engineer who is licensed to practice in the State of California. A TIS may be prepared by a registered Civil Engineer that has demonstrated appropriate expertise to the satisfaction of DTPW and is licensed to practice in the State of California. Said Engineer shall conduct objective qualitative and/or quantitative analysis, and submit a written traffic impact study that includes each of the following areas that apply to the proposed project. Please note that when a concern is identified, the Engineer shall propose a solution and identify funding for the solution.

Vehicle Queues: <u>Identify situations where either the addition of project traffic causes or exacerbates 95th percentile turning movement queues exceeding available turn pocket capacity</u>.

Signal Warrants: <u>Identify situations where the addition of project vehicles or pedestrian traffic will cause an intersection to meet or exceed Caltrans or CA-MUTCD signal warrant criteria</u>.

Turn Lanes: <u>Identify situations where the addition of project traffic at an intersection, including project driveways, causes an intersection to meet or exceed criteria for provision of a right or left-turn lane on an intersection approach.</u>

Questions:

- The DEIR does not sufficiently analyze the effects of traffic mitigation measures relative to FOR-2 and their impacts the County's plans to extend the Joe Rodota Trail Bike Path along Mirabel Road between Hwy116 and Davis Road. How could traffic impact mitigations effect the plan construction of the Joe Rodota Trail in the area of FOR-2?
- The FOR-2 site adds 736 new residents and approximately 500 cars to the FOR-2 Neighborhood. In the EIR will traffic signal(s), turn lane(s), improved intersection setbacks, improved sight distances, and or controlled crosswalks be required mitigations, on Mirabel Road and the in the FOR-2 Neighborhood streets?
- Are there any potential mitigations that are likely to increase traffic on Giusti Road and Nolan Road at the other two entrances to FOR-2?

Comments: Crosswalks

The DEIR insufficiently analyzes the need for a controlled crosswalk at or near FOR-2 that will allow adults and children cross Mirabel Road to access the Youth Park, walk or bike to town, walk to school or access bus stops.

See Caltrans or CA-MUTCD Page 835 Section 4C.06 Warrant 5, School Crossing

Support: 01 The School Crossing signal warrant is intended for application where the fact that schoolchildren cross the major street is the principal reason to consider installing a traffic control signal. For the purposes of this warrant, the word "schoolchildren" includes elementary through high school students.

Standard: 02 The need for a traffic control signal shall be considered when an engineering study of the frequency and adequacy of gaps in the vehicular traffic stream as related to the number and size of groups of schoolchildren at an established school crossing across the major street shows that the number of adequate gaps in the traffic stream during the period when the schoolchildren are using the crossing is less than the number of minutes in the same period (see Section 7A.03) and there are a minimum of 20 schoolchildren during the highest crossing hour.

Also See Permit Sonoma – Pedestrian Facilities

Policy 4.05 - Where discretionary projects in Urban Service Areas and unincorporated communities are found to create <u>additional demand for pedestrian travel</u>, require the project to directly provide or participate in the funding of pedestrian improvements such <u>as sidewalks</u>, gap closures, steps, safety improvements, and/or trails that will improve pedestrian access to destinations located within ½ mile of the project site.

Policy 4.08 - Provide high-visibility crosswalk marking at all intersections in Urban Service Areas, unincorporated communities, and wherever feasible countywide. Wherever possible, avoid mid-block pedestrian crossings, and where mid-block

<u>crossings are necessary, install signalization, refuge islands and signage warning</u> vehicles to stop for pedestrians and watch for cyclists.

#### Question:

• The FOR-2 Neighborhood would like to know what mitigations should be added to the EIR to allow the 736 new residents of FOR-2, including school children to safely cross Mirabel Road to attend school, visit parks, bike, and walk or obtain services including public transportation?

Comments: Parking

There is a trend in the County to reduce parking spaces per developed unit in order to increase density and force occupants to use other forms of transportation (reduce VMTs). This option may work in urbanized areas with robust public transportation or within walking distances to essential services and work. Forestville is a rural community, there are few jobs available within walking distance of FOR-2. There is no industry, no available commercial land for future for development, minimal public transportation and no legal on street parking in the FOR-2 Neighborhood.

DEIR – Impact WFR-2, 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. Prior 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; however, widening County roads would not exacerbate fire risk.

#### Questions:

- The DEIR does not sufficiently analyze the lack of on street parking in the FOR-2 Neighborhood. Onsite parking should not be reduced for the FOR-2 development. How will the EIR mitigate the issue of assuring that there is sufficient parking on the FOR-2 site for a minimum 2 cars per unit due to the lack of robust public transportation?
- Residents of the FOR- Neighborhood are concerned about overflow traffic parking on our streets. What mitigations are included in the DEIR that will address this issue and who will enforce it?

**Reference: Utilities and Service Systems** 

Comment: Sewer

The DEIR insufficiently analyzes the condition and size of the sewer pipeline serving FOR-2. The 8" sewer line that would service FOR-2 currently ends approximately 1000' south of the access easement at the Mirabel Road entrance to the FOR-2 site. This 8" line runs from this termination location to the corner of Mirabel Road and Hwy 116. It then transitions to a 6" line, running under the north side of HWY 116 for approximately 1000' to First Street, where it connects to the main line to the sewer treatment plant. This line is gravity flow and not pumped. The EIR does not sufficiently analyze whether the 1000' of 6" sewer line has the capacity to handle the increased output from the FOR-2 project. A 6" sewer line carries one half the capacity of 8" sewer line. The FOR-2 Neighborhood is also aware that there have been problems with this 6" line clogging at or near 6661 Front Street/HWY 116 due to a low spot in the line. Failure to adequately estimate the capacity of the 6" sewer line with the increase demand associated with the addition of the FOR-2 development could result in the failure of the system or significant sewer spills at low points in the system.

The Sonoma County Water Agency – Design and Construction Standards for Sanitation Facility, Page 20

1. Minimum Pipe Sizes - The minimum pipe size for main sewers shall be eight (8) inches except as noted below. The minimum pipe size for side sewers shall be four (4) inches or the same size as the building drain plumbing stub whichever is greater.

## Questions:

- Good planning for this project should include providing sewer access to the remainder of the FOR-2 Neighborhood which lies within or adjoining the boundaries of the Sewer District, does the DEIR adequately address this planning outlook?
- The FOR-2 Neighborhood should be added to the flow calculation when determining capacity of the, 1000' long 6" sewer pipeline, on Front Street/HWY 116. Has the County of Sonoma contacted the Forestville Water District to advise them of this planning issue and to assure it is included in any pipeline capacity calculations?
- If it is found that there are capacity issues related to the reduce size of the sewer line between Mirabel Road and First Street this should be included with mitigations in the EIR.
- If sewer line does need replacing who will be responsible for replacing 1000' of sewer line under HWY 116 for a distance of 1000'?

Reference: Wildfire

Comment: Threshold, Page 4.19-24

Threshold:

If located in <u>or near state responsibility areas</u> or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact WFR-1 THE PROJECT INCLUDES REZONING SITES THAT ARE IN OR NEAR AN SRA OR VERY HIGH FHSZS, BUT DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT SUBSTANTIALLY IMPAIR AN ADOPTED EMERGENCY RESPONSE OR <u>EVACUATION PLAN</u>. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

During our recent wildfire evacuations traffic has backed up on Mirabel Road south bound from the intersection of Mirabel Road/HWY 116 to Davis Road, approximately ½ mile. There are only 3 exits from FOR-2. Two of the exits are onto Nolan Road which is the closest proximity, west facing and south facing, of a wildland fire burning in the SRA. Using these exits would hamper the existing residents ability evacuate as well as put the evacuees of FOR-2 closer to proximity of the oncoming fire.

#### Question:

• The DEIR does not adequately analyze or provide sufficient mitigation measures relative to how an evacuation would occur, from the FOR-2 Neighborhood, with nearly 900 residents attempting to exit onto Mirabel Road at the same time while also attempting to merge with other evacuees. This certainly doesn't seem like a Less than Significant situation? These are issues that must be addressed in the EIR and not left to be dealt with after the project has been completed.

Comment: Wildfire Threshold, page 4.19-26

#### Threshold:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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?

Impact WFR-2 THE PROJECT INCLUDES <u>REZONING SITES THAT ARE IN OR NEAR MODERATE</u>, <u>HIGH</u>, AND VERY HIGH FHSZS. DEVELOPMENT FACILITATED BY THE PROJECT WOULD EXPOSE PROJECT OCCUPANTS AND STRUCTURES TO WILDFIRE RISKS FOR SITES <u>LOCATED IN OR NEAR (WITHIN 2 MILES OF)</u> <u>SRAS</u> OR VERY HIGH FHSZS. WILDFIRE RISK WOULD BE <u>SIGNIFICANT AND UNAVOIDABLE</u>.

When it comes to public safety, SIGNIFICANT AND UNAVOIDABLE do not belong in the same sentence, ever! There are always mitigations including not going forward with a project. The EIR should evaluate wildfire risk and mitigation options considering the knowledge gleaned from the recent devastating fires in Sonoma County.

The drainages directly west of FOR-2 are in a Moderate FHZ but are identical to those below Giusti Road designated a High FHSZ. A fire moving uphill from Martinelli Road will not differentiate between these two FHSZ's. It will run its course up slope seeking drainages where rates of spread and intensity will increase. It is just as likely to arrive at Nolan Road as it is to arrive at Giusti Road. In this case a single ember could easily cross Nolan Road and ignite properties or landscaping in FOR-2. (Dan Northern, Forestville Fire Chief RET.)

## Question:

• Given that Unavoidable is not an acceptable answer to a significant public safety issue what other wildfire mitigations are appropriate for the FOR-2 site, including removing the site from the Housing Element Update List?

Comment: Fire Hazard Severity Zone

FOR-2 is located 100 feet from a Moderate Fire Hazard Severity Zone and 1000' from a High Fire Hazard Severity Zone. The site is across the street from State Responsibility land on the West side of the site. The EIR, Page 4.19-26 States:

Access to FOR-2 ... does not meet County road standards of 20 feet in width or greater. Prior to approval of development 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; however, widening County roads would not exacerbate fire risk.

#### Question:

 Who would fund the on and off site road improvements and traffic mitigation measures, to meet County and Cal Trans standards should the FOR-2 site be developed?

# Comments: Removing FOR-2 from the Rezoning List

A copy of the owner's letter to the County asking that the FOR-2 site be removed from the rezoning list is attached. The family clearly states that they have no intention to sell the property and in fact have other plans for it. The family has owned the property since 1911 and it has become their legacy. It is a heritage property that they intend to pass down to future generations. Rezoning this property would be against their wishes and ruin their ability to use in a manner for which it is currently zoned.

## Question:

- Is it in the County's best interest to continue to rezone a property, against the owners wishes, knowing full well that the owner has no intention of selling the property that has been in their family since 1911 and that they intend to keep it in the family for future generations?
- Is there a process or policy to remove a property from the Housing Element Update at the owners request or if the County is aware that they have no intention of selling the property?
- If so who will make this decision and when will it be made?

Respectfully Submitted by the FOR-2 Neighborhood,

Contacts: Susan and Kon Zaharoff 6875 Nolan Road Forestville, CA 95436

# konzaharoff@comcast.net 707-800-2177

Sunoma and Dan Northern 6925 Nolan Road Forestville, CA 95436 <u>dsnorthern@sbcglobasl.net</u> 707-536-8991

Karen and Steve McDonald 6987 Nolan Road Forestville, CA 95436 smcdonald205@comcast.net 707-495-7371

Attachment 1:

## FOR-2, potential rezoning site

From: kdpmick@aol.com

To: eric.gage@sonoma-county.org; dsnorthem@sbcglobal.net

Cc bassman.pulley@gmail.com, kdynnkrup@gmail.com

Date: Tuesday, February 7, 2023 at 10:16 PM PST

## Good Morning,

Thank you for the opportunity to once again reach out to share my concerns regarding the proposed changes in property zoning for Sonoma County. I listened with intent, the zoom meeting held last week. I retreated from that meeting with mixed feelings, but felt that for the greater good, active listening and participation was done by those gathered and members present. This brings us forth, to this upcoming meeting, February 13th. Once again, it is imperative that I advocate for the land so wisely purchased and established by my Grandfather in 1911, from the original land owners of Forestville.

I must agree and ask like that of Mr. Carr, have committee members availed themselves by visiting the potential rezoning sites. What seems necessary to ask oneself and that of the committee, were the wisest sites selected, and based on criteria that might bring forth additional questions and concerns, prior to the Feb. 13th meeting. An example of question, in knowing that many of the sites do not have easy accessible water, sewer, roads, transportation, all of which would cost thousands, and yet within a few feet, yards, even a mile, there is viable land that would have easy access to those needed items. In examining the sites, were these questions asked as they pertained to each site.

I have read the lengthy report, and would like to share why I believe that the site I hold known as FOR-2 is not a desirable rezoning site.

Priority to all of the following reasons is the clear fact that I, as the owner of FOR-2, and subsequent generations to follow, have no interest in selling the land we own. As mentioned, we have owned this land since 1911, and while over time it has had great crop growth and production, low growth and production, and mediocre growth and production, what is constant is the fact that we have owned the land, worked the land, and it remains, a working Gravenstein apple orchard and vegetable farm. Currently, as previously stated in my first email, we are in the process of regenerating this land, a process begun in excess of five years ago.

Secondly, this land serves as water shed for the areas directly surrounding the proposed property. This is needed to maintain the existing permaculture, house wildlife, and maintain the ecosystem. The lack of respectfully interfacing with the permaculture, will increase and indeed incrementally damage the ecosystems and environment causing irreparable damage and significant effects to the ecosystem.

We have reason to believe and know, through the artifacts and mapping done, that our land at one time was home to several Native Americans who would travel along the coast as they passed from southern Sonoma County up the coast to Fort Bragg.

Fourth, the report mentions that if FOR 2 were to be rezoned, that due to the density factors, it would be a useful site only if mitigated use of appliances, plumbing, land use and landscaping, limited growth on each site, etc. were to be followed. Is this a wise use of land, and good land management? I don't believe so. How does

the committee measure greenhouse gases, emission hazards, unavoidable aesthetic cultural resources, for an unknown date in the future. Further, if to be developed, how is that managed and by what agency?

Fifth, which is now becoming a long list of concerns and reasons why not to rezone my land, is where it is located....or more accurately, where it is not located. Currently, there is limited regional transit, no SMART, etc. If allowed to be rezoned, and subsequently if the property were to be deemed needed, there would be increases in pollutants, significant changes in air quality, needs for increased infrastructure which would include water, sewer, garbage, police/sheriff, fire, road enhancements, traffic increases, and this is the short list. Impacts and indeed far-reaching unknown changes do not allow for informed or adequate decision making to be made.

Sixth, in studying the charts, analysis, more suggested outcomes, I have not been able to determine that there are any valuable gains to have my land rezoned. What I have learned through the studying of that data, is that it is apparent that FOR-2 is not a viable or useful piece of property to be rezoned. I fail to see positive outcomes. Why I would embrace the rezoning of my property is currently lacking, hence why I do not support this suggested rezone plan for FOR-2. Instead, the report continually uses the phrase significant impact. Does that translate to the unknown reality of what significant impact is, and would the county only stop growth once reached, which often and sadly means that significant impact was reached long before it is deemed time to stop development.

In summary, please reconsider the potential rezoning of FOR-2, my land and that of my family. We again humbly ask, to remove our land from the list. Thank you again for your committee work and the opportunity to have this communication.

Sincerely,

Karyn Pulley

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Letter 230

Eric Gage
Permit Sonoma
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Santa Rosa, CA 95403
Permitsonoma-housing@sonoma-county.org

Subject: Draft EIR Comments: Housing Element Update

Dear Mr. Gage,

My comments and concerns relate directly to FOR-2 APN, located in Forestville, and more generally to the Forestville sites proposed for increased housing. I am a 25-year resident of Forestville, own a home which backs on FOR-2, and am most familiar with this parcel and the vicinity in which it is located. My concerns include wildfire danger, impacts relative to climate change (GHG's), lack of water and sewers, egress and ingress, traffic, and the lack of local amenities.

230.1

230.2

I have reviewed a portions of the Draft Program EIR and was pleased that some of my concerns were addressed in the document. I do, however, want to emphasize that there are concerns that warrant consideration.

It appears that Alternative #3 (ref. ES-4 and Section 6—Alternatives) is in the best interest of the community, the county and the environment, as opposed to the Draft <u>as written</u>. Consider as it relates to FOR-2:

- The potential for and the actual significant adverse impacts that will result (ref. Table ES-1);
- The environmental constraints;
- ➤ Unknowns not yet explored for FOR-2 (e.g. water supply and wastewater generation impacts—page ES-42 43, and pages 6-13 6-16);
- There was no "Alternatives" discussion of "Alternative locations" (see below for further discussion and CEOA Guidelines Section 15126.6).
- ➤ "Based on the alternatives analysis provided ..., Alternative 3 would be the environmentally superior alternative (ref. page 6-18)."

There are other sites outside those discussed in the Draft PEIR that would seem less impactive from an environmental standpoint. They would be less costly from an infrastructure standpoint, would reduce the potential for wildfire impacts and other significant adverse impacts identified. It is important that although the County has a state mandate to fill, and is under a timeline to fulfill that mandate; the environmental impacts identified for the sites chosen must be considered and the resulting adverse impacts should outweigh the mandate requirement. It is imperative to identify housing sites, but it is also imperative that the county does its due diligence to identify housing that won't result in significant environmental damage, and put the residents and the community in a potentially harmful situation.

230.3

Based on the CEQA Guidelines Section 15126.6 (see below), it appears that "Alternative Locations" must be considered in the PEIR and evaluated given the significant adverse impacts that will result as described in the current document. How were the sites for analysis chosen? Was this a methodical endeavor? Are the sites chosen for this EIR the least impactive sites in the county? Are these the only feasible sites in all of

Sonoma County for rezoning? These questions are important when considering alternatives to the project as 1230.4 proposed.

<sup>I</sup>cont.

It should be noted that in the last couple of weeks, landowners adjacent to FOR-2 were given a letter by the FOR-2 landowners that included: "Let us be clear in no uncertain terms: WE ARE NOT SELLING THE ORCHARD. We plan on continuing to restore and expand the agricultural and environmental function of the land, with hopes of selling food to local stores and individuals in the near future, and eventually retiring here. This property has been in the family for 5 generations and will continue to be so." They have verbalized this for the last few years to various neighbors. I have not attached the letter, as the FOR-2 landowners indicated they would also be submitting a letter to you. Given the landowner's desire, and the significant adverse effects identified relative to rezoning the parcel as described, it does not seem that realistically this parcel will be available for the 283 houses the rezoning Draft PEIR identifies, or would it result in a realistic number for the county to submit to the state.

230.5

Given the size of Sonoma County, it appears that there may be many sites in Sonoma County that would not result in significant adverse impacts, compared to the impacts described for some of the sites in this draft PEIR.

230.6

Pursuant to the CEQA Guidelines Section:

"15126.6. CONSIDERATION AND DISCUSSION OF ALTERNATIVES TO THE PROPOSED PROJECT.

(a) Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project (my emphasis), 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 (my emphasis). An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation (my emphasis). An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

- (b) Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (my emphasis).
- (c) **Selection of a range of reasonable alternatives**. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are:(i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

(d) Evaluation of alternatives. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed."

Continuing, (f) defines Rule of reason, feasibility, and alternative locations

- "(f) Rule of reason. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project (my emphasis). Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.
- (1) Feasibility. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives. (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553; see Save Our Residential Environment v. City of West Hollywood (1992) 9 Cal.App.4th 1745, 1753, fn. 1).
- (2) Alternative locations (my emphasis).
  - (A) Key question. The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location (my emphases). Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
  - (B) None feasible. If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR (my emphasis). For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location.
  - (C) Limited new analysis required. Where a previous document has sufficiently analyzed a range of reasonable alternative locations and environmental impacts for projects with the same basic purpose, the lead agency should review the previous document. The EIR may rely on the previous document to help it assess the feasibility of potential project alternatives to the extent the circumstances remain substantially the same as they relate to the alternative.
- (3) An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. "

230.7 cont. Based on the CEQA Guidelines listed above, it seems unreasonable to not have included "Alternative Locations" in the Draft PEIR. I submit that this must be addressed so that all who are reviewing the proposal have adequate information to make an informed decision, and sites are chosen for rezoning that lessen and/or remove significant adverse impacts.

230.7 cont.

FOR-2 is located in an "urban service area," of an unincorporated area. The community of Forestville, in which it is located, is several miles from most of the amenities that people require, compared with most of the other parcels being considered under the EIR. There is a small grocery store, one dentist, a small medical clinic, and very little to no opportunity for permanent employment nearby.

230.8

FOR-2 would add approximately 783 people (there would be 1652 people added considering all Forestville sites), and it's my understanding that other site(s) within the urban service area of Forestville have already been rezoned for additional houses (e.g. the property across from Rotten Robbie's?). According to information obtained on "Google" the 2020 census showed ~3,800 people living in Forestville. This (granted over time) would result in a sharp rise in population; and would result in most of the population commuting several miles to jobs, the larger grocery stores, and medical appointments. This does not appear to be the best solution for addressing ghg's, impact on the community itself, or the other needs of the population. Would public services (e.g. the Sheriff's office staffing) be increased in the community?

230.9

230.10

As mentioned above, the increased population will add to environmental impacts by adding traffic congestion and CO2 to the air. In addition, it will increase impacts to the road surfaces. I appreciate that some mitigation was suggested (e.g. added bus lines and bike paths), however, it's unclear whether this will be a requirement. Additionally, these means will not generally get people to their desired destination in a timely manner; and most people will continue to drive.

230.11

The increased density in housing (635 houses in Forestville, and an added population of 1,652 people—ref. Table 2-4, pages 2-25 – 2-26) will have a significant adverse impact on traffic on Mirabel Rd. and Front St., in particular. These roads are already heavily impacted, and at times congested by the heavy use of gravel trucks (traveling at 45 mph on Mirabel Rd.), along with the "normal" traffic traveling these roads.

230.12

Referencing 4.16 Transportation, I was unable to find any reference to Mirabel Rd. which would be an important artery for FOR-2. I was surprised that Mirabel Rd. and Front St. are not described as "Minor Collectors" of traffic (ref. page 14.16-4 – 14.16-5); or analyzed for significant impacts (unless I missed it). If development of FOR-2 occurs, Mirabel Rd. will be the road that those residents will "collect on". Front St. will be a "collector" for the other FOR parcels, in addition to FOR-2.

230.13

These two-lane roads, which have little to no shoulder are dangerous to walk or ride bicycles on now. There are no sidewalks, bike paths, traffic lights or other measures to slow traffic, or accommodate pedestrians or bicycles particularly on Mirabel Rd., and Front St. is not much better. Mirabel Rd. has a stop sign where it intersects River Rd., and a stop sign where it intersects Front St./Hwy 116. The current conditions would not provide safe passage to the downtown area, to the Youth Park, Speers (our small local grocery store), or the river. In addition to the gravel truck traffic, vehicles have to back onto Front St. when they are leaving some of the businesses located there.

230.14

Forestville's high school—El Molino—is no longer an option for the general high school public. As a result high school students are required to bus, or be driven to Sebastopol (or elsewhere) for school, and associated events. This adds to traffic concerns and congestion, and added ghg. With the added population, the situation will be exacerbated.

Referencing page 4.1-18: "On Mirabel Road, a school is directly across the street from FOR-2." This is not accurate. The Forestville Youth Park is located across the street from FOR-2. School locations are: El Molino, located on Covey Rd., and The Forestville Elementary School and Academy located at 6321 Hwy 116.

230.15

The Draft PEIR indicates that transportation would result in significant and unavoidable impacts (ref. 4.16 and page 5-3). Nevertheless, it seems that Mirabel Rd. and Front St., given their current use and that proposed, would be important roads to discuss, analyze for significant adverse impacts, and mitigation measures; and disclosed for the purpose of thoughtful decision making.

230.16

Referencing pages 2-25 and 4.16.14. According to Table 2-4 the population buildout will be highest in FOR-2 compared to other parcels listed. Table 4.8-6 #4 indicates the project is consistent with reducing travel demand through focused growth. Although this may be true for some of the housing sites, it doesn't appear to be true for FOR-2, in that travel demand to work, grocery stores, high school, etc. will be greater than if located closer to the amenities needed for a large number of people. As noted above, Forestville has very few amenities and working opportunities.

As indicated in the Draft PEIR, the FOR-2 parcel does not have sewer hook-ups. The homes that surround the parcel are on septic, as there is no sewer system available. Additionally, water availability is scarce. With the drought, and the prediction by some, that this will continue into the future, I question whether there will be water available to accommodate another 783 people (1652 for all of Forestville) even with the mitigation proposed in the Draft PEIR. How and where will additional water be obtained? Where will the sewage be transported? Will additional sewage ponds be required?

230.17

Referencing page 2-4, "...the County narrowed its list to 59 Potential Sites based on meeting these four basic requirements: ... 2. Site must be located within an established Urban Service Area where public sewer and water service is available". As indicated in the DEIR: sewer is not available in FOR-2; and water availability and wastewater treatment are unknowns, and would require further study. It appears FOR-2 should have been eliminated from consideration in the DEIR, as were other sites. Why was it not?

230.18

Has FOR-2 been analyzed relative to hydrology, comparing the recharge that it currently provides (an area where water can absorb into the soil, and not have to be transported) to the area covered with houses, cement and asphalt? During large rain storms there is minor flooding along Mirabel Rd. as it descends towards the river, and flooding at the junction of Nolan and Mirabel and to a lesser extent at Giusti and Mirabel, particularly when drainage structures have not been cleaned. It appears a housing development has the potential to exacerbate the situation. Where will the drainage from the housing development be directed? Will it further impact potential for flooding?

230.19

Regarding wildlife, FOR-2 provides habitat for a number of species: deer, coyotes, bobcats, foxes, racoons, opossums, snakes, lizards, skinks, rats, mice, gophers, moles, and native bees, just to mention the obvious. It also provides roosting opportunities and hunting ground for owls, a variety of hawks—red shoulder hawks teach their young how to hunt in the orchard, sometimes a merlin in the winter, great blue herons, egrets, and a huge variety of other birds. Granted none of these species are "threatened" or "endangered", however, putting housing in, at the density proposed, will reduce habitat for these species.

230.20

Impacts from wildfire are a major concern relative to the housing development being considered for FOR-2. Forestville is located in and/or adjacent to a wildland urban interface (WUI). With our changing climate and increased droughts, the danger of wildfires increases. This community has been evacuated twice in the last few years because of threat of fire. Substantially increasing the population will add to the difficulty of evacuation, particularly considering the 2-lane exit roads; and also increase the concern for a catastrophic outcome for those people who are unable to get out in time.

Referencing 4.19—Wildfire—page 4.19-1, includes a projection that extreme wildfire events are expected to increase in frequency by 20 percent by 2050 and 50 percent by the end of the century. The county recognizes that, "although high-density structure-to-structure loss can occur, structures in areas with low-tointermediate-density housing were most likely to burn, potentially due to intermingling with wildland vegetation or difficulty of firefighter access." On page 4.19-2 (Table 4.19-1), FOR-2 is described as having 2-9% slopes on site with 0-75% slopes nearby. On page 4.19-4, vegetation is said to be less than Guerneville sites but more than Larkfield's. On page 4.19-5, FOR-2 is shown to have a Very High FHSZ in less than one mile. Page 4.19-26 includes: "Development facilitated by the project would increase the potential buildout of the Rezoning Sites, concentrating this population growth in designated urban service areas of the Unincorporated County, where the risk of wildfire is generally less than in more rural areas where fuels are more abundant. 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 (sic) having less abundant typical wildfire fuels. Page 4.19.26 goes on to state, "Access to Potential Sites FOR-2, FOR 4...currently does not meet County road standards of 20 feet in width or greater. Prior 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-ofway; however, widening County roads would not exacerbate fire risk." Why is it "could be required"? It seems the document should say "must be required".

As it pertains to the statements made in the Draft PEIR, some of which I referenced above, it appears that in and near WUI's housing density is "inherently" less. Putting high density housing in or near WUI's, where drought and wildfires will only increase over time does not appear to be a good idea. It sets up a situation of potential disaster. I'm remembering the Tubbs fire. Fountain Grove was built in an area that actually had burned in the past. In 2017 the area burned again--this time with houses, and it appears the wind carried the added fuel from Fountain Grove across the freeway to Coffey Park. Although the orchard in FOR-2 may not be dense and contain a high fuel load now, even with the mitigations proposed to reduce fire in the proposed structures, the fuel overall will be increased, and increase a wildfire burning through. As stated on page 4.19-28, "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." Considering the location of FOR-2, compared to many of the other proposed sites, it appears that there is an even greater significant risk relative to wildfire, and locating housing here only increases the risk for the community as a whole.

I wonder if there are studies that have been done which evaluate the best location for housing relative to climate change, drought and the danger of wildfires. It seems that these should be studied, and decisions made for the benefit of Sonoma county and the individuals and communities located in the county. I appreciate and agree with keeping open space between communities, however, when it comes to housing people in areas which would result in significant cumulative impacts as opposed to an area where impacts are minimal, I think it important to reconsider some areas currently "off-limits" to housing (e.g. areas near amenities, and areas where no significant adverse impacts would result).

Referencing page 4.8-22, it appears that the Cumulative Impacts focuses on GHG emissions generated by development of the project. I was unable to find (I could have missed) what impacts are projected once the housing development is in place and the people who occupy the 283 dwellings (FOR-2), or 635 dwellings (Forestville as a whole), are traveling on a daily basis.

Referencing page 5.2.1, "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, cultural resources, greenhouse gas emissions, hazards, transportation, utilities, and wildfire impacts. Although

230.22

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230.25

development facilitated by the project would be required to implement mitigation measures, impacts would remain significant and unavoidable due to this irreversible loss."

It is unclear how it is a greater good to continue on with a Draft PEIR that will result in significant adverse impacts for the people, the community and the county, as opposed to exploring areas of the county that will result in lesser impacts than the current proposal, with the consideration to rezoning those areas. Another indication that this document must address "Alternative Locations" as described under CEQA 15126.6

230.26 cont.

Given this is a Draft PEIR, the Impact Analysis speaks to the impacts of the housing sites in more general terms, and does not show the impacts relative to each parcel proposed for housing. There is a wide variety of parcels being considered in a variety of locations. Presumably, before some of the parcels are developed an additional EIR will be required. However, it is unclear how a zoning change can be decided when enough facts are still unavailable to determine whether the proposal is even feasible. How can you propose to change the zoning and allow up to 283 housing units on FOR-2, when there are still many environmental and feasibility unknowns?

230.27

As presented in the Draft PEIR and the Impact Analysis for Alternative #3, it clearly appears Alternative #3 is the superior environmental alternative, specifically as it relates to FOR-2, and is in the best interests of the community and Sonoma County. However, above and beyond this, other locations should be evaluated in the PEIR pursuant to the CEQA Guidelines Section 15126.6.

230.28

Thank you for considering my comments.

Sincerely,

Leslie Markham 6975 Nolan Rd. Forestville, CA From: Lindsay Sullivan <sullivan83@gmail.com>

Sent: Monday, February 13, 2023 4:16 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >; Lynda Hopkins

<Lynda.Hopkins@sonoma-county.org>; district5 < district5@sonoma-county.org>

Subject: Sonoma County Housing Element - Concerns

### **EXTERNAL**

To whom it may concern,

I would like to express my concerns regarding the Sunset Avenue, Guerneville site selection for the Sonoma County Housing Element.

While I am a supporter of affordable housing, the selection of Sunset Ave as a site for 78 units is shocking because the neighborhood is already dense. The road is a narrow, one lane thoroughfare that is already tight to navigate through. It would be impossible to accommodate more parking and traffic. Sweetwater Springs has already requested this site be excluded from the selection process because the land may be needed for future water storage expansion. Increasing the neighborhood density will introduce fire safety and evacuation risks as well.

231.1

Beyond the Sunset Ave site, it seems inappropriate to include the unincorporated towns in the county's housing element project. These towns do not have the infrastructure to support such a large housing expansion, nor a large enough job pool for long term employment.

231.2

Thank you for your consideration.

\_\_

Thanks, Lindsay From: Lisa Nahmanson < lnahmie@gmail.com> Sent: Monday, February 13, 2023 5:00 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Cc: Lisa Nahmanson < Inahmie@gmail.com>

Subject: Forestville Housing Element: Comments to DEIR

# **EXTERNAL**

February 13, 2023

#### **Dear Commissioners:**

I am writing to you today as a resident of Forestville, in unincorporated Sonoma County. I have lived in Forestville since February of 2011.

I am also a Forestville representative on the Lower Russian River MAC and on the Land Use Committee, so I have spent some time studying the DEIR and listening to Forestville residents during meetings and on social media (Facebook and Next Door).

Again, writing as a resident of Forestville, **the sheer number of housing units** proposed in the Housing Element plan for Forestville is absurd.

The Commission needs to eliminate many of the sites that have been chosen and dial back the impact of the Housing Element on the small town of Forestville.

My wife Sandra Steele and I have experienced fires first hand and also the impacts of floods on our town and surrounds. We have experienced first hand the dangers of dense housing in the wildland-urban interface (WUI) during evacuation periods.

We live on a one lane road portion of Giusti Road. We would be most closely impacted by the proposal of **6898 Nolan Road**. How would this parcel be developed, as it is internal, in the backyards of established homes and in an apple orchard. Would it be developed as a mini development with one ingress/egress off of the already impacted Mirabel Road? Would ingress/egress be from Nolan Road between 2 established homes? Would sewer and water lines be attached to an already impacted system? Fire lanes to fit current codes? Power infrastructure? It seems to be an unreasoned and irrational mess. Not to mention lighting, noise, dust, the typical building site mess. And eliminating a beautiful apple orchard.

When the fire in 2020 broke out we were hiking in Point Reyes. We immediately drove back to Forestville, secured our house and left again fortunate to have a safe situation with friends in Petaluma. And well before mandated evacuations. How would our one lane road be impacted by a fire evacuation adding multiple homes and residents trying to evacuate? How would our small town lacking infrastructure be impacted? How would the Lower Russian River be impacted? It is a frightening situation to ponder.

Our community lacks effective **broadband and mobile phone connections**. This type of infrastructure is also critical during fires and floods (not to mention during the day to day).

232.1

Letter 232

232.2

232.3

232.4

232.5

Furthermore, we lack **sidewalks**, **bike lanes and standard width roads** (such as our portion of Giusti Road, which is maintained by individual residents). We aren't set up like cities are to accommodate large scale growth. We don't even have enough **parking** spaces to handle tourists in the summer and we don't have enough **trash and recycling and compost infrastructure which becomes a public health issue**.

232.7

232.8

We need to have further conversations to determine how to proceed with affordable housing while considering infrastructure impacts to current residents.

232 a

Thank you for allowing us to comment. I look forward to your response.

Sincerely, Lisa Nahmanson (& Sandra Steele) Residents since 2011 7799 Giusti Road Forestville, CA 95436 From: lois <lois5@sonic.net> Letter 233

Sent: Monday, February 13, 2023 11:20 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Housing element DEIR

# **EXTERNAL**

I am sure you have heard enough about how inappropriate the Laughlin Road, Sunset Ave. and Cutten Ave. sites are for high density housing

One lane roads, in come cases steep and winding, not walking distance to public transit and possibly school buses

Inadequate room for parking dozens of vehicles, changing the nature of rural neighborhoods, etc.

What I am suggesting is that we get together as communities to identify usable sites for high density housing, because it is obvious that we need it

Also, I believe at least some of this new housing should be affordable for low income people (not just middle income people like school teachers and nonprofit directors)

And some of it should be subsidized

I understand the county is between a rock and a hard place, and that is when you need to ask for help from our communities

Lois Pearlman

14290 Sunset Ave., Guerneville, CA, 9544707-494-9127

233.1

From: Lorna Catford <catford@sonoma.edu> Sent: Monday, February 13, 2023 4:05 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Rezoning for Housing in Forestville

Hi,

I understand people need to live somewhere. To address the concern about "destroying the cottage atmosphere" of our small town, I think building more homes in the new area south of Hwy 116, East of the walking trail makes the most sense, because people bought into that area knowing that's what it's like.

234.1

Second, If you build on the lot behind the elementary school up Paul Paddock's driveway, would traffic enter from Van Keppel (road width concerns), or off of 116 somehow? How would the increased traffic affect kids going to school?

234.2

If you build on the large area off Covey — can you sort of hide the buildings so they aren't visible from the road? What would the increased traffic do regarding safety of kids walking to and from school?

234 3

Thanks,



From: Madeline Solomon <madelinesolomon60@gmail.com>

Sent: Monday, February 13, 2023 3:31 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Draft EIR comments: Housing Element Update

### **EXTERNAL**

Dear Mr. Gage,

My name is Madeline Solomon. I reside at 6794 Clara Lane, Forestville CA 95436, a home on a 1 acre property that I purchased in 1990.

I apologize for getting upset on the phone with you last week. I did not think this Draft EIR process could be legal, in accordance with all applicable code and law, and in good faith due to the inadequacies of the report itself and the public review and comment period, in regards to Forestville 95436.

(1) I first received notice of the Draft EIR's existence, contents related to Forestville 95436, and Feb 13, 2023 closing date for public comment when I went for a walk by our downtown park last Thursday evening Feb 9, 2023. I saw a photocopied and highlighted sign, obviously a non-governmental announcement, posted on the bulletin board. One of our Forestville residents/neighbors then hand delivered the flyer to my front gate, and to the other houses in the Van Keppel-Hughes neighborhood.

When we spoke on the phone on Friday, you said that some people were that the notices had been sent to them late. No notices were ever sent to either me or my neighbors here. An internet search revealed that the six Forestville properties listed in the DRAFT EIR have appeared in previous Sonoma Permit documents since at least 2018, but this was the first that my neighbors and I heard of it last week.

drove to the Healdsburg library on Saturday to read the DRAFT EIR in their library, because no copy of the document was placed in the Sebastopol or Forestville libraries. Please remedy this immediately, so that copies of all Permit Sonoma documents that have public comment periods and are relevant to Forestville 95436 are placed in both the Forestville and Sebastopol libraries. Please see that if notices of public comment periods for relevant documents are sent out, then they are sent out to us in Forestville 95436.

I believe this is the minimum standard for a public comment period under CEQA and NEPA, and that Sonoma Permit failed to meet this requirement in regards to the Draft EIR Housing Element Update this year 2023 in Forestville 95436 and perhaps in other areas as well.

Therefore I believe that submitting the Draft EIR and verifying that the requirements for public notice and comment have been met, would constitute fraud.

Moving forward, I suggest notifying the state of CA of your failure to meet the minimum standard for submission of the Draft EIR, with regards to Forestville 95436, and see what you can work out. I do not recommend lying or committing fraud.

(2) Two of the addresses listed as potential sites in Forestville are not suitable for apartment/medium density housing, and should be removed from the list.

235.1

235.2

\* Electro Vector 6555 Covey Rd is a contaminated site from past industrial activity. There is a report on the severity of the contamination in both dust and groundwater in the Dec 13, 2018 notes of the Forestville School District board meeting. By that time the contamination has spread from the Electro Vector site to the neighboring school as seen in groundwater monitoring wells. I received written notice of the groundwater contamination many years ago, perhaps 2008? The Electro Vector site cannot possibly be considered for housing.

235.3 Cont.

The fact that the Environmenta firm that Sonoma Permit hired for the Draft EIR did not find this contamination would require significant, costly and potentially dangerous mitigation before building housing shows that Sonoma Permit did not review the Draft EIR sifficiently before release, at least those parts of the report that relate to Forestville 95436.

\* 6090 Van Keppel is not an address, in that it is not associated with a parcel identified with a parcel number in the Sonoma County Assessor parcel number database. My neighbors and I have been puzzled by the location of the property described by the 6090 Van Keppel address. I'll spare you the details of the different theories, but I think I've got it right! The parcel shown as FOR-4 on the map is the same as appeared in a Sonoma County document from 2018, where the parcel number was given as 083-073-010. In the Assesor's database, that parcel number is associated with a property address on Highway 116, near Forestville School.

235.4

The use of the 6090 Van Keppel address for this parcel suggests that the proposed 65 residences could be accessed from Van Keppel Rd. This would not be possible without millions of dollars of engineering work. It would never be safe unless Van Keppel Rd were substantively reconfigured and rebuilt around the intersection with Hughes Rd.

Also, the property that Permit Sonoma (but not Sonoma County Assesor) recognize as 6090 Van Keppel (based on parcel number look-up) is adjacent to and slightly upslope from the contaminated Forestville School, and very close to and slightly downslope (in my estimation) from the contaminated Electro-Vector site (FOR-1).

235.5

(3) The good news is that Forestville 95436 is a generally open hearted and good spirited community. We are concerned about the housing crisis too, and have some good ideas for increasing the stock of safe and affordable housing in Forestville 95436 in order to do our part in helping Sonoma County to fulfill the state mandate.

We hope that you and/or your representatives will come to town and invite us to Town Hall meetings and focus groups so that we can work together to make actionable plans to fulfill the CA state housing mandate.

235.6

Such plans and proposals must be based on sound and accurate information, should align with the principles outlined in the Sonoma County General Plan 2020, and should of course include an appropriate public notice and public comment period once Draft documents have been prepared.

I look forward to working with you and Permit Sonoma in the future to create a workable plan for developing more housing in Forestville 95436.

Thank you,

Madeline Solomon MA, MSc 6794 Clara Lane Forestville, CA 95436 From: Marci Mascorro <marcimascorro@gmail.com>

Sent: Monday, February 13, 2023 12:03 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

**Subject:** Proposed Rezoning: Armstrong Valley

# **EXTERNAL**

I am writing to protest the proposed rezoning and high density developments in Armstrong Valley.

236.1

Letter 236

In addition to the obvious problems that this type of increase in density entails, namely an infrastructure that is insufficient to support an increase of over 600 households. The existing sewer system is already challenged by the county's own evaluation; California water does not store, nor is able to provide via its existing infrastructure sufficient water for additional household in the density proposed.

236.2

The state of California, years ago, and importantly, prior to 2017, enacted legislation that requires local governments to force feed its communities additional housing or be held hostage for funding (sounds a little bit like a previous presidential administration MO). This mandated housing clearly does not take into consideration the changes we have seen and the public emergencies we have experienced due to climate change. Especially fire. Especially in Armstrong Valley with a single road out. There is no wisdom or value in adding over 600 housing units to Armstrong Valley. It's a preposterous proposal. Especially considering that that type of increase in density and the problems that come with it in terms of the aforementioned infrastructure challenges, fire, or flood evacuation routes, put the existing valley residences and the existing ecosystem at peril.

236.3

Armstrong Valley is also situated in an urban interface wildfire zone. How can "affordable housing" even be built with the high cost of all of the requirements brought on by this new code.

Unfortunately, the developers seem to hold the higher cards and their input in forcing this legislation is obvious. The developers have by fa the most to gain, and they would benefit at the detriment of the existing community. I have heard the term "manufactured housing crisis". California housing is expensive in the majority of the state. There are also areas that are inexpensive and under populated. Further, Sonoma County in the past five years has experienced, according to the Press Democrat, a net loss of approximately 25,000 residence. The state of California has also experienced a net loss of residents. Yet, the cities of Windsor and Santa Rosa and Petaluma have added high density housing in core service and transportation zones, which is in accordance with their own zoning plans. No one even seems to know how many units have been added in the past five years.

236.4

I am neither for nor against additional housing in general. But I am certainly against the lack of transparency and basis in facts that have dominated the rezoning proposal and I am against the unreasonable and frankly unsustainable densities proposed for Armstrong Valley.

I have much more to say, I'm going to save that for Mike McGuire and Linda Hopkins. But please, put my name down as an opponent of the rezoning as proposed.

Thank you,

Marci Mascorro, a Laughlin Road resident Marcimascorro@gmail.com

--

Marci

From: Marilyn Cannon < cannon@sonoma.edu > Letter 237

Date: Monday, February 13, 2023

Subject: Draft EIR Comments: Housing Element Update

To: Permitsonoma-housing@sonoma.org

### To Eric Gage:

I am sending my response to the draft EIR:Housing Element Update to request the removal of FOR-2 from the rezoning plan found in Alternative 3 - removal of FOR-2 due to "greater than average environmental constraints compared to the other Rezoning Sites." The need for water and sewer improvements are very significant. The density of housing suggested for this parcel are inconsistent with this neighborhood, and would substantially increase air pollution and traffic in this area, to name two serious impacts.

237.1

Wildfires are another very significant concern since FOR-2 is located only about 99 feet from a moderately high fire zone. I live on Nolan Road, which is in very close proximity to two of the boundaries of FOR-2. During 2018 and 2020, we and our neighbors on Nolan Road and Giusti Road and other smaller streets were under mandatory evacuation orders from the Sonoma County Sheriff. It was not easy at all for all the people to get out of town. This would be a huge nightmare if hundreds or thousand more potential residents had to evacuate from this area! The traffic leaving our town of Forestville on those nights was terrible and took hours to get to safety. People trying to evacuate from Highway 116 through Pocket Canyon would also be unimaginably impacted in escaping wildfires.

237.2

Forestville is far from any significant grocery shopping and from hospitals and is not therefore suitable for adding multi-family households and many hundreds more residents. There would be increased traffic in and out of Forestville. As it is, there are many large gravel trucks traversing Mirabel Road and Front Street (Highway 116) through Forestville, and adding many extra vehicles which are indirectly proposed by this rezoning would be very dangerous and cause even more congestion on these two-lane roads.

237.3

Another negative issue associated with the rezoning of FOR-2 are the availability of schools and increased school traffic to other towns. El Molino High School has been closed permanently and now all the high school students from Forestville and all the way out to the coast along Highway 116, who used to attend El Molino High School must be transported to Analy High School in Sebastopol. Students walking to the elementary school, Forestville. School, would be endangered due to so much increased traffic along Mirabel Road (which has only one tiny stretch of sidewalk). They would be walking next to traffic with no buffer zone in between them and vehicles. Walking for anyone, whether for school or not, would also be significantly more dangerous, and would therefore negatively impact the quality of life of current residents of Forestville.

237.4

I believe the FOR-2 rezoning project, as addressed in the EIR, has greater than average environmental constraints. It would be very unwise to ignore these other important issues that I also raise.

Thank you for listening to my concerns.

Marilyn Cannon 6975 Nolan Road Forestville, California 95436

From: Mark Berry <mark@akinsberry.com> Sent: Monday, February 13, 2023 1:44 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Draft EIR Comments

# **EXTERNAL**

Hello,

Thank you for the opportunity to comment on the Draft EIR and proposed housing sites.

My comments are related to the proposed re-zoning sites located within Forestville, and more directly to site FOR 2.

I have great concerns about the proposed re-zoning of the identified parcels in the Forestville area. If all proposed parcels are re-zoned and built to proposed capacity, that would increase the total population of Forestville by 43% (based on 2020 population total). Such development would permanently alter the rural landscape and way of life for current residences – some of these families have lived here for multiple generations.

As a 20 year resident of Forestville, we own a property that is adjacent to the FOR 2 site.

This is a well established rural neighborhood with 50 year old single family homes that are built around the perimeter of the dry orchard parcel (FOR-2). Most homes are single story (there are a couple of 2 story homes), and all homes surrounding the proposed parcel are on septic systems.

I am especially opposed to re-zoning and building multiple housing units on the proposed parcel FOR-2.

The FOR-2 site is not compatible for the following reasons:

- There is no established infrastructure of water or sewer on this large sized parcel.
- Forestville water resources are already at maximum capacity and cannot support new multi-unit developments.
- This is a rural neighborhood without sidewalks. The proposed FOR-2 parcel borders Mirabel Road which has a 45 mph speed limit with heavy gravel truck traffic which is not safe for pedestrians & cyclists.
- Basic services are limited in this area and not within walking distance.
- There are many established natural trees on this parcel that would have to be removed for development.
- A multi-unit housing development of proposed scale on this site would be an eyesore, and forever change the pastoral setting that has been a part of this rural community for decades.

I agree that California in general is in need of more affordable / medium to low income housing, but should be done in a thoughtful and responsible way. Such developments in Sonoma county would be more successful and appropriate in developed communities with built-in infrastructures such as Santa Rosa, Rohnert Park, Windsor and Cotati.

Thank you for your consideration of my comments. Sincerely,

238.1

Mark Berry
mark@akinsberry.com
7410 Poplar Drive
Forestville CA 95436

From: Mark Molofsky <markmolofsky@icloud.com> Letter 239

Sent: Monday, February 13, 2023 12:53 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Comments Regarding Rezoning of Parcels #054-290-057 and #054-290-084

#### **EXTERNAL**

## Attention Eric Gage:

Sir.

As a 45 year resident of Glen Ellen, retired builder, and concerned citizen for the future of our unique town and county, I implore you to remove the above referenced parcels from the rezoning consideration.

The scope, scale and proposed use and impact implications are far beyond what should be developed in downtown Glen Ellen. Despite possible legal loopholes that would allow such development, the proposal is at complete odds with the spirit of the village and the practicality of handling and integrating this use. Additionally, aesthetics and construction quality need be a major element in any future build on this site.

Again, please, please remove these parcels from the proposed rezoning. It is completely wrong.

Thank you, Mark Molofsky

From: mcbear35@comcast.net <mcbear35@comcast.net> Letter 240

Sent: Monday, February 13, 2023 3:20 PM

**To:** mcbear35@comcast.net; district5 < district5@sonoma-county.org>; PlanningAgency < PlanningAgency@sonoma-county.org>; PermitSonoma-Housing < PermitSonoma-Housing@sonoma-

county.org>

Subject: Questions and Comments on DEIR Unincorporated Sonoma County Housing Element

## **EXTERNAL**

Permit Sonoma,

Thank you for the opportunity to make comments and ask questions regarding the DEIR. I am a resident of Forestville, and concerned about elements in this proposal.

The following questions pertain to FOR-1, FOR-2, FOR-3, FOR-4, FOR-5 and FOR-6.

- 1) Public sidewalks. With a potential significant increase in population base in Forestville how will people walk on streets or cross streets safely? Each of these sites have limited, broken and often nonexistent sidewalks. The FOR-2 site is a larger concern as Mirabel has a posted 45 MPH speed limit. There are no/limited sidewalks, and no crosswalks to cross Mirabel. How will people in general and specifically those with physical disabilities, children going to school negotiate our streets?
- 2) Traffic. This town has two streets that run through to and through it. The increase in population will certainly increase the traffic in Forestville and our ability to move safely and effectively into and out of town. I am concerned that an accident on either of these roads (or both) would put put traffic at a standstill and would pose a huge concern during emergencies. Is there a plan that addresses how such a larger population might effectively evacuate this community? What are the impacts to the air by such a increase in traffic?
- 4) General infrastructure services: General services such as sewer, water and PG& E are already a concern in Forestville with out adding any additional population. What will be done to repair, and bring these services up to current standards while adding new population? This issue is somewhat addressed in your Powerpoint with a very disappointing result. Utilities and Service Systems: "the project would require the relocation or construction of new or expanded water and wastewater facilities" is identified as "Significant and Unavoidable" in your report. It goes on further to state: "The project would NOT have sufficient water supplies to serve the project development during normal, dry and multiple dry years" The question is how can we allow housing to be built for a greater population base that will potentially not have the ability to have water or sewer services? Why would a plan be approved where basic needs of its population (water, sewer) cannot be met and is considered a "Significant and Unavoidable" issue? What plan can be developed to insure that the population base can and will be provided basic services such as running water and healthy wastewater

240.1

240.2

facilities? This is a very basic requirement and expectation for housing. Without a feasible plan to address something as basic as water and sewer, in the plan, the obvious solution is not to add additional population to this area until that simple expectation can be met.

240.3 Cont.

4) Personal Services: There are no grocery stores in Forestville, and isn't that part of the expectations of such a large development? The population of Forestville now relies on grocery stores in Santa Rosa or Sebastopol, both of which are about 7+ miles from Forestville. When and where does this become part of this plan?

240.4

5) Emergencies: Our town has been evacuated a number of times due to Wildfires, so the threat of having this occur in the community again is real and can and should not be taken lightly. The ability for our town and its people to evacuate guickly and safely is horribly lacking in this plan and it needs to be addressed! This is a major concern of mine as well as others who live in wildfire risk areas. Even the language on your Powerpoint is alarming and appears to have no concern in the safety of the population as a whole. Per the Powerpoint, "This project would expose project occupants and structures to wildfire risks for sites located in or near SRAS or FHSZS as "Significant and Unavoidable". To me, this statement shows a complete indifference to health and welfare of our population and is unconscionable and irresponsible. Why is there a proposal where it blatantly states that there is real potential for loss of life in a wildfire area and why is this considered "Unavoidable" ? It is not "unavoidable" to intentionally place people in hazardous areas! There is an obvious and simple solution: Do not build a high density housing element in the area. The question really is why build in high fire danger areas in general and specifically where access to evacuate is so limited as it is in Forestville? I also have a very specific concerns with FOR--2 as I believe it is within 2 miles of an SRAS area. FOR-2 has a plan to house hundreds and hundreds of people. Why would like site even be permitted to build on?

240.5

I appreciate the opportunity to bring my concerns and questions to Permit Sonoma. I understand there is a legal requirement to add housing to the State and with that in mind, we should certainly need to participate in that requirement. However, why is the town of Forestville being impacted more significantly that any other town based on population? What's fair is fair, and it doesn't appear that this requirement is being handled in a fair and equitable manner. Are we in such a rush to approve a plan, and make the 'numbers' that we approve a plan that allows and acknowledges real safety and basic need issues? I believe that these are truly "Significant" issues, and I refuse to believe they are "Unavoidable".

240.6

I hope that we will not look at our current decision making in years to to come and say, "Why did they ever build that here? What were they thinking? They knew better and look at the consequences". The project is referred to as a Housing Element, but please don't forget that these are peoples "homes", not simply houses. Community is where people and families live with a feeling of fellowship with others. At minimum we should have the basics of building housing that is safe and has running water and a functioning sewer. The impact for the current and future residents and families of this and every

other "community" should have a well developed, healthy and safe place to call home. This current plan does not provide that, and it should.

240.6 Cont.

Thank you,

Mary Clare Cawley 6632 Jim Court Forestville, CA 95436 Mcbear35@comcast.net From: Megan Cohen <megan@megancohen.com>

Sent: Monday, February 13, 2023 4:42 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

**Subject:** Attn: Eric Gage. Draft EIR - housing. Site FOR-2 at 6898 Nolan Road is not a suitable option.

#### **EXTERNAL**

Dear Eric Gage,

As a resident of Forestville, I believe the site at 6898 Nolan Road is not a suitable option.

Our community needs more affordable housing for working class citizens like me.

I am a Forestville resident on SNAP/EBT benefits and in the income bracket that would likely qualify for affordable housing.

But I strongly feel that the scope of the proposed development is not a suitable match for the suggested site.

I am a close neighbor to this site, living just a few minutes walk from the property. Based on my daily lived experience of this area for several years, I believe the Nolan site is not a suitable option for this housing project.

After reading the Draft Environmental Impact Report, here are my concerns.

\* How will residents safely evacuate?

Due to the layout and condition of our roads (especially Mirabel Rd), evacuation from this neighborhood during natural disasters is already very difficult. How can it possibly be safe to have a massive population increase in this neighborhood, which is extremely vulnerable to flooding?

\* How will our utilities grid meet the needs?

We already experience outages (planned and unplanned) due to an overtaxed power grid. I get notifications from PG&E and from my local officials asking me to change how and when I use water and power so that we can keep those key services going for current residents. In the proposal, I don't see an acceptable solution for strengthening our infrastructure to accommodate hundreds more folks under the same utilities grid that barely support us now.

\* How will transportation be safe?

We already have a challenging mix of residential and industrial traffic here, with no walkability and very little public transit for those who are not drivers. In the proposal, I don't believe there is adequate consideration given to the impact of adding hundreds more people and their cars to the already packed thoroughfare of Mirabel with its degraded road surface, and to the narrow residential roads of Nolan and Giusti with their limited capacity.

241.1

Letter 241

241.2

241.3

Thank you for the opportunity to add my local perspective to this process. My main concern is the safety of residents.

As we face natural disasters and daily life in this neighborhood I feel that a development of this size on this site would be dangerous not only for the new residents coming in, but for my own family.

241.4 (cont.)

I encourage the planning commission to reconsider the unsuitable site on Nolan Rd and to partner with local voices in seeking a new, more suitable site to meet our affordable housing goals.

Sincerely,

Megan Cohen 7446 Poplar Dr Forestville, CA 96436 megan@megancohen.com 2/13/23 Letter 242

Dear Sonoma County Planning Commission,

As local residents who live outside of downtown Forestville, who have a young child in public school there, and who frequent many of the local businesses in town, we oppose the County's Housing Element Update as it applies to Forestville. Rezoning the 7 potential sites in Forestville for by-right medium to high density housing at 20-22 units/acre for development over the next 8 years is not a sustainable solution to the county's housing challenges, and will likely create substantive problems for the town rather than improving it.

#### **Forestville Sites Summary**

FOR-1 6555 Covey Road 083-073-017 Forestville 2-5 Yes

FOR-2 6898 Nolan Road 083-120-062 Forestville 2-5 Yes

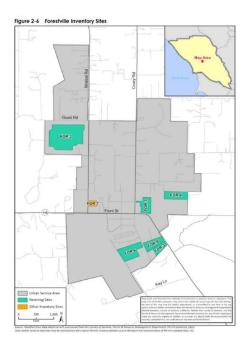
FOR-3 6220 Highway 116 N 084-020-004 Forestville 2-5 Yes

FOR-4 6090 Van Keppel Road 083-073-010 Forestville 2-5 Yes

FOR-5 6475 Packing House Road 084-020-003 Forestville 2-5 Yes

FOR-6 6250 Forestville Street 084-020-011 Forestville 2-5 Yes

FOR-7 Mirabel Road and Highway 116 083-090-085 Forestville F2-5 No



## Forestville Likely Lacks Adequate Services for Such a Rapid Increase in Population

One of the most important issues with the proposal from our perspective is that Forestville is not an urban or suburban area that can readily provide the myriad of community services that would be needed to support the extent of the proposed new housing units. While most sites

242.1

could provide public water and sewer to the new housing units<sup>1</sup>, the area surrounding the proposed sites is a relatively small community with limited public transportation, roads that have already been looked at for improvement given the current traffic patterns, limited opportunity for rapid job growth in or near town, as well as local services such as grocery stores, restaurants, and pharmacies that would potentially prove insufficient to provide for the needs of such a large increase in population should these new housing units be built. The existing public transportation system should be carefully studied to determine its adequacy to reliably allow people to reach jobs in neighboring communities such as Santa Rosa or Sebastopol in a reasonable and reliable way<sup>2</sup>. The impact of significantly increased car traffic in, around, and through downtown is of concern given that, for instance, there are currently no traffic lights of any kind in the town. Particular care should be taken to study the impact of increased traffic on the condition of modestly-sized roads including some with inadequate drainage and well known areas of concern from recent flooding. In addition, as noted the local services in or near town include only one small grocery store, a handful of local restaurants, a small coffee shop, a small bakery, a modestly sized pharmacy, and one children's park. The adequacy of these and other services should be studied for their ability or inability to adequately support the needs of an additional 1,652 people in 635 units.

242.2 cont.

# The Proposed Development Would Negatively Impact the Community, Including in Ways Covered by The EIS

As a result of Forestville likely having insufficient services at present to support these newly proposed high density housing developments and the fact that the current EIS provides no clearly articulated requirements nor exact vision and support for other potentially required improvements to the town that may need to be developed alongside this housing, the proposal for the 7 Forestville sites will result in greater environmental impacts than shown here in this Draft EIS because the development would cause:

- Increased traffic, vehicle miles, and associated pollution (Impact AQ-1, Impact ENR-1, Impact GHG-1, and Impact TRA-1)
- More land disruption via parking that would need to be developed, as well as that required to address drainage and other potential water management and flooding mitigation efforts (AES-4 and Impacts BIO-1 –BIO 14)
- More land disruption because more general services would likely have to be developed (Impact PS-3 schools and PS-4 parks), etc.
- The development would also not result in the goal of connecting new low-income people with affordable housing that supports their employment and access to support and other services nearby.

242.3

headed

<sup>&</sup>lt;sup>1</sup> The FOR 1,2,4, and 6 sites still have to confirm suitable water service or waste water service per pg ES-43.

<sup>&</sup>lt;sup>2</sup> The current Route 20 bus runs every hour to two hours to Santa Rosa via Sebastopol, so Sebatopol is reachable in ~25 min with those limits but the 20 min drive to Santa Rosa would become 1 hour+ depending on where one is

#### **Conclusion and Recommendations**

Thus, without greater study including the adequacy of existing services and physical infrastructure such as roads and overall drainage and flood management requirements and the associated environmental impacts with any improvements or expansions that may be required, we request that the County update Alternative 3 to remove the 7 Forestville sites from the proposed Housing Element Update and associated draft EIS. We would like to see the County instead support further investment in improving the existing services and access to housing in a  $|^{242.4}$ more integrated and holistic manner, to support further investment in more organic increases in economic activity, and the addition of new housing units in conjunction with those areas of growth which will enable Forestville to expand and welcome new residents and families and in a more sustainable way that provides opportunity and support to all its residents.

Thank you for your time and engagement on this important topic, and we look forward to hearing your thoughts on our feedback. We appreciate all of the important service and work you do for our community.

Best,

Melissa Kemp

50 Marigold Ln Forestville, CA 95436 607-351-7905

2/13/23, 4:24 PM

## aft EIR -Housing 2023

e, (Michael and Sherry Kane; 6492 First Street, Forestville) have lived for 38 years in e downtown area of Forestville. We have raised two children here. We recognize the ed for additional housing for the lower-income residents of our county. We hope this earing can come up with compromises that would be good for all.

243.1

recent article in The Press Democrat (2/13/23)pointed out statistics that show the bunty is not growing at an x5 rate but rather with many people leaving the area and a spulation that's aging out we should plan accordingly.

ere are some of my questions and suggestions...

#### TRANSPORTATION

- With one road in and one out (for occasions when we have fires and floods), the roads are inadequate to handle the current population.
- What will be the solution to this problem
- For the proposed sites in the downtown area, there are not enough sidewalks, crosswalks, and streetlights.

243.2

- This housing is being designed for low-income families. The increase in nonelectric vehicles will impact air quality. And we have one gas station in town. A study needs to be done to determine if that is adequate.
- The County Bus System had been an integral part of the workforce means for getting to and from work. Sadly, the schedules do not address those needs. I'd like this rectified for use not only for workers but for the senior population.

SEWER WATER GARBAGE

Grammarly 2/13/23, 4:24 §

The Forestville wastewater processing plant is adequate for the current population.
 With the addition of new housing, this facility will have to be re-engineered to handle the additional people.

243.3 Cont.

#### 3. COMMUNITY SERVICES

With the introduction of more people the need for Police and medical first responders goes up as well. Currently, there is one Fire/EMT unit in Forestville. And our police are th County Sheriffs. Low-income housing will increase the need for increased services. A bus system with a better schedule is just one way for people to be able to get doctors' appointments.

From: Michael Nicholls <mcnicholls@me.com> Letter 244

**Sent:** Monday, February 13, 2023 12:53 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Housing Element DEIR Comments

## **EXTERNAL**

I am submitting my Objection of Rezoning properties listed in Sonoma County Draft Environmental Impact Report (DEIR) specifically, GUE -1 -14156 Sunset Ave., GUE-2 -16450 Laughlin Road, GUE-3, 16500 Cutten Court, and GUE-4 -16050 Laughlin road, all in Guerneville.

244.1

• None of the above properties are near public transportation corridors and all parcels lack vital infrastructure to support the addition of densely populated housing.

244.2

 Affordable workforce housing indeed is required along the Lower Russian River, however a proposed population increase of over 600 in Guerneville doesn't support that level of workforce in the local community, which leads to increased GHG and commutes to the 101 corridor and elsewhere for employment.

244.3

Unfortunately I'm not all that familiar with the Forestville parcels listed in the Housing Element DEIR, therefore do not feel qualified to comment on that community's needs.

244.4

It is my understanding the only city that was amiable to additional workforce housing was Cloverdale. Where was the buy-in from Healdsburg, Cotati, Rohnert Park, Windsor, and Petaluma; key county employment hubs, in identifying additional potential sites for workforce housing? Santa Rosa, the major employment hub of the county identified only 10 sites in Moorland and South Santa Rosa adjacent to Santa Rosa Av, which are not near major employment districts within the city.

I am baffled county owned property at the County Governmental Center in Santa Rosa is not considered in the Housing Element for more densely populated high-rise workforce housing for County, Kaiser and

other local employers. Was consideration given to converting underutilized parking structures near/within the Santa Rosa downtown area to multi-story parking, housing structures?

244.5 Cont.

• Is there a valid reason the airport corridor (Brickway Blvd., Copperhill Pkwy., Skyline Blvd.) wasn't designated for workforce housing rezoning? Many industries are located within that community, it is close to transportation corridors, has the important infrastructure necessary to support housing and is an ideal setting for growth and workforce, whether it be low rise, condominiums, rental units or live/work lofts.

244.6

Thank you for the opportunity to comment on the Housing Element DEIR

Sincerely,

Michael Nicholls Cazadero CA Mr. Eric Gage Permit Sonoma, Project Manager 2550 Ventura Ave. Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3-16500 Cutten Ct, and GUE 4-16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

245.1

There are many specific adverse effects noted in the DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

245.2

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

245.3

The GUE 2.3, and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDCD, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan, for clear safety reasons.

245.4

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

245.5

The rezoning of GUE 2,3 and 4 are inconsistent with the goals of the county General Plan, Bay Area 2050, and Housing Element Policy.

245.6

We, as individuals, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Rd, GUE3- 16500 Cutten Ct, and GUE 4-16050 Laughlin Rd, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

245.7

Mike Gray and Susan Ryan 16215 Laughlin Road Guerneville, California 95446

the statement of the ta sila escrib un della vi strudte ma tatus", ar sipi munt on que sonta espanita at painigame un apara e, pagnou met leucilippe bus seperado autronosqui equito, ruigo ot policoson od tha teligat keo legas puo apacis, au Anomals on revenue from tourism. Old growth

Cities (in yes the Breakmolty, Building in Food and high the zonce is contrary to the County General Plan, for clear it the most severa caregray. They are either in did it also of completely scatterinder by the freed zone. On an annext annual basis, residents have been on ever ration status for long periods of time requiring relocation due to product they are all noned as arbysed to figure to applicative injustication outsided by a solution cological SPGDA with END CONTROL THE CONTROL NO HEATH HERE TRANSPORTED ON THE PROPERTY OF THE PROPE

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From: Mitchell Genser <mitchgenser@gmail.com>

Sent: Monday, February 13, 2023 6:22 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

**Cc:** Leo Chyi <Leo.Chyi@sonoma-county.org>; Susan Gorin <Susan.Gorin@sonoma-county.org>; Pat Gilardi <Pat.Gilardi@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; Andrea

Krout <Andrea.Krout@sonoma-county.org>; district4 <district4@sonoma-county.org>; Jenny Chamberlain <jchamber@sonoma-county.org>; district5 <district5@sonoma-county.org>

Subject: Housing Element Update - Forestville

## **EXTERNAL**

Mr. Gage, and Council Members,

My wife and I have lived in Forestville for over 30 years. We raised 2 children, ages 30 and 25 on Hughes Road, a wonderful, vibrant dead end street a few minutes from downtown. I am, besides being an attorney, also a real estate developer and have worked on historic low income housing projects for many years. I am all about creating more affordable housing, yet doing so in a sane and progressive manner that honors the pre-existing community and permits the timing and pace of building and integration of new residents and families to not be majorly disruptive and divisive.

246.1

This proposal to 'streamline' the rezoning and permit process to allow construction of up to 635 new dwellings that has 1,652 people as a proposed total population to a town presently with 3,880 people is, to put it bluntly, insane, and invariably would change the entire texture of this unique community. Just because SB-6 (Middle Class Housing Act of 2022) and AB-2011 (Affordable Housing and High Road Jobs Act of 2022) allow for streamlining the re-development process and affordable housing in current commercial and industrial zoning designated properties dos NOT mean that doing so in Forestville in such a manner that would increase the population by literally 50% makes any sense whatsoever.

l246.2

Any one of the 'smaller' FOR Site proposals in the range of proposed total population of 185, would, in and of itself, increase the population of Forestville by 5%. A big move, but something that I suspect we could comfortably absorb. The Nolan Road FOR-2 site which would go from a density of 7 to 283 and result in a population increase of 736 would be a disastrous move, having anticipated and unintended repercussions for Covey Road and the entirely of Forestville.

PLEASE slow down and be do 'smart planning. Select one, tops two of the FOR sites with no more than a 250 person proposed total population increase and work with that. The proposed actions are just too drastic and if implemented, would represent the transformation of this west county community into something no longer recognizable nor desirable to live in for many many present and future residents of Forestville.

246.3

Thanks for your consideration.

Mitchell S. Genser

Attorney and Real Estate Developer

707.480.0138 (cell)

Permit Sonoma Attn: Eric Gage Housing Element Update DEIR Feb 13, 2023 Comments on DEIR for Forestville re-zoning

1. FOR 4: Significant impact to Community Public Health (specifically fire safety). Significant impact to wetland and riparian habitats. Access to this property is via two lane Van Keppel Road and then a single lane dirt road easement over property 083-073-009. At the point that the single lane dirt road meets Van Keppel Road there is a year-round creek (which currently floods Van Keppel Road during heavy rains). Property 083-073-009 is bisected by this year-round creek and wetland habitats. The existing roadways, Van Keppel and the single lane dirt road already currently infringe on riparian corridor setbacks. Current condition of Van Keppel Road and the single lane dirt road cannot accommodate proper fire evacuation of the proposed 41- 71 units. Any major road work will need to mitigate the significant impact to the year-round creek and riparian corridor habitat. Significant impact to Public Heath if access to the property is via Travis Road. Travis Road is the main and only entry for the Forestville Elementary School. The increase of traffic by the proposed increase of 41- 71 units would be of significant safety concern to the school environment and child safety.

2. FOR 1: Significant public health concern. This property is currently listed by the state of California as contaminated with TRICHLOROETHYLENE (TCE). LISTED AS CASE NUMBER RB Case Number INSO901. HTTPS://ENVIRONMENTAL.NETRONLINE.COM

Any proposed housing on this site poses significant public health concern to any future residents.

The town of Forestville would be better served by a public parking lot at the location that would cap the contaminated site and provide safe parking for visitors to the downtown area. Additionally a large public parking lot could be used for any emergency services agencies to establish centralized emergency coordination centers during fire or flood events.

3. FOR1, FOR2, FOR3, FOR4, FOR5 FOR6: The county did not allow an expedited process to create a downtown open space park in Forestville on the main corridor of Hwy 116. It has taken 8 years and multiple publicly held local meetings to determine what would best serve the public good of Forestville. Why would intensive housing projects get a pass on meeting all CEQA requirements and full CEQA analysis plus no public hearing to get local input. There cannot be a double standard for accountability especially when the DEIR states that the proposed rezoning if these properties in Forestville could have significant impact on the community and natural environment with no possibility of mitigation.

Visual dominance: There is not a single multistory apartment building in the town of Forestville. Zoning that would create of multi-story apartment buildings would be a drastic and major alternation to the visual aspect of this small rural town and would conflict directly with the town of Forestville's location in a designated a scenic corridor. The existing DEIR states that every site listed for Forestville would be Dominate for site sensitivity rating. This is a significant impact that cannot be mitigated, and county cannot allow for expedited processing to bypass CEQA.

Public safety: There is currently an incomplete network of pedestrian sidewalks in the town of Forestville. The town simply cannot accommodate increased traffic of cars without installing a safe connective network of pedestrian safe corridors though out the entire town.

247.1

247.2

247.3

247.4

APPROPRIATE ALTERNATIVE IN REZONING: allow subdivisions with 1\4 acre lots with maximum two-story townhouse duplex units. No apartment buildings. This will still increase the number of people that can be housed in Forestville but will fit into the existing rural residential aesthetics of this small rural town.

247.5 Cont. From: Patricia Brunelle <honeypj@comcast.net> Sent: Monday, February 13, 2023 2:30 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** EIR Proposal for Forestville

## **EXTERNAL**

February 13, 2023

Dear Mr. Eric Gage:

The Workforce Housing Proposal which contains a provision adding 635 new housing units to the town of Forestville does not take into account several factors. Would you please address my concerns?

The following addresses are included in the plan for Forestville:

- 1. 6555 Covey Road
- 2. 6898 Nolan Road
- 3. 6220 Highway 116
- 4. 6090 Van Keppel Road
- 5. 6475 Packing House Road
- 6. 6250 Forestville Street
- 7. Mirabel Road and Highway 116

My concerns are related to all of these properties and addresses.

I have lived within 2 or 3 miles of these locations for the past 38 years and believe the addition of 635 housing units at these locations will severely negatively impact the quality of life for all residents, including those possibly living in the new housing.

1. All these roads are small and most do not have any sidewalks. To add hundreds of people driving, biking and walking them would create a safety hazard with the ensuing congestion. Do you have plans to build new roads to accommodate this increase? How are your plans consistent with the state's belief in city-centered growth? Why isn't housing being planned along transportation routes in the county, like in Santa Rosa? Or near the Smart Train? Living in Forestville requires having a car to get to work and school. How does this plan accommodate the parking and driving needs of the future and existing residents?

248.1

2. These living units will suddenly increase the town's population by at least 44%. How is this consistent with rational growth plans? How will the water and sewage needs be accommodated? How will the plans for public safety be assured when now we only have the sheriff which is leaving a gap in coverage in our unincorporated area as it is? Why aren't these housing units being phased in in the larger city areas of the county, like Santa Rosa? There are many vacant lots available due to the fires in 2017 and are located near transportation, have water and sewer systems and bigger roads already. Have those lots been seriously considered? Those lots are already near the 101 corridor where most of the jobs are.

248.3

3. Why isn't this workforce housing located near where people are working? Certainly the climate crisis necessitates this type of planning to eliminate the burning of fossil fuels for transportation. Why isn't the corridor of the Smart train being used as it was intended-to provide transportation to eliminate the use of cars. It's a 10 mile drive from Forestville just to get to the smart train. Have bus routes been examined to place housing near them so people could walk to catch a bus to work? Has the use of bicycles by the residents been examined and planned into the land use?

248.4

4. When you came up with these addresses to add housing units to, did you talk to the people who live here? Who did you talk to? Did they raise any of the concerns I have? Will you study where the people will be working and make the housing convenient to the locations?

248.5

I am requesting answers to my questions and appreciate your addressing them before any further actions are taken to add 635 housing units to Forestville. Will you do this?

248.6

Please enter my letter into the record.

Sincerely,

Patti Brunelle and Janet Zagoria

email: honeypj@comcast.net

mail: 6484 Mirabel Road P.O. Box 462, Forestville CA 95436

house: 8471 Champs De Elysees, Forestville CA

Patricia Brunelle honeypj@comcast.net 707-486-9187

From: berdalee <berdalee2003@yahoo.com> Letter 249

Sent: Monday, February 13, 2023 4:37 PM

**To:** PermitSonoma-Housing <PermitSonoma-Housing@sonoma-county.org>; PermitSonoma-Housing <PermitSonoma-Housing@sonoma-county.org>; Eric Gage <Eric.Gage@sonoma-county.org>; Eric Gage <Eric.Gage@sonoma-county.org>; Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>; Lynda Hopkins

<Lynda.Hopkins@sonoma-county.org>

Subject: Draft EIR Comments: Housing Element Update

#### **EXTERNAL**

I am a resident of Cutten Drive and want to voice my concern and strong opposition to the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

The response that the community and residents are hearing at meetings is not acceptable. We are being told that, for GUE 3 specifically, this property has been previously considered and because nothing happened then, then it's likely that nothing will happen now. I question why this property remains under consideration given all of the obvious issues surrounding it. I can think of at least 8 other viable sites in Guerneville that would be better fits for proposed affordable housing (near Safeway, Ferrell Gas site, large fields off of 116 are just a few examples). It is apparent that very little thought and time went into selecting the Guerneville properties. Perhaps in the future the planning committee can tap into the expertise of long-time residents of Guerenville to identify more viable sites.

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There are many specific adverse effects noted in the DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning. Here are a few of my concerns, specifically related to GUE 3.

\_\_\_\_\_

## Infrastructure

#### Roads

GUE 2 and GUE 3 are accessible via one-lane roads that will need utility upgrades. The needed upgrades and road closures will severely impact the emergency egress for residents. Cutten Drive is a one-lane road that climbs up a ridge and is already dangerous for residents to navigate. There is a large Redwood on Laughlin that cannot be passed by 2-lane traffic. That redwood would need to be removed to widen the road to allow for needed traffic flow. Road work in these areas will need to be addressed before any construction can be considered, as heavy machinery can not safely make it

249.2

into these areas without causing severe access issues and major disruption to residents.

249.2 Cont.

#### Sidewalks & Bike Lanes

There are no sidewalks or bike lanes in our rural community. Increasing the foot traffic in these areas without sidewalks will result in many accidents and injuries. It is already dangerous, especially for summer visitors, who do not understand the intricacies of navigating these roads with small amounts of traffic.

249.3

#### Water and Wastewater

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages. Additionally, the grade of GUE 3 will make it near impossible to add proper sewage to this area without significant development costs.

249.4

## Health & Safety

The GUE 2,3 and 4 properties are within areas documented as high wildfire danger, flood plains, and earthquake-prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons. We have been evacuated for significant amounts of time in 2018, 2019 and 2020. Most recently, with the rain and wind, we were without power for over 7 days on Cutten Drive.

249.5

The nearest hospitals are at least 30 minutes away and our ambulance service is often overextended, especially dealing with the homeless community. Many low-income residents are elderly and it would be irresponsible to house them in an area that is so isolated from reliable emergency health services.

Additionally, Guerenville will need to increase the amount of law enforcement and emergency response given the significant increase in residents. I've seen little discussion or plans surrounding this issue.

## **Biological Resources**

For GUE 3, future development facilitated by the project will impact special status species and their habitat during construction and/or operation. Development on this site would require the removal of redwoods and this meadow is a known habitat for California Quail, California Grey Foxes and Osprey.

GUE 3 is also adjacent to existing agricultural uses, and Mitigation Measure AG-1 would require an agricultural protection buffer for future development.

249.6 Cont.

#### Visual Assessment

For GUE 3, Site Sensitivity should be high and not moderate and and Visual Dominance should be considered Dominant. Old-growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high-density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed." There is no way to develop this property without removing a significant number of trees.

249.7

In the DEIR, "Figure 4.1-5 GUE-2 and GUE-3 Looking Westward from Cutten Avenue" is misleading and there should be additional photos of this property to fully show the immense beauty of this valley view - a pillar of the visual character of our community.

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The rezoning of GUE 2, 3, and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

249.8

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California. I hope to continue discussions in future meetings.

249.9

In complete agreement with all the objections above, roberta schepps 16403 cutten dr. guerneville, ca 95446

From: Robin Shopbell <robin.shopbell@gmail.com>

Sent: Monday, February 13, 2023 12:44 PM

**To:** PermitSonoma-Housing <PermitSonoma-Housing@sonoma-county.org>; Susan Gorin <Susan.Gorin@sonoma-county.org>; Pat Gilardi <Pat.Gilardi@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; Andrea Krout <Andrea.Krout@sonoma-county.org>; district4 <district4@sonoma-county.org>; Jenny Chamberlain <jchamber@sonoma-county.org>; district5 <district5@sonoma-county.org>; Leo Chyi <Leo.Chyi@sonoma-county.org>

Cc: Bob Shopbell <shopbell@gmail.com>

Subject: Housing Element Update

#### **EXTERNAL**

Dear Sonoma County Leaders and Neighbors;

Regarding the Housing Element Update, specifically FOR-4, located at 6090 Van Keppel Rd. As the owner of 6073 Van Keppel we are in agreement with the Housing Element Update DRAFT EIR that states ".. and development could be dominant if it differs considerably from surrounding land uses." Should this "... area accessible only by unpaved roads..." be selected for continued exploration, we feel this would be a mistake.

250.1

While the maps provided within the Update identifying the location of FOR-4, and the description associated with it, do not seem to align with the address of 6090 and our home of 6073 Van Keppel, we do know that Van Keppel itself is a single egress road. Given this single way in/single way out, the addition of 70+ housing units would have a significant impact should there be a need for an evacuation of Van Keppel.

250.2

Additionally, there currently does not exist a public sewer in the 6000 block of Van Keppel. We are on a septic tank, so I assume, in addition to the updates to the current road, sanitary systems would also need to be updated to accept these 70+ housing units.

250.3

We are opposed to continuing to explore FOR-4 as part of future high density planning, as Van Keppel itself cannot support these additional units, the public sewer system does not serve this area of Van Keppel, and the surrounding homes/properties, including our 1 acre parcel, are appreciably different in style and character from the anticipated housing project.

250.4

We are aware that denser, affordable housing is very much needed in Sonoma County, and so we do support this. But we feel that infrastructure costs associated specifically with FOR-4 to bring this parcel up to needed levels, combined with the fundamental changes to Van Keppel do not make fiscal sense to further pursue FOR-4 in the long range plans.

Sincerely, Bob and Robin Shopbell 6073 Van Keppel Rd. Forestville

Letter 251

From: Sabrina <szola@sbcglobal.net>
Sent: Monday, February 13, 2023 11:40 AM

**To:** PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>; Lynda Hopkins

<Lynda.Hopkins@sonoma-county.org>
Subject: Proposed rezoning of 6 sites 95436

#### **EXTERNAL**

I am writing to you to express my opposition to the six parcel rezoning proposal for housing in Forestville Ca. While I not opposed to some housing, the current proposal is too much for our small town. We already have traffic issues and to introduce 1,600 more residents in a town of 3,800 is unsustainable. Not only will this ruin our small town charm, it also poses other issues such as:

- Gridlock during commute hours
- Not being able to evacuate safely
- Higher demands on our infrastructure, such as sewer, water supply, etc.
- Pedestrian safety
- Threats to wildlife

I have talked with my neighbors and they also share my concern.

I urge you to reconsider such a drastic change to our town.

Thank you for your time.

Sincerely,

Sabrina Zola

Resident and property owner Forestville, Ca.

From: Scott Ruthrauff <scottruthrauff@yahoo.com> Letter 252

Sent: Monday, February 13, 2023 1:54 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Cc:** district4 < district4@sonoma-county.org>; Susan Gorin < Susan.Gorin@sonoma-county.org>; Pat Gilardi < Pat.Gilardi@sonoma-county.org>; David Rabbitt < David.Rabbitt@sonoma-county.org>; Andrea Krout < Andrea . Krout@sonoma-county.org>; Jenny Chamberlain < jchamber@sonoma-county.org>;

district5 <district5@sonoma-county.org>; Leo Chyi <Leo.Chyi@sonoma-county.org>

**Subject:** Housing Elements Update

#### **EXTERNAL**

Dear Mr. Gage and Sonoma County Board of Supervisors,

It has come to my attention through various neighbors and social media postings that Sonoma County is considering rezoning several parcels in the hamlet of Forestville to accommodate high density housing development projects. I understand the State of California is requiring all of the counties in the state to develop a plan with a specific number of housing units to meet a quota. However, the parcels that have been identified cannot accommodate the number of residents that are being proposed nor can the infrastructure of our township handle an estimate additional 1,652 residence.

252.1

I'm in favor of some higher density housing projects and definitely recognize that we need more housing in the State of California. However, this one-size-fits-all proposal doesn't make any sense in our community. By rezoning these parcels to accommodate 1,652 new residents, it would swell the Forestville population by 50% over it's projected 3,900 current residents. Furthermore, these new residents would be concentrated in the center of Forestville where we have limited space and only a single road in and out of town. Even if these projects resulted in improved services (water, sewer, electrical, etc...), the roadways cannot handle the additional traffic...especially when we've had to evacuate due to fires and floods.

252.2

Please reconsider the numbers allocated for these rezoning projects. I think a more modest rezoning proposal that would include closer to a total of 600 new residences and a total of 150 homes would be more feasible for our community and would help the County meet some of the targeted rezoning goals. Furthermore, placing more housing nearer to transportation hubs and services will be more beneficial to lower income residents who are more reliant on those services and employment opportunities. Santa Rosa, Rohnert Park, Windsor and Petaluma are all better suited to accommodate denser housing projects as they possess the infrastructure to handle that increase in population, as well as the law enforcement, health care, education and supportive services.

252.3

Hopefully you'll all be willing to listen to your constituents who will be most impacted by these rezoning decisions and adjust your proposals accordingly.

Thanks for your consideration.

Scott Ruthrauff 5921 Van Keppel Road Forestville, CA 95436 From: Soichiro Takahashi <greenfishtrading204@gmail.com>

Sent: Sunday, February 12, 2023 1:57 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Cc: Maureen.taber@ymail.com; Susan Gorin <Susan.Gorin@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; Andrea Krout <Andrea.Krout@sonoma-county.org>; district4 <district4@sonoma-county.org>; Jenny Chamberlain <jchamber@sonoma-county.org>; district5

<district5@sonoma-county.org>; Leo Chyi <Leo.Chyi@sonoma-county.org>

Subject: Draft EIR comment: Housing Element Update

#### **EXTERNAL**

Dear Eric Gage and Board of Supervisors:

My family and I are opposed to the proposal to build large housing complexes around the downtown area of Forestville.

Regardless of housing affordability, the increase in population does not suit our community. We are a very small town that values being small and intimate.

We do not desire a local police station, traffic lights, more larger roads, markets, a hospital etc. These things would be needed to support such growth in population size.

And like I said, we appreciate most of all our communities small size and intimacy we share with our current neighbors.

It would be a much better idea, and best use of money, to concentrate such housing structures in the Santa Rosa downtown area where employment is readily available and people can easily get to work even without a vehicle.

The real cost of living is not only housing fees, so it is naive to think that simply more affordable housing will equal a good life for those who move here. If you actually care about people, you know Forestville is not the suitable location for such plans.

Please seek locations that already have the proper services and employment available for the people who will be living in the proposed housing complexes. The small town of Forestville is not that location and will never be.

Sincerely,

Soichiro Takahashi 8416 Spring Drive Forestville, CA 95436 253.1

From: S & A Perry <perry13975@gmail.com> Letter 254

Sent: Monday, February 13, 2023 8:07 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Sonoma County Housing Element proposed rezoning of parcels # 054-290-057 and # 054-290-

084 (GE-1 and GE-2).

#### **EXTERNAL**

The proposed rezoning and resulting increased density of parcels # 054-290-057 and # 054-290-084 in Glen Ellen should be removed from the proposed Housing Element changes.

The Proposal would increase allowed density on these parcels to around 300% of the current density and could go as high as 400+%. This would change the community's character by increasing population in the very limited downtown center, i.e. more people rather than more services.

Additionally, parking would be significantly impacted with additional vehicle counts generated by the increased density. The community already suffers from a dearth of parking. Most street parking in the vicinity has already been spoken for over the years with earlier approved proposals.

254.3

Add to all of this, the various proposals for the former Sonoma Developmental Center. All proposals increase density and traffic issues that will impact Glen Ellen and are not adequately addressed in the EIR prepared for the Housing Element proposal.

Over the years the community has worked very hard to protect itself with General Plan language and the Glen Ellen Design and Development Guidelines. Do not let our community down. Remove the Glen Ellen parcels, cited above, from the Housing Elements proposed rezoning!

Thank you, Steve and Andrea Perry Glen Ellen, CA

From: susan mulcahy <1susanmulcahy@gmail.com>

Sent: Monday, February 13, 2023 5:15 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** The proposed project in Glen Ellen

#### **EXTERNAL**

Dear planners.

I am 100% against the projects proposed by Marty Winter Glen Ellen Parcels #054-290-084 and #054290-057 GE 1 and 2.

I am not opposed to a reasonable sized development there. I can not imagine how gross a two-story 22 unit apartment complex will be there. And as we all know they are inclined to get the highest number of units possible as it does not seem the county listens to any of us out here in Glen Ellen !!! This does not fit in with the county guidelines nor is it an appropriate use of the space. The bus service is minimal. The stores are very small so people would be driving outside of town mosty for all the needed services. It does not take into account the other proposed projects in the area including SDC, Hanna Boys center, Elnoka etc. I have to wonder if this was your neighbor, what would you think? Please please please reconsider these proposals

Thank You Susan Mulcahy

Letter 256

From: Susan Ziegler < szyz@sbcglobal.net >
Sent: Monday, February 13, 2023 4:40 PM
To: Eric Gage < Eric.Gage@sonoma-county.org >
Subject: Sonoma County Housing Element Update

#### **EXTERNAL**

February 13, 2023

Permit Sonoma County of Sonoma Permit & Resources Management Department

Ref: Sonoma County Housing Element Update

Attn: Eric.Gage@sonoma-county.org

My name is Susan Ziegler, I live in Guerneville near the Senior Center located on Armstrong Woods Road and just recently found out about the referenced project. I found some information on the Permit Sonoma website but must admit I was a bit overwhelmed. I looked at the Draft Environmental Impact Report and some of the other reports and still not clear what this project entails. These are some of my questions:

What kind of units will be built, single family, duplex, 4 plex. Will they be owner occupied or rentals. What are the terms of ownership. For example, will buyer be able to re-sell at any time to anyone.

Is the plan to develop all the properties listed on the report.

Will the rezone program, rezone all properties listed even if they will not be used for this project.

Based on page 100 of the Report, there are 6 sites listed in Guerneville, 4 rezoned sites GUE-1 to GUE-4 and 2 more GUE-5 & GUE-6. The Report stated the rezoned sites would potentially add a 616 Buildout Population. There was no info on the Buildout Population potential for GUE-5 & GUE-6 (what's the acres of GUE-5 & Gue-6). Is the intent to use all 6 sites in Guerneville?

How many cars will be used by the additional population. The increase in the number cars would have to include delivery vehicles for mail, packages, etc. The environmental impact from exhaust would be unbearable. The roads that lead to GUE-2 & GUE-3 have two roads to the property, Laughlin & Watson-Valley Ln. These roads are narrow with parts that only allows for one way traffic. There are no sidewalks. This also would apply to the property on Sunset GUE-1 as well.

The added vehicles and traffic from these 6 sites would impact the downtown Guerneville and the surrounding area including River Road and 116.

How can I get more information and questions answered about this project? Will community input be required before the project moves forward. Will there be an opportunity to give input and have these questions be answered?

256.4

Sincerely,

256.1

256.2

Susan Ziegler

16130 Brookdale Dr. Guerneville, CA 95446

szyz@sbcglobal.net

From: Suzi Molofsky <suzimolofsky@gmail.com> Sent: Monday, February 13, 2023 1:06 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

**Subject:** Rezoning in Glen Ellen

#### **EXTERNAL**

Sonoma County Housing Element proposed rezoning of parcels # 054-290-057 and # 054-290-084 (GE-1 and GE-2)

257.1

I am writing to object to the proposed rezoning of the parcels mentioned above. I am the owner of the commercial property across from one of these parcels (969 Carquinez Ave.) and a resident of Glen Ellen for over 40 years.

Downtown Glen Ellen is rural in character and this proposed increase in housing will gridlock the two block downtown area. This rezoning is not consistent with the General Plan and not consistent with the Glen Ellen Development Guidelines. The demand for new housing is already being addressed by the increase in ADUs in the area the proposed extensive development of the Sonoma Developmental Center and the proposed development of part of Hannah Boys Center. The intersection of Arnold Dr. And Warm Springs Road should be zoned for more commercial development if anything. There are many residentsinf this part of the valley who would prefer not to have to drive to Sonoma or Santa Rosa for shopping and errands. Regardless, this proposed number of units is way out of scale with the character and infrastructure of Glen Ellen. I object and request that the county object to this change.

257.2

Sincerely,

Suzi Molofsky (707) 481-1327 12300 Manzanita Lane Glen Ellen, CA 95442 **From:** Tamara Santry <santrygraphics@yahoo.com>

Sent: Monday, February 13, 2023 3:12 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Housing Element Update-Forestville FOR-2

#### **EXTERNAL**

#### Dear Permit Sonoma,

Regarding the proposed rezoning of Forestville to include up to **1652** new residents, I'd like to first point out that as of the 2020 census the population of Forestville is **3788** people. Which means you are proposing increasing the size of our town by **50%**. An increase like this would seriously impact traffic, safety, and overall quality of life for our community.

258.1

Forestville simply does not have the infrastructure for growth like this, and there are communities with open space much closer to the 101 and public transportation, like Fulton. We have limited access to public transportation which is located on streets without sidewalks, an elementary school that is at capacity, no high school, few sidewalks, no access to medical and social services, limited sewer and water capacity and no police force.

## Regarding the rezoning of FOR-2 on Nolan

- Mirabel Rd. is a very busy and important 45 MPH thoroughfare, how do you propose to facilitate a safe flow of traffic for up to 736 additional cars entering the flow of traffic onto Mirabel Rd? Onto Hwy 116? Onto River Rd?
   Mirabel Rd only has a sidewalk on one side of the street heading towards downtown. How do you propose to keep the many pedestrians and children from this high density housing safe? On their way to Speers Market? On their way to the River?
   There is limited and infrequent public transportation in Forestville. Many of the residents, in the
- 3. There is limited and infrequent public transportation in Forestville. Many of the residents, in the proposed high-density housing will surely rely on public transportation which is only accessible down a very busy Mirabel Rd. with no sidewalk and dangerous ditches on either side. What will you do to ensure the safety of the pedestrians and children on their way to the bus stop?
- 4. What will you do to improve public transportation from Forestville to Santa Rosa and throughout the Russian River?
- 5. What will you do to improve the local Elementary School, ensuring there are enough teachers to accommodate the influx of children?
- 6. Our local Sewer and Water system would need to be upgraded to handle the extra residents, what will you do to upgrade and improve our local Sewer and Water system? How is Forestville water district supposed to accommodate 283 extra homes?
- 7. Forestville doesn't have a police station, or much of a Sheriff's presence, how will you ensure that we receive the extra policing required for an additional 736 residents?
- 8. How do propose to improve appropriate access to medical and social services for these high density housing residents.

It's a wildly inappropriate proposal for any of the small communities in unincorporated Sonoma County to increase their population by 50% and Forestville seems to be bearing the brunt of the current effort to rezone for affordable housing in Sonoma

258.10

258.4

258.5

258.6

258.7

County. I look forward to a sane and thoughtful process before you decide to rezone such a large swath of Forestville.

258.10 Cont.

Thank you, Tamara Sarkissian 8004 Savio Ln. Forestville, CA. 95436 From: Tamara Santry <santrygraphics@yahoo.com>

Sent: Monday, February 13, 2023 3:21 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Housing Element Update-Forestville FOR-4

#### **EXTERNAL**

#### Dear Permit Sonoma,

Regarding the proposed rezoning of Forestville to include up to **1652** new residents, I'd like to first point out that as of the 2020 census the population of Forestville is **3788** people. Which means you are proposing increasing the size of our town by **50%**. An increase like this would seriously impact traffic, safety, and overall quality of life for our community.

Forestville simply does not have the infrastructure for growth like this, and there are communities with open space much closer to the 101 and public transportation, like Fulton. We have limited access to public transportation which is located on streets without sidewalks, an elementary school that is at capacity, no high school, few sidewalks, no access to medical and social services, limited sewer and water capacity and no police force.

## Regarding the rezoning of FOR-4 on Van Keppel

- 1. Van Keppel is a narrow 1 lane road with several abrupt turns, seeing as it is barely suitable for the current flow of traffic, what will you do make this road safe and suitable for up to an extra 185 cars, plus their visitors?
- 2. Hwy. 116 is a very busy thoroughfare, how do you propose to facilitate a safe flow of traffic, for up to 185 additional cars entering the flow of traffic onto Covey Rd? Onto Hwy 116?
- 3. Van Keppel is a narrow rd without a sidewalk. How do you propose to keep the many pedestrians and children from this high density housing safe? On their way to Speers Market? On their way to the River?
- 4. There is limited and infrequent public transportation in Forestville. Many of the residents, in the proposed high-density housing will surely rely on public transportation which is only accessible down a very busy Mirabel Rd. with no sidewalk and dangerous ditches on either side. What will you do to ensure the safety of the pedestrians and children on their way to the bus stop?
- 5. What will you do to improve public transportation from Forestville to Santa Rosa and throughout the Russian River?
- 6. What will you do to improve the local Elementary School, ensuring there are enough teachers to accommodate the influx of children?
- 7. Our local Sewer and Water system would need to be upgraded to handle the extra residents, what will you do to upgrade and improve our local Sewer and Water system? How is Forestville water district supposed to suddenly accommodate 71 extra homes?
- 8. Forestville doesn't have a police station, or much of a Sheriff's presence, how will you ensure that we receive the extra policing required for an additional 185 residents?
- 9. How do propose to improve appropriate access to medical and social services for these high density housing residents.

It's a wildly inappropriate proposal for any of the small communities in unincorporated Sonoma County to increase their population by 50% and Forestville seems to be bearing the brunt of the current effort to rezone for affordable housing in Sonoma County. I look forward to a sane and thoughtful process before you decide to rezone such a large swath of Forestville.

259.1 cont.

Thank you, Tamara Sarkissian 8004 Savio Ln. Forestville, CA. 95436 From: Tamara Santry <santrygraphics@yahoo.com>

Sent: Monday, February 13, 2023 3:32 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Subject: Housing Element Update-Forestville FOR-5

#### **EXTERNAL**

#### Dear Permit Sonoma,

Regarding the proposed rezoning of Forestville to include up to **1652** new residents, I'd like to first point out that as of the 2020 census the population of Forestville is **3788** people. Which means you are proposing increasing the size of our town by **50%**. An increase like this would seriously impact traffic, safety, and overall quality of life for our community.

Forestville simply does not have the infrastructure for growth like this, and there are communities with open space much closer to the 101 and public transportation, like Fulton. We have limited access to public transportation which is located on streets without sidewalks, an elementary school that is at capacity, no high school, few sidewalks, no access to medical and social services, limited sewer and water capacity and no police force.

## Regarding the rezoning of FOR-5 on Packing House

- 1. This site is a natural wetland, home to protected species. I assume you don't intend to diregard any environmental protection laws? When will you have an environmental report done here?
- 2. Hwy. 116 is a very busy thoroughfare, how do you propose to facilitate a safe flow of traffic, for up to 151 additional cars entering the flow of traffic onto Covey Rd? Onto Hwy 116?
- 3. 116 is doesn't have a sidewalk. How do you propose to keep the many pedestrians and children from this high density housing safe?
- 4. There is limited and infrequent public transportation in Forestville. Many of the residents, in the proposed high-density housing will surely rely on public transportation which is only accessible down a very busy Mirabel Rd. with no sidewalk and dangerous ditches on either side. What will you do to ensure the safety of the pedestrians and children on their way to the bus stop?
- 5. What will you do to improve public transportation from Forestville to Santa Rosa and throughout the Russian River?
- 6. What will you do to improve the local Elementary School, ensuring there are enough teachers to accommodate the influx of children?
- 7. Our local Sewer and Water system would need to be upgraded to handle the extra residents, what will you do to upgrade and improve our local Sewer and Water system? How is Forestville water district supposed to suddenly accommodate 58 extra homes?
- 8. Forestville doesn't have a police station, or much of a Sheriff's presence, how will you ensure that we receive the extra policing required for an additional 151 residents?
- 9. How do propose to improve appropriate access to medical and social services for these high density housing residents.

It's a wildly inappropriate proposal for any of the small communities in unincorporated Sonoma County to increase their population by 50% and Forestville seems to be bearing the brunt of the current effort to rezone for affordable housing in Sonoma

County. I look forward to a sane and thoughtful process before you decide to rezone such a large swath of Forestville.

260.1 Cont.

Thank you, Tamara Sarkissian 8004 Savio Ln. Forestville, CA. 95436 **From:** Tamara Santry <santrygraphics@yahoo.com>

Sent: Monday, February 13, 2023 3:41 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Housing Element Update-Forestville FOR-6

## **EXTERNAL**

## Dear Permit Sonoma,

Regarding the proposed rezoning of Forestville to include up to **1652** new residents, I'd like to first point out that as of the 2020 census the population of Forestville is **3788** people. Which means you are proposing increasing the size of our town by **50%**. An increase like this would seriously impact traffic, safety, and overall quality of life for our community.

Forestville simply does not have the infrastructure for growth like this, and there are communities with open space much closer to the 101 and public transportation, like Fulton. We have limited access to public transportation which is located on streets without sidewalks, an elementary school that is at capacity, no high school, few sidewalks, no access to medical and social services, limited sewer and water capacity and no police force.

## Regarding the rezoning of FOR-6 on Forestville St.

- 1. How do propose facilitating the flow of traffic throughout Forestville to accommodate an extra 312 vehicles, bikes and pedestrians plus their visitors throughout Forestville? We have few sidewalks, no traffic lights (which we like!), no lit crosswalks, no bike lanes, and few sheriff patrols.
- 2. Hwy. 116 is a very busy thoroughfare, how do you propose to facilitate a safe flow of traffic, for up to 312 additional cars entering the flow of traffic onto Hwy 116 right next to an elementary school?
- 3. How do you propose to keep the many pedestrians and children from this high density housing safe crossing Hwy 116?
- 4. There is limited and infrequent public transportation in Forestville. Many of the residents, in the proposed high-density housing will surely rely on public transportation which is only accessible down a very busy Mirabel Rd. with no sidewalk and dangerous ditches on either side. What will you do to ensure the safety of the pedestrians and children on their way to the bus stop?
- 5. What will you do to improve public transportation from Forestville to Santa Rosa and throughout the Russian River?
- 6. What will you do to improve the local Elementary School, ensuring there are enough teachers to accommodate the influx of children?
- 7. Our local Sewer and Water system would need to be upgraded to handle the extra residents, what will you do to upgrade and improve our local Sewer and Water system? How is Forestville water district supposed to suddenly accommodate 120 extra homes?
- 8. Forestville doesn't have a police station, or much of a Sheriff's presence, how will you ensure that we receive the extra policing required for an additional 312 residents?
- 9. How do propose to improve appropriate access to medical and social services for these high density housing residents.

It's a wildly inappropriate proposal for any of the small communities in unincorporated Sonoma County to increase their population by 50% and Forestville seems to be

bearing the brunt of the current effort to rezone for affordable housing in Sonoma County. I look forward to a sane and thoughtful process before you decide to rezone such a large swath of Forestville.

261.1 Cont.

Thank you, Tamara Sarkissian 8004 Savio Ln. Forestville, CA. 95436

#### **EIR Comments**

# Prepared and submitted by Tim and Kathy Dellinger Forestville, CA February 13, 2023

Letter 262

We are residents of Forestville, CA. Our street address is 135 Nolan Ct. We have reviewed the 600+ page EIR report regarding the rezoning of specific parcels in Sonoma County addressing the state mandates for the addition of housing.

We understand that this is not the forum to criticize the State of CA "mandate". We will however take the liberty to state that we are opposed to it. We believe that rezoning and determination of the numbers and types of homes to be constructed should be the primary and sole responsibility of counties/districts/cities and their citizens. Mandates in terms of "numbers" in exchange for "funding" considerations, as we believe is the case here, should not be permitted. Our comments going forward will focus solely on the EIR Report

262.1

Reports like the one we have reviewed are certainly a necessary part of the rezoning process. This one does a better than reasonable job of addressing the what is being considered and provides reasonable alternates to what is required in the mandate. We will limit our comments to the report's analysis and suggested alternatives for Forestville, CA as we do not think it is appropriate for us to comment on areas beyond our own community.

#### Questions

1. It is not clear how the sites for the Project were chosen. We do not believe this is addressed in this report. Who are the parties responsible for selecting the sites, and what was the methodology used in the process? It appears from the information we could find referenced in this report, in particular Association of Bay Area Governments (ABAG) and Regional Housing Needs Allocation (RHNA) Plan, that this was accomplished by select committees which included elected officials. While we did see some representation of Sonoma County cities, we did not see representation for the unincorporated areas of Sonoma County, (which includes the town where we live...Forestville.) What representation and input did the Forestville community and their District Supervisor have in this process?

262.2

2. The EIR offers alternatives as required by CEAQ. Who will make the choice or selection of the best suited alternative? What input will citizens and their elected officials have? we have read in the report, "this Environmental Impact Report (EIR) identifies inventory sites included in the Housing Element; however, the County Board of Supervisors has the authority to remove sites from the Housing Element based on public comment or for other reasons, and the analysis is focused on sites that would be rezoned to allow for higher density housing". We have interpreted this as "the County of Sonoma has the final word regarding the selection and use of sites". Is our interpretation of this statement a correct one?

#### **EIR Comments**

## Prepared and submitted by Tim and Kathy Dellinger Forestville, CA February 13, 2023

3. Table 2-4 shows a housing buildout potential for FOR-2 and FOR-3 as follows:

## TAKEN FROM Table 2-4 Housing Unit and Population Buildout Potential for Rezoning Sites

Rezoning Site	Total Allowable Dwelling Units Under Current Designation	Total Allowable Dwelling Units Under Proposed Designation	Change in Total Allowable Dwelling Units (Buildout Potential)	Total Population Under Current Designation <sup>1</sup>	Total Population Under Proposed Designation <sup>1</sup>	Change in Buildout Population Potential
FOR-2	7	283	276	18	736	718
FOR-3	3	33	30	8	86	78

In Alterative 3, FOR-2 and FOR-3 are omitted. Does that mean the Total Allowable Dwelling Units would remain at the current designation of 7 and 3 respectively?

## **Comments and Input**

People choose to live in Forestville for many reasons. One reason that we believe is universal is that Forestville has and does provide a slower pace and peacefulness that comes with the population of a small village residing in low density housing. Our neighborhood is quiet day and night with the exception of occasional daytime noise from a nearby stone quarry and the trucks that transport those quarried materials on Mirabel Road and RT 116 to their destination. Mirabel Road connects the main traffic corridors of River Road and RT 116. RT 116 runs through the village center.

Rezoning that could potentially add 1,652 residents to the existing population of ~3,800 would result in major changes to the current way of life in Forestville, especially as nearly half of those residents would be added to a 14 acre "landlocked" site (FOR-2) located in a low-density residential neighborhood about .5 miles from the village center. This site is framed on 4 sides by Nolan Rd, Mirabel Rd and Giusti Rd. On the inside perimeter there are ~ 25 single family homes occupied by an estimated 100 residents. The majority of lot sizes for these existing homes are between .25 and .6 acres. Most of the structures are single story construction. It appears that most have septic systems and are not connected to the public sewage treatment system. The project proposes adding between 188 to 283 residences on FOR-2's 14acre parcel. Three parking spaces for each residence and multiple ingress and egress points to the perimeter roads would be required. These conditions point to the construction of multi-story structures, towering above the current small single-story homes on the perimeter. While the report minimizes the impact of this esthetic change, we expect residents on the perimeter and passersby would strongly disagree. We oppose tall buildings in this space and believe it is reasonable to change the report to indicate this is a problem. We do not oppose adding housing that is similar to the current neighborhood standard, character and community feeling. Any addition must consider and address requirements for infrastructure improvement and safety.

Part of the road traffic on the perimeter road is foot traffic.... people walking, running, with pets and family (including) baby strollers. There are no sidewalks on either side of the perimeter roads. People in automobiles are likely to be confronted by both pedestrian traffic and vehicular traffic. The pedestrian

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## **EIR Comments**

## Prepared and submitted by Tim and Kathy Dellinger Forestville, CA February 13, 2023

traffic is literally on the perimeter roads. The absence of sidewalks is not mentioned in this report. We expect with a higher population density, there will be more of both types of traffic. We are not sure how sidewalks could be added. The perimeter roads are narrow allowing only adequate room for passing of opposing vehicular traffic.

During our twelve-year residence, we have never seen the perimeter roads used for parking vehicles other than for overflow parking during community picnics held in the "Forestville Youth Park" during the summer. This community park is on Mirabel Road directly across the street from this neighborhood and specifically the 14 acre FOR-2 site. We are assuming that this population of the FOR-2 site will include children. We wonder how they will safely cross this road which is heavily traveled by quarry trucks, grape gondolas, other commercial vehicles and automobile traffic.

262.7 Cont.

Most people who live in Forestville do not work in Forestville. Data shows that the average one-way work commute time for people going to work is 24 minutes. At a speed of 35 MPH, that is ~15 miles. And while there is a small commercial sector in the village center, we venture that many of the employees commute similar distance from and back to their residence. Adding population to a place that does not have jobs to support it makes little sense to us.

The small commercial sector in the town center is comprised mostly of small retail and personal services businesses. Congestion due to lack of parking occurs at times but is currently tolerable. Contiguous sidewalks exist on one side of the street (RT 116) but not the other. Addition of a new and popular restaurant has increased the week end congestion. Another new restaurant is opening in a site vacated during the pandemic just across the street. There is one other vacant building on this same street site that we expect will be occupied in the coming year. The traffic through this commercial sector includes the people shopping or using the retail and personal services offered. We expect this to increase proportionally with population growth. The traffic also includes thru traffic from the towns of Sebastopol and Guerneville. We believe this was picked up in the Fehr and Peers transportation study, but we believe that its impact was underestimated. This traffic includes large truck traffic from the nearby quarry and from grape vineyards during the harvest season. Traffic signaling or road configuration that slows this traffic entering the commercial section does not exist even though it has been a topic of discussion for many years. This is a problem that needs correction with or without the added population.

262.8

In conclusion, we hope this provides valuable input to your process and final report.

Tim Dellinger 02/13/2023

Kathy Dellinger 02/13/2023

From: toby tobes <tobestoby@gmail.com> Letter 263

Sent: Monday, February 13, 2023 4:52 PM

**To:** PermitSonoma-Housing <PermitSonoma-Housing@sonoma-county.org>; Eric Gage <Eric.Gage@sonoma-county.org>; Lynda Hopkins <Lynda.Hopkins@sonoma-county.org> **Cc:** kathleendahl527@hotmail.com; joe.rogoff51@gmail.com; nic.rrmac@gmail.com

Subject: Public Comment regarding the Draft EIR Housing Element update

## **EXTERNAL**

Hi- I would like to start by stating my position is that the vast majority of the sites within the Housing Element and Draft EIR look to be great additions to the housing inventory for Sonoma County and key to ensuring new housing which is needed.

My response and analysis is focused on the Cutten property as a resident since when I reviewed the EIR and proposed increases in density, I was taken aback since it didn't seem to make sense on the surface. The concern and inappropriateness of the re-zoning seemed to be what everyone was talking about as it just didn't make sense. We heard the same from multiple public officials during public meetings and from other non-residents about this site and the Laughlin site.

I wanted to be mindful of the goals and do not want to drive commentary that's from a self centered perspective so I took some time to review the documents and research which is provided below but again, the commentary all seems to be around these handful of Guerneville sites. Many of the other locations in the Housing Element and Draft EIR appear to be great sites and thusly aren't see the same questioning of appropriateness.

Based on my review and research of the EIR, the 2022 Housing Element and 2014 Housing Element, the gaps and lack of specific analysis and recommendations from the EIR seem to show why folk's original reaction was to question the rezoning. I hope some of these items will give a residents point of view and help form a more reasonable approach and remove these sites, specifically GUE-3 and GUE-2. I've not done more research on the Sunset site (GUE-1) but it too seemed to be an inappropriate selection.

When it was mentioned that the Cutten site had been in the 2014 plans, it was stated by Planning Department management that nothing had happened and likely nothing would happen. However that is concerning because that's not the point. Building housing that's commercially viable, close to services, has appropriate infrastructure, safe transportation, and doesn't have undue negative impacts on the environment, current residents and/ or future residents.

This site doesn't appear to be commercially viable due to the lack of sewer, water, parking, sidewalks, and appropriate roadways. This is a one lane road at many points and being 1.4miles from Guerneville means residents will be car dependent and the increase in traffic and lack of parking would be a notable negative impact and not make for an attractive site for development. Other sites along Armstrong Woods and in downtown Guerneville are obviously better candidates but are inexplicably absent from the nominated sites.

The following sections describe issues I've found with the EIR, alignment with county goals, alignment with Housing Element goals and which demonstrate the large uplift required for certain infrastructure and the impossibility of other infrastructure improvements such as roads due to geographic features and large slopes and/ or adjacent property where road widening and building sidewalks is either clearly not possible or would require an inordinate amount of resources lowering the financial viability of investment to build at the site on Cutten.

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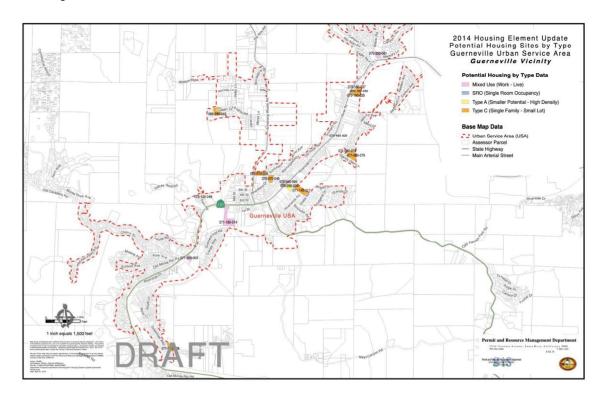
## Housing Element history of the site and the large uplift in zoning from previous proposals

In researching where the Cutten property was nominated for the rezoning, I discovered that this property had a different zoning proposed in 2014. Even then, the remote distance from downtown is evident on the map as seen below. There are many other large vacant tracks closer to services, closer to town and with better infrastructure. Specifically water, sewer, roads and sidewalks. How did this increase occur? What was the rationale? It seems like the density was increased without analysis or looking at the actual site as the other notations in this comment document will show.

https://sonomacounty.ca.gov/Main%20County%20Site/General/Sonoma/Sample%20Dept/Department%20Information/Calendar%20-

%20New/Meeting%20Archives/2014/ 2014/ Packet/20140805 complete agenda packet.pdf

NOTE THIS IS PARCEL REFERENCE: 069-280-043 but maps to GUE-3 for the Cutten site in the 2022 Housing Element Draft EIR.



263.7	
cont.	

APN	Site ID	Туре	USA	Acres	GPLU	Densit y	Zoning	Base Units	Potentia I Units	Existin g Units	Net Addtn'l Units	Comments
140-160-011	1	Type C	Geyserville	1.11	UR	4.8	R1	5	12	0	12	Redevelop
070-070-040	3	Type C	Guerneville	1.38	UR	4	R1	4	9	0	9	Redevelop
070-160-035+												Reduced by F1
070-160-036+												area. Was 070-
070-160-037+	4	Type C	Guerneville	3.65	UR	4	R1	6	12	0	12	160-027
100-180-022	7	Type C	Bodega Bay	12.39	UR	5	R1	57	136	0	136	40% UR4, 60% UR5
100-200-037	8	Type C	Bodega Bay	1.92	UR	4	R1	7	21	1	20	Redevelop
140-150-001				1.31				6	14	2	12	
140-150-004				1.07				5	11	2	9	1
140-150-008	9	Type C	Gevserville	1.56	UR	4.8	R1	7	17	1	16	Redevelop
069-280-043	11	Type C	Guerneville	2	UR	4	R1	8	22	1	21	Redevelop
070-010-005	12	Type C	Guerneville	1.86	UR	4	R1	7	20	1	19	Redevelop
071-080-078	1000	age the average of		0.09		Section (BIN	ROBERT STORT OF STREET	1	2	0	1	
071-080-079	13 P	roposal	from 201	4 Hou	sing El	ement	Plan fo	r 11	31	1	30	Redevelop
071-140-017	11412	o Trans	GUE <sup>E</sup> 3"in	+1 162					28	1	27	Redevelop
071-250-uus	15 14	Type C	Guerneville	1.87	UK	Jusing	Elemen		20	2	18	Redevelop
054-381-010	16	Type C	Sonoma	1.26	UR	4	R1	5	13	1	12	Redevelop
054-381-011	Ther	e isasi	zabeincre	ase ir	the 2	022 pla	n that	5 5	15	1	14	Redevelop
130-165-001		- Type C				. 5	R1	5	12	0	12	Redevelop
039-cinexpii	cable	fromar	a <u>naly</u> sis	or no	mijņat	ion <sub>5</sub> pei	spectiv	<b>e</b> 37	22	2	20	Redevelop
133-150-038	25	Type C	Sonoma	1.37	UR	5	R1	6	15	0	15	Redevelop
130-101-037	26	Type C	Graton	1.15	UR	5	R1	5	12	1	11	Redevelop
130-294-016	28	Type C	Graton	1.01	UR	5	R1	5	11	1	10	Redevelop
039-025-019	29	Type C	Larkfield	1.02	UR	5	R1	5	11	1	10	Redevelop
039-380-018	30	Type C	Larkfield	1.51	UR	5	R1	7	16	1	15	Redevelop
039-380-026	31	Type C	Larkfield	1.09	UR	5	R1	5	11	1	10	Redevelop
039-380-027	32	Type C	Larkfield	1.04	UR	5	R1	5	11	1	10	Redevelop

Page HE-68

 $\frac{https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Long%20Range%20Plans/Proposed%20Plans/Housing%20Element/EIR/Housing%20Element%20Update%20Draft%20ElR.pdf}{}$ 

Table 2-4 Housing Unit and Population Buildout Potential for Rezoning Sites

Rezoning Site	Total Allowable Dwelling Units Under Current Designation	Total Allowable Dwelling Units Under Proposed Designation	Change in Total Allowable Dwelling Units (Buildout Potential)	Total Population Under Current Designation <sup>1</sup>	Total Population Under Proposed Designation <sup>1</sup>	Change in Buildout Population Potential
GEY-1	82	123	41	213	320	107
GEY-2	8	33	25	21	86	65
GEY-3	5	22	17	13	57	44
GEY-4	6	26	20	16	68	52
GUE-1	6	30	24	16	78	62
GUE-2	2	80	78	5	208	203
GUE-3	8	41	33	21	107	86
GUE-4	3	105	102	8	273	265
LAR-1	1	97	96	3	252	250
LAR-2	0	16	16	0	42	42
LAR-3	10	14	4	26	36	10

2022 Housing Element Draft EIR propsoed population increase via proposed rezoning.

## Infrastructure

## Roads

GUE 2 and GUE 3 are accessible via one-lane roads that will need utility upgrades. The needed upgrades and road closures will severely impact the emergency egress for residents. Cutten Drive is a one-lane road that climbs up a ridge and is already dangerous for residents to navigate. There is a large Redwood on Laughlin that cannot be passed by 2-lane traffic. That redwood would need to be removed to widen the road to allow for needed traffic flow. Road work in these areas will need to be addressed before any construction can be considered, as heavy machinery can not safely make it into these areas without causing severe access issues and major disruption to residents.

## Sidewalks & Bike Lanes

There are no sidewalks or bike lanes in our rural community. Increasing the foot traffic in these areas without sidewalks will result in many accidents and injuries. It is already dangerous, especially for summer visitors, who do not understand the intricacies of navigating these roads with small amounts of traffic.

POINT OF DEVIATION FROM PAGE 36 of the HOUSING ELEMENT - GOAL #3 and supporting POLICY HE-3g (page 36 of the Housing Element Plan). The EIR mentions distances (which it gets wrong) from services but doesn't mention that this is not a walkable area (10/100 walkable score on Zillow as an example not to mention 1.4miles is a 30 minute walk which is more than what folks would consider a walkable area) and this will promote much more traffic which again ties into the lack of mention of the one lane road leading up to Cutten which can't be expanded due to geography and is prone to previously slides as evidenced by repairs. This is another area where the EIR's lack of context which eventually

263.7 cont.

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<sup>&</sup>lt;sup>3</sup> 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.

makes no mention of the poor viability of the Cutten site and is another area where the EIR is out of context from the Housing Element's goals and which spurs the broad public comment from officials and county residents who do not even live the not even live the area and noticed the issues after just driving through. (Watch public meetings for the Sonoma Planning commission call on Feb 2 and the later session where the Draft EIR was presented for public comment.

Sonoma County Public Review Draft Housing Element

November 3, 2022

over 81% of the vote in a countywide election. City and County voters also approved and extended a quarter-cent sales tax and created the Sonoma County Agricultural Preservation and Open Space District in 1990, and in 2006 the tax was renewed by 76% of voters in a countywide vote to fund the acquisition of more than 122,000 acres of open space throughout the County.

The General Plan contains policies to preserve agricultural and open space lands in Sonoma County to maintain a viable agriculture-based economy, prevent urban sprawl, direct growth and development into existing cities, and promote infill and smart growth. Despite these concerted efforts to concentrate future growth in the County's urban centers, a large RHNA allocation to the Unincorporated County challenges the County's commitment to city-centered growth. Infill development in the County's urbanized areas is a necessary priority to reflect community intent, and it is important to remove constraints to such development. Community members also expressed interest in increasing infill development, avoiding sprawl, and preserving the natural character of the rural unincorporated area.

The County's previous growth management program was not carried forward in General Plan 2020 and is no longer in use by the County. However, the Zoning Code still includes two former growth management areas (Sonoma Valley and Planning Area 6) and the allocations to be made in each area. Even though the growth management program is no longer used, it has been identified as a potential constraint to development because its continued presence in the zoning code conflicts with current provisions to increase housing production and could disqualify the County from some funding sources. A program is needed to eliminate this obsolete language from the code in the first year of the 2023-2031 Housing Element cycle.

▲ Policy HE-3g: Strive to focus affordable housing development in moderate and high-resource areas well-served by public transportation, schools, retail, and other services. Continue to consider developer requests to add the Affordable Housing (AH) and Workforce Housing (WH) combining districts to sites in light industrial and commercial zones and other appropriate urban zones when designation criteria are met. (Existing for AH; revised to add WH Combining district and to address Affirmatively Furthering Fair Housing (AFFH) considerations)

## POINT OF DIVERGENCE FROM THE EIR AND Housing Element Goals:

There are clear gaps in the EIR which don't speak to what has been commented on my residents and public officials in public meetings surrounding the inappropriateness of the Cutten site being in the inventory.

To this end, the analysis below demonstrates that there isn't a mitigation nor is the public safety and lack of sufficient roadway addressed in the EIR. This clear gap to anyone who has been to the site may be driven by a consultant approach to the EIR and leveraging public records, internet research such as

263.10 cont.

263.11 cont.

maps, etc. and shows a failure in the EIR to assess and provide any analysis outcomes for these key items at the Cutten site.

More detail and citations for this point of divergence from goals, obvious issues and the EIR. Is below.

Public transit and sidewalks for pedestrians doesn't appear to be addressed in the EIR report at all. This doesn't fall inline with with the goals for Goal 6 elements of the Housing Element (see page 40 of the Nov 3rd 2022 Housing Element document. The focus of the discussion points in the goal are for environmentally sustainable aspects and Policy HE-6f (page 42 of the Housing Element) which states that: Policy HE-6f: Provide high quality and equitable public services, including public transportation, fire and police safety, crime prevention, parks, sidewalks, street lighting, and recreational facilities and programs in lower-resource areas through the use of place-based strategies and master plans. (New; Fair Housing)

There are no sidewalks and the bus service is more than .4 miles away from the Cutten location navigating 1 lane roads and what would be significantly increased traffic. This area isn't well lit and doesn't appear to support the goals in the Housing Element as this isn't analyzed in the EIR. En mentions sidewalks in Impact AQ-2/ AQ-1 around Basic Construction Mitigation measures but doesn't analyze the environment for not having sidewalks in the area nominated for re-zoning. The focus is mitigations (see AQ-1 item 5 on EIR page 4.2-19) mentioning "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"

263.12

Further gaps on the item of sidewalks, crosswalks and pedestrian signals, the EIR mentions on page 4.16-8 "PEDESTRIAN FACILITIES Pedestrian facilities include sidewalks, crosswalks, and pedestrian signals. Historic downtown areas such as those located in Sonoma, Sebastopol, Petaluma, Cotati, Santa Rosa, Windsor, Healdsburg, and Cloverdale have long-established, central areas where pedestrians can reach a variety of destinations. Sidewalks are in place in almost all recently built residential, civic, and business developments. System gaps exist between older and newer development. Discontinuous sidewalks are also present in the County's unincorporated towns, and most rural roads lack sidewalks and have a shoulder area for pedestrians to walk on. Barriers to safe pedestrian travel include freeways and high-speed and multiple-lane arterials."

There is no mention of these gaps for the Cutten or Laughlin site - this again appears to be a gap with the EIR with respect to these sites, specifically the Cutten site where there isn't geographical possibility of building sidewalks given the one lane road and hills and a point of issue where the EIR fails to address these key safety items driving for what is widely seen as an inappropriate site for increasing housing density at such a high level for the Cutten site.

In section c. Project Images and Mitigation Measures, with respect to Pedestrian Facilities on page 4.16-15 of the EIR states:

Pedestrian Facilities Development facilitated by the project 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 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. No significant impacts to pedestrian facilities would occur.

263.13

There is no mention in the EIR that these impacts would be mitigated. The state is only for Impact TRA-1 and mentions "this impact would be significant and Unavoidable" - This reads as there is no plan to address the side walks or roadways for the Cutten site which is a very large concern and without EIR

analysis or statements of appropriateness of a site, it's obvious that the EIR isn't addressing this and the site should be removed from the inventory.

263.13 cont.

## Water and Sewage -

this is a very large increase in population and the EIR doesn't provide any analysis to call out that the Cutten property falls at the bottom of the current infrastructure nor does it mention things like our water outages, our recent 6 day power outage, or other items which drive a concern for rezoning at this site.

As a quick example, below is an extrapolation of the basic data from the EIR that would who the increase in water GPD

263.14

Per The EIR the water use would increase dramatically over the current population. Table 5-2 from the EIR appendix shows approx 134.77 GPD per individual in the population and with approximate 42 people on Cutten full time, then the sewer usage would go from a current 5660 GPD to over 20,000 GPD because of the large density uplift being proposed which is a 500% increase in current population (note the 21 one in the existing zoning aren't people there, those are potential people if housing was built at current zoning)



Site ID	Exist. Max Population (per)	Exist. Average Day Demand (gpd)	Prop. Max Population (per)	Prop. Average Day Demand (gpd)	Prop. Average Day Demand (AFY)	Demand Increase (AFY)
LAR-4	10	1,350	16	2,156	2.3	0.8
LAR-5	187	25,245	257	34,638	38.9	10.6
LAR-6	0	0	31	4,178	4.7	4.7
LAR-7	26	3,510	117	15,795	17.7	13.8
LAR-8	0	0	29	3,909	4.4	4.4
GEY-1	213	28,755	320	43,200	48.4	16.2
GEY-2	21	2,835	86	11,591	13	9.8
GEY-3	13	1,755	57	7,682	8.6	6.65
GEY-4	16	2,160	68	9,165	10.3	7.9
GUE-1	16	2,156	78	10,513	11.8	9.4
GUE-2	5	673	208	28,034	31.5	30.7
GUE-3	21	2,830	107	14,421	16.2	13
GUE-4	8	1,080	273	36,855	41.3	40.1
PEN-1	0	0	3	404	0.5	0.5
PEN-2	3	405	55	7,425	8	7.9
PEN-3	0	0	10	1,350	2,0	2
PEN-4	5	675	91	12,285	14	13
PEN-5	3	405	21	2,835	3	2.7
PEN-6	5	675	104	14,017	15.7	14.97
PEN-7	47	3,384	278	37,468	22.4	18.63
PEN-8	0	0	42	5,661	3.39	3.39
PEN-9	0	0	21	1,512	1.7	1.7
TOTAL	930	118,579	8,655	1,145,704	1,260	1,130

Table 5-2 below summarizes the increase in water demand for each USA assuming that all parcels under consideration are developed.

## Sloping-

This table shows in context the issue with teh GUE-3, Cutten property. This doesn't appear to be mentioned with any analysis as to why this would need to be mitigated or why this would drive significant cost and reduce the 2 acre estimate of viable land. Again, a point in which the EIR doesn't appear to provide analysis services, only data reporting which diverge from what many folks see when they visit the site.

263.14 cont.

Table 4.19-1 Rezoning Sites Slope Information

Rezoning Site	Slopes on Site	Slopes Near Site
GEY-1	0-5%	0-50%
GEY-2	0-5%	0-50%
GEY-3	0-5%	0-50%
GEY-4	0-5%	0-50%
GUE-1	30-50%	0-50%
GUE-2	0-5%	0-50%
GUE-3	0-5%, 50-75%	0-50%
GUE-4	0-2%	0-50%
LAR-1	0-9%	0-15%
LAR-2	0-9%	0-15%
LAR-3	0-9%	0-15%
LAR-4	0-5%	0-15%
LAR-5	0-9%	0-15%
LAR-6	0-9%	0-15%
LAR-7	0-5%	0-15%
LAR-8	0-5%	0-15%
FOR-1	2-9%, 9-15%	0-75%
FOR-2	2-9%	0-75%
FOR-3	2-9%	0-75%
FOR-4	9-15%	0-75%
FOR-5	2-9%	0-75%
FOR-6	2-9%	0-75%

263.15 cont.

## Historic Buildings

The family at the Cutten property has lived there for over 100 years and there doesn't seem to be a mention for impact or mitigation there nor the likelihood that the property would be sold thusly impacting the viability of the site to be in the inventory.

#### Cultural Resources

The No Project Alternative would allow development under existing zoning at a smaller scale than under the proposed project but could still entail ground disturbance or excavation activities. It is assumed that development under existing zoning would result in similar impacts to historic or potentially historic buildings on some of the Rezoning Sites; therefore, the No Project Alternative would not eliminate a significant and unavoidable impact to historic resources. Ground disturbance from development allowed under existing zoning would still have potential impacts to archaeological resources and human remains, although likely to a lesser extent than under the proposed project due to decreased size and scale of potential new structures. Impacts would be similar to, and slightly reduced from the proposed project.

Environmental Impact Analysis

Cultural Resources

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. A review of historic aerial photographs and information on file with the Sonoma County Assessor does indicate, however, that there are built environment properties that are 45 years of age or older, such as buildings and/or structures on the Rezoning Sites, or on adjacent parcels (NETR Online 2020; Parcelquest 2020). According to guidance from the California Office of Historic Preservation, built environment features over 45 years of age maybe considered for federal, state and/or local designation (California Office of Historic Preservation n.d., 1995). Table 4.5-1 lists Rezoning Sites and indicates those that may contain historic-age buildings and/or structures on site.

Table 4.5-1 Rezoning Sites with Historic-Age Buildings

Rezoning Site	<b>Nearest Community</b>	Historic-Age Buildings	
GEY-1	Geyserville	No	
GEY-2	Geyserville	Yes	
GEY-3	Geyserville	Inconclusive*	
GEY-4	Geyserville	Yes	
GUE-1	Guerneville	Yes	
GUE-2	Guerneville	Yes	
GUE-3	Guerneville	Yes	
GUE-4	Guerneville	Yes	
LAR-1	Larkfield	No	
LAR-2	Larkfield	No	
LAR-3	Larkfield	No	
I AR-4	Larkfield	No	

## Health & Safety

The GUE 2,3 and 4 properties are within areas documented as high wildfire danger, flood plains, and earthquake-prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons. We have been evacuated for significant amounts of time in 2018, 2019 and 2020. Most recently, with the rain and wind, we were without power for over 7 days on Cutten Drive.

263.16 cont.

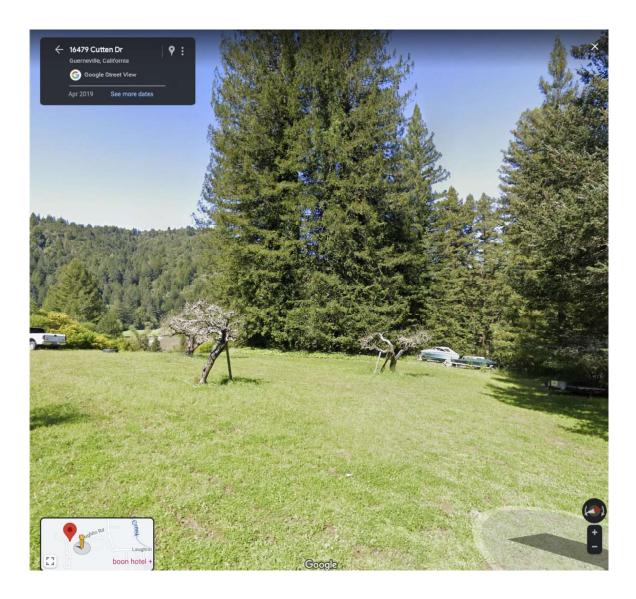
The nearest hospitals are at least 30 minutes away and our ambulance service is often overextended, especially dealing with the homeless community. Many low-income residents are elderly and it would be irresponsible to house them in an area that is so isolated from reliable emergency health services.	263.18
Additionally, Guerenville will need to increase the amount of law enforcement and emergency response given the significant increase in residents. I've seen little discussion or plans surrounding this issue.	263.19
Biological Resources	
For GUE 3, future development facilitated by the project will impact special status species and their habitat during construction and/or operation. Development on this site would require the removal of redwoods and this meadow is a known habitat for California Quail, California Grey Foxes and Osprey.	263.20
GUE 3 is also adjacent to existing agricultural uses, and Mitigation Measure AG-1 would require an agricultural protection buffer for future development.	263.21
Visual Assessment	
Visual Assessment  For GUE 3, Site Sensitivity should be high and not moderate and and Visual Dominance should be considered Dominant. Old-growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high-density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed." There is no way to develop this property without removing a significant number of trees.	263.22
For GUE 3, Site Sensitivity should be high and not moderate and and Visual Dominance should be considered Dominant. Old-growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high-density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed." There is no	263.22
For GUE 3, Site Sensitivity should be high and not moderate and and Visual Dominance should be considered Dominant. Old-growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high-density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed." There is no way to develop this property without removing a significant number of trees.  In the DEIR, "Figure 4.1-5 GUE-2 and GUE-3 Looking Westward from Cutten Avenue" is misleading and there should be additional photos of this property to fully show the immense beauty of this valley view - a	263.23

Figure 4.1-5 GUE-2 and GUE-3 Looking Westward from Cutten Avenue



Source: Google Earth 2020

263.24 cont.



263.24 cont.

The dominance impact and site sensitivity mentioned in the EIR are inappropriate assessed and again, this is likely due to the use of a consultant group who made judgements missing a more in depth and local view of the area which should be reconsidered and is inaccurate in my view and many other's as mentioned above.

Table 4.1-6 Site Impacts and Recommended Mitigation Summary

Rezoning Site	Site Sensitivity	<b>Project Potential Dominance</b>	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-5
GEY-3	Moderate	Co-Dominant	Less than significant	AES-5
GEY-4	Moderate	Co-Dominant	Less than significant	AES-S
GUE-1	Moderate	Co-Dominant	Less than significant	AES-5
GUE-2	Moderate	Co-Dominant	Less than significant	AFS-5
GUE-3	Moderate	Co-Dominant	Less than significant	AES-5
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-5
LAR-3	Low	Co-Dominant	Less than significant	AES-5
LAR-4	Low	Co-Dominant	Less than significant	AES-5
LAR-5	Low	Co-Dominant	Less than significant	AES-5
LAR-6	Low	Co-Dominant	Less than significant	AES-5
LAR-7	Moderate	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
LAR-8	Low	Co-Dominant	Less than significant	AES-5
FOR-1	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
EOB 2	Moderate	Dominant	Cignificant	ACC 1 ACC 2 ACC 2 ACC A ACC C

263.24 cont.

Unfortunately the time between the mailings and the meetings didn't allow for further research given the size of the documentation and issues with how the plans are communicated however, given more time there may be other inconsistencies which may be more technical than an average citizen could comment on. To that end I would hope that the planning officials, nominated officials and elected officients would give a deeper look and reconsider some of these questionable sites.

263.25

The rezoning of GUE 2, 3, and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

263.26

I oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct,

263.27

The hope is that a deeper look at hie EIR and Housing Element by citizens will underscore the need to remove certain sites from the inventory and plan.

Name: Toby Barber

Address: 16400 Cutten Dr, Guerneville, CA 95446

264.6

264.7

From: Vikki Miller < vikkilmiller@icloud.com> Sent: Monday, February 13, 2023 3:26 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Housing Element ATTN: ERIC GAGE

## ADDITIONAL RESIDENT COMMENTS REGARDING PROPOSED **BUILDING SITES IN FORESTVILLE**

Addendum to previously submitted comments.	
Forestville does have a need for Workforce Housing in our quaint little town. Done with the right amount of conscientious planning to address the needs and issues residents already face and combining them to safely accommodate any new residents, this project has the potential to meet the State's mandates and quell the concerns regarding such an expansive endeavor.  The following is in consideration of the proposed Forestville sites:	264.1
Of all of the proposed sites, FOR-3 and FOR-6 hold the most promise to meet housing needs in our small community. Although FOR-6, as well as FOR-1, and FOR-5 are all being on the "Existing Hazardous Material Contamination" list . If those issues can be safely mitigated, they too hold promise.	264.2
Forestville has very little in the way of stores and restaurants, certainly not enough to serve the kind of population increase being proposed. There are also valid concerns about a significant increase in Greenhouse emissions as well as extreme traffic congestion. The most serious concern is the ability for our residents to safely evacuate given a natural disaster. These occurrences are not uncommon events as I have experienced them personally on multiple occasions during the decade I have been a resident here in Forestville.	264.3
FOR-1. An eye sore to the community for some time, this site is a good location for a building site with the exception of the traffic problem that would ensue and more importantly the ground is contaminated. I believe that would need to be addressed before any building occurs .Pouring cement over contaminated ground often leads to costly and time-consuming problems for builders and contractors. To avoid potential harm to the environment, building, and future occupants, the property owners, and their builder or environmental contractor should manage the contaminated soil. Left unmanaged, the contamination can potentially harm the environment, people, plants, and even the future building, including its foundation.	264.4
FOR-2 This location would not be a good location for numerous reasons. Putting a building of that scale would significantly impact the aesthetics of the small neighborhood as well as significant health and safety concerns. The roads going in and out of the neighborhood would not allow such a project of the proposed magnitude and emergency evacuations would be too dangerous to attempt.	264.5
FOR-3, and FOR-6 are relatively close in proximity and are a better fit for the proposed Housing Element with some additional infrastructure to accommodate the amount of people in the proposal. With nearby	264.6

shops and access to public transportation, these 2 sites, absent any potential health hazards due to the

FOR-4 The exact address of 6090 Van Keppel, in my estimation, does not actually exist which has many on the street perplexed as to where the intended lot would be The DEIR indicates proposed occupancy anywhere from 5-185 however there is a very narrow roadway made up of a rock and dirt driveway.

Because of the logistics of this location, it too would not be conducive to an emergency evacuation as it

proximity to the waste treatment plant, would be the most promising of the list of options.

FOR-5 This site has been looked at and grant monies acquired with the hopes of turning this site into a skate park. Forestville has a real need for youth services and this site would be ideal for that purpose. For several years, and with the support of our County Supervisor, this County owned site (Transportation and Public Works - now Sonoma Public Infrastructure), would meet such a need in our community. And equally as important could serve as a barrier to housing built near the sewage plant.

FOR-6 As mentioned above, this property makes the most sense because of its proximity to Main Street where the various small shops and access to public transportation are located. If safety measures can be put in place to mitigate any concerns from the nearby sewer treatment plant, it is a viable option.

FOR-7 This lot would be practical for a small scale unit but impractical for anything larger due to the traffic along Highway 116 and on Mirabel Road which would cause huge headaches for local residents as it would impact the two main thoroughfares.

would be extremely dangerous and impractical as a building site for that reason alone. The infrastructure

264.7

Thank you for your consideration regarding these comments.

Vikki Miller 7491 Mirabel Road Forestville, CA 707 887-1068 From: Wayne Weeks <wweekster@sbcglobal.net>

Sent: Monday, February 13, 2023 1:36 PM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

**Subject:** Housing planned at Sweetwater Springs??

## **EXTERNAL**

I live just down the street from Sweetwater Springs on SunsetAve. If the amount of units being planned 265.1 is 30, I am totally OPPOSED! This seems far to large of a development for the neighborhood(it would double the population of the hill, the street (one lane only). If true, it is way to large of a development, and to large to not change the essence of our piece of paradise. Lastly, the county should have notified folks that would be impacted, and not one of my neighbors.

Wayne Weeks 14105 Woodland Dr.

ATTENTION: Eric Gage, Planner in Charge Letter 266

Sonoma County PRMD

2550 Ventura Ave.

Santa Rosa, CA

## **DRAFT EIR UPDATE: HOUSING ELEMENT UPDATE**

The following comments and questions apply to ALL the sites proposed for the community of Forestville, CA.

1) Although affordable housing is necessary – it is critical that the implementation process follows the same existing rules and regulations (CEQA, etc) that previous building applications were required to follow. Government officials are voted into office, or appointed, by the taxpaying public, and are therefore bound to follow the same rules and laws that is expected of the public that they work for.

The current approach to locating this housing sets a dangerous precedent for the propagation of a dictatorship style of government, completely at odds with the democratic system intended by our Constitution.

2) State preemption limits the ability of communities to address critical local issues and uphold the values of those living in their communities. Local control gives communities the ability to adapt and have the tools they need to build stronger economies, promote innovation and move forward.

#### **Questions:**

- a. What gives the State of California and Sonoma County the right to ignore established CEQA planning laws, otherwise required to be followed by the voting public, to implement housing increases in rural communities with extremely limited services and without ability to handle more vehicle traffic?
- b. How is this <u>non</u>-conformance to established CEQA evaluation processes and guidelines mitigated?
- c. How is it fair to the general public and developers, when they are required to follow CEQA, and the State or County can choose to ignore CEQA as they choose?
- d. How will this dichotomy and double standard by the State and County be mitigated to prevent future lawsuits?

266.1

266.2

3)	reasonable	to existing tax-paying communities, any increase in housing must be scaled to a and fair percentage of existing community populations, to prevent over-burdening a ommunity with unsustainable impacts to their existing environment.	266.4
	Questions:	Why is the percent increase in housing proposed for the Forestville community significantly out of proportion with the percentage increase amounts proposed in the other community sites discussed in the Draft EIR ?	266.5
	2)	Who came up with the proportions, and what was the reasoning behind the currently proposed increase proportions?	
	3)	Why are the unincorporated areas of Sebastopol, Windsor, Healdsburg, and Cloverdale <u>not</u> included in the distributions ?	266.6
4)	major urba	to amenities, including food, medical, and other services, located mainly along n corridors, must be considered to avoid more automobile traffic, accidents, road nts, pollution, and parking overload.	•
	Questions:		266.7
	1)	Why aren't the proposed locations for housing increases located closer to the Hwy 101 main urban corridors, with easy access to services? How is this non-conformance to the County's General Plan mitigated?	
	2)	How does the county propose that people in the (barely) affordable new housing travel to access services in the main urban corridors?	266.8
	3)	Since people will need to travel, they will likely purchase used / affordable gasburning vehicles to access the urban corridors from the currently proposed remote sites. How does the county plan to mitigate the increased pollution from auto traffic on the existing environment? How is the additional traffic impact on existing roadways mitigated?	266.9

Andy and Renee Tchirkine 8664 Marianna Drive

Forestville, CA 95436

PermitSonoma-Housing@sonoma-county.org

#### Dear Eric:

I have lived on Watson Rd for 8 years. I moved here to live in a rural setting with a slower paced lifestyle that provides a connection to community. The proposed re-zoning of Cutten and Laughlin Roads not only threatens to change the neighborhood to look and feel like a suburb, but ignores the current resident's wellbeing and worse, puts them and any new residents in danger. I am 100% against the proposed rezoning for several reasons:

267.1

• This neighborhood cannot handle the increased number of people and cars. Both Cutten and Laughlin are narrow, small roads that are basically a single line with one way in and one way out. Adding nearly 600 people (a 1700% increase from the current zoning) who on average will make over 1000 trips per day will cause immense congestion into and out of the neighborhood on a regular basis. Add the increased traffic during resort season and the situation becomes untenable. The traffic lights in Guerneville already cannot handle the traffic during resort season when the number of people in town is increased. In addition, the traffic situation would have a negative impact on the businesses in town as getting to these would be much more difficult.

267.2

• The re-zoning is putting the lives of the residents at risk. If there is a mandated evacuation due to a spreading wildfire (which there have been several), there is only one way out on both Cutten and Laughlin. Laughlin is lined with large trees and if a tree were to fall, people could easily be trapped. In addition, due to the traffic issues, residents may be forced to flee on foot. Adding this amount of people to such a small residential area accessed by small country roads is incredibly irresponsible.

267.3

• In a flood there is only one major road to get out of the neighborhood, Armstrong Woods, which is only 2 lanes. Fife Creek runs along Armstrong Woods and often floods, making Armstrong Woods impassable. Adding nearly 600 people to this area would increase the risk of danger to all should there be an evacuation due to flooding. In 2019, the Russian River flooded and left Guerneville an island, with no way in or out. Adding 18% more people to Guerneville primarily in this one area will stretch emergency services such that all residents will be at greater risk of danger.

267.4

• Emergency services are already limited in Guerneville with a very small number of police officers patrolling an immensely large area. Is there a proposal to proportionally increase police and fire personnel if another 588 persons are added to the neighborhood?

267.5

• The existing infrastructure cannot service more residents. The sewage system is antiquated and can barely handle the number of residents currently in the neighborhood. The entire sewer and water infrastructure north of Main Street would most likely need to be evaluated, removed and redone. In addition, the area is prone to electrical black outs for no apparent reason as well as due to storms. Will the power grid be updated as needed?

267.6

Cutten and Laughlin Roads are not suitable locations for the large number of affordable housing units proposed. Adding 588 people would be completely irresponsible from a health and safety perspective. I hope that the Planning Department and County Council listen to those who are affected most, the residents of this area who live and pay property taxes in Sonoma County.

267.7

Sincerely,

Anita Das 16711 Watson Rd. Guerneville, CA 95446

Letter 268

From: caitlin marigold <marigold932002@yahoo.com>

Sent: Tuesday, February 14, 2023 9:41 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org>

Subject: Guerneville zoning

## **EXTERNAL**

Good afternoon, I'm writing you as a resident at 16320 valley laneGuerneville. My partner and I oppose	1268.1
the rezoning and allowing of multiple units to be built. The streets are narrow and cannot handle the	200.
heavy traffic. Many people live in this neighborhood and moved here because of the quietness and	1
zoning that doesn't allow for multi units. We have invested many years of our lives, time and money.	000,
We chose carefully where we wanted to live because of the low density zoning and lack of traffic and	268.2
people. Not only can this neighborhood not handle the traffic, nor is it safe considering flooding, and	
fire dangers. It's not fair to the local community. Also because we live in a valley noise travels far and	i
fast the added noise, traffic, and people would completely change the quality of living for those of us	268.
who live here. Please do not rezone our homes. Sincerely Caitlin marigold Sent from my iPhone	I

From: Janice Stenger < <u>janicestenger@yahoo.com</u>>

**Sent:** Tuesday, February 14, 2023 1:01 PM **To:** Planner < <u>planner@sonoma-county.org</u>>

**Subject:** Re: Some input

## Letter 269

## **EXTERNAL**

I was commenting on Laughlin Road, which is in Guerneville....it applies to our property 16450 Laughlin but it also pertains to the other two properties that were chosen; one on Laughlin and one on Cutten Drive. Thank you for your help.

On Tuesday, February 14, 2023 at 11:48:13 AM PST, Planner < planner@sonoma-county.org > wrote:

Hello Janice,

Thank you for your comments. Could you please specify which project these comments pertain to, so that I can make sure they get to the right person?

Thank you,

## Doug Bush, MCRP

He/Him

Planner III

Planning and Zoning 707-565-1900 (option 5)

Planner@sonoma-county.org



#### Access Permit Sonoma's extensive online services at www.PermitSonoma.org

Permit Sonoma's public lobby at 2550 Ventura Ave in Santa Rosa is open Monday, Tuesday, Thursday, Friday from 8:00 AM to 4:00 PM, and Wednesday from 10:30 AM to 4:00 PM.

From: Janice Stenger < ianicestenger@yahoo.com >

Sent: Monday, February 13, 2023 1:47 PM

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

Subject: Some input

## **EXTERNAL**

Of course, over-populatin has nothing to do with anything. Importing poverty has nothing to do with the decades long slide into failing education. clogged roads, overcrowded hospitals and poverty. High taxes, high energy costs and very very little for the actual citizen taxpayers. Our state managed to make the pandemic worse with rules that made no sense, billions in unemployment fraud and thousands that lost their jobs. The water situation is real, but also enhanced by the recent governors reluctance to build water storage infrastructure. Sorry that you didn't see the golden days of California, when the majority of people built their own sturdy houses, counties made it easy and communities grew organically and established bonds that don't exist here today.

And the whole story is a canard for the developer lobby. Farm work is seasonal and transient. Farm workers tend to be from elsewhere and are just looking for a place to crash between shifts. There is no economic sense to building permanent housing for temporary workers. But nicer dorms make sense — unfortunately developers looking to make their millions aren't interested in building stuff like that.

269.2 cont.

Since the county is running the EIR,, all their heads of sewer, water, roads, parks will assure us that everything is fine. Our failing Sewer system does need a \$25 million do over because of original shoddy work (as was told to us only a year ago). And yes they put the treated effluent in the River all summer long while they have lowered the water flow from Lake Sonoma, a mitigation required for the Dry Creek Dam and the havoc it played on spawning creeks. Here in Sonoma Co, they identified 59 parcels that were :"suggested" by ( unknown) people (I'm guessing developers) some that are already in talks with the county. Why wasn't it facilitated for the owners to meet and share thoughts? We have just had a county wide water problem, have a road system that hasn't been improved much in 20 years of outlandish growth and

269.3

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hundreds of houses, maybe thousands, that have been turned into VRBO's and taken out of the rental market. The property owners, people that have owned the houses and land now being coveted, with tiny print and slight of hand, the 59 irrelevant owners have had no real information as to the process in any way and the DEIR just magically appeared in January with a comment period that stretches to....Feb. 15th. 1600 pages of university land planning lingo that would take months to untangle. Window dressing

269.5 cont.

269.6

**Objective LU-7.1**: Restrict development in areas that are constrained by the natural limitations of the land, including but not limited to, flood, fire, geologic hazards, groundwater availability and septic suitability.

269.7

From the General Plan. How does building on Laughlin Road fit with this? No fire danger? No Liquification in our valley...can you prove that with maps?Particularly old maps that might untinged by what the county and state wants.

The project is located within the jurisdictional boundaries of the State Responsibility Area for fire protection and is therefore subject to comply with the Department of Forestry and Fire Protection Fire Safe regulations as

provided under Title 14 of the California Code of Regulations, Sections §1270 - §1276.

State fire safe regulations prohibit a single-lane design and configuration of the access road. State law requires safe access for emergency wildfire equipment and civilian evacuation concurrently and requires roads to provide unobstructed traffic circulation during a wildfire emergency (14 CCR §1273.00). The current requirement is for two 10-foot-wide lanes. The project access road does not meet this requirement. State law allows for consideration of one lane roads that connect on both ends to a public two-lane road.

269.8 cont.

Policy 2.7 (5): Protect against intensive development of lands constrained by geologic hazards, steep slopes, poor soils or water, fire and flood prone areas, biotic and scenic areas, and other constraints.

## **Staff Comment:**

Policy LU-7d: Avoid new commercial, industrial, and residential land use designations in areas subject to "high" or "very high" fire hazards, as identified in the Public Safety Element, unless the combination of fuel load, access, water supply, and other project design measures will reduce the potential fire related impacts of new development to insignificant levels.

Staff Comment: The project site is subject to the "High" fire hazard severity zone and adjacent to a "Very High" fire hazard severity zone. The General Plan limits development potential on the property to one primary dwelling unit per 200 acres.

269.9 cont.

Dear Eric,

As a 7 year resident of Watson Road, I am 100% against the proposed re-zoning of Laughlin Road and surrounding areas due to several factors listed below.

## Climate change issues:

- a) Increasing CA Wildfires. This tiny neighborhood would quickly morph into a massive traffic jam, literally endangering the lives of the residents if a mandated evacuation due to a quickly spreading wildfire were to take place. Laughlin is lined with massive redwood trees and in some places there is only room for one car to pass. Laughlin is a narrow dead end there is only one way in, which happens to be the same way out. To propose adding almost 18% more people to the town of Guerneville and almost all of them on the tiny street of Laughlin is a complete and total safety hazard. People who become trapped due to traffic issues could literally burn to death since there is only one narrow way out, and if a tree were to fall, hundreds of residents would be forced to flee on foot. So adding this amount of people to this incredibly small residential area would be completely irresponsible from a safety perspective.
- b) Increased flooding issues. There is only one major road to get out of town, Armstrong Woods Road, and it is only two lanes; one lane northbound (into the mountains no escape) and one lane south (to 116 and River Road). Fife Creek runs alongside Armstrong Woods Road and during the rainy season, oftentimes floods, rendering the two lane highway virtually impossible to use. Adding almost 600 people to this area would greatly increase the risk of danger due to 100 year storms that are now happening every 25 years or so. In March of 2019, the Russian River flooded to the point that the vineyard adjacent to the proposed location was underwater. I live several blocks north of the proposed location and the water level came within 7" of my backdoor threshold (photo evidence to follow at your request).

#### **Sewage Issues:**

The existing sewage system is antiquated and can barely keep up with the number of residents we currently have. The entire sewage infrastructure north of Main Street would most likely need to be evaluated, removed and redone.

#### **Traffic issues:**

Guerneville is about to get a downtown renovation, making the sidewalks larger and sections of the road area more narrow. Both 116 and River Road are major thoroughfares that bring traffic into the town of Guerneville. The amount of daily traffic by 588 new residents would make getting in and getting out almost impossible. Additionally, there would be a negative impact on the businesses in town, since getting to those businesses (& resorts) would be much more difficult.

Laughlin Road is simply not an acceptable location for the addition of affordable housing units. Adding this amount of people would be completely irresponsible from a health & safety perspective. To be clear, I am in no way against adding affordable housing. It simply must be added in a location that will not literally threaten the lives (and/or infrastructure) of the residents who currently live and pay taxes here.

Sincerely,

Tre Gibbs 16713 Watson Road Guerneville CA 95446 270.1

270.2

270.3

270.4

Letter 271

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

Sent: Wednesday, February 22, 2023 11:09 AM

To: PermitSonoma-Housing < PermitSonoma-Housing@sonoma-county.org >

Cc: Eric Gage <Eric.Gage@sonoma-county.org>; Greg Carr <Greg.Carr@sonoma-county.org>; Larry Reed

<Larry.Reed@sonoma-county.org>; Martin Sessi <sessimest@aol.com>; Emma Mann

<soapcauldron@sonic.net>; Don Seppa <donseppa@gmail.com>; Lyndi Brown <lyndi@sonic.net>; R.

Savel <skypilot4u2@yahoo.com>

Subject: Attn: Eric Gage: #2 Penngrove PSZ comments - PRMD DHE DEIR - Permit Sonoma Rezoning

Housing SItes for Housing Update

## **EXTERNAL**

2/22/22

Attn: Eric Gage
Permit Sonoma
2550 Ventura Avenue
Santa Rosa, California 95403.
(707) 565-1391
eric.gage@sonoma-county.org

Permit Sonoma Rezoning Housing SItes for Housing Update - DEIR comments

RE: <u>Penngrove Sewer Zone (PSZ) Capacity Study dated November 4, 2002</u> updated by me, SCWA PSZ engineer David Grundman (*retired*)

I noted several corrections to the Kennedy/Jenks/Chilton study of June,1990 with the conclusion that under the existing physical conditions the collection system <u>did not have sufficient capacity to</u> handle the expected land use build out. Please see the complete study attached.

To my knowledge, <u>nothing has been done to change the physical situation</u> during the past 30 years. However, there has been yet another study done which, was updated September 2016. From my experience, it does little good to do multiple studies and not address actual corrections to the existing problems.

In the September 2016 SCWA PSZ SSPM updated study, there are a number of items that I would take issue with.

#### **SCWA SSPM Section 8:**

The Summary suggests that that the Penngrove system would benefit from continued I/I monitoring and lays out a good monitoring plan, however it does little to determine and identify where the existing identified physical problem areas are located and solving actual known physical problems.

How will monitoring fix an already established previously identified physical problem the known locations? The system is very old and is in need of repairs in order to reduce I/I, a major cause of overflows and inadequate capacity.

**System Evaluation:** second page, first paragraph, suggests that securing manhole covers (this will likely lead to backflows into homes/businesses) and temporarily diverting flows. Where do they plan to divert

the flows to? (It appears to me that this section may have been written by someone(s) lacking actual experience in the operation of a sewer system.)

## **SCWA SSPM Section 9:**

While this section does layout a good monitoring plan, it does little to determine where the problem areas are located. It is not likely that monitoring flows will serve any purpose at this time, lacking normal storm patterns.

271.1cont.

It appears that there is a lot of resources being spent on studies and very little on actually solving the already identified existing conditions and problems.

David Grundman (SCWA retired)
Email: dave pat 1999@yahoo.com

Attachment: Penngrove Sewer Zone (PSZ) Capacity Study dated November 4, 2002