



County of Sonoma
Permit & Resource Management Department

Date: May 20, 2021
To: Sonoma County Planning Commission
From: Nina Bellucci, Project Planner
RE: PLP20-0018 Rezoning Sites for Housing
Public Comments on the Draft Environmental Impact Report
May 20, 2021 Planning Commission Meeting

Comments are provided for informational purposes only. All comments raising substantial California Environmental Quality Act (CEQA) issues will be responded to in the Final Environmental Impact Report. The May 20 public hearing is only to receive public comments and the Commission is not scheduled to deliberate or take action on the project on that date.



From: [Arielle Wright](#)
To: [Nina Bellucci](#)
Cc: [Chelsea Holup](#)
Subject: FW: GA Public Comment - PC 5.20.21 - Item 1 – Draft EIR Commena
Date: May 18, 2021 3:14:44 PM
Attachments: [Logo_green_web_72dpi.png](#)
[GAPublic Comment - PC - May 20 - Item 1 Draft EIR Comments - Rezoning Sites for Housing.pdf](#)
[GACEQALegalMemoHousingSonoma County Planning Commission.docx](#)
[GACommentsHousingInitiativesItem28.30.18.pdf](#)
[SCTAHousingUrban-FootprintHousing Capacity.pdf](#)

From: Teri Shore <tshore@greenbelt.org>
Sent: Tuesday, May 18, 2021 12:51 PM
To: HousingSites <HousingSites@sonoma-county.org>; Nina Bellucci <Nina.Bellucci@sonoma-county.org>
Cc: Greg Carr <Greg.Carr@sonoma-county.org>; PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: GA Public Comment - PC 5.20.21 - Item 1 – Draft EIR Commena

EXTERNAL



May 18, 2021
Sonoma County Planning Commission
Permit Sonoma
575 Administration Drive
Room 102-A
Santa Rosa, CA 95403
VIA EMAIL

Re: Item 1 - Public Comment – Draft EIR Comments: Scattered Rezoning Sites for Housing - County of Sonoma

Summary of Comments:

1. The DEIR finds Significant and Unavoidable Impacts to Wildfire Risk and Transportation (VMT thresholds) – Both Priority Equity and Climate Issues that Cannot Be Mitigated
2. The EIR Analysis on Housing and Population is Inadequate, and Findings are Flawed – Is Project Needed?
3. Housing Rezone encroaches on voter-approved Urban Growth Boundaries in several cities and their associated Sphere of Influence

Action Requested: Scattered Housing Rezone and DEIR Should be Denied or Delayed Until Housing Element Update

Dear Sonoma County Planning Commission,
Greenbelt Alliance urges the Sonoma County Planning Commission to consider and take action on these public comments on the Draft Environmental Impact Report and County of Sonoma's proposed Scattered Housing Rezone of parcels for by-right medium density housing that are currently zoned for other types of uses including agricultural, residential, commercial,

and industrial. We have been making comments on the proposed Scattered Housing Rezone dating back to 2018, several key letters attached.

As you know, Greenbelt Alliance recognizes the urgent need for affordable housing across the income spectrum and supports climate-smart development around the Bay Area. However, this project is a major policy and zoning departure from the existing county General Plan and Housing Element. It is a separate process from the upcoming county Housing Element update that is required by the end of 2022 where a more holistic instead of scattered approach will be taken. The Housing Rezone is premature on its own and should be denied, delayed or folded into the Housing Element Update and associated EIR.

In addition, the Housing Rezone generates “significant and unavoidable” negative environmental impacts by increasing wildfire risk and failing to meet CEQA regulations for Vehicle Miles Traveled. The Housing Rezone will put more people and homes at wildfire risk in an increasingly dangerous hot climate and longer wildfire seasons; and fails to meet new CEQA regulations and thresholds for Vehicle Miles Traveled – a core climate change problem. Those findings alone should cause the county to halt this project now.

Whether this project is even needed remains in question based on population, housing needs and room to grow. In fact, the DEIR acknowledges early on that Housing Rezone project ***“would exceed established population and housing forecasts.”*** **It fails to provide adequate evidence or provide any analysis to explain why it needs to go forward given it exceeds established population and housing forecasts.**

In fact, as of 2018 after the wildfires, there were 21,000 housing units in the pipeline across the county and cities, mostly in the UGBs and Priority Development Areas, according to an analysis by the Sonoma County Transportation Authority. See attached power points. This includes the rebuild of 5,300 homes that were lost in the 2017 wildfires and are getting reconstructed. If you consider the build out of all the General Plans in the county as of 2012, there is adequate capacity to accommodate new housing within the city centers and Priority Development Areas already. This DEIR does not touch on these facts anywhere, but makes broad assumptions and conclusions, and speculates on the need for this project to meet RHNA. For these reasons, and more details below, Greenbelt Alliance urges the Planning Commission to halt further process on the Housing Rezone and the DEIR due to the “significant and unavoidable” negative environmental impacts to Wildfire Risk and Transportation VMTs and the questionable need for the project at all given that the DEIR does not analyze existing housing parcels that could be rezoned for higher density to meet housing needs.

Another option would be to delay any further action on the DEIR or project and wait until the Housing Element is updated. At that point, several of the parcels identified for medium density zoning housing could be reconsidered if needed.

1. The DEIR finds Significant and Unavoidable Impacts to Wildfire Risk and Transportation (VMT thresholds) – Both Priority Equity and Climate Issues that Cannot Be Mitigated

As we reviewed the DEIR, the biggest concern is that the draft EIR finds **“Significant and Unavoidable” impacts that cannot be mitigated in two critical areas of major relevance to public health and safety and climate change: Wildfire Risk Reduction and Vehicle Miles Traveled.**

That means that if this goes forward as proposed, even with lengthy mitigations spelled out in the DEIR, that more people will be exposed to wildfire risk and that housing rezone will generate Vehicle Miles Traveled that exceed allowable thresholds under new California Environmental Quality Act regulations. These two significant environmental impacts are in direct conflict with city, county, regional and state priorities to increase wildfire safety and reduce VMTs and GHGs. It conflicts directly with goals of the Regional Climate Protection Authority. On this basis alone, the Planning Commission should deny

the project as proposed and/or halt it until the Housing Element is updated.

A. WILDFIRE RISK

When it comes to Wildfire Risk the DEIR acknowledges that the medium density housing being proposed is the type of housing MOST AT RISK of loss of life and home to wildfire.

The Office of Planning and Research has recognized that although high-density structure-to-structure loss can occur, structures in areas with low- to intermediate-density housing were most likely to burn, potentially due to intermingling with wildland vegetation or difficulty of firefighter access. Fire frequency also tends to be highest at low to intermediate housing density, at least in regions where humans are the primary cause of ignitions (California Natural Resources Agency 2018).

The DEIR clearly states that even with proposed mitigations, that the housing rezone will increase wildfire risk to residents:

THE PROJECT INCLUDES POTENTIAL SITES THAT ARE IN OR NEAR MODERATE, HIGH, AND VERY HIGH FHSZS. DEVELOPMENT FACILITATED BY THE PROJECT WOULD EXPOSE PROJECT OCCUPANTS AND STRUCTURES TO WILDFIRE RISKS FOR SITES LOCATED IN OR NEAR (WITHIN 2 MILES OF) SRAS OR VERY HIGH FHSZS. WILDFIRE RISK WOULD BE SIGNIFICANT AND UNAVOIDABLE.

The DEIR describes in detail the problems with putting more houses in places where homes and lives are likely to be lost if a wildfire occurs including:

- Spread of wildfire into urban areas
- Unsafe roads that don't provide adequate egress or ingress for evacuations
- Existing codes and regulations have not been updated since before the 2017 wildfires and cannot fully prevent wildfires from damaging structures or occupants
- The project would increase the exposure of new residential development to risk of loss or damage from wildfire.
- Most of the unincorporated county is designated as an SRA.

It seems unthinkable that the County of Sonoma would allow the Housing Rezone to move forward knowing these risks and the facts that there is little to be done to prevent it. The best solution is not to put more people in harm's way. Instead, the county should focus on updating the Housing Element and rezoning existing housing parcels or repurposing parcels that are inside existing urban centers with firefighting services (as well as public water and sewer, which most of the parcels don't currently have).

B. Transportation and VMTS

As the DEIR clearly states, the generation of VMTs by this project is in direct conflict with the county's plans to address climate change emissions, reduce driving and focus on climate-smart city centered growth.

THE ADDITION OF VEHICLE MILES TRAVELED (VMT) BY DRIVERS COMING FROM DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN AN EXCEEDANCE OF VMT THRESHOLDS AND CONFLICT WITH POLICIES SEEKING TO REDUCE VMT IN SONOMA COUNTY. THIS WOULD NOT MEET THE VMT SCREENING CRITERIA. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Like with the wildfire risk above, it seems unthinkable that the County of Sonoma would

move forward with the Housing Rezone when it contributes to the worst environmental threat that we have ever faced: climate change. Given that driving is the number one cause of GHG emissions in the county and in California, the Housing Rezone should be denied or halted until the Housing Element is updated. At that time, if more housing sites are needed, then appropriate parcels identified in the Rezone that are connected to public water and sewer and close to fire/flight services could be considered.

Greenbelt Alliance strongly opposes the adoption of a statement of overriding considerations to allow the Housing Rezone to go forward based on the significant and unavoidable impacts to wildfire risk and Transportation/VMTs.

2. The EIR Analysis on Housing and Population is Inadequate, and Findings are Flawed – Is Project Even needed?

In fact, the DEIR acknowledges early on that Housing Rezone project *“would exceed established population and housing forecasts.”* **It fails to provide adequate evidence or provide any analysis to explain why it needs to go forward given it exceeds established population and housing forecasts.**

In fact, as of 2018 after the wildfires, were 21,000 housing units in the pipeline across the county and cities, mostly in the UGBs and Priority Development Areas, according to an analysis by the Sonoma County Transportation Authority. See attached power points. This includes the rebuild of 5,300 homes that were lost and getting reconstructed. If you consider the build out of all the General Plans in the county as of 2012, there is adequate capacity to accommodate new housing within the city centers and Priority Development Areas already. This DEIR does not touch on these facts anywhere, but makes broad assumptions and conclusions, and speculates on the need for this project to meet RHNA.

Essentially, this project and the DEIR circumvents the Housing Element and provides little if any substance or evidence to support the need for the project, other than to say that the County “has established” or “identified” that there is a need for more housing. Most importantly, the DEIR does not provide an assessment of the existing housing opportunity sites across the county nor consider whether existing housing parcels could be rezoned for higher density to accommodate housing needs.

In fact, the DEIR raises far more questions than provides answers. The project, as stated, is simply a list of parcels that property owners provided to the county that were filtered out by county staff based on various criteria. It is premature to move this project forward before the Housing Element, and based on the DEIR findings, it would be irresponsible for it to move forward as proposed given the increased wildfire risk to people and homes and lack of compliance with CEQA regulations for VMTs, in addition to conflicting with the county’s longstanding commitment to city-centered growth, respecting voter-approved Urban Growth Boundaries, and Climate Emergency resolutions and commitments to reduce driving and VMTs.

In particular, the Draft EIR notes that the Housing Rezone project *“would exceed established population and housing forecasts.”* How can the county move forward with a project on that basis, particularly when there is little in the DEIR to substantiate with data or other evidence that the project is even needed?

The DEIR does not in any way consider or analyze that the cities and the county have many parcels that are already zoned for housing and could be rezoned for higher density and/or innovative new housing solutions. The proposed project is premature at best and misguided at worst and very likely not necessary to meeting housing needs. Such an analysis will be done during the Housing Element. At that time, the County could consider rezoning some of the parcels from the Housing Rezone if needed.

AFFORDABILITY: Another failure in this project and DEIR is to identify the number of affordable units that would result. The problem in our county is lack of affordable housing, not market rate, vacation rental or second homes. Given the fact that 20 percent of Housing Units in the County are either vacant or vacation rentals, it seems like the Housing Rezone is not addressing the core issues about housing stock in Sonoma County. Rezoning parcels may or may not address the affordability or overcrowding issues. The DEIR does not clearly explain how it would.

Instead, the DEIR findings tend to make assumptions and conclusions without providing adequate evidence, citations or substantiation.

Here are several examples where the DEIR makes findings that are not adequately substantiated:

THIS WOULD EXCEED ESTABLISHED POPULATION AND HOUSING FORECASTS, BUT THE COUNTY HAS ESTABLISHED THE NEED FOR ADDITIONAL HOUSING BEYOND THAT ALLOWED IN THE COUNTY'S GENERAL PLAN, DUE TO SHORTAGES IN WORKFORCE HOUSING, OVERCROWDING, AND RESIDENCE DESTRUCTION BY RECENT WILDFIRES AND OTHER EMERGENCIES.

THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT. [Emphasis added.]

The DEIR does not explain how rezoning parcels for medium density housing in wildfire areas would create workforce housing, reduce overcrowding or provide affordability. It just makes a huge leap of faith that it would do so.

Also, in other place the EIR makes these findings with little evidence to substantiate the finding:

The County has also identified a shortage in high-density housing of approximately 20,700 units to accommodate projected household employment and to alleviate overcrowding that occurs in approximately six percent of existing housing units (**County of Sonoma 2018**).

As discussed under Impact PH-1, while the housing unit estimates would exceed the County's General Plan buildout estimates, the County **has identified an ongoing housing need associated with the destruction of residences due to recent fires, overcrowding, and a shortage of high-density housing. [Emphasis added.]**

The first citation above is from the Beacon Economics Report for the Sonoma, County from 2018. Sonoma County Complex Fires: Housing and Fiscal Impact Report. Beacon Economics. This is a consultant report that does not have any standing under CEQA and it was never publicly reviewed. It is not adequate evidence or a basis for the county going outside the General Plan and Housing Element.

In addition, the DEIR seems to count the homes lost to the wildfires as permanent loss of housing stock. The DEIR seems to be saying that the "destruction of residences due to recent fires" won't be rebuilt. Is the DEIR considering those homes as permanently removed from the housing stock?

Does the EIR account for the fact that the population displaced by the wildfires and other disasters will either return or be replaced? Are they added to the population increase numbers? How will rezoning parcels in scattered locations address overcrowding? Will people living in overcrowded homes be given first choice to move into new housing? What is the correlation or any analysis or evaluation of this assertion that rezoning parcels will relieve overcrowding? How does a Housing Rezone for Medium Density Housing address a shortage of High-Density Housing? Where is the correlation or evaluation or any evidence that this is true in the DEIR?

Also, what exactly does this mean?

Other **project-level developments** would be required to adhere to applicable zoning and development regulations and General Plan policies to mitigate environmental impacts where feasible and would undergo environmental review, including consideration of whether the

projects would **induce unplanned population growth**. With these considerations prior to project approval, cumulative impacts related to growth inducement would be less than significant. Furthermore, the proposed project's contribution to less than significant cumulative impacts for Impact PH-1 would be less than cumulatively considerable. This is supposed to be a Programmatic EIR to allow the proposed parcels to get rezoned and then built in a streamlined process without further environmental review. The state above seems to contradict that and/or to make very confusing claims to achieve a finding of "less than significant" impact.

RHNA

The DEIR claims that the project was intended to meet RHNA numbers. It acknowledges that the county is currently meeting RHNA and that new RHNA numbers will be higher according to draft numbers released by ABAG. Please note that those numbers have not been finalized, though the DEIR cites that they were final in January 2021, which is incorrect.

In any case, the only way to know if this project is needed to achieve RHNA or not is to wait until the Housing Element is updated so we know what existing housing parcels remain and how the county might rezone those parcels and/or other parcels already identified as opportunity housing sites. **The need for this project to meet RHNA numbers is purely speculative until the Housing Element is updated.**

Using RHNA as a reason to forward this project is premature until the Housing Element is updated as required by law. If at that time, some of these parcels are integrated into the long-term planning for housing in our county, then they could be revisited.

3. Housing Rezone encroaches on voter-approved Urban Growth Boundaries in several cities and their associated Sphere of Influence

For the first time since voter approved UGBs were voted into every city more than a quarter century ago, this is the first time that the county has attempted to override the wishes of the voters and City Councils and planners to impose zoning on lands that are expected to be areas of growth and potential annexation for each of those cities. The UGBs are also aligned with LAFCO Sphere of Influence boundaries designed to further orderly growth and prevent sprawl.

None of the cities that we contacted supported this action as it will impinge on these cities' ability to grow and meet their housing needs in the future; putting needless additional pressure for unhealthy sprawl and loss of greenbelts.

Potential Sites are within Urban Growth Boundaries of Santa Rosa, Petaluma and Sonoma and near incorporated areas located in Geyserville, Guerneville, Larkfield, Forestville, Graton, Glen Ellen, Agua Caliente, and Penngrove.

Greenbelt Alliance reached out to many of the communities involved. Most didn't know about the proposed rezone, were opposed or were interested in finding out more. Clearly, more outreach is needed particularly to those who live in those communities.

Summary and Conclusion

Greenbelt Alliance is a strong advocate for climate-smart growth and housing in the right places. We recognize the housing crisis and support innovative ways to provide more affordable, missing middle and market rate housing in city centers near public services, transit and jobs. We are proactive and endorse housing projects that are sometime unpopular with neighbors because we realize it is essential to provide housing as a basic human right. But we need to do right in a way that serves the community, the climate, the environment, and economy. For projects that are in direct conflict with our mission and goals, we actively oppose.

The Scattered Housing Rezone is not in line with our mission to support climate-smart growth. That is why we oppose it going forward as proposed. Instead, it should be halted until the Housing Element is updated and we can see where and how we can provide housing inside

existing urban areas, adding innovative housing options, and without scattering housing on the edge of UGBs and rural communities.

Thank you so much for your consideration of our views.
Sincerely yours,



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cc Sonoma County Board of Supervisors
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Santa Rosa Office
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August 29, 2018

Sonoma County Planning Commission
C/o Permit Sonoma
2550 Ventura Avenue
Hearing Room
Santa Rosa, CA 95403

Re: Item 2 – New County Housing Initiatives and Negative Declaration

Dear Planning Commission,

Greenbelt Alliance generally supports measures to allow housing and higher density in city centers to create walkable, bike friendly communities near jobs, transit and services. We appreciate the County of Sonoma's intention to forward new and innovative housing policies to advance the rebuild and recovery after the North Bay fires of 2017.

However, Greenbelt Alliance and our allies have concerns about the proposed new housing measures because they increase housing units and population in the unincorporated areas outside of city centers and UGBs. While we understand that the proposals are focused on existing Urban Service Areas, we urge the Planning Commission to address concerns relating to environmental impacts under the California Environmental Quality Act (CEQA), affordability and other important issues before voting on the four measures, particularly the Workforce Housing Combining Zone, Cottage Housing Provisions, and Streamlined Multifamily Development code standards.

In your deliberations, please consider that right now there are about 16,000 new housing units in the pipeline across Sonoma County (cities and county) that are in line with current housing policies, General Plans and Housing Elements per a recent draft "housing capacity" presentation at the Planning Advisory Committee of the Sonoma County Transportation Authority, which will be finalized for the full SCTA board on Sept. 10.

If you add the rebuild of 5,300 homes that were lost and now slowly getting reconstructed, a total of more than 21,000 new units are in the works. If you consider the build out of all the General Plans in the county as of 2012, there is adequate capacity to accommodate most new housing within the city centers and Priority Development Areas already. This is also consistent with Plan Bay Area 2040.

If the County of Sonoma desires to create new housing opportunities beyond the existing frameworks, in our view, the county and our communities need to carefully analyze the pros and cons of these innovative and significantly different housing policies before approving. We don't want to make short-term decisions that may have long-term negative environmental impacts without doing so!

Greenbelt Alliance's mission is to fully protect the Bay Area's 3.6 million-acre greenbelt of natural and agricultural lands; direct all new development into already urbanized areas; and supporting urban development that benefits residents across the socio-economic spectrum.

Overview

In May 2018, Sonoma County approved changes to the County Code pertaining to accessory dwelling units (Ordinance No. 6222) and mixed-use projects and single room occupancy projects (Ordinance No. 6223). Both ordinances, approved in May, were determined to be categorically exempt from the California Environmental Quality Act (CEQA).

A second set of housing initiatives that would also amend the County's zoning code are proposed for consideration at the Planning Commission's August 30, 2018 hearing. These include: (1) simplifying development standards for multi-family housing; (2) allowing higher densities near jobs and transit through provision of a new Workforce Housing Combing Zone; (3) providing a new housing type called Cottage Housing Developments that will provide multi-unit housing in the style, scale, and size of single-family homes, in low-and medium-density neighborhoods; (4) allowing the use of a new density unit equivalent concept to encourage more smaller rental units and fewer larger units; and (5) codifying the existing condominium conversion policy and better protections for residents in rental mobile home parks. All of the initiatives call for expanding housing opportunities within designated Urban Service Areas.

Here are our key concerns:

1. Environmental Review and Negative Declaration is Inadequate

On August 9th, the County published a Negative Declaration for the second set of housing initiatives. The Negative Declaration states that the housing initiatives would have *no* environmental impacts.

It is evident, however, that the housing initiatives would have the potential to impact water, endangered species, auto travel, greenhouse gas emissions, and fire risk. Prior to making a decision on the housing initiatives, the County must comply with the California Environmental Quality Act (CEQA) by providing additional analysis of the following environmental impacts:

- Because the code amendments will allow for additional housing (e.g., changing the development standards for multi-family housing and allowing cottage housing developments), they have the potential to increase vehicular trips. This increase in vehicle trips (discussed further below) would likely result in increased air pollutant emissions which, in turn, could result in conflicts with the BAAQMD Clean Air Plan prepared to bring the region into compliance with the state and federal ozone standards. The County must analyze the potential air quality impacts resulting from the proposed code amendments.
- Future housing projects allowed by the proposed code amendments could be located within the Santa Rosa Plain, where four state and federally listed Endangered vernal pool adapted plant species, and designated critical habitat for California tiger salamander (CTS) (*Ambystoma californiense*) currently reside. (Negative Declaration page 12). CTS are associated with vernal pools and seasonal wetlands as well as upland annual grasslands on the Santa Rosa Plain. CTS is federally-listed Endangered and state-

listed Threatened. (*Id.*) The County must evaluate the potential for the code amendments to adversely impact biological resources. If the impacts are determined to be significant the County must identify mitigation measures or alternatives capable of reducing these impacts.

The zoning code amendments would allow development in locations within Very High Fire Hazard Severity Zones. (Negative Declaration at 18). Despite this fact, the Negative Declaration downplays the potential for any impacts (e.g., exposing people or structures to loss, injury or death), claiming that the housing projects would be subject to the Wildland-Urban Interface Building Code. This approach is unacceptable. *See East Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 302 (“The general plan alone does not constitute substantial evidence that there is no significant impact.”) Codes are certainly necessary as they contain standards that include fire resilient building materials and defensible space requirements. However, building codes alone are not sufficient to protect life and property.

Please see detailed CEQA memo attached that explains how and why the County of Sonoma needs to conduct a more thorough environmental review before advancing these housing initiatives.

2. Housing Affordability levels are not included

One of the main reasons for these new measures is lack of affordable housing. However, none of the measures (except the mobile home ordinance) requires the construction of any affordable housing. It assumes that building micro-apartments will be affordable, but the rest market rate.

How will the county ensure that the micro-apartments will be affordable and to whom?

How will these measures help solve the problems outlined in the staff report related to the scarcity of rentals and high prices?

Please direct staff to estimate how many affordable units and at what level and for how many years that will be provided through the passage of these measures.

3. How many units and parcels?

Neither the Initial Study nor the staff report describes how many parcels or potential new housing units might be constructed by these measures. The public needs to be able to identify the potential increase in housing units and map the location of these units. For example, with the ADU ordinance, staff identified about 2,000 potential new units in rural areas. While GA may support additional density in urban areas, developing housing in rural areas may lead to increased auto travel, air pollution, increased greenhouse gas emissions and heightened wildfire risk.

The staff makes one reference to parcels related to one of the options for cottage housing as follows:

This option would eliminate detached cottage housing development potential on 10,022 parcels with R1 zoning, reducing the impact these code changes could have on the County’s housing stock, but would allow conversion of existing homes into attached cottage housing on those parcels.

This indicates that Permit Sonoma does have information about the numbers and locations of parcels that would be effected by the new measures. Please direct staff to provide a more detailed analysis of what and how many parcels and where could be rezoned for cottage housing and workforce housing.

4. Commercial and industrial lands conversion - need?

Neither the Initial Study nor the staff report explain what the result might be of converting commercial and industrial lands to housing in the long term. The County must analyze the long term effect on the economy from rezoning commercial and industrial uses. And at the airport in particular, which is expanding service and passengers. And what about cannabis industry?

Please direct staff to provide the most current analysis of the need for commercial and industrial lands in the county and how the need will be met in the future if land-use is converted to housing.

5. Urban Service Areas near Urban Growth Boundaries

Two areas that may qualify for conversion from commercial and industrial to housing are the airport business park and 8th St. East in the town of Sonoma. Those areas are in between or on the edge of city-approved UGBs and could trigger expansion of those UGBs if housing is added, contributing to sprawl.

Have the cities of Santa Rosa, Windsor and Sonoma been contacted to review these county policies and potential direct and indirect impacts to voter approved UGBs?

Please direct staff to conduct an analysis of the potential impacts of these measures on the city-approved UGBs and to seek review and input from the most relevant cities.

6. Housing Element and General Plan

Neither the Initial Study nor the staff report evaluate how the increase in units resulting from the proposed measures compares to the projections in the County's General Plan and the Housing Element in particular?

As part of this analysis, the County must evaluate the proposed code amendments' consistency with the County's Housing Element. Although the Negative Declaration (page 22) states that the proposed amendments are consistent with and directly implement the County's Housing Element, it fails to provide any analytical evidence to support this statement.

Please direct staff to provide details on the number of housing units already identified in the Housing Element for rural areas and the Urban Service Areas in the unincorporated areas and how the estimated increase in units from these proposed measures compare.

7. RHNA - – Neither the Initial Study nor the staff report disclose how these measures help to address the county's RHNA numbers, particularly when there is no requirement for affordability?

Also, the county is meeting its RHNA numbers under current plans, one of the few jurisdictions in the state that is doing so.

Please direct staff to provide details on how the proposed measures would help meet RHNA gaps for the current 2014-2023 cycle.

8. Public review - The measures would appear to preclude public participation because they would allow cottage housing or workforce development project to be approved "by right" or with design review in some cases. Certain types of projects would not even need Planning Commission review. The measures would also

eliminate the requirement for use permits in some cases. Please direct staff to explain in more detail the numbers and types of projects that would receive reduced public review through by-right and other streamlining proposed in these measures.

Public review of measures: When it comes to these four fairly complicated measures, few people in the communities that will be affected know about them. The staff cites meetings with developers and one public workshop in Santa Rosa. The staff report refers on several occasions to developer profitability, regulatory certainty for developers and flexibility and ease for developers.

We didn't see similar references to community benefits or any other type of public comment, such as those that were made at the public workshop.

Please direct staff to provide the minutes or summary of the comments that were received at the public workshop (which Greenbelt Alliance attended along with several housing advocates and homeowners).

There is also a comment in the staff report that if these measures are not adopted, that Sonoma County will become "Marin North." Please ask staff to explain this comment and what this means exactly, or strike it from the staff report.

Greenbelt Alliance urges that public workshops be held in each of the areas that might be most impacted, such as the Sonoma Valley Citizens Advisory Committee (which is tentatively scheduled for September after the PC meeting). Others that should be notified (and which I've notified directly) include the Geyserville Planning Committee and Springs Alliance. Others that should be informed include the communities of Larkfield-Wikiup, Guerneville and Forestville, Bodega Bay.

Ultimately, Greenbelt Alliance suggests that such important and far reaching housing policy changes be part of the General Plan Update, not as individual stand-alone ordinances.

In any case, decision makers and the public should be fully informed of the consequences of these new housing policies before the County takes action.

Sincerely yours,



Teri Shore

Regional Director, North Bay

CEQA Legal Memo attached below

Greenbelt Alliance – California Environmental Quality Act - Legal Memo

Sonoma County Planning Commission

1 pm, August 30, 2018

County Housing Initiatives

Negative Declaration is Inadequate under CEQA

The Negative Declaration to support the County’s proposed zoning code amendments states that the proposed housing initiatives would have *no* environmental impacts. Greenbelt Alliance and its legal advisors believe that this is inadequate and that additional environmental review is required to disclose potential negative environmental impacts from the proposed measures before approval or adoption.

CEQA’s low threshold for preparing an EIR.

Under CEQA, the legal standard for preparing an EIR is very low. Specifically, CEQA provides that a lead agency may issue a negative declaration and avoid preparing an EIR *only* if “[t]here is no substantial evidence, in light of the whole record before the lead agency, that the Project may have a significant effect on the environment.” CEQA § 21080(c)(1). The Supreme Court has held that an agency must prepare an EIR whenever it is presented with a “fair argument” that a project may have a significant effect on the environment, even if there is also substantial evidence to indicate that the impact is not significant. *No Oil, Inc. v. City of Los Angeles* (1974), 13 Cal. 3d 68, 75; Guidelines § 15064(f)(1). Where there are conflicting opinions regarding the significance of an impact, the agency must treat the impact as significant and prepare an EIR. Guidelines § 15064(f)(1).

Increasing the housing density in the County has the potential to create significant impacts on the environment:

- Because the code amendments will allow for additional housing (e.g., changing the development standards for multi-family housing and allowing cottage housing developments), they have the potential to increase vehicular trips. This increase in vehicle trips (discussed further below) would likely result in increased air pollutant emissions which, in turn, could result in conflicts with the BAAQMD Clean Air Plan prepared to bring the region into compliance with the state and federal ozone standards. The County must analyze the potential air quality impacts resulting from the proposed code amendments.
- Future housing projects allowed by the proposed code amendments could be located within the Santa Rosa Plain, where four state and federally listed Endangered vernal pool adapted plant species, and designated critical habitat for California tiger salamander (CTS) (*Ambystoma californiense*) currently reside. (Negative Declaration page 12). CTS are associated with vernal pools and seasonal wetlands as well as upland annual grasslands on the Santa Rosa Plain. CTS is federally-listed Endangered and state-listed Threatened. (*Id.*) The County must evaluate the potential for the code amendments to adversely impact biological resources. If the impacts are determined to be significant the County must identify mitigation measures or alternatives capable of reducing these impacts.

- The zoning code amendments would allow development in locations within Very High Fire Hazard Severity Zones. (Negative Declaration at 18). Despite this fact, the Negative Declaration downplays the potential for any impacts (e.g., exposing people or structures to loss, injury or death), claiming that the housing projects would be subject to the Wildland-Urban Interface Building Code. This approach is unacceptable. See *East Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 302 (“The general plan alone does not constitute substantial evidence that there is no significant impact.”) Codes are certainly necessary as they contain standards that include fire resilient building materials and defensible space requirements. However, building codes alone are not sufficient to protect life and property.

Discussing the deadly wildfires that ravaged Northern California last year, Wayne Vroman, an associate with the Urban Institutes Center on Labor, Human Services, explains,

[California] has strong building codes that have requirements for what buildings and roofs can be made of. But the state is densely populated, it’s very dry, and it has high winds. No one expected a fire of this kind in Napa County and Sonoma County. It’s unheard of. In such a densely populated area, a lot of new buildings are located in heavily wooded areas and reflect the expansion of an urban area. People are building in woods and other areas with lots of foliage. If a fire occurs, it has serious consequences for the people in those locations. That will be a continuing phenomenon as our population grows and as we decentralize. California’s devastating wildfires reveal how urban sprawl can endanger communities.¹

The County must evaluate impacts relating to the development of additional housing in the wildland urban interface and the potential for increased ignitions. As part of this evaluation, the County must analyze impacts relating to emergency response and evacuation.

- The new housing development that would occur with the zoning code amendments could also adversely impact groundwater and surface water resources. Although water supply for most of the new development would be provided by the Sonoma County Water Agency. (Negative Declaration page 20), the Negative Declaration does not provide any analysis regarding the adequacy of the Water Agency’s current and projected water supply. In addition, some of the development would be in the community of Graton yet the Graton Urban Service Area does not have a public water system. *Id.* The Negative Declaration cannot simply assert that there will be no impact on water supply, it must support its conclusion with facts and analysis.
- Although the zoning code amendments are specifically intended to allow and encourage additional housing within the County, the Negative Declaration incorrectly concludes that the amendments would

¹ See “California’s devastating wildfires reveal how urban sprawl can endanger communities;” Urban Institute, October 27, 2017; available at <https://www.urban.org/urban-wire/californias-devastating-wildfires-reveal-how-urban-sprawl-can-endanger-communities>: accessed August 17, 2018.

not induce population growth (Negative Declaration page 24). The document relies on the assumption that adding more, smaller units in place of a smaller number of large units, would result in equivalent numbers of occupants. (*Id.*). In particular, the Negative Declaration assumes a studio could be occupied by two people and a three-bedroom unit could be occupied by seven people. (Negative Declaration page 25). According to the California Department of Fair Employment and Housing and U.S. Department of Housing and Urban Development, however, if there are no problems from a health and safety perspective, more persons may be permitted.² The County cannot simply rely on housing guidelines to conclude the proposed code amendments would not induce population growth, it must disclose the number of additional housing units (regardless of size) that would be allowed with the proposed code amendments.

- As part of this analysis, the County must evaluate the proposed code amendments' consistency with the County's Housing Element. Although the Negative Declaration (page 22) states that the proposed amendments are consistent with and directly implement the County's Housing Element, it fails to provide any analytical evidence to support this statement.

The City cannot avoid CEQA compliance by claiming that a zoning code amendment is not a development project.

The County asserts that no physical changes to the environment will result from the proposed zoning code amendments. (Negative Declaration page 1). However, CEQA refutes this argument. CEQA specifically provides that it "shall apply to discretionary projects proposed to be carried out or approved by public agencies, including, but not limited to, the enactment and amendment of zoning ordinances . . ." Pub. Resources Code § 21080(a). Likewise, CEQA Guidelines section 15378(a) defines "project" to include the "enactment and amendment of zoning ordinances."

At the same time, the courts have firmly held that lead agencies must analyze the effects of planning and zoning enactments even if the property owner will need to obtain additional approvals before actually constructing a project. For example, in *City of Carmel-by-the-Sea v. Bd. of Supervisors* (1986) 183 Cal.App.3d 229, 235, 244, the court held that a zoning amendment was a "commitment to expanded use of the property" that must be analyzed under CEQA even if "no expanded use of the property was proposed." See also *Koster v. County of San Joaquin* (1996) 47 Cal.App.4th 28, 34, 39-42 (county must analyze its decision to allow development of two new towns, even though no construction had yet been authorized). Because the approval of a zoning enactment serves as a crucial "first step" toward approval of particular development projects, CEQA requires that the lead agency analyze the impacts of the ultimate amount of the development allowed under the new zoning. *Bozung v. Local Agency Formation Com.* (1975) 13 Cal.3d 263, 279, 282 (EIR must examine project's potential to impact the environment, even if the allowed development may not ultimately materialize).

² See "How Many People Can Legally Live in a One Bedroom Apartment?," available at: <https://homeguides.sfgate.com/many-people-can-legally-live-one-bedroom-apartment-83311.html>; accessed August 20, 2018.

Accordingly, the County cannot rely on the Negative Declaration for approval of the zoning code amendments; it must prepare an EIR to analyze the impacts of the full development allowed by the amendments.

Compliance with regulations does not ensure a project will have no impact.

In several instances, the Negative Declaration asserts that future development projects would need to obtain permits prior to construction, suggesting that permit compliance would reduce impacts to less than significant levels. For example, the Negative Declaration (page 12) suggests that impacts to streams, wetlands, and riparian habitats would be less than significant because future development projects would have to comply with the County's Riparian Corridor Ordinance and Tree Protection Ordinance.

This approach is contrary to CEQA. Merely requiring compliance with agency regulations does not conclusively indicate that a proposed project would not have a significant and adverse impact. In *Kings County Farm Bureau v. City of Hanford* (1990), 221 Cal.App.3d 692, 716 (1990), for example, the court found that the fact that the EPA and the local air pollution control district had issued the necessary air emission permits for the construction of a coal fired cogeneration plant did not nullify the CEQA requirement that the lead agency analyze the significant air quality impacts of the entire project.

Moreover, the Negative Declaration's assertion that projects will be required to comply with General Plan policies to dramatically reduce GHG emissions falls short of CEQA requirements. (Negative Declaration page 16). While policies calling for a reduction in GHG emissions are important, the Negative Declaration fails to provide any evidentiary support that future projects would even be capable of achieving a sufficient level of emission reductions.

The County is relying on the wrong baseline for evaluating the project's transportation impacts.

Long standing CEQA case law holds generally that an agency may not compare the impacts of a project to those that would occur in a plan (such as the County General Plan or the Zoning Code); rather, the agency must assess the project's impacts on the ground. In *Communities for a Better Environment v. South Coast Air Quality Management District* (2007), 158 Cal.App. 4th 1336, 1353, the court struck down the approval of a project where the negative declaration failed to analyze impacts using an appropriate baseline. The finding of no significant environmental impact and thus the decision to prepare a negative declaration was based on analysis that used "the level of emissions that [the applicant] is allowed to emit under existing permits as the baseline, even though [the applicant] may not have released that level of emissions in the past." The court explained that using the "permits maximum figure as the baseline for [the project], ... improperly calculated the baseline environmental setting on the basis of 'merely hypothetical conditions' as opposed to 'realized physical conditions on the ground.'" *Id.* (citing *San Joaquin Raptor Rescue Center v. County of Merced* (2007), 149 Cal. App. 4th 645, 658). "[W]e conclude that a project's baseline is normally comprised of the existing environmental setting-not what is hypothetically allowed pursuant to existing zoning or permitted plans." *Id.* at 1361.

Sonoma County makes the same mistake here in its analysis of transportation impacts. In determining baseline, the Negative Declaration assumes that single-family residential lots will build out to maximum intensities and then determines average daily trip generation rates based on this hypothetical buildout level. The County's

current plans allow single-family lots in the County to contain three dwelling units: a single-family dwelling of unspecified size; an accessory dwelling unit of up to 1,200 square feet; and a Junior Accessory Dwelling Unit of not more than 500 square feet. The Negative Declaration then calculates average daily trips for this hypothetical baseline scenario: 9.44 trips for the single-family home; 7.55 trips for the accessory dwelling unit; and 5.0 trips for the junior accessory dwelling unit, for a total of 21.99 average daily trips. (Negative Declaration page 29).

The Negative Declaration then calculates the expected trip generation from the *proposed* housing initiatives. For example, the cottage housing development would allow for three small cottages (900 square feet each) on the same lot, in place of the scenario above. The calculated daily trips for three cottages would be 3 x 7.55, for a total of about 23 average daily trips. The Negative Declaration then determines that the code amendment would result in no traffic impacts because the cottage housing would result in roughly the same number of trips as that generated by a single-family lot. (*Id.*)

The Negative Declaration's approach is misleading and legally deficient. While the County's existing plans may allow three units on a single-family lot, single-family lots generally do not contain this intensive level of development. The average trip generation rate for a single-family home is generally about 9 or 10 average daily trips, not 22.65.³ By assuming the maximum number of vehicular trips that are hypothetically allowed by the County's plans, the Negative Declaration substantially *underestimates* the potential traffic impacts that would result from the proposed housing initiatives. Rather than rely on this hypothetical scenario, the County must use a baseline that identifies existing traffic conditions absent the proposed housing initiatives, and then evaluate the effect that the trips from the housing initiatives would have on streets and intersections.

Furthermore, this baseline problem is not the only error in the Negative Declaration's transportation section. The County also neglects to conduct the transportation impact analysis required by Section 21099 of the Public Resources Code. That section states that the criteria for determining the significance of transportation impacts must promote: (1) the reduction of greenhouse gas emissions; (2) the development of multimodal transportation networks; and (3) a diversity of land uses. Pub. Resources Code, § 21099, subd. (b)(1).) To this end, vehicle miles traveled (VMT) is now considered the most appropriate metric (as opposed to level of service) to evaluate a project's transportation impacts. As one appellate court recently explained: "During the last 10 years, the Legislature has charted a course of long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing greenhouse gas emissions." *Covina Residents for Responsible Development v. City of Covina*, Feb. 28, 2018, B279590) __ Cal.App.5th __, ordered pub. Mar. 22, 2018.). To this end, the County should identify the increase in VMT from the housing initiatives and determine whether this increase constitutes a significant impact under CEQA. If so, the County must identify mitigation measures or alternatives capable of reducing this impact.

³ See Trip Generation Analysis Table 1, available at: https://www.ci.azusa.ca.us/DocumentCenter/View/36831/Appendix-G_Trip-Generation-Analysis?bidId=; accessed August 15, 2018.

Sonoma County Planning Commission

1 pm, August 30, 2018

County Housing Initiatives

Greenbelt Alliance – California Environmental Quality Act - Legal Memo

Negative Declaration is Inadequate Under CEQA

The Negative Declaration to support the County’s proposed zoning code amendments states that the proposed housing initiatives would have *no* environmental impacts. Greenbelt Alliance and its legal advisors believe that this is inadequate and that additional environmental review is required to disclose potential negative environmental impacts from the proposed measures before approval or adoption.

CEQA’s low threshold for preparing an EIR.

Under CEQA, the legal standard for preparing an EIR is very low. Specifically, CEQA provides that a lead agency may issue a negative declaration and avoid preparing an EIR *only* if “[t]here is no substantial evidence, in light of the whole record before the lead agency, that the Project may have a significant effect on the environment.” CEQA § 21080(c)(1). The Supreme Court has held that an agency must prepare an EIR whenever it is presented with a “fair argument” that a project may have a significant effect on the environment, even if there is also substantial evidence to indicate that the impact is not significant. *No Oil, Inc. v. City of Los Angeles* (1974), 13 Cal. 3d 68, 75; Guidelines § 15064(f)(1). Where there are conflicting opinions regarding the significance of an impact, the agency must treat the impact as significant and prepare an EIR. Guidelines § 15064(f)(1).

Increasing the housing density in the County has the potential to create significant impacts on the environment:

- Because the code amendments will allow for additional housing (e.g., changing the development standards for multi-family housing and allowing cottage housing developments), they have the potential to increase vehicular trips. This increase in vehicle trips (discussed further below) would likely result in increased air pollutant emissions which, in turn, could result in conflicts with the BAAQMD Clean Air Plan prepared to bring the region into compliance with the state and federal ozone standards. The County must analyze the potential air quality impacts resulting from the proposed code amendments.
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adversely impact biological resources. If the impacts are determined to be significant the County must identify mitigation measures or alternatives capable of reducing these impacts.

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Raptor Rescue Center v. County of Merced (2007), 149 Cal. App. 4th 645, 658). “[W]e conclude that a project’s baseline is normally comprised of the existing environmental setting-not what is hypothetically allowed pursuant to existing zoning or permitted plans.” *Id.* at 1361.

Sonoma County makes the same mistake here in its analysis of transportation impacts. In determining baseline, the Negative Declaration assumes that single-family residential lots will build out to maximum intensities and then determines average daily trip generation rates based on this hypothetical buildout level. The County’s current plans allow single-family lots in the County to contain three dwelling units: a single-family dwelling of unspecified size; an accessory dwelling unit of up to 1,200 square feet; and a Junior Accessory Dwelling Unit of not more than 500 square feet. The Negative Declaration then calculates average daily trips for this hypothetical baseline scenario: 9.44 trips for the single-family home; 7.55 trips for the accessory dwelling unit; and 5.0 trips for the junior accessory dwelling unit, for a total of 21.99 average daily trips. (Negative Declaration page 29).

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Furthermore, this baseline problem is not the only error in the Negative Declaration’s transportation section. The County also neglects to conduct the transportation impact analysis required by Section 21099 of the Public Resources Code. That section states that the criteria for determining the significance of transportation impacts must promote: (1) the reduction of greenhouse gas emissions; (2) the development of multimodal transportation networks; and (3) a diversity of land uses. Pub. Resources Code, § 21099, subd. (b)(1).) To this end, vehicle miles traveled (VMT) is now considered the most appropriate metric (as opposed to level of service) to

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1029614.2

Chelsea Holup

From: Ed Fortner <efortner@sweetwatersprings.com>
Sent: April 22, 2021 11:14 AM
To: Nina Bellucci
Subject: EIR Lot 070-070-040 GUE-1

EXTERNAL

Nina,

We need Lot 070-070-040/ GUE-1 removed from the County's list of properties to potentially be rezoned for public housing. This is our Water Treatment Plant and Water Storage site on 14156 Sunset Avenue, Guerneville. I have asked several times as each list is distributed to have this lot removed from consideration. Please advise. I would like an email or letter saying this will be removed, please. Feel free to call to discuss if necessary. I left you a voicemail on this subject.

Sincerely,

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



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Chelsea Holup

From: Jan Frost <jan.frost@sbcglobal.net>
Sent: April 21, 2021 10:13 AM
To: HousingSites
Subject: Nina, thank you for your consideration - PLEASE SHARE

EXTERNAL

PET-4
I moved from the east coast to live in Sonoma County more than 40 years ago. I chose Sonoma County because I had a farming background and I loved the wholesome agricultural presence and influence. I became a 4-H leader in Southwest Santa Rosa for many years where I had purchased a farm and I was able to contribute my experience to children in our Freedom 4-H Chapter. I attended the livestock auctions- bought and sold for myself and others in Santa Rosa and Petaluma every week, raised hogs, sheep, goats etc. More often than not during those days- I was the only woman in attendance at these auctions. For this great experience, I am very proud and appreciative to Sonoma County Agriculture and the men and women that built our Agriculture to the standard that it is today. Ultimately, I sold the farm and moved to West Petaluma in order to purchase and rehab the oldest wood frame church in town- the original Lutheran Church on the corner of 5th and F street.. It had been abandoned and was in extreme condition. My husband and I were immediately "taken" by it and decided to do a complete restoration without disturbing the integrity of the buildings - church, parsonage and school. We made all of our decisions based on visitors that had married there, shared in Baptisms, etc. It was a very exciting time for the community as well... Fast forward, we decided to sell the Church and associated buildings after 18 years because our "Mission" was complete and we wanted to "return to the land" again- thus, we purchased APN 019-090-058 - commonly known as 1002 Bodega Ave. This land was split off for an adjacent property owned by the Sorenson Family. We LOVED the terrain and the "rise" of the parcel at the top of the hill and felt it was the perfect place to build a home. In addition, it met our requirement to be located close enough to walk to the town that we loved so much and had built lifelong friendships in. I began to develop the property first by having my well installed by Jim Mickelson's company - Jerry and Don's Yager. I thought it would be a great opportunity to call on Jim for his business since we had both worked at Ross-Holm together in Petaluma many years ago when we were very young... I then called on Maus Electric for my phone pole and electrical service. I had it fenced, cross fenced , surveyed etc. Then the problems began -public meetings were being held to change the type of allowable septic system in Sonoma County - it appeared that a system that would cost me around \$7,000 could end up being \$70,000.. (a mound system) ***I researched the adjacent properties and learned that they are All on city sewer even though they are out side city limits also! When I learned of that information, I called many people in City and County positions (Heather Heins, Cynthia Olson, Nathan Quarrels, Darla Pimlott, David Rabbit's assistant and 15 more officials I can site. I thought they could help me to get a 'waiver' due to "hardship" or even get a septic system "grandfathered in" because I had purchase the property in good faith.***

I am going to turn 73 this year. I have spent 4 ½ years on this effort..

What has happened to Sonoma County??? - this ordeal began way before the fires and Covid. I have a beautiful piece of Ag land that is a fire hazard that I cannot develop because the city will not hook me up to sewer - even though they need money and the County will not give me a waiver for a conventional septic system. I do not understand why we MUST have a mound system - other counties make this determination based on the soils of each parcel! When you consider a mound system with 200% expansion and the required setbacks - there is no room for a home..!! To make matters worse, I have a 1 bedroom perk! I would like my property to be rezoned to R2 so my land can be able to support a group of tiny homes that could be tied to the sewer system and to provide affordable housing to people that really want and need to enjoy what Petaluma offers. Let's try to benefit our community as a whole and the town of Petaluma. Lets make our lands great again.. Thank you for your consideration-
Jan Frost

Jan Frost

D 707.364.2981

Jan.frost@sbcglobal.net

Golden Rules -

Do unto others, -

ALL creatures great and small!



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Chelsea Holup

From: Heather Hendrickson <heatherhdsn@mac.com>
Sent: May 06, 2021 11:56 AM
To: HousingSites
Subject: Guerneville, Armstrong Valley

EXTERNAL

Hello Nina,

I am aware that the county is planning to change some zoning for properties on Laughlin Rd and Cutten Drive into denser housing in Guerneville. Can you please send the street address for these properties? I am very concerned that with climate change and fire danger that increasing the number of homes in this area will create an emergency situation when the next fire season arrives and in the years to come.

Thanks
Heather Hendrickson

Guerneville

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Chelsea Holup

From: lee.mathias@verizon.net
Sent: May 04, 2021 4:11 PM
To: HousingSites; Lynda Hopkins
Cc: lee.mathias@verizon.net; shannac@sonic.net; cpilcher47@gmail.com; e.mathias@verizon.net
Subject: Public Input to Rezoning EIR for higher density housing 11 areas of the county including Graton, Forrestville and Guerneville.

EXTERNAL

Thank you for inviting public comment on this EIR Report on Rezoning certain properties in Sonoma County for higher density housing.

What is not to like?

- 1. We are adding more houses and increasing population without any regard for the lack of water resources.
- 2. The higher density zoning is largely taking place in flood prone areas.
- 3. The plan identifies current policy in the County to "water" construction sites and wash trucks and tires every time they leave a construction site. No one thought about how citizens might react to that given our plants are drying up and our cars are always dirty?
- 4. A key feature of this plan is to increase housing density in areas where there is public transit or short commutes to employment. I'm looking forward to the new plan to put in a new high speed train from Graton and Forestville! Maybe a new technology center? Or maybe we are counting on a water intensive pot farm to provide high paying jobs!
- 5. New information, due to a State Law (Senate Bill 743) it is illegal to consider the impact of traffic on the environment when considering new growth. The number 1 issue in every political season is traffic. Now it is illegal to consider when planning new growth and development.

The conclusion of this EIR appears to be that a few new houses and people in a County plagued by wildfire and drought will not make our plight much worse unless we get too much rain and flooding, they we will have more high density housing areas under water.

Some areas for our political leaders to consider:

- I. The actual numbers of potential individuals added may be significantly more than suggested in the report. The consultants apparently used 2.6 people per household without consideration for recent trends toward multigenerational families living in homes which are unaffordable otherwise. I used 10,000 people in my analysis of the issue of fresh water.
- II. Fresh water is a critical issue in the County. 10,000 new people seems inconsequential but assuming average water use, they will consume 10.5 billion gallons of water over the next 50 years. Why 50 years? It will take at least 50 years to add new water storage capacity for the County assuming we start planning now.
- III. We are likely days away from local officials mandating water conserving practices. This EIR notes in several places plans to mitigate construction air pollution by "Watering" construction sites, washing trucks (including tires) each time they leave the site and using water street cleaners to keep construction sites and neighboring streets clean.
 - a. The requirement is so specific that they are instructed to water each site 2 times per day or more as to maintain a soil moisture content of 12%! The use of wastewater is encouraged. Unfortunately, we have a shortage of wastewater as well. Ask the farmers!
 - b. I cannot water my landscape or wash my car? As local government leaders you should not have even let this get out of draft. You are in danger of losing any credibility. It is a slippery slope. You are tone deaf and need to get it together before it is too late.
- IV. This plan objective is to increase housing density in areas where public transportation is available, and employment is nearby. Guerneville, Graton and Forestville are not a center of transport or employment?
 - a. Traffic is the number one issue every election year in Sebastopol. It is awful. During rush hour we cannot even get out of our street onto 116. The noise and pollution make it impossible to ride a bike in those

beautiful new bike lanes. (No one does). It is unbelievable that tis plan has a section explaining that by law, it is not legal to consider traffic congestion in an EIR report.

- b. As a practical matter the County needs to consider the impact of more people, cars and animals that will need to evacuate in the event of a wildfire. Adding more homes in Graton and Forestville will increase traffic into and out of Sebastopol. Every election year candidates nod and smile when we complain about traffic. The issue is annoying until we get word to evacuate due to an immediate fire threat! Then it is an emergency!
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V. Inexplicably, 4 of the 11 areas selected for rezoning for high density housing are in or immediately adjacent to 100-year flood plains. As our political leaders you rarely go a week without reminding us of the implications of global climate change and yet you increase housing density in flood prone areas? Taxpayers are usually on the hook to make these people whole. Experts have repeatedly warned us that 100-year flood plains much be considered 10-year flood plains.

In summary:

Supervisors or the Planning Commission needs to send this back to identify areas for increased housing density that are not in areas where climate change and flooding are an immediate threat.

- o Flooding is the number 2 threat identified in the Santa Rosa Disaster Mitigation Plan. If we know the problem, why do political leaders continue to make it worse?

- At some point we need to address the issue of Groundwater shortages in the County. There appears to be a Sonoma County Sustainable Groundwater Agency that is working on plans, but they appear to be in early descriptive phases and in draft form.

- o The Supervisors should place any new plans for rezoning on hold until such time as the County understands the water resources, we have available and what population can be sustained. If this conflicts with State law, then take it to court.

- Supervisors should act now to end the "watering practices" on construction sites within the county to avoid a citizen revolt as political leaders again limit the allowed activities of citizens in the County.

- o You cannot expect us to let our plants die while contractors are carefully maintaining dirt at 12% water content.

- Supervisors need to explain the plan to evacuate the county during this year's fire season.

- o We have never had a useful map of the evacuation zones.

- o The county website crashes on a good day and is largely useless once PG&E cuts off power and online access declines.

- o We need preplanned evacuation routes with proper communications and signs marking the routes. Four hours is an unacceptable time to get out of Sebastopol.

lee.mathias@verizon.net

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Chelsea Holup

From: Arielle Wright
Sent: May 13, 2021 7:19 AM
To: Nina Bellucci
Subject: Draft EIR/Housing Public Comment FW: Either for increased housing

-----Original Message-----

From: Eileen Mathias <e_mathias52@comcast.net>
Sent: Wednesday, May 12, 2021 12:47 PM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: Either for increased housing

EXTERNAL

2 points:

- 1) It is outrageous that traffics cannot be considered in EIR's in California. Some of the additional housing is recommended for Graton and Forestville. In the last evacuation, a couple of years ago due to a PG&E evacuation, it took many people 3 to 4 hours to evacuate from the area because so many people had to come through Sebastopol. Is this really what we want in the event of a real emergency? People could die.
- 2) California really needs to start facing climate change, and it's effects on our water supply. We need solutions. Adding more housing before concrete solutions are proposed is irresponsible.

Thank you.

Eileen Mathias
7431 Henon Dr
Sebastopol CA 95472

Sent from Eileen Mathias' iPhone

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Chelsea Holup

From: diane.m3@comcast.net
Sent: April 26, 2021 8:23 AM
To: casonoma@public.govdelivery.com; Nina Bellucci
Cc: 'Rich Merlo'
Subject: RE: Permit Sonoma Rezoning Housing Sites for Housing Update - Draft EIR Available for Public Review

EXTERNAL

Re:SON-1 20549 Broadway 128-311-015 Sonoma 2-12 SON-2 20561 & 20531 Broadway 128-311-016 Sonoma 2-12 SON-3 20535 & 20539 Broadway 128-311-014 Sonoma 2-12 SON-4 20563 Broadway 128-311-017 Sonoma

Nina,

In regards to the California Environmental Quality Act (CEQA), this Program EIR examines alternatives to the proposed project we are in question as to the findings, the Potential Sites with the most environmental constraints that would make developing sites more difficult. We feel alternate 2: Workforce housing Combining district would be the best for the properties. I would like to **note we do have sewer** at the property SON-3 20535 & 20539 Broadway 128-311-014 and water is close by.

Where in the environmental report do these concerns come up? Can you explain how these alternatives will be determined?

Maybe at a latter date we can talk by phone or setup a meeting.

Thanks you for your time.

Rich Merlo

707-975-5824

From: Sonoma County, CA <casonoma@public.govdelivery.com>
Sent: Monday, April 19, 2021 3:58 PM
To: diane.m3@comcast.net
Subject: Permit Sonoma Rezoning Housing Sites for Housing Update - Draft EIR Available for Public Review

On April 19, Permit Sonoma staff is publishing a Draft Environmental Impact Report (EIR), which analyzes the environmental impact of potentially rezoning 59 sites in unincorporated Sonoma County to accommodate the county's housing need. The Draft EIR can be downloaded from the [project website](#).

A public review period for the Draft EIR will begin April 19 and end June 18. All interested parties are also invited to submit comments in writing throughout the public review period, and comments will be accepted during a public hearing on May 20 before the Planning Commission.

Contact: Nina Bellucci, (707) 565-1236, or HousingSites@sonoma-county.org.

You are receiving this email because you have expressed interest in receiving updates on Permit Sonoma's housing work and/or Rezoning Sites for Housing initiative.

Chelsea Holup

From: Mitzi Schaap <mitzi60@sonic.net>
Sent: May 18, 2021 4:45 PM
To: Nina Bellucci
Subject: Re: Fwd: Permit Sonoma Rezoning Housing Sites for Housing Update - Draft EIR Available for Public Review

EXTERNAL

Hi Nina,

First, please add me to the E-mail list for this project.

Next, I am concerned about your thoughts on considering our property at 16500 Cutten Court, Guerneville. If you rezone it, will our property taxes change? How else could this possibly effect us?

The access to our property is poor....thus, I feel would not be a good fit. Cutten Drive/Court is not a good fit for any additional housing.

Thank you and I look forward to hearing back from you.

Mitzi Schaap

----- Forwarded Message -----

Subject: Permit Sonoma Rezoning Housing Sites for Housing Update - Draft EIR Available for Public Review
Date: Mon, 19 Apr 2021 17:57:59 -0500
From: Sonoma County, CA <casonoma@public.govdelivery.com>
Reply-To: casonoma@public.govdelivery.com
To: gaylord@sonic.net

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This email was sent to gaylord@sonic.net using GovDelivery Communications Cloud on behalf of: Sonoma County, CA · 575 Administration Drive · Santa Rosa, CA 95403



Chelsea Holup

From: Anne Watson <chuckandanne33@gmail.com>
Sent: May 01, 2021 9:33 PM
To: HousingSites
Subject: Comment on proposed re-zoning in Glen Ellen

EXTERNAL

We would like to register our opposition to using our small historic hamlet of Glen Ellen to assist implementing the new Housing Element for urban areas of the unincorporated county. It doesn't follow the local Development and Design Guidelines, and is out of character with our town, which lacks the infrastructure to support it. We would like to state that Margie Foster and Mike Witkowski's comments are spot on.

Sincerely, Charles and Anne Watson

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Chelsea Holup

From: Penny Williams <pdw924@gmail.com>
Sent: April 21, 2021 2:07 PM
To: Nina Bellucci
Subject: Draught

EXTERNAL

Hello

We've been in a draught for approximately 5+years. How is the county going to supply water for new housing and resorts?

There are new subdivisions and resorts in Healdsburg under construction. This signals that there is plenty of water for these new constructions, why should the establish citizens conserve water?

Penny Williams

Healdsburg

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Chelsea Holup

From: Arielle Wright
Sent: May 18, 2021 3:16 PM
To: Nina Bellucci
Cc: Chelsea Holup
Subject: FW: i'm going to try this again: for Nina Bellucci
Attachments: final copy for EIR hearing Thursday.docx; pge fire zone mapa 2021 May.png

From: Janice Stenger <janicestenger@yahoo.com>
Sent: Tuesday, May 18, 2021 2:12 PM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: i'm going to try this again: for Nina Bellucci

EXTERNAL

I got an text back that said there was no such meeting: so I will try to give you a reference:

PLP20-0018 1:05 p.m. Thursday EIR for 59 separate parcels disbursed across the county. I am attaching my comments re: the conclusions and information that have been included in the EIR..

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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".

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

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.

“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?

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.

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.

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

Chelsea Holup

From: Heather Hendrickson <heatherhdsn@mac.com>
Sent: May 06, 2021 11:56 AM
To: HousingSites
Subject: Guerneville, Armstrong Valley

EXTERNAL

Hello Nina,

I am aware that the county is planning to change some zoning for properties on Laughlin Rd and Cutten Drive into denser housing in Guerneville. Can you please send the street address for these properties? I am very concerned that with climate change and fire danger that increasing the number of homes in this area will create an emergency situation when the next fire season arrives and in the years to come.

Thanks
Heather Hendrickson

Guerneville

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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

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?

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.

Chelsea Holup

From: lee.mathias@verizon.net
Sent: May 04, 2021 4:11 PM
To: HousingSites; Lynda Hopkins
Cc: lee.mathias@verizon.net; shannac@sonic.net; cpilcher47@gmail.com; e.mathias@verizon.net
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- o Flooding is the number 2 threat identified in the Santa Rosa Disaster Mitigation Plan. If we know the problem, why do political leaders continue to make it worse?

- At some point we need to address the issue of Groundwater shortages in the County. There appears to be a Sonoma County Sustainable Groundwater Agency that is working on plans, but they appear to be in early descriptive phases and in draft form.

- o The Supervisors should place any new plans for rezoning on hold until such time as the County understands the water resources, we have available and what population can be sustained. If this conflicts with State law, then take it to court.

- Supervisors should act now to end the “watering practices” on construction sites within the county to avoid a citizen revolt as political leaders again limit the allowed activities of citizens in the County.

- o You cannot expect us to let our plants die while contractors are carefully maintaining dirt at 12% water content.

- Supervisors need to explain the plan to evacuate the county during this year’s fire season.

- o We have never had a useful map of the evacuation zones.

- o The county website crashes on a good day and is largely useless once PG&E cuts off power and online access declines.

- o We need preplanned evacuation routes with proper communications and signs marking the routes. Four hours is an unacceptable time to get out of Sebastopol.

lee.mathias@verizon.net

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From: [Penny Williams](#)
To: [Nina Bellucci](#)
Subject: Draught
Date: April 21, 2021 2:07:41 PM

EXTERNAL

Hello

We've been in a draught for approximately 5+years. How is the county going to supply water for new housing and resorts?

There are new subdivisions and resorts in Healdsburg under construction. This signals that there is plenty of water for these new constructions, why should the establish citizens conserve water?

Penny Williams
Healdsburg

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From: [Anne Watson](#)
To: [HousingSites](#)
Subject: Comment on proposed re-zoning in Glen Ellen
Date: May 01, 2021 9:33:14 PM

EXTERNAL

We would like to register our opposition to using our small historic hamlet of Glen Ellen to assist implementing the new Housing Element for urban areas of the unincorporated county. It doesn't follow the local Development and Design Guidelines, and is out of character with our town, which lacks the infrastructure to support it. We would like to state that Margie Foster and Mike Witkowski's comments are spot on.

Sincerely, Charles and Anne Watson

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May 19, 2021

To: Sonoma County Planning Commission

From: Wendy Krupnick
4993 B. Occidental Rd. Santa Rosa, 95401

Re: May 20 Item 1-Public Comment –Draft EIR Comments: Scattered Rezoning Sites for Housing-County of Sonoma

I'm writing in complete support of the comments submitted May 18, 2021 regarding this agenda item by Greenbelt Alliance. The Planning Commission should reject this DEIR and proposal. If re-zoning any of these parcels is considered it should be in the context of the pending County Housing Element update. I'd like to emphasize the points made in the Greenbelt letter listed below and add some additional points.

As you know, the County Housing Element update is required by the end of 2022. It is critical that a wholistic approach to our housing situation with adequate public input and accurate data inform the goals and policies that result from this update. It is inappropriate at this time to move forward with an approach that is as scattered as the housing rezoning being considered.

The County recently held a public workshop on the climate crisis and has committed to addressing solutions to this existential threat. The County also has committed substantial resources to mitigating danger from wildfires. Yet the Housing Rezone generates "significant and unavoidable" negative environmental impacts by increasing wildfire risk and failing to meet CEQA regulations for Vehicle Miles Traveled. The Housing Rezone will put more people and homes at wildfire risk in an increasingly dangerous hot climate and longer wildfire seasons; and fails to meet new CEQA regulations and thresholds for Vehicle Miles Traveled –a core climate change problem.

There is no evidence that more medium-density housing is actually needed. It is clear from our homeless crisis and data on incomes, housing and rental prices that what is really needed is affordable housing. Too many homes have been allowed to become vacation rentals, further reducing homes available to residents. The County and state have experienced decreases in population in recent years, yet many new housing developments have been built in the county, in addition to rebuilds. Current, accurate data is needed to assess actual housing needs. Both the County and cities have committed to city-centered growth and increasing high-density housing near transit and services. This proposal does nothing to address these needs and runs counter to these goals.

We are in a severe drought which scientists warn may well be an extended "mega-drought". Farmers are running out of water and many homes have dry wells now. **IF WE DO NOT HAVE THE WATER FOR THOSE LIVING HERE NOW, HOW CAN WE PLAN FOR MORE HOMES? Our water situation must be a key limiting factor in any building proposals.**

The County has also recognized the need to increase our food security and diversify agriculture. A "food belt" around urban areas has been proposed by some Supervisors and the

Ag & Open Space District is actively looking for sites that could be appropriate to serve this function. Urban fringe properties like some of those being considered for this housing re-zone would be perfect for small-scale farming or ranching. These unpaved parcels also have potential for groundwater recharge and carbon capture, Once land is paved its ability to be climate-positive and provide other ecosystem services is lost forever.

The proposal to increase sprawl with more medium-density housing on city edges was a bad idea in the first place and I'm dismayed that valuable County resources went into the EIR, which, in spite of its flaws, does state severe problems that would result from the re-zoning.

I hope you will reject this DEIR and misguided proposal. Thank you for considering my comments.

From: [David Bonk](#)
To: [HousingSites](#)
Subject: Regarding property GUE-2
Date: May 19, 2021 11:10:26 AM

EXTERNAL

Regarding property GUE-2

We, along with most of the residents of Armstrong Valley are opposed to any zoning changes to add more high density housing in our area.

In emergency situations it's very difficult already to evacuate using our only exit out, Armstrong Woods Road. Adding more people to our neighborhood will make this even more difficult and could end up costing lives especially in fire evacuation. Armstrong Woods Road also floods in a large area in front of Boon hotel leaving all of us stranded, locked in our neighborhood until the water recedes.

Also Laughlin Road, the road all of these properties will use that connects to Armstrong Woods Road failed during a major flood a few years ago. The county never repaired it properly as all of our roads are neglected in Armstrong Valley, yet we pay the same amount of taxes as everyone else in Sonoma county and also provide the county with a lot of TOT taxes from the hotels here. The School buses and parents dropping their children off at school use that road, it's the only access road to the school. They have to currently navigate around a failed road, which is the counties responsibility to fix.

Another very serious concern is adding more stress to our existing aged sewer system and if the lots designated would indeed qualify to be added to the district system. There would also be an exorbitant cost to connect any additional housing to it, if they did qualify.

Any action to move forward with this plan will definitely bring strong opposition in our close knit community. It demonstrates an example of over reach over private property owners rights to maintain long standing family properties the way they intend.

Regards,

David Bonk and Gay Guidotti

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From: [David Bonk](#)
To: [HousingSites](#)
Subject: Regarding property GUE-3
Date: May 19, 2021 11:12:41 AM

EXTERNAL

Regarding property GUE-3

We, along with most of the residents of Armstrong Valley are opposed to any zoning changes to add more high density housing in our area.

In emergency situations it's very difficult already to evacuate using our only exit out, Armstrong Woods Road. Adding more people to our neighborhood will make this even more difficult and could end up costing lives especially in fire evacuation. Armstrong Woods Road also floods in a large area in front of Boon hotel leaving all of us stranded, locked in our neighborhood until the water recedes.

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Regards,

David Bonk and Gay Guidotti

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From: [David Bonk](#)
To: [HousingSites](#)
Subject: Regarding property GUE-4
Date: May 19, 2021 11:11:46 AM

EXTERNAL

Regarding property GUE-4

We, along with most of the residents of Armstrong Valley are opposed to any zoning changes to add more high density housing in our area.

In emergency situations it's very difficult already to evacuate using our only exit out, Armstrong Woods Road. Adding more people to our neighborhood will make this even more difficult and could end up costing lives especially in fire evacuation. Armstrong Woods Road also floods in a large area in front of Boon hotel leaving all of us stranded, locked in our neighborhood until the water recedes.

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Any action to move forward with this plan will definitely bring strong opposition in our close knit community. It demonstrates an example of over reach over private property owners rights to maintain long standing family properties the way they intend.

Regards,
David Bonk and Gay Guidotti