

Date:

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

Dear Mr. Gage,

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

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

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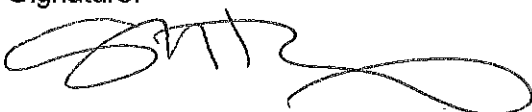
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Name: CINDY ROMERO

Address: 16424 CUTTEN DR Guerneville CA 95446

Date: 2/1/23

Signature:



Date: 2/16/23

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

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Name: Mary Helt

Address: 16542 Laughlin Rd Guerneville CA 95446

Date: 2/3/23

Signature: MBHelt

Date: 02/05/2023

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

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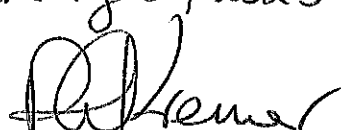
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Name: Patricia Kremer

Address: 16445 Cutten Drive

Date: February 5, 2023

Signature:



Date: 2.3.23

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

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Name: *Roberta Schepps Roberta Schepps*
Address: *16403 Cutten dr. Guerneville CA 95446*
Date: *Feb 3, 2023*
Signature: *RSchepps*

Date: 2/4/2023

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

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Name: Sandra Reilly
Address: 14755 Janet Lane, Guerneville
Date: 2/4/23
Signature: Sandra Reilly

Date: 2/6/23

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

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Name: William Helt

Address: 16542 Laughlin rd. Guerneville Ca.

Date: 2-2-23

Signature: William Helt

Date: 2/7/23

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

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Name: Grable W. Duvall

Address: 16300 Cutten Dr.

Date: 2/7/23

Signature: 

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

February 4, 2023

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

Re: "Draft EIR Comments: Housing
Element Update"
Unincorporated Areas Housing
State Clearinghouse ID:
2022060323: Forestville, CA

Dear Mr. Gage

In response to a letter dated December 28, 2022, I am sending my comments. I have concerns for our little town of Forestville if these housing projects are allowed to continue.

Forestville has maintained its small town quaintness for as long as I have been a resident, which has now been almost 55 years. Its my forever home and I would hate to see it change its unique charm and hometown flavor.

Here is a list of some reasons that I feel these project should be halted:

Environmental impact on the communities - wetlands, creeks (Jones creek), water run-off and natural habitat life.

Public Safety for residents and visitors coming and going into our little town.

Transportation issues - County bus services limitations already set in place will become burdened with increased resident populations

Traffic numbers on Hwy 116, Covey Road, Mirabel Road, River Road and side streets leading onto and off of these main roads will be greatly affected in adverse ways.

Gas station is limited to just one in town.

Public Schools: Since the closing El Molino student body numbers have already increased at Analy. And the single elementary/middle school will become overcrowded as well.

Parking issues already in Forestville is very tight and frustrating at best. Increasing the number of residents will only impact what little we have already.

Our water and sewer systems will become overtaxed and burdened by additional housing in our communities.

Lack of any real grocery store within town proper is a concern. The one store already in place will become over burdened by excess consumers.

Safety from a lack of upgraded side walks and cross walks will be a major issue as more people will use our little town. At times, Forestville has an issue of cars not stopping for people crossing our streets and what streets we do have have pot holes and uneven pavement at cross walks.

Limits on UpZoning for RV parking and "ADUs" will need to be addressed.

These, Mr. Gage, are, I'm sure, just the beginning of the list of concerns I have can think of why Forestville should not be considered an unincorporated neighborhood for constructing 440+/- units of affordable housing.

Sincerely

Robin Bens

Date:

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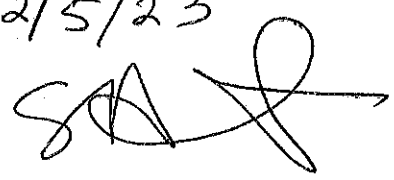
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Name: Susan Ament

Address: 14742 Marys Lane

Date: Guerneville, CA 95446

Signature: 2/5/23



Date: 2/8/23

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2550 Ventura Ave.,
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Name: ARLEEN L. Zuniga
Address: 16399 WATSON Rd Guerneville CA 95446

Date: Feb 8, 2023

Signature: Arleen L Zuniga

Date:

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

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Name: *FRANK ZANCA*

Address: *14725 JANET LANE, GUERNEVILLE*

Date: *2/8/2023*

Signature:



Date: January 31, 2023

Mr. Eric Gage
Permit Sonoma, Project Planner
2550 Ventura Ave.,
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Name: Jonathan Teel

Address: 14735 Carrier Lane
Guerneville, CA 95446

Date: January 31, 2023

Signature: 

February 7, 2023

Marilyn and David Kinghorn
P.O. Box 949
Forestville, Ca. 95436

To Whom It May Concern:

We are writing in regards to the rezoning that is planned in Forestville. The rezoning has just recently come to our attention.

We have been told that everyone living within 300 feet of the areas to be rezoned received a notice of intention. We probably live 301 feet away so we were not notified. Everyone in the Forestville zip code should have received this information because everyone who lives in the area will be affected when and if development occurs.

We also realize that rezoning areas for affordable housing is State mandated. What we don't understand is why this seems to have taken our Board of Supervisors by surprise, and now there seems to be a rush to get it done ASAP. We elected our supervisors to anticipate and be prepared for just such occurrences.

There is no question that there is a need for affordable housing. Growth is inevitable. However, knowing that growth is inevitable doesn't mean that our supervisors get to engage in a haphazard scatter shot to decide where that growth should be. The argument that Supervisor Hopkins makes that we should quickly rezone and worry about potential problems when the development takes place is not only ridiculous, but it's irresponsible.

We would like to direct your attention to Forestville site FOR 1, the Electro Vector site. It is a hazardous waste site. While the location seems ideal for growth it is a HAZARDOUS WASTE site. It should not be rezoned until it is safely cleaned up. That clean up, incidentally, has been put off for too long and needs to be dealt with. We have lived on Hughes Road for 39 years and the site has never been taken care of despite the fact that a school sits right under it.

FOR 4 is another potential rezoning site which is directly east from site FOR 1. To rezone an area for dense housing so close to a hazardous waste site is unthinkable and irresponsible. There are several other environmental concerns with regards to site For 4. At least one creek runs directly through the area and overflows its banks in heavy rain. The access to this property is nothing but a narrow, dirt driveway that runs off of Van Keppel on a steep curve. With the resulting increase in traffic, this would result in a dangerous situation for cars, bikes, and pedestrians.

Again, we think it is negligent and irresponsible to rezone and expect developers to take care of or even be concerned with the complex issues that face a growing community.

Possible problems and environmental issues need to be addressed prior to rezoning.

Some concerns:

- 1) Utility wires – underground
- 2) Water – more storage
- 3) Sewer – is there adequate capacity. Many residents have septic tanks
- 4) Roads – the obvious is that they are not designed for an increased population

A question: several years ago there was discussion about making a bypass around the town of Forestville. Is that being discussed along with the housing rezoning?

And a final question: Why is Forestville set to increase population by 25% rather than the 10% of other neighboring areas.

Final thoughts:

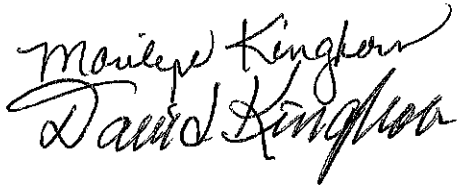
Along with increased housing there are quality of life concerns. We need some open space and parks. A neighbor has been working to develop a skatepark for the youth of our community.

Affordable housing should take into account those that are actually going to live in our area. With that in mind we feel that organizations like Habitat for Humanity needs to be a part of the conversation.

Our request of the Board of Supervisors is that you put some thought and planning into what you are trying to accomplish. Do not push through a set of haphazard rezoning sites because you have not done your homework and you have not involved the community in a responsible, meaningful way.

Sincerely,

Marilyn and David Kinghorn

Handwritten signatures of Marilyn and David Kinghorn in cursive script. The signature for Marilyn is on top and David's is below it, both overlapping.

Sonoma County Planning Commission

Feb 10, 2023

This submittal is in regards to the Draft Environmental Impact Report for the Sonoma County Area countywide housing element update.

For the following reasons, and in no particular order, I submit and strongly feel the parcel designated as **LAR-9** in the **Draft Environmental Impact Report for the Sonoma County Area countywide housing update**, should be excluded. This parcel is 5200 Fulton Rd Santa Rosa, Ca in the Larkfield area and designated a flood zone

- a) This property not only flooded in 1995 and 2005 but was under mandatory evacuation in the 2017 Fire in the Larkfield area. It is in a flood zone. **FEMA** flood map included with this submission.
- b) The Mark West Creek setback, alone, would wipe out nearly the entire property from development either on the driveway or the private easement north of the driveway.
- c) This property exits off Fulton Rd, to the east, onto a 25' wide, approx. 800' long dead in, with no turn around, on this private driveway easement. No parking is allowed on the easement driveway for emergency vehicle access. All parking, including guest parking, **MUST** be provided onsite of each parcel. Parking is NOT ALLOWED ON FULTON RD. Fulton Rd, during the morning and evening commute times, has a tremendous amount of traffic blocking this aforementioned driveway/intersection making ingress and egress onto this private driveway extremely difficult. This private driveway currently serves a population of 34. The proposed addition of a population of 66 would have a **significant impact** on this intersection!

Thank you

Mike Bojanowsk

PO Box 756

Healdsburg, Ca 95448

bbojanowsk@comcast.net

Office 707 433 5243 Cell 707 292 1690

NORTH
↑



SUBJECT SITE

Date:

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

Dear Mr. Gage,

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

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

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

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

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

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

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

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

Name: Ashley Nolan

Address: 16300 Cutten Drive

Date: 2.9.2020

Signature: Ashley P Nolan

Date: 2/3/2023

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

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Name: GERRY DO

Address: 14756 MARYS LANE, GUERNEVILLE CA 95446

Date: 2/3/2023

Signature:



Date:

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

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Name:

John T. Ryan

Address:

14712 Janet Lane

Date:

2-6-23

Signature:

John T. Ryan

Date:

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

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Name: Patrick Reesink
Address: 14733 Janet Ln.
Date: 2-4-23
Signature: Patrick Reesink

Date:

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

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Name: Jill Reesink
Address: 14733 Janet Lane
Date: 2-4-2023
Signature: Jill Reesink

Date:

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

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Name: *RICHARD EVANGELISTI*

Address: *16387 MELODY LANE P.O. BOX 213 GUERNEVILLE CA.*

Date: *2/11/23*

Signature: *Richard Evangelisti*

February 1, 2023

County of Sonoma Planning Commission

RE: Draft EIR Comments Housing Element Update

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

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

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

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

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

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

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

Sincerely,

Sally Percich
Robert Percich
7486 Poplar Drive
Forestville, CA 95436

Date: Feb 9, 2023

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

We strongly oppose the rezoning of properties mentioned in the letter below and agree with all the serious concerns stated in this letter.

Dear Mr. Gage,

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

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Name: Susan and Ron Reed

Address: 16341 Valley Lane Guerneville, CA 95446

Date: 2/9/23

Signature: Susan Reed, Ron Reed

Hello Eric,

It was nice to put a face to your name and thank you so much for attending the recent meeting on Thursday evening regarding The Housing Element!

I very much understand there is a real need to build low income housing in the county including in unincorporated areas and have hopes people will come forward with more appropriate locations. I also understand it is an uphill battle and I applaud your efforts and commitment to get it right.

I have lived on Mirabel Road in Forestville for a decade. There are a number of pressing issues that already continue to go unaddressed here in our small community. I was surprised to read the proposed increase to the population of Forestville is, by far, the highest of any of the proposed sites and would include well over 1600 new residents to our small community. Krista raised a point in the meeting, and I too am interested and am asking how Forestville locations were selected as they would have the most impact to our population? Our residents here would be, by far, impacted more than any other location. I also want to speak to some of the resources already lacking in our small community such as water, sewage, accessibility to transportation, lack of sidewalks, poor road quality, insufficient access to police and shopping, traffic congestion. Mirabel Road, like so many others in the Russian River area already presents a real danger. Many roads, including Mirabel Road are in poor condition largely from lack of maintenance and exacerbated by recent storms and constant traffic. On Mirabel Road the conditions are already quite dangerous due to degraded road surface which poses an ongoing threat to bicyclists and pedestrians including our school aged children.

I help moderate a site called Next Door and another ongoing concerns voiced by local residents in Forestville is the drug and alcohol abuse plaguing our neighborhoods.

Of paramount concern for our residents is to have a safe and expedient evacuation plan in the event of a natural disaster. Having experienced this firsthand on several occasions, our ability to safely evacuate during an emergency is a concern of many, if not all, of my neighbors.

Eric, Forestville, as well as some of the other proposed locations, clearly lacks adequate infrastructure to move forward with the planned proposal. The issues I spoke of above, in my humble opinion, should all be addressed prior to the inception of any endeavor of that magnitude, especially here in Forestville due to our already inadequate infrastructure and safety concerns.

It is my understand that residents of a housing project, such as the one proposed in Forestville on Mirabel Road and the 116, would do much better in a more urban setting primarily due to lacking infrastructure and proximity to services.

In closing, I want to thank you for taking time to read this. I am aware many of the concerns have already been noted. I want to voice my concerns as well and wish I had more suggestions for more appropriate locations in this area.

I wish you the best in helping to resolve this in an equitable manner, one that would work for all of us. You can reach me via email or my landline if you have any questions.

My phone number is 707 887-1068.

Best to you,

Vikki Miller
Forestville, CA

I'll email a duplicate in the event this doesn't arrive by the deadline.

Alice Horowitz
P.O. Box 1045
Glen Ellen, CA 9542
oneallicat@gmail.com

Feb. 11, 2023

DELIVERED VIA EMAIL

Please distribute copies of this letter to all concerned County staff & Decision Makers.

RE: Comments on Sonoma County Housing Element Draft EIR, specifically regarding Glen Ellen parcels, # 054-290-057 and # 054-290-084 (GLE-1 and GLE-2)

Dear PRMD Staff:

I am writing to voice my concerns about the Draft EIR for the Sonoma County Housing Element, specifically regarding the two properties referenced above owned by Mr. Marty Winters and located on the corner of Carquinez and Arnold Drive in the heart of downtown Glen Ellen. These parcels were identified as potential sites for upzoning during the "Rezoning Sites for Housing Project" and were included in the Draft EIR. During the Draft EIR public comment period, many people submitted comments with valid concerns regarding the inappropriateness of substantially upzoning these parcels, which are outside of the urban growth boundary in the tiny village of Glen Ellen at an unsignalized intersection.

As a 29-year-resident of downtown Glen Ellen, I have no objection to Mr. Winters improving his properties (they certainly are in great need of improvement)! However, the rezone sites represent a large part of the downtown core (all two blocks of it!) and will dramatically change the core by tripling the existing number of housing units allowed. The Workforce Housing (WH) zone district REQUIRES a minimum number of units (16), so the property owner will have no choice but to overdevelop the property. The proposal is **clearly inconsistent with the intent of**

the Glen Ellen policies established in the General Plan and Glen Ellen Development and Design Guidelines.

Furthermore, the DEIR cumulative impact analysis does not consider two huge projects in close proximity to the proposed rezoning sites in Glen Ellen and Sonoma Valley – the adopted SDC Specific Plan and the Hanna Center housing, hotel, and commercial development a few miles down Arnold Drive. How can it be that these two large-scale developments were apparently NOT considered in the **cumulative impact analysis** for transportation, land use policy consistency, GHG, visual resources, public services (water, wastewater), or wildfire evacuation and emergency response? How on earth is Arnold Dr. supposed to accommodate so much increased traffic on a daily basis, not to mention during an emergency evacuation?

Please consider:

1. Removing the two Glen Ellen parcels from the rezoning list due to significant impacts identified in the EIR; and/or
2. Assigning an alternative zone district that reduces the number of allowed units on the site and does not require a minimum number of units, as required by the WH zone.

In closing, with the large scale SDC development, it is clear that Glen Ellen and the surrounding semi-rural area (without adequate infrastructure or transit) will be taking on more than its fair share of housing and should not be required to accommodate even more housing that will contribute to the significant and unmitigatable traffic impacts identified for the SDC Specific Plan.

Respectfully,



Alice Horowitz

2-13-2023

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

Dear Mr. Gage,

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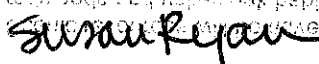
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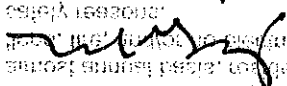
Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site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

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

We, as individuals, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Rd, GUE3- 16500 Cutten Ct, and GUE 4-16050 Laughlin Rd, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

Mike Gray and Susan Ryan
16215 Laughlin Road
Guerneville, California 95446





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

RECEIVED
FEB 14 2023
PERMIT AND RESOURCE
MANAGEMENT DEPARTMENT

RE: Draft EIR Comments: Housing Element Update

From: The FOR-2 Neighborhood

Date: February 10, 2023

Dear Mr. Gage,

This letter is intended to specifically address the significant impacts and insufficient analyzation found in the Sonoma County Planning Update Draft EIR as it relates to the FOR-2 site, a 13.5 acre parcel located at 6898 Nolan Road in the town of Forestville beginning on Page 4.

As neighbors of the FOR-2 site, the 222 residents who signed this letter believe that before the HCD, Sonoma County Planning Commission and the Sonoma County Board of Supervisors make any decisions on rezoning the parcels in Forestville they must first understand what the community of Forestville does and doesn't have to offer in the way of resources, services, transportation and infrastructure.

Forestville California 95436

Forestville is a small rural town in West Sonoma County about 11 miles and a 20 minute drive from Santa Rosa, the nearest job center. The population of Forestville is considered to be about 3300 people following the general boundaries of the Urban Service Area. The Sonoma County Land Use Element, Policy LU-15g, states that the boundary of Forestville is that of the Elementary School District or approximately 6700 people. If all 6 sites, designated for rezoning in the General Plan Housing Element Update, were built to capacity the population of Forestville would increase by 1652 people according to the Sonoma County Update DEIR. This is 25% to 50% increase in population depending on which boundary is used. The proposed cumulative dwelling units added to the town of Forestville is 635. This is the largest number of proposed units and population increase, for any community, in the unincorporated area of the County, with the exception of the unincorporated area around the City of Santa Rosa.

The main road thru Forestville is HWY116 which becomes Front Street for the 3 blocks where most businesses are located. Front Street/HWY 116 is a narrow two lane State Highway built around the turn of the century. All of the side streets in this area are residential.

There are few formal, private business maintained parking lots on Front Street/Hwy 116. Street parking consists of parallel parking on the south side and a combination of parallel and diagonal

parking on the north side of the 3 block downtown area. Parking spaces are limited here and thus Downtown Park Open Space site is often used for overflow parking. The Downtown Park is located at the termination of the Joe Rodota Trail and is privately owned and maintained by a non-profit 501c3.

Sidewalks in the 3 block area of Front Street/HWY 116 are either nonexistent, non-contiguous or in extremely poor condition and dangerous. Limited sidewalks do exist from the intersection of Mirabel Road to the Forestville Youth Park. There are no other sidewalks in the neighborhoods that surround the downtown area. Walking the neighborhoods of Forestville requires walking on the narrow shoulders or in some cases in the middle of the road.

With the exception of the Joe Rodota Trail there are no bike lanes in the town of Forestville or surrounding neighborhoods.

Pedestrian or bicycle crossing Front Street/HWY 116, is facilitated by 2 uncontrolled crosswalks. One in the center of town and the other at Covey Road. The Forestville School District provides a crossing guard at the Covey Road intersection to facilitate the safe crossing of Front Street/Hwy 116 by school children. Crossing with or without a crosswalk or exiting a parallel parked car is dangerous on Front Street/HWY 116 due the road width, heavy traffic volume, including gravel trucks from the two local quarry's, as well as most vehicles traveling faster than the posted speed limit.

There is one informal southbound bus stop in the downtown area. The bus stops in the Front Street/HWY 116 southbound traffic lane, to load and unload passengers. Sonoma County Transit provides bus service to Forestville. Bus Route 20, Russian River/Santa Rosa Route, makes one pickup and one drop off a day in downtown Forestville. Bus Route 26, Forestville/Sebastopol/Cotati/Rohnert Park Route, also makes one pickup and one drop off a day in downtown Forestville.

For all intents and purposes the commercial area of downtown Forestville is built out. There are two commercial/industrial parcels available for development within or contiguous to the downtown area. The first parcel, 3.4 acres zoned PC, is located at the intersection of south side of HWY 116 at the Mirabel Road intersection. The other parcel, located at 6555 Covey Road, is currently being considered in the Draft Housing Element for rezoning (FOR-1). Also known as Electro Vector, the parcel is 2.86 acres and zoned MP, AH. This site is subject to unknown groundwater contamination from a previous industrial business on this site. Mitigations have been underway for quite some time and this site should be fully evaluated before it is removed from the Housing Element Update rezoning inventory (Alternative-3). One additional site with Industrial zoning, although not contiguous with Front Street/HWY 116, does exist. This site is also being considered for rezoning under the Draft Housing Element Update and is currently zoned M1. Designated as FOR-6 in the plan, it is 4.94 acres.

Street lighting in Forestville is limited to the 3 blocks of the downtown area along Front Street/HWY 116. This allows the surrounding neighborhoods to very good Night Sky Viewing Areas with minimal light emissions.

New jobs in Forestville are few and far between. Those that do exist are generally minimum wage service industry jobs. This is largely due to the lack of sufficient commercial and/or industrial business. Forestville is a rural bedroom community.

Government Services in Forestville consist of:

- Sewer and Water - Forestville Water District
- Schools - Forestville Union Elementary School District K-8
- Fire and EMS - Sonoma County Fire District Forestville Station
- Police Services – Sonoma County Sheriff’s Department
- Roads – Sonoma County Road Department

Notable business/retail services are limited in the downtown area of Forestville, off street parking is either non-existent or limited at all of these sites, very little future commercial growth is possible:

The following business can be found in Forestville:

A package store, pharmacy, hardware store, bakery, coffee shop, post office, laundromat, real estate office, hair salon, gas station, bar, liquor store, dog groomer, antique store, winery, bicycle shop, auto repair shop and five eating establishments.

The following human services are available in Forestville:

A dentist office, a church, food bank, and a pharmacy.

There are no social services, medical facilities or broadband and very limited cell service within a ½ mile of downtown Forestville. The closest grocery store to downtown Forestville is 1.25 miles away.

The following Land Use and Housing statements, policies and objectives are relative to the discussion of all future development in the town of Forestville.

Reference: Sonoma County Land Use Element - Page Lu-81

Another issue in this area is growth and development in Forestville. Specific issues that need to be addressed include the amount of additional development that could be absorbed without changing the rural character or straining public services, how to make available commercial and industrial opportunities to provide local employment, and how to preserve the desirable environmental qualities of the area.

Objective LU-15.4

Maintain the “rural village” character of Forestville through design development standards that support small-scale development with substantial open space and native landscaping.

Reference: Sonoma County Land Use Element - Page Lu-82

Policy LU-15a: Phase residential and commercial development within the Forestville Urban Service Boundary to allow the community facilities and services adequate time to absorb new growth, and to maintain the community character. For any project of 10 or more housing units, require a precise development plan or master plan that specifies the maximum number of new residential units to be built per year.

Policy LU-15b: Require design review for major subdivisions within the Forestville Urban Service Boundary. Design review approval shall assure that:

(1) Project scale and design is consistent with existing rural village character.

(6) The project includes pedestrian access connecting new homes in a nearby commercial area.

Reference: Sonoma County Draft Housing Element

Policy HE-2a: Enhance opportunities for affordable housing production on all appropriate sites with adequate infrastructure and proximity to services ...

Policy HE-3g: “Strive to focus affordable housing development in moderate and high resource areas well-served by public transportation, schools, retail, and other services.

...

Policy HE-5d: Strive to provide for senior housing needs. Focus senior housing projects in areas well-served by transit, accessible sidewalks, and amenities...

Policy HE-6f: Provide high quality and equitable public services, including public transportation, fire and police safety, crime prevention, parks, sidewalks, street lighting, and recreational facilities and programs in lower-resource areas through the use of place-based strategies and master plans.

Response to DEIR - FOR-2 - 6898 Nolan Road

FOR-2 Neighborhood

There are three main streets that directly surround FOR-2, Mirabel Rd, Nolan Rd and Giusti Rd. There are 5 additional streets that are accessed from either Giusti Road or Nolan Road and are also considered part of the FOR-2 Neighborhood; Nolan Ct., Niki Lane, Poplar Drive, Ohaire Lane and Chope Lane. There are approximately 85 homes and 180 residents living in this neighborhood.

FOR-2 is a 13.5 acre parcel. All 4 sides of the parcel abuts the backyards of well-established single family, single story homes along Nolan and Giusti Roads. The maximum proposed density on the FOR-2 site is 283 dwelling units and 736 new residents. The FOR-2 site is currently zoned for 7 homes.

The FOR-2 Neighborhood is a walking neighborhood and not just for its residents, people come from other areas just to walk here. There are no sidewalks or on street parking in the FOR-2 Neighborhood. The FOR-2 Neighborhood is an excellent place to view the night sky due to the lack of any streetlights in the area.

There are 3 designated existing entrances/exits to FOR-2. One on the East side of the property on Mirabel Road, one on the south side of the property on Nolan Road and one on the West side of the property also on Nolan Road.

FOR-2 is a heritage apple orchard established by the current owner's family in 1911. The family has shared with the Neighborhood and the County, in person and in writing, they have no intentions of selling the property and wish to pass it down to future generations. See Attachment 1

Question:

- The County will require a minimum of 2 entrances/exits to the FOR-2 site if it is developed. The 3 lots that make up the entrance/exits to FOR-2 have their own unique APN's (completely separate lots) and appear to be owned by the owner of FOR-2. If the County rezones FOR-2 without the owner's permission, what stops the owner from selling one or more of the 3 entrance/exit lots thereby land locking the property?

Reference: Executive Summary

Alternative 3 (Fewer Rezoning Sites) – ES-3 Page 24

The Sonoma County Housing Element DEIR lists the FOR-2 site as one of the six rezoning sites that "have greater than average environmental constraints compared to the other Rezoning Sites. In particular, these sites would require off-site infrastructure water and sewer improvements to serve future development." The DEIR offers to remove these six sites, including FOR-2 as an alternative to the Plan. The following significant impacts are also associated with the FOR-2 site and not listed in the DEIR.

1. The parcel is considered by the California Department of Housing and Community Development (HCD) as being too large, over 10 acres, for an affordable housing development. (Page 6)
2. It is the largest project, 283 units/7736 residents, of all 59 sites proposed for rezoning in the unincorporated area of Sonoma County and it will increase the population size of the FOR-2 Neighborhood by 400%.

3. There are significant sewer pipeline size and capacity issues associated with the FOR-2 Site. (Pages 19-20)
4. School crossing traffic signal(s), traffic signal(s), left turn channelization, road widening and site distance and setback mitigations will be needed, on Mirabel Road, Giusti Road and Nolan Road as a result of this project. (Pages 14-19)
5. The FOR-2 site is approximately 100' from a Moderate Wildfire FHSZ and approximately 1000' from a High Wildfire FHSZ. (Pages 20-21)
6. Substantial water runoff from this project flows thru seasonal creeks and riparian corridors, causing flooding in the homes on Mirabel Road and the backyards of homes along Sunridge Lane and Trenton Road before flowing into the Russian River without any filtration or other mitigations. (Pages 12-13)
7. There is no broadband and limited cell coverage at the FOR-2 site.
8. The property owner has repeatedly assured the FOR-2 Neighborhood, verbally and in writing, that the Family has no intentions of selling the property and intend to pass it down to future generations. (Page 22 and Attachment #1)
9. California No Net Loss Laws discourage Jurisdictions from considering inadequate or unsuitable sites as adequate or available to achieve RHNA quotas.

Question:

- Given the above information, and further justifications to follow, would it be appropriate for the HCD, Sonoma County Planning Commission or the Sonoma County Board of Supervisors to remove FOR-2 from the list of sites to be rezoned?
- If no please explain how the County of Sonoma plans to assume legal responsibility for traffic accidents, storm water runoff pollution, damage to biological resources, flooding and sewerage backups as a result of permitting this project without analyzing these issues and developing appropriate mitigations?

Reference: Project Description

Comment: HCD Requirements

The DEIR identifies FOR-2, 6898 Nolan Road, 13.5 acres, as one of the 59 urban sites in the unincorporated area of Sonoma County for by-right, medium-density housing.

The California HCD, Realistic Development Capacity, Analysis of Sites and Zoning – Size of Sites States:

To achieve financial feasibility, many assisted housing developments using state or federal resources are between 50 to 150 units. Parcels that are large may require very large projects, which may lead to an over concentration of affordable housing in one location, or may add cost to a project by requiring a developer to purchase more land than is needed, or render a project ineligible for funding. A parcel smaller than one half acre or over 10 acres is considered inadequate to accommodate housing affordable to lower income households,

unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible. Please note, for purposes of this requirement, “site” means that portion of the parcel designated to accommodate lower income housing needs. The housing element must consider and address the impact of constraints associated with small or large lot development on the ability of a developer to produce housing affordable to lower income households. To demonstrate the feasibility of development on this type of site, the following analysis is required.

An analysis demonstrating that sites of equivalent size were successfully developed during the prior planning period with an equivalent number of lower income housing units as projected for the site.

Evidence that the site is adequate to accommodate lower income housing. Evidence could include developer interest, potential for lot consolidation for small sites or lot splits or subdivision for large sites...

A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.

Question:

- The site designated as FOR-2, APN 083-120-062, according to information provided in the DEIR, is 13.5 acres. According to the HCD any parcel over 10 acres is considered inadequate to accommodate housing affordable to lower income households. Has the County of Sonoma prepared sufficient documentation for the HCD to demonstrate the County’s history of successfully developing sites of similar size, its potential for lot splits or subdivision or the existence of a proposal to develop the site in accordance with HCD requirements?

Reference: Sewer and Water

Comment: Urban Service Area Boundary

The Urban Service Area indicated on Figure 2-6 Forestville Inventory Sites – Page 2-14 would lead the reader to assume that both sewer and water are on site or adjacent to the FOR-2 site. This is not entirely true and the map is misleading. Existing domestic secondary water supply lines do run to the site and the surrounding streets of Nolan Road and Giusti Road. They are serviced by a water main on Mirabel Road. However, the existing sewer pipeline stops approximately 1100’ south of the Mirabel Road entrance to the FOR-2 Site. Should the site be

developed the existing sewer pipeline would have to be extended, from its current location, approximately 1100', to the existing right of way to the site off of Mirabel Road.

Question:

- It would be appropriate for the County of Sonoma to place a footnote on the map to clarify this situation?

Reference: Environmental Impact Analysis

Comments: Forestville, Page 4.1-18

FOR-2 is a large parcel west of Mirabel Road surrounded by single-family homes on large lots and zoned LG/116 but outside the SR designation. Views of the ridgelines and open spaces are not visible from the streets looking across the lot due to existing residential development, flat topography, and mature vegetation on all sides (Figure 4.1-14). On Giusti Road, residences are large, single-story, and designed in a vernacular suburban ranch style. They are situated close to the roadway and are landscaped in a varied but unified manner. On Mirabel Road, a school is directly across the street from FOR-2. The residential development on Mirabel Road features a less unified design than that on Giusti Road, with fewer trees and some intermittent fencing. Residential development on both sides of Nolan Road is like that on Giusti Road, but with less unified design and landscaping. Overall, the area around the site exhibits visual unity as the homes are large and consistently feature mature landscaping. While the unity is high, the level of vividness is lower because the neighborhood does not offer expansive views or feature notable architecture. The site has moderate sensitivity and, depending on density and height, new development could be dominant.

Comments and Questions:

1. Any multi story, medium density development would be inconsistent with and pose a significant impact on the surrounding neighborhood where the majority of homes are single family/single story. In addition any construction over one story, would become the dominant feature in the neighborhood.
 - The last sentence in the paragraph should be corrected to read: Any construction over one story will be a dominant feature in the neighborhood.
2. The report is incorrect in stating that there are no ridgelines or opens spaces viewable from the neighborhood. There are expansive views of Mount St. Helena, the Santa Rosa foothills and portions of Trenton Hill and other closer ridgelines are visible from the upper areas of Nolan Road and Giusti Roads surrounding the site.

- The EIR should be corrected to include the areas in which expansive views are available.
3. The site is not flat as stated above but has a slope of 2 to 9 (generally 3 to 5 percent) percent as stated elsewhere in this report.
 - This statement should be corrected in accordance with the slope data provided elsewhere in the DEIR.
 4. There are mature redwood trees on the property but they do not block views of the surrounding hillsides from all locations.
 - This statement should be corrected.
 5. The FOR-2 site is not directly across the street from a school. The Forestville Youth Park, a privately owned 501c3 park, is directly across Mirabel Road from FOR-2 and was mistaken for a school.
 - This item should be corrected in the EIR.

Reference: Site Impacts and Recommended Mitigation Summary

The DEIR, Page 4.1-52 - The FOR-2 Site is listed with the following Impacts:

- Site Sensitivity – Moderate
- Project Potential Dominance – Dominant
- Potential Impact – Significant

Comment: Site Sensitivity Impact

The density of this project is 200% greater than the surrounding neighborhood. The vast majority of homes in the neighborhood are single story/single story on ½ acre lots. Any building 2 stories or taller, with a density of up to 20 units per acre, will become the Dominant feature in the neighborhood and the Site Sensitivity rating in the EIR should reflect that impact on the neighborhood.

Question:

- Based on the above information, the Site Sensitivity rating for FOR-2 should be changed from Moderate to Significant.

Reference: Aesthetics

Significance after Mitigation, Page 4.1-58

With implementation of Mitigation Measure AES-2, impacts from light and glare would be reduced to less than significant.

Comment: Significance after Mitigation

This statement is not sufficient and does not adequately represent or analyze the current night sky conditions in this area. The FOR-2 Neighborhood, Nolan Road, Giusti Road, Niki Lane, Poplar Drive and Nolan Court do not have street lights as does most of the Forestville area. This area is considered by its residents as a Night Sky Viewing Area with minimal light emissions and our visitors often comment on the beautiful night sky that we have. Any construction over a single story will impact the Night Sky Viewing in this area simply from uncontrolled and unmitigated light emitted second or third story units and a dramatic increase in night time vehicle traffic (headlights). Further analysis should be conducted to determine the effects of light emission in the FOR-2 Night Sky Viewing area.

Question:

- In accordance with General Plan Goal OSRC-4, Preserve and maintain views of the nighttime skies and visual character of urban, rural and natural areas, while allowing for nighttime lighting levels appropriate to the use and location. The EIR should acknowledge the significance and existence of night sky viewing areas and the impact of significantly altering those existing sights by developing FOR-2. The current analysis is insufficient. What additional mitigations are necessary to maintain the existing levels of Night Sky Viewing in the FOR-2 Neighborhood?

Reference Agriculture and Forestry Resources

Impact AG-1, Page 4.2-15: NONE OF THE REZONING SITES OCCUR ON LAND DESIGNATED AS PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE. THEREFORE, DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT CONVERT THESE TYPES OF LANDS TO NON-AGRICULTURAL USE.

All Rezoning Sites occur in County-designated Urban Service Areas, defined in the 2020 General Plan as geographical areas within the urban growth boundary of a city that are designated for urban development. Many of the identified parcels and their adjacent uses are currently zoned for rural residential or limited density, which in some cases means agricultural cultivation is currently underway; nonetheless, none of these lands are considered prime or important farmlands, as designated by the FMMP mapping program. The Rezoning Sites were selected out of dozens of possible sites in part specifically because rezoning them for higher density residential development would not convert productive, prime agricultural lands

The Sonoma County General Plan Goals:

Goal AR-3: Maintain the maximum amount of land in parcel sizes that a farmer would be willing to lease or buy for agricultural purposes.

Objective AR-3.1: Avoid the conversion of agricultural lands to residential or nonagricultural commercial uses.

Goal LU-9: Protect lands currently in agricultural production and lands with soils and other characteristics that make them potentially suitable for agricultural use. Retain large parcel sizes and avoid incompatible non-agricultural uses.

Objective LU-9.1: Avoid conversion of lands currently used for agricultural production to nonagricultural use.

It is a false statement to say that rezoning FOR-2 for higher density residential development would not convert productive, prime agricultural lands. The landowners have stated that this agriculturally important parcel has been used by the family since 1911. The California Department of Conservation's Interactive Map of Important Farmlands lists FOR-2 as Farmland of Local Importance. It was most likely excluded from the higher designations because it was not irrigated at some time during the four years prior to the mapping date of 2018. In fact, the property was listed as Prime Farmland up until 2004. The current owner wishes to rehabilitate the parcel into a more productive apple orchard.

Question:

- The above information requires the EIR to address the mitigation issues and impacts of rezoning FOR-2, a Farmland of Local Importance, to higher density residential housing.

Reference: Biological Study Area

Comment: Biological Study Boundaries, Page 4.4-5, Figure 4.4-4

The Biological Study Area – Forestville boundaries are not accurate in relation to the FOR-2 site, Figure 4.4-4 Biological Study Area - Page 4.4-5.

The majority of storm water runoff from FOR-2 that potentially affects biological resources flows north from the FOR-2 site and makes its way to the Russian River via unmaintained drainages ditches, seasonal creeks and riparian corridors to the Russian River. The effect to the biodiversity of these seasonal creeks, riparian corridors and the Russian River must be considered and investigated for Critical Habitat and Sensitive Communities.

Question:

- The Biological study area for FOR-2 should be expanded to include the ditches, seasonal creeks, riparian corridors from the site to the Russian River due to the increase runoff as a result of the development of FOR-2.

Reference: Biological Resources

Comment: Correction

The DEIR statement, Forestville - Page 4.4-13, does not mention that the FOR-2 site is connected to the Russian River via the storm water runoff from the site.

Question:

- This should be corrected so sufficient analyzation can occur and mitigation measures identified in the EIR.

Reference: Cultural Resources

Comment: Cultural Sites

The FOR-2 site is located within a half a mile of a known Native American cultural site where an ancient lake existed and Native American Community existed. Archaeological reviews are required on development projects in the area. Native American artifacts have been found on the FOR-2 Site and in the surrounding area.

Question:

- The EIR should state that this site is in proximity to a Native American cultural site and the possibility that artifacts and possibly human remains may be found on the site?

Reference: Hydrology and Water Quality

Comment: Storm Water Runoff

The FOR-2 site, is 13.5 acres with a slope of approximately 4.3% (52' in 1256') from the highest point on its western boundary (Nolan Road) to its lowest point at the intersection of Mirabel and Giusti Roads. Currently water runoff during heavy rainfall floods the crawl spaces and garages on the homes below the site and along Mirabel Road. One homeowner has installed a French drain to divert flows to the unmaintained drainage ditch on the west side of Mirabel Road. None of the current runoff is collected into storm drains. All runoff is uncontrolled and the vast majority flows along the west side of Mirabel Road downhill in a generally northerly

direction. The water from the FOR-2 site is collected in a concrete open collector between 7522 and 7566 Mirabel Road. The water then flows west in an open seasonal ditch/creek until it meets a “blue line creek” and riparian corridor also known as Sunridge Creek. This blue line creek crosses Trenton Road and runs behind the homes between Sunridge Avenue and Trenton Road. During heavy rains this creek inundates Trenton Road and the backyards and first floors of homes along Trenton Road and Sunridge Avenue. This runoff then makes its way to the Russian River without filtration or settling ponds.

The effect to the biodiversity of these seasonal creeks, riparian corridors and the Russian River must be considered and investigated for Critical Habitat and Sensitive Communities. Significant hard surfaces, incapable of absorbing water, will be created thru development on the FOR-2 site. 15 acres of land generates 407,000 gallons of rainwater per one inch of rain. Forestville receives an average of 41 inches of rain per year, non-drought years. That accounts for over 16 million gallons of water flowing from this site to the Russian River annually. Failure to identify the significant impacts and mitigation measures related to the storm water runoff from FOR-2 will impact biological resources and result in additional flooding of roadways and properties in the area

Question:

- The storm water runoff condition was not sufficiently analyzed in the DER to reflect the significant downstream effects of additional storm water runoff from the development of FOR-2. Further analysis and identification of mitigation measures must occur and be included in the EIR to avoid damage to the environment, biological resources and personal and public property.

Reference: Public Facilities and Services

Comment: Park Space and Funding

Page 4.15-8 - Policy PF-2c:

Use the following standards for determination of park needs: Twenty acres of regional parks per 1,000 residents countywide and five acres of local and community parks per 1,000 residents in unincorporated areas. A portion of State parklands may be included to meet the standard for regional parks.

Page 4.15-8 - Policy PF-2g:

Require dedication of land or in-lieu fees as a means of funding park and fire services and facilities.

Questions:

- There are no publically funded parks in Forestville. Please clarify if the full buildout in Forestville (1652 new residents) would require the addition of new public park space, how many acres and where it would be located, or if the existing two privately owned parks would qualify for the Policy PF-2c standard?
- The Forestville Youth Park is 7.93 acres and the Forestville Downtown Park is 4.26 acres and both are owned by non-profit organizations and available for public use. What population boundaries would be used to calculate population (PF-2c) and if in-lieu fees are obtained from the developer for parks do the existing privately owned parks receive that funding (PF-2g)?

Comment: Park Degradation

Impact PS-4, Page ES-38

The FOR-2 site is directly across Mirabel Road from the Forestville Youth Park. The FOR-2 Neighborhood is concerned that the Forestville Youth Park would see a considerable increase in use that would lead to a physical deterioration of the facility.

Question:

- What mitigation measures are in place if existing parks, Forestville Youth Park and the Forestville Downtown Park suffer degradation due to overuse? Both parks are privately funded and exist solely on donations. The addition of over 1600 new residents within a half mile of downtown Forestville will have an impact on these existing parks. An additional section could be added to the DEIR that address privately owned Parks and how new development could support them?

Reference: Traffic and Parking

Comment: Traffic Study

According to the County of Sonoma Traffic Counts (arcgis) there are 6909 total trips per day on Mirabel Road, in both directions. The speed limit on Mirabel Road, in the area of FOR-2 is 45 mph although vehicles drive faster than the posted speed limit in this area. Due to speed limit and vehicle traffic volume, including large gravel truck traffic, Mirabel Road is likely a Major Collector when compared to other roadways defined in the DEIR Existing Street Network.

Question:

- DEIR, Existing Street Network – Page 4.16-1 thru 4.16-5 - Mirabel Road is not listed in the Existing Street Network. This should be corrected in the DEIR.

Comment: Mirabel Road/HWY 116 Intersection

At a conservative calculation of 5 trips per day per residence, including the existing FOR-2 Neighborhood and the proposed addition of 283 residences at FOR-2, the total trips per day coming and going from the FOR-2 Neighborhood would be approximately 4000, almost doubling the trips per day currently observed on Mirabel Road and significantly affecting the LOS rating of the Mirabel/HWY 116 intersection.

According to the DEIR:

Peak Hour Traffic at the Mirabel/Hwy 116 intersection is 1040. The cumulative total, including other River area rezoning projects is estimated to be 1782. This a 70% increase Peak Hour Traffic for that intersection.

According to the County of Sonoma Guidelines for Traffic Impact Studies-Page 4,

If the project is located in a study area where one or more intersections are currently or projected to operate LOS E or Worse a Traffic Study is required.

Since the County has already determined that the intersection is failing, any development should be responsible for upgrades to the intersection due to increased Peak Hour Traffic. The last estimate available for a round-about at this intersection is 7.2 million dollars. The County has also considered a traffic signal at the intersection of River and Mirabel.

Questions:

- The DEIR is not clear whether traffic mitigations caused by the FOR-2 development, including the round-a-bout at Mirabel and HWY 116, as well as those on Mirabel Road and in the FOR-2 Neighborhood would be fully or partially the responsibility of the developer?
- The DEIR should require the need for a Traffic Study as a traffic mitigation requirement based on FOR-2's proximity to the Mirabel/HWY116 intersection due to the significant increase in trips per day that will be generated from the FOR-2 site and the substantial increase vehicle trips per day on Mirabel Road.

Comment: General Traffic Concerns

There are three existing access/right of ways to the FOR-2. One is directly off of Mirabel Road and two are off Nolan Road. Mirabel Road runs between River Road on the north end, a County Road, and HWY 116 on the south end, a State Highway.

There are two 4 way intersections between the northern border and the southern border of FOR-2. The intersection on the north side of FOR-2 is Giusti Road and Davis Road at Mirabel Road. The intersection on the south side of FOR-2 is Nolan Road and Speer Ranch Road at Mirabel Road. There are stop signs on Davis, Giusti, Nolan and Speer Ranch Road that control traffic entering Mirabel Road. Historically there have been serious accidents at the Giusti/Mirabel/Davis road intersections.

There are no are no turn lanes, at either of the four way intersection on Mirabel Road and traffic site distances are limited at both intersections. Site distances are also limited at the Mirabel entrance to FOR-2. The distance, along Mirabel Road between the two 4 way intersections, Giusti/Davis and Nolan/Speer Ranch, is about 1000'. The Mirabel Road entrance to FOR-2 lies roughly in the middle of the two intersections.

As residents of the FOR-2 Neighborhood we would like to share how difficult it can be to enter and exit Mirabel Road safely via either Giusti Road or Nolan Road. With the absence of turn lanes, the current speed limit, limited sight distances and high vehicle and gravel truck traffic, movements onto and off of Mirabel Road are currently dangerous. We anticipate entering FOR-2 from the designated right of way off of Mirabel Road will be equally dangerous.

In addition the County of Sonoma Guidelines for Traffic Impact Study Thresholds provide some references to possible mitigation measures that will be needed as the result of the planned development of the FOR-2 site. (Thresholds, PG 10)

A project would have a significant traffic impact if it results in any of the following conditions:

1. On-site Roads and Frontage Improvements: Proposed on-site circulation and street frontage would not meet the County's minimum standards for roadway or driveway design, or potentially result in safety hazards, as determined by the County in consultation with a registered Traffic Engineer or Civil Engineer.
6. Vehicle Queues: Project causes or exacerbates 95th percentile turning movement queues exceeding available turn pocket capacity.
7. Signal Warrants: The addition of the project's vehicle or pedestrian traffic causes an intersection to meet or exceed Caltrans or CA-MUTCD signal warrant criteria.
8. Turn Lanes: The addition of project traffic causes an intersection to meet or exceed criteria for provision of a right or left turn lane on an intersection approach.
9. Sight Lines: The project constructs an unsignalized intersection (including driveways) and/or adds traffic to an existing unsignalized intersection approach that does not have adequate sight lines based upon Caltrans criteria for State highway intersections and AASHTO criteria for County roadway intersections.
10. County Intersection Operations: The County level of service standard for County intersection operations is to maintain a Level of Service D or better pursuant to General

Plan Policy CT-4.2. The project would have a significant traffic impact if the project's traffic would cause an intersection currently operating at an acceptable level of service (LOS D or better) to operate at an unacceptable level (LOS E or worse). If the intersection currently operates or is projected to operate below the County standard, the project's impact is considered significant and cumulatively considerable if it causes the average delay to increase by five seconds or more. The delay will be determined by comparing intersection operations with and without the project's traffic for both the existing baseline and projected future conditions.

11. County Roadway Operations: The County level of service standard for County roadway operations is to maintain a Level of Service C pursuant to General Plan Policy CT-4.1; or, for specific roadway segments, the level of service standard adopted in the General Plan Figure CT-3. The project would have a significant traffic impact if the project's traffic would cause a road currently operating at an acceptable level of service (LOS C or better) to operate at an unacceptable level (LOS D or worse).

Sonoma County Standards for Traffic Impact Studies, Page 15

The project applicant shall retain a registered Traffic Engineer who is licensed to practice in the State of California. A TIS may be prepared by a registered Civil Engineer that has demonstrated appropriate expertise to the satisfaction of DTPW and is licensed to practice in the State of California. Said Engineer shall conduct objective qualitative and/or quantitative analysis, and submit a written traffic impact study that includes each of the following areas that apply to the proposed project. Please note that when a concern is identified, the Engineer shall propose a solution and identify funding for the solution.

Vehicle Queues: Identify situations where either the addition of project traffic causes or exacerbates 95th percentile turning movement queues exceeding available turn pocket capacity.

Signal Warrants: Identify situations where the addition of project vehicles or pedestrian traffic will cause an intersection to meet or exceed Caltrans or CA-MUTCD signal warrant criteria.

Turn Lanes: Identify situations where the addition of project traffic at an intersection, including project driveways, causes an intersection to meet or exceed criteria for provision of a right or left-turn lane on an intersection approach.

Questions:

- The DEIR does not sufficiently analyze the effects of traffic mitigation measures relative to FOR-2 and their impacts the County's plans to extend the Joe Rodota Trail Bike Path

along Mirabel Road between Hwy116 and Davis Road. How could traffic impact mitigations effect the plan construction of the Joe Rodota Trail in the area of FOR-2?

- The FOR-2 site adds 736 new residents and approximately 500 cars to the FOR-2 Neighborhood. In the EIR will traffic signal(s), turn lane(s), improved intersection setbacks, improved sight distances, and or controlled crosswalks be required mitigations, on Mirabel Road and the in the FOR-2 Neighborhood streets?
- Are there any potential mitigations that are likely to increase traffic on Giusti Road and Nolan Road at the other two entrances to FOR-2?

Comments: Crosswalks

The DEIR insufficiently analyzes the need for a controlled crosswalk at or near FOR-2 that will allow adults and children cross Mirabel Road to access the Youth Park, walk or bike to town, walk to school or access bus stops.

See Caltrans or CA-MUTCD Page 835 Section 4C.06 Warrant 5, School Crossing

Support: 01 The School Crossing signal warrant is intended for application where the fact that schoolchildren cross the major street is the principal reason to consider installing a traffic control signal. For the purposes of this warrant, the word “schoolchildren” includes elementary through high school students.

Standard: 02 The need for a traffic control signal shall be considered when an engineering study of the frequency and adequacy of gaps in the vehicular traffic stream as related to the number and size of groups of schoolchildren at an established school crossing across the major street shows that the number of adequate gaps in the traffic stream during the period when the schoolchildren are using the crossing is less than the number of minutes in the same period (see Section 7A.03) and there are a minimum of 20 schoolchildren during the highest crossing hour.

Also See Permit Sonoma – Pedestrian Facilities

Policy 4.05 - Where discretionary projects in Urban Service Areas and unincorporated communities are found to create additional demand for pedestrian travel, require the project to directly provide or participate in the funding of pedestrian improvements such as sidewalks, gap closures, steps, safety improvements, and/or trails that will improve pedestrian access to destinations located within ½ mile of the project site.

Policy 4.08 - Provide high-visibility crosswalk marking at all intersections in Urban Service Areas, unincorporated communities, and wherever feasible countywide. Wherever possible, avoid mid-block pedestrian crossings, and where mid-block crossings are necessary, install signalization, refuge islands and signage warning vehicles to stop for pedestrians and watch for cyclists.

Question:

- The FOR-2 Neighborhood would like to know what mitigations should be added to the EIR to allow the 736 new residents of FOR-2, including school children to safely cross Mirabel Road to attend school, visit parks, bike, and walk or obtain services including public transportation?

Comments: Parking

There is a trend in the County to reduce parking spaces per developed unit in order to increase density and force occupants to use other forms of transportation (reduce VMTs). This option may work in urbanized areas with robust public transportation or within walking distances to essential services and work. Forestville is a rural community, there are few jobs available within walking distance of FOR-2. There is no industry, no available commercial land for future for development, minimal public transportation and no legal on street parking in the FOR-2 Neighborhood.

DEIR – Impact WFR-2, Page 4.19-26

Access to Rezoning Sites FOR-2, FOR-4, GRA-2, AGU-1, and AGU-2 currently does not meet County road standards of 20 feet in width or greater. Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways could be required. Those improvements would require a County encroachment permit if on a public right-of-way; however, widening County roads would not exacerbate fire risk.

Questions:

- The DEIR does not sufficiently analyze the lack of on street parking in the FOR-2 Neighborhood. Onsite parking should not be reduced for the FOR-2 development. How will the EIR mitigate the issue of assuring that there is sufficient parking on the FOR-2 site for a minimum 2 cars per unit due to the lack of robust public transportation?
- Residents of the FOR- Neighborhood are concerned about overflow traffic parking on our streets. What mitigations are included in the DEIR that will address this issue and who will enforce it?

Reference: Utilities and Service Systems

Comment: Sewer

The DEIR insufficiently analyzes the condition and size of the sewer pipeline serving FOR-2. The 8” sewer line that would service FOR-2 currently ends approximately 1000’ south of the access easement at the Mirabel Road entrance to the FOR-2 site. This 8” line runs from this termination location to the corner of Mirabel Road and Hwy 116. It then transitions to a 6” line, running under the north side of HWY 116 for approximately 1000’ to First Street, where it

connects to the main line to the sewer treatment plant. This line is gravity flow and not pumped. The EIR does not sufficiently analyze whether the 1000' of 6" sewer line has the capacity to handle the increased output from the FOR-2 project. A 6" sewer line carries one half the capacity of 8" sewer line. The FOR-2 Neighborhood is also aware that there have been problems with this 6" line clogging at or near 6661 Front Street/HWY 116 due to a low spot in the line. Failure to adequately estimate the capacity of the 6" sewer line with the increase demand associated with the addition of the FOR-2 development could result in the failure of the system or significant sewer spills at low points in the system.

The Sonoma County Water Agency – Design and Construction Standards for Sanitation Facility, Page 20

B. Minimum Pipe Sizes - The minimum pipe size for main sewers shall be eight (8) inches except as noted below. The minimum pipe size for side sewers shall be four (4) inches or the same size as the building drain plumbing stub whichever is greater.

Questions:

- Good planning for this project should include providing sewer access to the remainder of the FOR-2 Neighborhood which lies within or adjoining the boundaries of the Sewer District, does the DEIR adequately address this planning outlook?
- The FOR-2 Neighborhood should be added to the flow calculation when determining capacity of the, 1000' long 6" sewer pipeline, on Front Street/HWY 116. Has the County of Sonoma contacted the Forestville Water District to advise them of this planning issue and to assure it is included in any pipeline capacity calculations?
- If it is found that there are capacity issues related to the reduce size of the sewer line between Mirabel Road and First Street this should be included with mitigations in the EIR.
- If sewer line does need replacing who will be responsible for replacing 1000' of sewer line under HWY 116 for a distance of 1000'?

Reference: Wildfire

Comment: Threshold, Page 4.19-24

Threshold:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact WFR-1 THE PROJECT INCLUDES REZONING SITES THAT ARE IN OR NEAR AN SRA OR VERY HIGH FHSZS, BUT DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT SUBSTANTIALLY IMPAIR AN ADOPTED EMERGENCY RESPONSE OR EVACUATION PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

During our recent wildfire evacuations traffic has backed up on Mirabel Road south bound from the intersection of Mirabel Road/HWY 116 to Davis Road, approximately ½ mile. There are only 3 exits from FOR-2. Two of the exits are onto Nolan Road which is the closest proximity, west facing and south facing, of a wildland fire burning in the SRA. Using these exits would hamper the existing residents ability evacuate as well as put the evacuees of FOR-2 closer to proximity of the oncoming fire.

Question:

- The DEIR does not adequately analyze or provide sufficient mitigation measures relative to how an evacuation would occur, from the FOR-2 Neighborhood, with nearly 900 residents attempting to exit onto Mirabel Road at the same time while also attempting to merge with other evacuees. This certainly doesn't seem like a Less than Significant situation? These are issues that must be addressed in the EIR and not left to be dealt with after the project has been completed.

Comment: Wildfire Threshold, page 4.19-26

Threshold:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

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

When it comes to public safety, SIGNIFICANT AND UNAVOIDABLE do not belong in the same sentence, ever! There are always mitigations including not going forward with a project. The EIR should evaluate wildfire risk and mitigation options considering the knowledge gleaned from the recent devastating fires in Sonoma County.

The drainages directly west of FOR-2 are in a Moderate FHZ but are identical to those below Giusti Road designated a High FHSZ. A fire moving uphill from Martinelli Road will not differentiate between these two FHSZ's. It will run its course up slope seeking drainages where

rates of spread and intensity will increase. It is just as likely to arrive at Nolan Road as it is to arrive at Giusti Road. In this case a single ember could easily cross Nolan Road and ignite properties or landscaping in FOR-2. (Dan Northern, Forestville Fire Chief RET.)

Question:

- Given that Unavoidable is not an acceptable answer to a significant public safety issue what other wildfire mitigations are appropriate for the FOR-2 site, including removing the site from the Housing Element Update List?

Comment: Fire Hazard Severity Zone

FOR-2 is located 100 feet from a Moderate Fire Hazard Severity Zone and 1000' from a High Fire Hazard Severity Zone. The site is across the street from State Responsibility land on the West side of the site. The EIR, Page 4.19-26 States:

Access to FOR-2 ... does not meet County road standards of 20 feet in width or greater. Prior to approval of development on- and off-site improvements to County and/or private roadways could be required. Those improvements would require a County encroachment permit if on a public right-of-way; however, widening County roads would not exacerbate fire risk.

Question:

- Who would fund the on and off site road improvements and traffic mitigation measures, to meet County and Cal Trans standards should the FOR-2 site be developed?

Comments: Removing FOR-2 from the Rezoning List

A copy of the owner's letter to the County asking that the FOR-2 site be removed from the rezoning list is attached. The family clearly states that they have no intention to sell the property and in fact have other plans for it. The family has owned the property since 1911 and it has become their legacy. It is a heritage property that they intend to pass down to future generations. Rezoning this property would be against their wishes and ruin their ability to use in a manner for which it is currently zoned.

Question:

- Is it in the County's best interest to continue to rezone a property, against the owners wishes, knowing full well that the owner has no intention of selling the property that has been in their family since 1911 and that they intend to keep it in the family for future generations?

- Is there a process or policy to remove a property from the Housing Element Update at the owners request or if the County is aware that they have no intention of selling the property?
- If so who will make this decision and when will it be made?

Respectfully Submitted by the FOR-2 Neighborhood,

Susan and Kon Zaharoff
6875 Nolan Road
Forestville, CA 95436
konzaharoff@comcast.net
707-800-2177

Sunoma and Dan Northern
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dsnorthern@sbcgloboasl.net
707-536-8991

Karen and Steve McDonald
6987 Nolan Road
Forestville, CA 95436
smcdonald205@comcast.net
707-495-7371

Contacts:

CC: Sonoma County Board of Supervisors
Sonoma County Planning Commissioners

Attachment 1:

FOR-2, potential rezoning site

From: kdpmick@aol.com
To: eric.gage@sonoma-county.org; dsnorthern@shcglobal.net
Cc: bassman.pulley@gmail.com; klymkrup@gmail.com
Date: Tuesday, February 7, 2023 at 10:16 PM PST

Good Morning,

Thank you for the opportunity to once again reach out to share my concerns regarding the proposed changes in property zoning for Sonoma County. I listened with intent, the zoom meeting held last week. I retreated from that meeting with mixed feelings, but felt that for the greater good, active listening and participation was done by those gathered and members present. This brings us forth, to this upcoming meeting, February 13th. Once again, it is imperative that I advocate for the land so wisely purchased and established by my Grandfather in 1911, from the original land owners of Forestville.

I must agree and ask like that of Mr. Carr, have committee members availed themselves by visiting the potential rezoning sites. What seems necessary to ask oneself and that of the committee, were the wisest sites selected, and based on criteria that might bring forth additional questions and concerns, prior to the Feb. 13th meeting. An example of question, in knowing that many of the sites do not have easy accessible water, sewer, roads, transportation, all of which would cost thousands, and yet within a few feet, yards, even a mile, there is viable land that would have easy access to those needed items. In examining the sites, were these questions asked as they pertained to each site.

I have read the lengthy report, and would like to share why I believe that the site I hold known as FOR-2 is not a desirable rezoning site.

Priority to all of the following reasons is the clear fact that I, as the owner of FOR-2, and subsequent generations to follow, have no interest in selling the land we own. As mentioned, we have owned this land since 1911, and while over time it has had great crop growth and production, low growth and production, and *mediocre growth and production*, what is constant is the fact that we have owned the land, worked the land, and it remains, a working Gravenstein apple orchard and vegetable farm. Currently, as previously stated in my first email, we are in the process of regenerating this land, a process begun in excess of five years ago.

Secondly, this land serves as water shed for the areas directly surrounding the proposed property. This is needed to maintain the existing permaculture, house wildlife, and maintain the ecosystem. The lack of respectfully interfacing with the permaculture, will increase and indeed incrementally damage the ecosystems and environment causing irreparable damage and significant effects to the ecosystem.

We have reason to believe and know, through the artifacts and mapping done, that our land at one time was home to several Native Americans who would travel along the coast as they passed from southern Sonoma County up the coast to Fort Bragg.

Fourth, the report mentions that if FOR 2 were to be rezoned, that due to the density factors, it would be a useful site only if mitigated use of appliances, plumbing, land use and landscaping, limited growth on each site, etc. were to be followed. Is this a wise use of land, and good land management? I don't believe so. How does

the committee measure greenhouse gases, emission hazards, unavoidable aesthetic cultural resources, for an unknown date in the future. Further, if to be developed, how is that managed and by what agency?

Fifth, which is now becoming a long list of concerns and reasons why not to rezone my land, is where it is located...or more accurately, where it is not located. Currently, there is limited regional transit, no SMART, etc. If allowed to be rezoned, and subsequently if the property were to be deemed needed, there would be increases in pollutants, significant changes in air quality, needs for increased infrastructure which would include water, sewer, garbage, police/sheriff, fire, road enhancements, traffic increases, and this is the short list. Impacts and indeed far-reaching unknown changes do not allow for informed or adequate decision making to be made.

Sixth, in studying the charts, analysis, more suggested outcomes, I have not been able to determine that there are any valuable gains to have my land rezoned. What I have learned through the studying of that data, is that it is apparent that FOR-2 is not a viable or useful piece of property to be rezoned. I fail to see positive outcomes. Why I would embrace the rezoning of my property is currently lacking, hence why I do not support this suggested rezone plan for FOR-2. Instead, the report continually uses the phrase significant impact. Does that translate to the unknown reality of what significant impact is, and would the county only stop growth once reached, which often and sadly means that significant impact was reached long before it is deemed time to stop development.

In summary, please reconsider the potential rezoning of FOR-2, my land and that of my family. We again humbly ask, to remove our land from the list. Thank you again for your committee work and the opportunity to have this communication.

Sincerely,

Karyn Pulley

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

DIANE GALIARDI

10675 CANYON RD.

Signature

Diane Galiardi

Forestville CA. 95436

Print Name

Address:

Myron Thorman

10670 Canyon Rd

Signature

Myron Thorman

Forestville Ca 95436

Print Name

Address:

SCOTT STRONG

10829 CANYON RD FORESTVILLE CA

Signature

Scott Strong

Print Name

Address:

DON CARMAN

10641 CANTON ROAD, FORESTVILLE

Signature

Don Carman

Print Name

Address:

ANN CARMAN

10641 CANTON ROAD, FORESTVILLE

Signature

Ann Carman

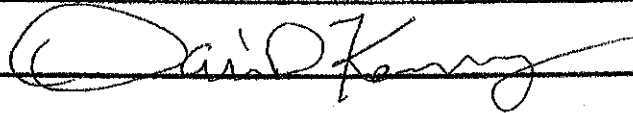
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Print Name

Address:

DANIEL KENNEY 11133 CANYON RD FORESTVILLE 95436

Signature



Print Name

Address:

MARK MURPHY 11133 CANYON Rd Forestville 95436

Signature

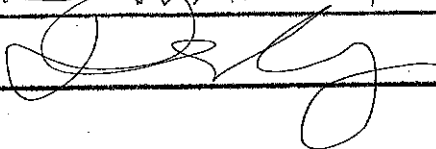


Print Name

Address:

DAVID WAIKEL 10821 CANYON RD. FORESTVILLE 95436

Signature

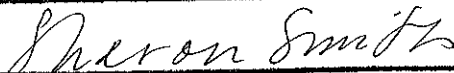


Print Name

Address:

SHARON SMITH 10821 canyon Rd Forestville 95436

Signature



Print Name

Address:

Lorraine Libubb 10670 Canyon Road Forestville 95436

Signature



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Print Name

Address:

MARCO CALAVETTA

9489 ARGONNE WAY

Signature



Print Name

Address:

Edward BARTNER

7024 Trenton Road

Signature



Forestville, CA

Print Name

Address:

Adrian MANGRAN

6908 Mirabel Rd

Signature



Forestville CA 95436

Print Name

Address:

RICK COYSTON

9315 CHAMPA DE ELIZABETH

Signature



FORESTVILLE CA 95436

Print Name

Address:

CHRISTOPH VOSS

6972 GIOVANNETTI RD

Signature



FORESTVILLE CA 95436

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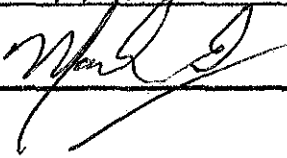
Print Name

MARK ARYA

Address:

6764 Ellen Ln.

Signature



Forestville CA

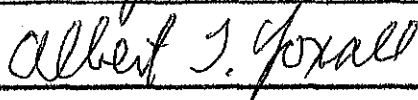
Print Name

Albert J. Goxall

Address:

7383 Hidden Lake

Signature



Forestville CA 95436

Print Name

Christa Gallo

Address:

7397 hidden lake rd.

Signature



Forestville, 95436

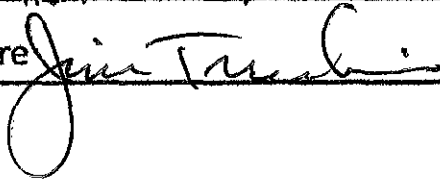
Print Name

JIM TRANCHINA

Address:

7404 HIDDEN LAKE RD

Signature



FORESTVILLE, CA


Print Name

MARY RAND

Address:

7404 Hidden Lake Road

Signature



Forestville, CA 95436

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Print Name

Address:

Bary Galvin 6650 Ellen Lane Forestville

Signature

Bary Galvin

Print Name

Address:

MARY KAY GALVIN 6650 ELLEN LANE FORESTVILLE

Signature

Mary Kay Galvin

Print Name

Address:

LAURA MARTIN 6710 ELLEN LANE FORESTVILLE

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Laura Martin

Print Name

Address:

Conie Brooks 6595 ELLEN LANE FORESTVILLE

Signature

C. Brooks

Print Name

Address:

ANDREW V. SOUSA 6595 ELLEN LANE FORESTVILLE, CA 95736

Signature

Andrew V. Sousa

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Print Name

Address:

DAN BONTACOL

5720 PRIVE RD

Signature

FORESTVILLE, CA 95430

Print Name

Address:

PAUL PEARSON

7200 COVER RD

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FORESTVILLE, CA

Print Name

Address:

Anne Lewis

P.O. Box 670 Forestville

Signature

Anne Lewis

Print Name

Address:

Ken McLEAN

8365 TEMPLETON Rd.

Signature

Ken McLean

Print Name

Address:

RICHARD HICKMAN

8066 MARTINOLI RD

Signature

Richard Hickman

FORESTVILLE

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Print Name

Address:

Megan Doble

4450 Guerneville Rd 95401

Signature



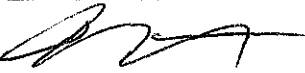
Print Name

Address:

Matt Edgas

5980 Anderson Rd 95436

Signature



Print Name

Address:

Cynthia Johnson

6088 Front st Forestville 95436

Signature



Print Name

Address:

ERIC J DOBLE

4450 GUERNEVILLE RD

Signature



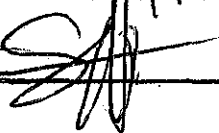
Print Name

Address:

Spencer Henderson

7400 Malone Rd

Signature



Forestville CA 95436

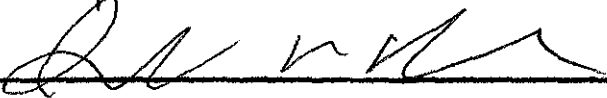
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Print Name

Address:

RANDOLPH W NELSON 11550 Sunnyside Ave

Signature



Forestville CA 95434

Print Name

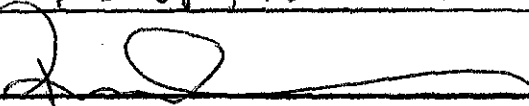
Address:

Ron Anderson

8693 Green Valley Rd.

SECASTRO, CA 95472

Signature



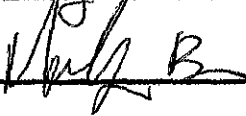
Print Name

Address:

Molly Brown

4450 Guerneville Rd

Signature



Santa Rosa CA 95401

Print Name

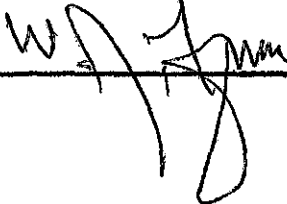
Address:

Bill Ferguson

8383 Hwy 116

Forestville CA

Signature



95436

Print Name

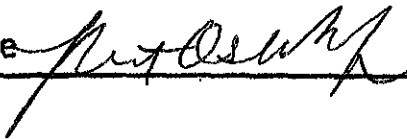
Address:

Robert O. Baba Jr.

7444 Parker Ave

Guerneville Ct. 95446

Signature



We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

JOEY BURTNER

7024 TRENTON RD

95436

Signature



Print Name

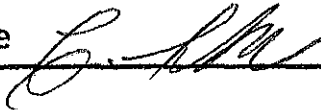
Address:

Claude Schroeder

8739 Mainway 95438

Forestville, CA

Signature




Print Name

Address:

GERBOLD D'ELIA

4829 BUCKLEY AV

Signature



FORESTVILLE, CA

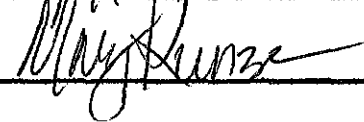
Print Name

Address:

Mary Kunze

4520 Niki Ln

Signature



Forestville

Not enough room for town needs.

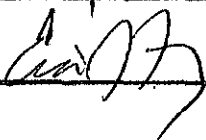
Print Name

Address:

Eric Fry

8330 1st Street, Forestville

Signature



We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

ROBERT O. BABA III

6631 1ST ST. FORESTVILLE, CA


Signature Robert O. Baba III

Print Name

Address:

Christopher Smith

8645 Trenton Road, Forestville, CA 95427

Signature 

Print Name

Address:

ROBERT J BLACKER

7423 Poplar Drive

Signature Robert J Blacker

Print Name

Address:

DIANA ROUSSEAU

6830 Ellen Lane, Forestville

Signature 

Print Name

Address:

JILL BABA

7444 PARKER, GUERNEVILLE

Signature Jill Baba

We, the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name Laura Almada Address: 5809 Vine Hill Rd

Signature Laura Almada Sebastopol

Print Name Marc McLer Address:

Signature Marc McLer

Print Name NATHAN Butler Address: 5660 Hwy 116 N -

Signature Nathan Butler

Print Name Jumpi Smirnic Address: 8501 Hwy 116

Signature Jumpi Smirnic

Print Name ROGER BETTA Address: 6303 Hendricks Ln

Signature Roger Betta

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

Diana L. Stuart 6815 Giusti Rd, Forestville

Signature Diana L. Stuart

CA 95436

Print Name

Address:

Carly Downs 6815 Giusti Rd.

Signature Carly Downs

Forestville CA 95436

Print Name

Address:

Johnathon Downs 6815 Giusti Rd Forestville CA

Signature [Signature]

95436

Print Name

Address:

Barbara Wisland 7521 Niki Lane

Signature Barbara Wisland

Forestville, VA 95436

Print Name

Address:

CHRISTINE HUEMER 6740 Lavon Ct.

Signature Christine Huemer

FORESTVILLE, CA 95436

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name Sally Olson Address: 6537 Wayne Ct., Forestville, CA 95436

Signature Sally Olson

Print Name Ken Harlan Address: 6515 Wayne Ct

Signature Ken Harlan

Print Name Mary Ellen Palmer Address: 8000 Speer Ranch Rd

Signature Mary Ellen Palmer Forestville, CA 95436

Print Name Marshall John Palmer Address: 8000 Speer Ranch Rd

Signature Marshall John Palmer Forestville, CA 95436

Print Name Judy L. Lubas Address: 6505 Wayne Ct.

Signature Judy L. Lubas Forestville, CA 9505

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name Address: 6845 GIUSTI RD.
SANDRA FARKAS FORESTVILLE, CA 95436

Signature Sandra Farkas

Print Name Address:
Colleen O'Neill 8065 Speer Ranch Rd Forestville CA
95436

Signature Colleen O'Neill

Print Name Address:
Jennifer Alwood 6733 Lavon Ct Forestville, CA
95436

Signature Jennifer Alwood

Print Name Address:
Mike Alwood 6733 Lavon Ct Forestville, CA 95436

Signature Mike Alwood

Print Name Address: 6725 LAVON COURT
Forestville, CA 95436

Signature Peggy Fromala

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

RONALD WININGAR

6900 ELLEN LANE FORESTVILLE CA

Signature

Ronald M. Winingar

Print Name

Address:

Amy Ferguson

6718 Laron Ct. Forestville

Signature

Amy Ferguson

C.L. Tree

Print Name

Address:

C.L. Tree

6610 JIM CT, FORESTVILLE

Signature

Print Name

Address:

LARRY LOEBIG

6610 Jim Ct Forestville

Signature

Larry Loebig

Print Name

Address:

MARY CLARE CAWLEY

6632 Jim Ct Forestville

Signature

Mary Clare Cawley

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

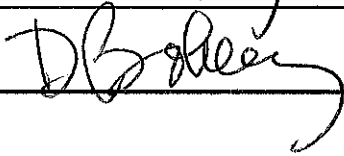
Print Name

Debra Bohling

Address:

4632 Jim Ct

Signature



Print Name

Ian Welsh

Address:

6644 Jim Ct

Signature



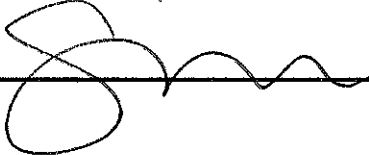
Print Name

Sarah Hoffmann

Address:

6644 Jim Court

Signature



Print Name

Leone Manini

Address:

4506 Wayne Ct

Signature



Print Name

Mel Manini

Address:

4506 Wayne CT

Signature



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Print Name) Kent Wilson Address: 6536 Wayne Ct,
Forestville, CA 95436
Signature Kent Wil

Print Name Nancy Dempster Address: 6730 1st St
Forestville Ca, 95436
Signature Nancy Dempster

Print Name Vikki Miller Address: 7491 Mirabel Rd cottage 1 Forestville
95436
Signature Vikki Miller

Print Name Rebecca Boye Address: 10825 Canyon Rd Forestville
CA 95436
Signature [Signature]

Print Name Donna Winger Address: 6900 Ellen Lane Forestville, CA
95436
Signature Donna Winger

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

Richard Benyo

7050 Giusti Rd, Forestville CA 95436

Signature

Print Name

Address:

Chris Mullins

8065 S Pears Ranch Rd Forestville

Signature

Print Name

Address:

Allen Adams

8111 Speer Ranch

Signature

Print Name

Address:

Melody Adams

8111 Speer Ranch

Signature

Print Name

Address:

CHARLENE PETERSON

8123

SPEER RANCH RD

Signature

Charlene Peterson

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

Maria Birch 7446 Niki Lane

Signature

Maria Birch

Print Name

Address:

Richard Birch 7446 Niki Lane

Signature

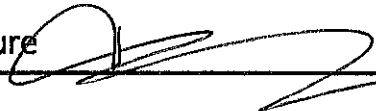
Richard Birch

Print Name

Address:

Tami Barrick 7485 Niki Lane Forestville CA

Signature



95436

Print Name

MICHAEL BAUMAN

Address:

6875 GIUSTI RD

Signature

Michael Bauman

Print Name

Address:

Carol Singleton 6000 Highway 116


Signature

Carol Singleton

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name Rebecca Wessling Address: 6020 Hwy 116
Signature Rebecca Wessling Forestville, CA
95436

Print Name Karen Denise Langford Address: 5995 Hwy. 116
Signature Karen Denise Langford Forestville, CA 95436

Print Name Greg Gallemore Address: 8135 Speer Ranch Road
Signature  Forestville, CA 95436

Print Name Kristen Gallemore Address: 8135 Speer Ranch Rd Road
Signature KMGallemore Forestville, CA 95436

Print Name Frances Oliver Address: 8368 Trenton Rd.
Signature Frances Oliver Forestville CA 95436

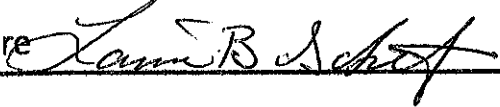
We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

Laurie Schefer 8147 Speer Ranch Rd. Forestville Ca 95436

Signature



Print Name

Address:

Thomas Schefer 8147 Speer Ranch Rd Forestville Ca 95436

Signature



Print Name

Address:

Christine Bell 8168 Speer Ranch Rd Forestville CA 95436

Signature



Print Name

Address:

Richard Phillips 8132 Speer Ranch Rd

Signature

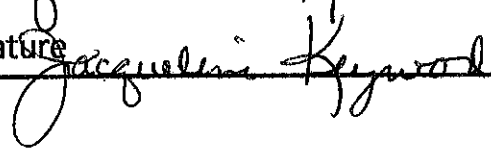


Print Name

Address:

Jacqueline Keywood 8132 Speer Ranch Rd.

Signature



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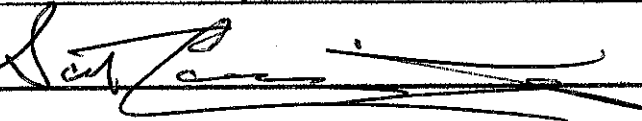
Print Name

Address:

SCOT COVINGTON

8031 SPEER RANCH ROAD

Signature



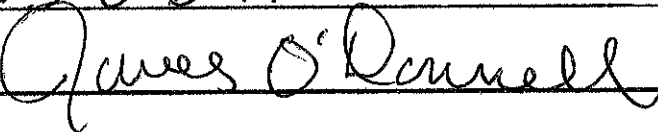
Print Name

Address:

JAMES O'DONNELL

8024 Speer Ranch Rd

Signature



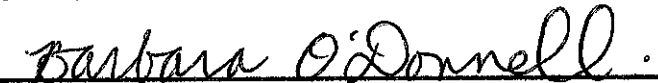
Print Name

Address:

Barbara O'Donnell

8024 Speer Ranch Rd

Signature



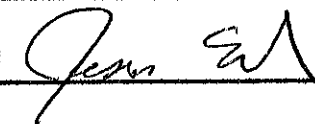
Print Name

Address:

Jessica Earl

8012 Speer Ranch

Signature



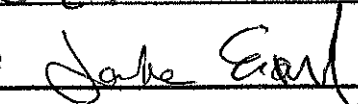
Print Name

Address:

Jake Earl

8012 Speer's Ranch

Signature



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Print Name

JAMES W. MACLURE

Address:

7483 Poplar Dr.

Signature



FORESTVILLE, CA 95436

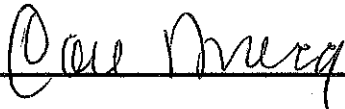
Print Name

Corinne Domecq

Address:

7455 Poplar Dr

Signature



Forestville, CA 95436


Print Name

Dan Kenner

Address:

7455 Poplar Dr

Signature



Forestville, CA 95436

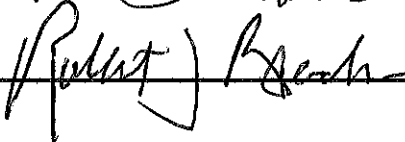
Print Name

ROBERT J. BLOCKER

Address:

7423 Poplar

Signature



FORESTVILLE CA

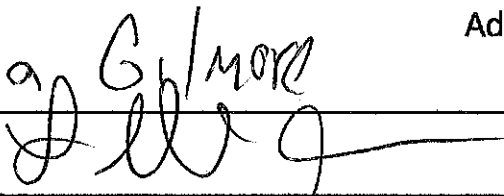
Print Name

Lisa Gilmore

Address:

7518 Mirabel Rd

Signature



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Print Name

Address:

Mona Behan

6867 Nolan Rd., Forestville 95436

Signature Mona A Behan

1/28/23

Print Name

Address:

ALAN CRISP

6867 NOLAN RD, FORESTVILLE 95436

Signature Alan Crisp

1/28/23

Print Name

Address:

Regan Crisp

6867 Nolan Rd. Forestville

Signature Regan Crisp

95436

Print Name

Address:

TONY BRITTON

7420 POPLAR DRIVE, FORESTVILLE

Signature Tony Britton

Print Name

Address:

ANDRE JACKSON

7400 POPLAR DR. FORESTVILLE, CA 95436

Signature Andre Jackson

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

James Kay

7492 Poplar Dr

Signature

James Kay

Forestville, CA 95436

Print Name

Address:

Molly Kay

7492 Poplar Drive

Signature

[Signature]

Forestville CA 95436

Print Name

Address:

Kevin Williams

7498 Poplar Drive

Signature

Kevin Williams

Forestville, CA 95436

Print Name

Address:

Ron Ruiz

7500 Poplar Drive

Signature

Ron Ruiz

Forestville, CA 95436

Print Name

Address:

Sandra McClure

7463 Poplar Dr.

Signature

Sandra E McClure

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name RONALD FIELDS Address: 6512 WAYNE CT
Signature [Signature] Forestville CA

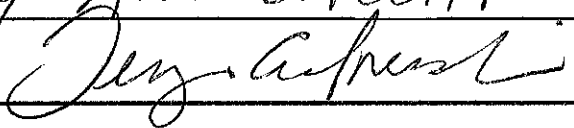
Print Name CINDY KING Address: 6512 WAYNE CT
Signature [Signature] Forestville CA

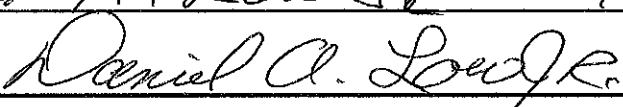
Print Name Debi Unterscher Address: 6512 Wayne Ct.
Signature [Signature] Forestville, CA

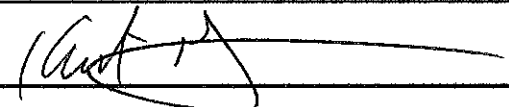
Print Name Steve Unterscher Address: 6512 Wayne Ct.
Signature [Signature] Forestville, CA

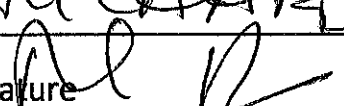
Print Name GERRARD KELSALL Address: 6548 WAYNE CT
Signature [Signature] FORESTVILLE, CA

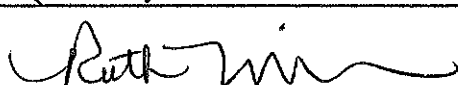
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Print Name Address:
TERRY ANDREACCHI 7785 GIUSTI RD
Signature 

Print Name Address:
DANIEL A. LOW JR 7767 GIUSTI RD.
Signature 

Print Name Address:
KURT GIUSTI 7750 GIUSTI RD
Signature 

Print Name Address:
RICHARD BIRCH 7446 NIKI LN
Signature  FERBSTER

Print Name Address:
Ruth Wilson 6536 Wayne Ct. Forestville
Signature 

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Print Name Alice Shoffit Address: 6830 Giusti Rd
Signature Alice Shoffit

Print Name Mike Barats Address: 6996 Mirabel RD
Forestville Ca 95436
Signature Mike Barats

Print Name Janet Bauman Address: 7366 Mirabel Rd
Signature Janet Bauman Forestville, Ca 95436

Print Name Linda Barker Perkins Address: 6835 Giusti Rd Forestville
Signature Linda Barker Perkins

Print Name Michael D. Perkins Address: 6835 Giusti Rd Forestville
Signature Michael D. Perkins

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.


Print Name

DAN VNOZI

Address:

6970 Giusti Rd.

Signature



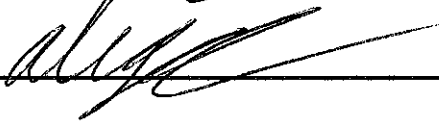
Print Name

Alex Cruz

Address:

6875 Giusti Rd

Signature



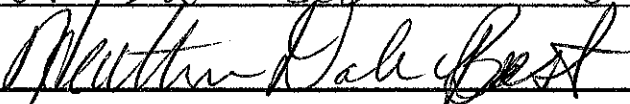
Print Name

Heather Dale Best

Address:

6986 Mirabel Rd.

Signature



Print Name

Robert Best

Address:

6986 Mirabel Rd

Signature



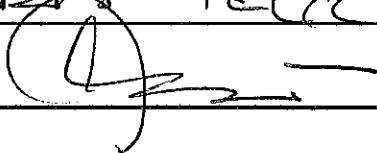
Print Name

GIRIA FERRER

Address:

7445 - Niki Forestville

Signature



We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

John Franceschi 6874 Nolan Rd Forestville CA

Signature John Franceschi

Print Name

Address:

Thomasine A. Franceschi 6995 Giusti Rd. Forestville, CA.

Signature Thomasine A. Franceschi

Print Name

Address:

Lloyd Franceschi 6995 Giusti Rd Forestville CA.

Signature Lloyd Franceschi

Print Name

Address:

Cece Gannon 6955 Giusti Rd, Forestville CA

Signature Cece Gannon 707 887 7223

Print Name

Address:

C. Taylor Brown 6935 Giusti Rd.

Signature [Signature] Forestville, CA 95436

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Print Name

Address:

Steve McDonald 6987 Nolan Rd. 1/27/23

Signature

Steve McDonald

Print Name

Address:

Karen McDonald 6987 Nolan Rd. 1-27-23

Signature

K McDonald

Print Name

Address:

Elisa Baker 7423 Poplar Dr. 1/28/23

Signature

Elisa Baker

Print Name

Address:

ROGER STANCLIFF Forestville 129 NOLAN CT 1/28/23

Signature

Roger Stancliff

Print Name

Address:

Valerie Stancliff 129 Nolan Ct Forestville. 1/28/23

Signature

Valerie Stancliff

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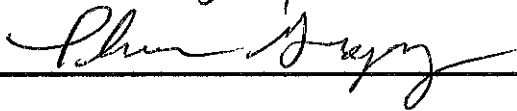
Print Name Chase Reece

Address: 7445 Niki Lane

Signature 

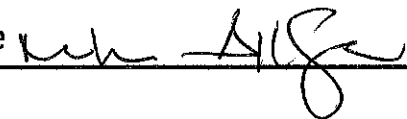
Print Name Thomas Gregory

Address: 7485 Niki Ln

Signature 

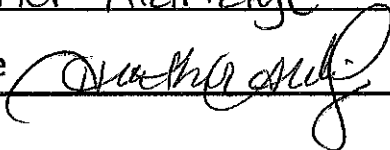
Print Name MARK ALDRIDGE

Address: 7484 NIKI LN

Signature 

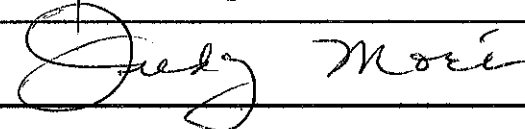
Print Name Heather Aldridge

Address: # 7484 Niki Ln.

Signature 

Print Name Judy Mori

Address: 7495 Niki Ln.

Signature 

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name TIMOTHY DELLINGER Address: 135 NOLAN CT FORESTVILLE, CA

Signature 

Print Name Kathy Dellinger Address: 135 Nolan Ct. Forestville, CA

Signature 

Print Name Helen Butt Address: 122 Nolan Ct. Forestville Ca ⁹⁵⁴³²

Signature 

Print Name Kirsten Franceschi Address: 6874 Nolan Rd. Forestville, CA

Signature Kirsten Franceschi ⁹⁵⁴³⁶

Print Name Starlee Rownd Address: Nolan Rd. Forestville, CA

Signature  ⁹⁵⁴³⁶

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Print Name

Address:

1/28/2023

MARY K. DAUGHERTY

7107 GIUSTI RD.

Signature

Mary K. Daugherty

FORESVILLE, CA
95436

Print Name

Address:

EKaterina Bleeker

7600 Giusti Rd. Forestville, CA 95436

Signature



Print Name

Address:

Melody Clark

7680 Giusti Rd

Signature

Melody Clark

Print Name

Address:

Adele Turk

7680 Giusti Rd

Signature

Adele Turk

Print Name

Address:

Dana Riven

7635 Giusti Road

Signature

Dana Riven

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Print Name

Address:

Robin Trimble

6955 Nolan Rd.

Signature

R. Trimble

Forestville, CA

95436

Print Name

Address:

Tim Kline

6955 Nolan Rd

Signature

Tim Kline

Forestville, CA 95436

Print Name

Address:

Mark Collischowan

6955 Nolan RD Forestville, CA 95436

Signature

Mark Collischowan

Print Name

Address:

JON STURTEVANT

6955 Nolan Rd. Forestville, CA 95436

Signature

Jon Sturtevant

Print Name

Address:

Sally Quady

7635 Giusti Rd., Forestville CA 95436

Signature

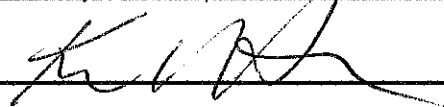
Sally Quady

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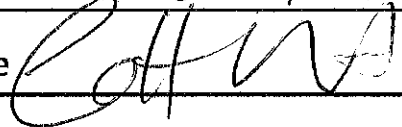
Print Name Edward Mori Address: 7495 R.K. Ln

Signature 

Print Name Kara Northern Address: 7682 Gustb Rd

Signature 


Print Name GARRETT NORTHERN Address: 7682 GUSTI RD.

Signature 

Print Name Sunoma Northern Address: 6925 Nolan Rd

Signature Sunoma NMA Forestville, CA

Print Name DAN NORTHERN Address: 6925 NOLAN RD

Signature  FORESTVILLE

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

Nick Comaich

6831 Nolan RD

Signature

Nick J Comaich

Print Name

Address:

Amanda Danzart

6829 Nolan RD

Signature

Amanda Danzart

Print Name

Address:

Karl Hallstrom

6815 Nolan Rd

Signature

Karl Hallstrom

Print Name

Address:

Erin Hallstrom

10815 Nolan rd.

Signature

Erin Hallstrom

Print Name

Address:

Rhonda Provost

7050 GUSTI ROAD

Signature

Rhonda Provost

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Print Name Kon Zaharoff Address: 6875 Nolan Rd
Forestville, CA

Signature K. Zaharoff 1-27-2023

Print Name Susan Zaharoff Address: 1-27-2023
6875 Nolan Road

Signature Susan Zaharoff Forestville, CA 95436

Print Name Karen Krell Address: 6860 Nolan Rd Forestville CA 95436

Signature Karen Krell 1-27-2023

Print Name Florentino Garcia Address: 6854 Nolan Rd Forestville CA 95436

Signature Florentino Garcia 1-27-2023

Print Name Dewitt Blackman Address: 6854 Nolan Rd Forestville CA 95436

Signature D. Blackman 1-27-2023

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name Nancy L. Jones Address: 6975 Giusti Rd, Forestville
Signature Nancy L. Jones 1-27-2023

Print Name Ken Jones Address: 6975 Giusti Rd, Forestville
Signature Ken Jones 1-27-2023

Print Name DOLORES VOIGHT Address: 8000 SPEER RANCH RD, FORESTVILLE
Signature Dolores Voight 1-27-2023

Print Name Douglas Mark Dutina Address: 6884 Nolan Road Forestville
Signature Mark Dutina 1-27-2023

Print Name Dawn Dutina Address: 6824 Nolan Rd. Forestville
Signature Dawn Dutina 1-27-2023 CA

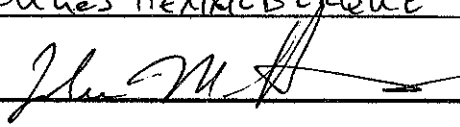
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Print Name

Address:

Johannes HENNEBERGUE 6844 Nolan Road, Forestville, CA 95436

Signature



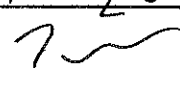
1/27/23

Print Name

Address:

Ryan Hennebergue 6844 Nolan Rd. Forestville, CA 95436

Signature



1/27/23

Print Name

Address:

Ron Mollo 6857 Nolan Rd Forestville 95436

Signature



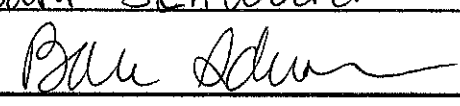
1-27-23

Print Name

Address:

Barbara Schwoerer 6815 Nolan Rd, Forestville, CA

Signature



1-27-23

Print Name

Address:

Michael Schwoerer 6815 NOLAN R FORESTVILLE

Signature



1-27-23

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Print Name

Address:

Jeannette Smith 7780 Giusti Rd Forestville

Signature

Jeannette Smith

Print Name

Address:

Diane Nelson 6341 Van Keppel Rd.

Signature Diane Nelson Forestville, CA

Print Name

Address:

Tim Nelson 6341 Van Keppel Rd.

Signature Tim Nelson Forestville, CA

Print Name

Address:

Debra Rypka 7096 O'Hare Lane

Signature Debra Rypka Forestville, CA 95436

Print Name


Address:


Dyana Foldvary 7381 Hidden Lake rd 95431

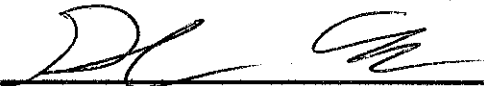
Signature

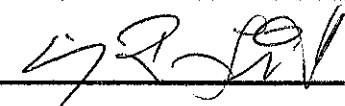
Dyana Foldvary


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Print Name Timothy Allen Address: 7581 Giusti Rd Forestville
Signature 

Print Name Leila Allen Address: 7581 Giusti Rd. Forestville
Signature 

Print Name GLENN Trowbridge Address: 7000 Nolan Rd
Signature 

Print Name CRAIG R. LEVITT Address: 7685 Giusti Rd. Forestville
Signature 

Print Name COLLEENE LOW Address: 7767 Giusti Rd. Forestville
Signature  95436

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

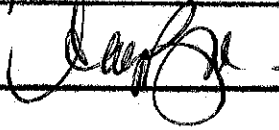
Print Name

Address:

Gary Beyroufi

11140 Canyon Rd, Forestville, CA 95436

Signature



Print Name

Address:

Daryl Springer

11140 Canyon Rd Forestville, CA 95436

Signature



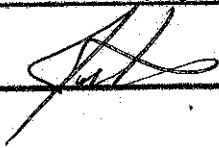
Print Name

Address:

Joel Woodbury

10905 Canyon rd.

Signature



Print Name

Address:

Signature

Print Name

Address:

Signature

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Print Name

Address:

Margaret Katta

7430 Hidden LAKE Rd.

Signature

Margaret L Katta

Print Name

Address:

Ellen Faryna

6400 Hidden Lake Rd.

Signature

Ellen Faryna

Print Name

Address:

Signature

Print Name

Address:

Signature

Print Name

Address:

Signature

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and wildland mitigations that would make the project financially impossible for a developer to overcome
a current density and that it would be unwise to ignore these issues in order to meet the RHND allocation
needs.

Print Name

Gillian Hayes

Address:

7385 Hidden Lake Rd
Forestville, CA 95426

Signature

Gillian Hayes

Print Name

tyler Haen

Address:

7385 Hidden Lake Rd
Forestville, CA 95436

Signature

Tyler Haen

Print Name

Address:

Signature

Print Name

Address:

Signature

Print Name

Address:

Signature

From: [M.c](#)
To: [PermitSonoma-Housing](#)
Subject: Housing Element Draft
Date: Friday, November 11, 2022 7:37:34 PM

Hello,

I wanted to input my comment about the Housing Element draft plan and the current affordable housing units that exist and currently being made.

First off I would like to thank they county for these affordable housing options but I do believe the county should imply that the Housing organization that controls the income limits for these homes be increased drastically due to inflation and other competing factors that others wouldn't no of unless living in these conditions with their families or children as couples, single parents and elders.

I would also like to state that the walls within these affordable apartments are super thin and you can hear everything happening on the other side in the neighbors apartment, in which I believe these walls need to be looked into and have them updated and re-enforced to help with soundproofing these homes.

I know sound proofing these walls will help out tremendously and help stop conflict, friction and fights between neighbors since everyone has their own sleep schedule and some people are up later than others as well.

Thank you for your time and I hope you have a great day.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

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

December 3, 2022

DELIVERED VIA EMAIL

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

Comments on Sonoma County Housing Element proposed rezoning of parcels # 054-290-057 and # 054-290-084 (GE-1 and GE-2).

Dear Permit Sonoma,

As a thirty-three year resident, owner of a historical consulting business in Glen Ellen, and member of the North Sonoma Valley Municipal Advisory Council, I understand the need for more housing in the County. However, I am concerned about the proposed rezoning of the two parcels listed above, now under consideration in the County's draft 'Housing Element.'

Issues relating to development of this site have been raised during two public hearings in the last six years. In an April 5, 2016 letter to the Joint Design Review Committee & Landmarks Commission (attached to email), I detailed the sensitivity of this site for development. Fronting along a significant portion of Glen Ellen's main thoroughfare, development on these parcels has the potential to either enhance or appreciably erode the character of our small town. I submitted additional letters in 2020 and 2021, which are also attached.

The current rezoning proposal only increases my concerns about the future of this site. Three contributing structures to the proposed Glen Ellen Historic District (Painter 2013) occupy the property. This would seem to be at odds with the statement in the Housing Element's Technical Background Report that: "Historic preservation requirements do not pose a constraint to housing development."

Zoning these parcels for higher density risks compromising the integrity of the Glen Ellen Historic District. As one example, the building currently occupied by Talisman Winery on the southeast corner of Carquinez and Arnold Drive, was constructed in about 1895 and appears to be the oldest commercial structure in downtown Glen Ellen. I believe there are a number of vacant lots in the vicinity could be developed without compromising the integrity of the District.

I have other concerns about this rezoning proposal, including: 1) the lack of real analysis of the appropriateness of applying the Workforce Housing (WH) zone district to Glen Ellen's 2-block long village; 2) the dramatic increase in density in a small, semi-rural community center; 3) the WH zone requires a minimum development density and could not be redeveloped with fewer units; 4) the owner's previous plans to develop the site were rejected by the Design Review Board; 5) despite invitations to work with local citizens to develop an acceptable plan, the owner has never made any real effort to do so, thus it is especially concerning that WH permits will be granted ministerially without requiring public review and comment; 6) this is the only location proposed for WH in all of Sonoma Valley, without identifying other suitable locations in more urbanized areas, like the City of Sonoma.

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

Given these potential adverse affects, I hereby request that the County remove the two Glen Ellen parcels from rezoning consideration.

Sincerely,

Arthur Dawson

Arthur Dawson, Historical Consultant
Baseline Consulting
Glen Ellen, California

Attachments:

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

Letter submitted April 5, 2016

Letter submitted May 6, 2020

Letter submitted June 17, 2021

Current letter, submitted December 3, 2022



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

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

April 5, 2016

Dear Joint Design Review Committee & Landmarks Commission,

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

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

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

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

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

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

Glen Ellen Design Guidelines Subarea 1

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- *Open Space and Natural Resource Policies*

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

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

- *Elevations Policies*

1. ...avoid monotony of design.

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

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

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

- *Historical Preservation Policies*

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

See previous comments with respect to impacts to the Historic District

- *Building Design*

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

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

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

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

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

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

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

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

Sincerely,

Arthur Dawson

Arthur Dawson
Historical Consultant
Baseline Consulting
Glen Ellen, California

SOURCES CITED:

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



BUILDING #2, placed as proposed

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





May 6, 2020

DELIVERED VIA EMAIL

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

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

Dear PRMD Staff,

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

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

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

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

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

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

Sincerely,

A handwritten signature in blue ink that reads "Arthur Dawson".

Arthur Dawson
Historical Consultant
Baseline Consulting
Glen Ellen, California

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

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

**Assessment of Historic Resources for the
Community of Glen Ellen
Glen Ellen, Sonoma County, California**



Photograph courtesy Sonoma County Library

Glen Ellen in 1933

Prepared for
Sonoma County Historic Landmarks Commission
Santa Rosa, Sonoma County, California

Prepared by
Diana J. Painter, PhD
Painter Preservation & Planning

October 2013

**Assessment of Historic Resources for the
Community of Glen Ellen
Glen Ellen, Sonoma County, California**

Prepared for
**Sonoma County Historic Landmarks Commission
Santa Rosa, Sonoma County, California**

Prepared by
**Diana J. Painter, PhD
Painter Preservation & Planning**

October 2013

ACKNOWLEDGEMENTS

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Assessment of Historic Resources for the Community of Glen Ellen

TABLE OF CONTENTS

Acknowledgements

Executive Summary

I. Introduction 9

Purpose of Study
Survey Boundaries
Research Design
Field Methods
Previous Surveys
Evaluator Qualifications

II. Historic Context11

Early Settlement – 1839-1880
Glen Ellen is Established – 1881-1918
Prohibition to a New World War – 1919-1940
World War II and Beyond – 1941 to the Present

III. Architectural Context18

Location and Setting
Patterns of Growth
Architectural Styles and Building Types
Summary

IV. References21

Exhibits

Appendices

Appendix A – Previous Surveys and Listings

Appendix B – Lists of Properties and Survey Map

Appendix C – Department of Parks and Recreation Forms

Assessment of Historic Resources for the Community of Glen Ellen

LIST OF FIGURES

Table 1 – Glen Ellen Survey Summary

Table 2 - Glen Ellen Building Construction Dates by Decade

Table 3 – Properties in Survey Area

Figure 1 – Regional vicinity map

Figure 2 – Current USGS map of Glen Ellen (1954-rev. 1980)

Figure 3 – Glen Ellen Historic District as adopted in 1990

Figure 4 – Glen Ellen Historic District Arnold Drive corridor (Subarea 1)

Figure 5 - Glen Ellen in 1877

Figure 6 – Glen Ellen in 1898

Figure 7 – Arnold Drive corridor in 1898

Figure 8 – View of Glen Ellen, 1890

Figure 9 – The 1905 Chauvet Building, n.d.

Figure 10 – View of Poppe Building, 1906

Figure 11 – Looking north from Poppe Building, 1910

Figure 12 – View of Hotel Chauvet from the north, 1910

Figure 13 – Arnold Drive, looking north from Sonoma Creek Bridge, n.d.

Figure 14 – Stone Winery at Jack London Village, 1911, looking south

Figure 15 - Glen Ellen in 1916 (Sanborn Fire Insurance Map)

Figure 16 – Hotel Chauvet and Poppe Building in 1933

Figure 17 – Land Use designations in Glen Ellen today

Map 1 – Field Survey Numbers

Map 2 – Field Survey Numbers

Assessment of Historic Resources for the Community of Glen Ellen

Executive Summary

The following summarizes the findings of the “Assessment of Historic Resources for the Community of Glen Ellen” study. Painter Preservation & Planning was commissioned to undertake this study in 2013 by the Sonoma County Permit and Resource Management Department Historic Landmarks Commission. The scope of the study was to conduct a survey of the properties adjacent to Arnold Drive and develop a brief historic context for the town of Glen Ellen, in order to re-assess its potential as a historic district. The Arnold Drive corridor, which includes most of the identified historic properties in Glen Ellen, is a sub-set of the larger district that was adopted by the Commission in 1990 as a historic district, but never implemented. It is the corridor that is the subject of this study.

Of the approximately 560 properties in the Glen Ellen Historic District, about 114 properties are located along Arnold Drive, noted as Subarea I in the 1990 *Glen Ellen Development and Design Guidelines*. Of these properties, thirteen are vacant.¹ Seventy-one (71) Department of Parks and Recreation (DPR 523) forms were prepared for the corridor, for 63 properties.² The properties were considered Contributing if they were over 50 years of age and retained integrity. No attempt was made to establish Areas of Significance or a Period of Significance for the corridor, as this was beyond the scope of work for this project. Of these 63 properties, 38, or approximately 33%, are considered contributing, based solely on age and integrity.

The survey showed that roughly one-third (33%) of the properties were contributing to a potential district; that is, they were over 50 years of age and retained integrity. Roughly another third (33%) were “Out of Period” properties, meaning they were not over 50 years of age. And about one-third (33%) were non-contributing, meaning that they were over 50 years of age but lacked integrity, or were vacant. Discounting the vacant properties, the ratio of contributing to non-contributing properties are: Contributing 38%; Non-contributing 25%; and Out of Period 38%. This may also be seen in the following table:

Table 1: Glen Ellen Survey Summary

GLEN ELLEN SURVEY SUMMARY		
	Number	Percentage
Properties in District	558+	
Properties in Corridor	114+	100%
Contributing properties	38	33%
Non-contributing properties	25	22%
Out of period properties	38	33%
Vacant properties	13	12%
	114	100%

¹ Note that two of these properties are parking lots associated with specific businesses.

² Note that DPR forms were not prepared for the two bridges in the corridor, both of which are historic and are already listed as Sonoma County Landmarks. DPR forms were not prepared for vacant properties or properties that were not 50 years of age. Note that many properties have multiple structures on them. Separate DPR forms were used for recording some of these structures.

A historic district is defined as an area that “possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.”³ A general rule of thumb is that an area must possess about 60% contributing properties to be eligible for listing in the National Register of Historic Places. Local registers, administered by local governments, may adopt historic districts based on their own ordinances or practices. Taking into consideration the fact that a number of properties in Glen Ellen include several buildings, a decision on whether or not a historic district is present should not be made solely on the numbers, but on the presence of a concentration of properties that relate to the Area(s) of Significance and Period(s) of Significance adopted for the district. In other words, a decision should be made based on the presence of a concentration of properties that successfully tell Glen Ellen’s story.

Note that the numbers in the above table are slightly misleading, in that along this corridor several properties (a property being one parcel with one APN number) have multiple buildings on them, representing more than one period of development. For example, the property on which the Glen Ellen Inn is located also includes the Glen Ellen Grill, The Fig Café, a dentist’s office, a veterinary hospital, the Glen Ellen Grocery, the Glen Ellen Post Office, and Allen Real Estate, whose dates of development range from about 1880 to 1962. Note also that some of these buildings are co-joined, further challenging recordation and a determination of historic significance. For example, the ca 1930 veterinary hospital would be a contributing resource, but for the fact that it is attached to the non-contributing dentist’s office and The Fig Café.

Another challenge in Glen Ellen is that in the 1990 study, properties along Arnold Drive were treated equally, but in fact there are dramatic differences in the properties along the corridor from a physical point of view. There are topographical differences along the corridor, with some properties not accessible from Arnold Drive for that reason. Similarly, other properties are non-developable due to the presence of Sonoma and Calabazas Creeks.

Glen Ellen includes three separate and distinct areas of commercial development. This was true historically, and remains the case today. The two northerly centers would be contiguous but for their separation by Sonoma and Calabazas Creeks and the bridge over the creeks. The southerly center, which is about a half mile south of Glen Ellen proper, has developed around Jack London Village. It is historically connected to the town and considered here another commercial node within the town. Residential uses are still mixed in among the commercial businesses in Glen Ellen, and some residences having been converted to businesses over time. Note that the two land use designations that occur along the corridor are “Urban Residential” and “Limited Commercial,” which generally reflects the conditions on the ground. Again, the 1990 study treats the corridor as a uniform entity, but in fact it is made up of commercial centers, numerous residential properties, and disparate topographical and other physical conditions.

Next Steps

This study was not meant to be conclusive, as it was intended to be a small, pilot project that defined how the larger district should be approached, based on previously adopted boundaries and subareas. Accordingly, the following are recommendations from this first phase of assessing Glen Ellen’s potential as a historic district. .

- If a historic district or another type of district is desired in Glen Ellen, a determination will have to be made as to what types of uses should be included in the district, and what

³ National Park Service, National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation*. Washington DC: National Park Service, 1995 (1990), p. 5.

the geographic boundaries will be. It makes sense to relate the geographic boundaries of the district to the uses that are to be regulated within it. For example, the Glen Ellen Community Church and Mayflower Hall are important historic buildings and an important part of public life in Glen Ellen, yet were not included in the Arnold Drive corridor (Subarea I). It makes sense for the boundaries of the corridor to be drawn considering viewsheds from Arnold Drive, as well as the commercial and institutional properties within it. So a first step would be to determine what types of uses should occur, or primarily occur, within the district, and draw the boundaries of the district taking into consideration uses, topography, viewsheds, developable land, the presence of historic structures, and related factors.

- A decision will have to be made as to whether it makes sense to include individual single family homes that are located in the hills surrounding Glen Ellen in the district, as they are now. And a decision will have to be made as to whether these uses would be regulated the same way that the commercial uses are.
- If a historic district is desirable, best practices are to develop historic district design guidelines that are consistent with the Secretary of Interior's Standards and provide additional detail that is tailored to the character of the district. If a property is deemed historic under the auspices of the California Environmental Quality Act, changes to the building must be consistent with these standards, so it streamlines regulations to have historic district design guidelines that are consistent with these standards. A good example is the present historic district design guidelines for the town of Bodega.
- If a historic district is desirable, boundaries should be drawn to relate most closely to the Period(s) of Significance and Area(s) of Significance chosen for the district. This should relate to what is considered most valuable, historically and architecturally, in the district. For example, consideration should be made as to whether the Glen Ellen Grocery should be considered historic. It is over 50 years of age, having been constructed in 1962, in a style that is a good example of its type. It is a commercial building with Ranch style elements, which may have been chosen to fit in with the prevailing residential types in the village as a whole. It is also an important use in the area.
- Another possibility in Glen Ellen is to protect historically and architecturally significant historic buildings and structures by nominating them individually as Sonoma County Landmarks, and to govern the remainder of the corridor or district with general design guidelines, which is essentially how the district is regulated today. However, any design guidelines should, to the extent possible, speak to the desired character of the area. Even if the desired character is to not stipulate architectural design per se, but speak to the desired urban design qualities in the commercial center (which is essentially how the guidelines are currently crafted), this should be clear. The guidelines in place today are somewhat outdated.

Assessment of Historic Resources for the Community of Glen Ellen

I. Introduction

Purpose of Study

In 1990, the Sonoma County Board of Supervisors adopted the *Glen Ellen Development and Design Guidelines* with Ordinance No. 4297. Although frequently referred to as a Historic District, Glen Ellen was never officially zoned as such. Nonetheless, for the sake of discussion, it is referred to as District in this document.⁴ The District encompasses development along all the major roads that radiate out from the center of Glen Ellen, where Arnold Drive crosses Sonoma Creek, for a total of about 560 properties (see Figure 3). The Design Guidelines built on previous work developed in conjunction with the Glen Ellen Town Plan of 1988, sponsored by the Glen Ellen Association and undertaken by Walter Hood and Matt Taecker of the University of California, Berkeley. The *Glen Ellen: Development and Design Guidelines* were prepared by J. Kapolchok & Associates, Land Use Planners.

Despite this promising beginning, the District has not been administered as a historic district. Most of the design guidelines pertain to the design and use of public space, and only two guidelines address historic preservation:

- Distinguishing architectural features presently covered or in disrepair should be restored as much as possible; and
- Buildings, features and artifacts that are reminiscent of Glen Ellen's past should be retained where possible. Special attention should not be drawn to them; however they should remain as reminder's of the community's history.

These policies are ambiguous and do not give adequate direction for administering a historic district. Slightly more direction was given in the section, "Building Materials and Construction," but again, the design guidelines are primarily oriented toward urban design, rather than the architectural design of buildings per se.

The purpose of this document is to evaluate the core of the Glen Ellen district, essentially the properties on either side of Arnold Drive south of Highway 12 to the southern boundary at Jack London Village, for their potential as a historic district today, and provide additional recommendations for future actions to more effectively manage Glen Ellen's historic properties.

Survey Boundaries

The boundaries of the survey area were the same as those established in the 1990 Glen Ellen "Development and Design Guidelines," which are the properties to either side of Arnold Drive from south of Highway 12 to Jack London Village. The survey area is referred to as Subarea I in this same report. See Figure 4 for a map of the survey area.

⁴ Note that in local government in general, there are many kinds of districts – design districts, historic districts, and conservation districts, among others.

Research Design

The properties within the survey area represent a sub-set of the approximately 560 properties in the Glen Ellen Historic District. They represent the properties along the Arnold Drive corridor that were identified in the 1990 study of Glen Ellen as “Subarea I.” Basic information on the properties, such as the address and Assessor Parcel Number, was provided by Sonoma County PRMD. A reconnaissance level survey was conducted in the field, and the properties checked against PRMD’s mapping program and permit history records. Development of the survey report included the results of this survey, primary and secondary research, and interviews with those knowledgeable about Glen Ellen history.

Field Methods

The properties in the survey area were surveyed on April 1 and 2, 2013. Photographs were taken of all properties in the survey area and basic data recorded on field forms, although properties were only recorded on Department of Parks and Recreation Forms (DPR 523 forms) if they were over 50 years of age. Seventy-one survey forms were prepared for the 114 properties in the survey area.

Previous Surveys

Numerous properties in Glen Ellen have been the subject of surveys and inventories in the past, including the 1973 survey of historic resources conducted by Sonoma County Parks and Recreation Department, and the 1978 survey of historic properties undertaken by the Sonoma League for Historic Preservation. The League conducted an additional survey in 1990, updated in 1998. Eight properties in the Glen Ellen survey area are listed as Sonoma County Landmarks. See Appendix A for more information.

Evaluator Qualifications

Diana J. Painter, principal of Painter Preservation & Planning, undertook this survey of historic resources along Arnold Drive in Glen Ellen and developed the historic context for the study. She was assisted by Rebecca Grossman-Kahn and Robin Fies, both of San Francisco. Painter’s qualifications meet the Secretary of Interior’s Standards professional standards as defined in the Code of Federal Regulations, 36 CFR Part 61 for architectural history and history. Painter Preservation & Planning has been undertaking reconnaissance level and intensive level surveys; drafting historic district design guidelines; and conducting design review of historic properties for compliance with the Secretary of Interior’s Standards in Sonoma County since she founded her firm in 2002. She holds a PhD in Architecture and a Masters Degree in Urban Planning/Urban Design and has 30 years of professional experience in historic preservation and urban design. Painter Preservation & Planning is based in Sonoma, California and Salem, Oregon and is listed in the roster of consultants on file with the State of California Office of Historic Preservation’s Eastern Information Center at the University of California, Riverside.

Assessment of Historic Resources for the Community of Glen Ellen

II. Historic Context

Early Settlement – 1839-1880

Settlement of the Sonoma Valley began when Mission San Francisco Solano, the last and furthest north of the missions, was established by Father Altamira in Sonoma, at the northeast corner of Sonoma Plaza. Shortly before secularization of the missions, which occurred in 1834, Mexican Governor Jose Figueroa chose Sonoma Valley for settlement and assigned the task to General Mariano Guadalupe Vallejo, who received vast grants of land in return for his services. Vallejo established the Pueblo de Sonoma next to the mission and proceeded to encourage settlement by awarding large land grants throughout what is now Marin and Sonoma Counties to prospective settlers.⁵

In 1839 General Vallejo established a sawmill at the confluence of Asbury and Calabazas Creeks about one half mile south of where Glen Ellen proper is today. This marked the beginning of Glen Ellen, but it would be several decades before the small town took the form that it exhibits today.

Glen Ellen is named after the wife of early Sonoma Valley settler Charles V. Stuart, who came to California in 1849 and settled in the Glen Ellen area about 1869, where he “began one of the earliest essays at viticulture in Sonoma County.”⁶ Glen Ellen in fact got its start in the vicinity of Stuart’s ranch (see Figure 5). Stuart named his ranch Glen Ellen, a name that was also given to the post office, which was originally just north of his ranch on Captain Justi’s property, also on Dunbar Road. The post office eventually moved south to what is now the Glen Ellen townsite and Stuart renamed his ranch Glen Oaks to avoid confusion. Both the town and the ranch still hold these names today.

One of earliest histories that mentions Glen Ellen and the surrounding countryside was written by Charles A. Menefee in 1873. At this time Menefee was writing a history of the four counties of Napa, Sonoma, Lake and Mendocino. He called Sonoma, “one of the most important and interesting counties in the State.”⁷ He recounted the history of the town of Sonoma, discussing its importance before California became a state, but noted that after the county seat moved to Santa Rosa, the town languished. He continues: “But this stagnation only belongs to the town, the valley [Sonoma Valley] is quite different. It is now probably one of the finest vineyard sections in the state.”⁸ At this time Sonoma Valley was additionally known for its wheat crops, as was the entire county. Sonoma Valley would continue to be the most important center in Sonoma County for wine production.

The 1874 *Hand-Book and Directory of Napa, Lake, Sonoma and Mendocino Counties* also provides insight into early Glen Ellen at the time. This directory lists just seventeen residents

⁵ Kyle, 2002:508.

⁶ He had purchased property in Sonoma Valley about 1851, however (*An Illustrated History of Sonoma County, California*, 1889:431).

⁷ Menefee, 1873 (p. 163 in 1993 reprint).

⁸ Menefee, 1873 (p. 167 in 1993 reprint).

associated with the Glen Ellen post office.⁹ The listed residents were primarily farmers and vintners, and included the proprietor of the Half-Way House on Santa Rosa Road; Joshua Chauvet (who lists his residence as in Sonoma); Captain Charles Justi, the postmaster, who lived in the Justi Adobe on Dunbar Road; J. A. Poppe, whose place of business at this time was on the east side of the Plaza in Sonoma; and vintners C. V. Stuart, Dr. J. B. Warfield, and J. A. Williams. A map showing land ownership patterns in the vicinity of Glen Ellen at this time can be seen in Thompson’s 1877 Atlas of Sonoma County (see Figure 5).

Prefacing the Directory, the author L. L. Paulson describes his trip through Sonoma County in, “A General Description of Sonoma County, Incidents of Travel, Adventures, Etc.” He first arrived at the small community of Donahue by steamer from San Francisco, and records his impressions there.¹⁰ At the time of his trip there were 20,476 people living in Sonoma County. It was agriculturally rich, and its populace was considered well educated, due in part to the 102 schools throughout the county.¹¹ Like the earlier author, he first described the town of Sonoma. Traveling from Sonoma to Santa Rosa by stage, along what would be roughly the route of Highway 12 today, east of Sonoma Creek, the author notes the farms of the Carriger brothers and William Hill, among others: “On all sides are elegant residences, surrounded by shade trees, fruit trees, vines and flower gardens . . . They all have large vineyards, fruit orchards and flower gardens; their places are kept in excellent order, and are among the most beautiful we have seen in our travels. Here we see growing side by side in the open air, oranges, apples, almonds, plums, figs, cherries, and other tropical and semi-tropical fruit . . . The vineyards contain almost every quality of grapes, from the finest imported to the more common Mission variety.”¹²

Glen Ellen got less press, however: “. . . a two house town, where the post office and the necessary saloon are under the same roof with a shoemaker shop (doing a good business?) next door; on we pass more vineyards, more vineyards and vineyards again, having seen but very few grain fields since leaving Sonoma, and come to the farm of William Hood . . .”¹³

Historian J. P. Munro-Fraser devoted just one paragraph to the young Glen Ellen in his 1880 history of Sonoma County. He noted the location of Captain Justi’s Glen Ellen post office (on what is Dunbar Road today, noting that Glen Ellen was “. . . only a mail stop, but is surrounded by some of the most experienced wine growers in the county . . . A radius of six miles, with Glen Ellen for a center, would, in the opinion of many, include the finest grape-growing section in the State of California.”¹⁴ This is no less true today than it was in 1880.

Glen Ellen is Established – 1881-1918

Twenty years later, by the turn of the century, Glen Ellen was established in its present location. The San Francisco & Northwestern Pacific Railroad (S.F. & N.P.R.R.) had arrived in Glen Ellen in 1881 and could now be used to transport wine, as well as the region’s other agricultural products. J. C. Chauvet built his stone winery building south of the city in 1881 as well. The 1899 Sanborn Fire Insurance map shows that at that time two hotels and a grocery were located across the street from the depot for the S.F. & N.P.R.R., among which are scattered residences,

⁹ Note that the Glen Ellen post office at this time was still on Captain Justi’s property on Dunbar Road

¹⁰ Donahue was a small community south of Lakeville on Petaluma Creek (Petaluma River today).

¹¹ Paulson, 1874:87.

¹² Paulson, 1874:88.

¹³ Paulson, 1874:88. The Hood Mansion was and is in Los Guilicos.

¹⁴ Munro-Fraser, 1880:30.

north of the bridge across Sonoma Creek. South of the bridge is a cluster of buildings that are not the same buildings that would be there by 1905-1906, but nonetheless represent the same uses, including two general merchandise stores, a hotel, and a saloon, as well as residences. J. C. Chauvet owned the winery south of town by this time, which included the substantial stone winery building, used for fermenting and storage, with scales and the crusher on the south end, a cooper and hay storage building to the south, and a distillery at the far south end of the parcel.

In addition to facilitating the export of wine and other products, the railroad also brought visitors to the region. The 1898 Reynolds and Proctor Atlas of Sonoma County featured two properties in Glen Ellen, Dr. C. C. O'Donnell's Mineral Springs, "The Largest and Most Picturesque Pleasure and Health Resort in California," which was located on a 103-acre property north of Glen Ellen on what is now O'Donnell Lane (see Figure 6), and the White Leghorn Poultry Farm of C. H. W. Bruning, four miles west of town. It introduced Glen Ellen as being ". . . one of the loveliest spots in all the county – and that is saying a great deal." The resort, which consisted of 30 cottages, among other facilities, was described as follows: "At Glen Ellen there are fine mineral springs which have proved by analysis to be the greatest remedy for liver, stomach and bladder complaints, rheumatism, catarrh and lung troubles. These springs are forty-six miles from San Francisco, to which there are four daily trains, via S. F. & N. P. R. R. Company. Realizing what the utilizing of these springs will do for mankind, Dr. O'Donnell has expended large sums of money in laying out the grounds, making roads, buildings, cottages, etc. The cottages all have from three to ten rooms. They are all named."¹⁵ The Glen Ellen Community Church, still extant, was in place here, and the resort boasted fresh, local produce and meat. In short, "The climate is unsurpassed. Elegant bathing, fishing and game abundant, and here all those seeking rest and health, or pleasure, can find a spot that will meet their wants which all can easily bear and in all an ideal summer and winter resort."¹⁶

The Sonoma Home for the Care and Training of the Feeble Minded, which was 1670 acres in size at this time, was in place just south of Glen Ellen and provided a steady source of employment for local residents.¹⁷ The 1898 map of Glen Ellen, as seen in Proctor and Reynolds Atlas, shows both rail stations in place (see Figure 7). The S.F. & N.W.P.R.R. station was east of Sonoma Creek and directly west of what is Arnold Drive today (about where the parking lot for the Glen Ellen Inn is). The town was made up of several small centers, as it is today. North of Carquinez Avenue, where it meets Glen Ellen Avenue (Arnold Drive today), was Gibson's Addition. West of the Addition and Glen Ellen Avenue was the depot for the S. F. & N.W.R.R. East of the Addition, on what is Railroad Avenue today, was the Southern Pacific Railroad Depot.¹⁸ North of where the Southern Pacific track turned east before continuing to Santa Rosa was "North Glen Ellen," an area occupied by the properties along Riddle Road today. Southwest of the confluence of Sonoma and Calabazas Creeks, the heart of Glen Ellen, was Chauvet's Addition, which was served by Carquinez Street (Arnold Drive today), Chauvet Avenue, and Madrone Avenue. The land north of Bennett Street (London Ranch Road today) was owned by Joshua Chauvet. The large land holding between today's Warm Springs Road and Henno Road was owned by C. C. and Emma O'Donnell and operated as a resort (see above description).

¹⁵ Reynolds and Proctor, 1898:47.

¹⁶ Reynolds and Proctor, 1898:47.

¹⁷ U.S. Census, 1910. The facility, still in place, is today called the Sonoma Developmental Center.

¹⁸ The railroad, which was constructed from Santa Rosa to Napa, had been run by the Northern Railway Company. It became part of the Southern Pacific Railroad in 1898 (Shere, 2012).

By the end of the first decade of the twentieth century Glen Ellen was quite well established, a result no doubt of the excellent railroad service, among other factors. The 1908 directory notes that Glen Ellen had daily mail, a Western Union telegraph, telephone service, and a Wells, Fargo & Company express.¹⁹ The directory also showed that about 140 male residents called Glen Ellen their post office, which was now located in Glen Ellen proper. About 55 of those men referred to themselves as farmers. One was a rancher, one was a vineyardist, and one raised poultry. Five were wine makers, including Henry J. and Joshua Chauvet. The railroads proved good employers. There were four engineers in town, two conductors, two foremen, a baggage master, two brakemen, and one agent. Five teamsters and two blacksmiths catered to the older travel trades. The boom period no doubt attracted members of the building trades as well. There were seven carpenters in town, a brick burner, a clay worker, and a painter. The town boasted five people who worked in or owned general merchandise stores. The service trades were represented by four butchers, six hotel and three saloon owners or workers, one waiter, and two barbers. Other trades people included a shoemaker, a tailor, and a druggist. The professions were represented by one physician, one veterinarian, a nurse, a lawyer, a journalist, and a teacher. The town was served by one mailman and two firemen. In short, Glen Ellen had a full component of services necessary for any small town and center for surrounding agriculturalists. Its most substantial masonry buildings were in place, including the Hotel Chauvet (1906), Poppe Building (1906), Chauvet Building (1905) and Chauvet's winery south of town (1881), as well as the J. Chauvet House (1906), the H. J. Chauvet House (ca 1880), and the Gage House (ca 1890) (note that these two latter buildings are wood frame). And although there were not many residences in town, the town provided employment for a substantial number of people.

Prohibition to a New World War - 1919-1940

By 1910 the state of California was producing over forty-five million gallons of wine, as well as exporting wine to Europe, and in 1918 the powerful California Wine Association, headquartered in Contra Costa County, paid its highest dividend.²⁰ That would shortly change, however. National Prohibition became law on January 16, 1920, prohibiting the sale of alcohol for any but medicinal or sacramental uses.²¹ In California as a whole, the number of wineries went from approximately 700 in 1920, to 140 by the time prohibition was repealed in 1933.²² But in Sonoma County the number of acres in grapes went from 17,080 in 1919 to 21,496 in 1933, a 4,000-acre total gain of acreage planted in vineyard.²³ Overproduction of grapes for juice and raisins collapsed this market as a whole in the mid-1920s, but Sonoma County was able to maintain its high percentage of wine grape vineyards.²⁴ While research did not reveal specific information on the impact of Prohibition in Glen Ellen, historian Lynn Downey has written that, "In the Sonoma Valley, many businesses failed, and others barely held on. When repeal finally came in 1933, the damage could be seen all over town: closed wineries, abandoned buildings full of discarded machinery and rotting barrels, and shabby neglected vineyards."²⁵

¹⁹ *California Polk-Husted Directory Co.'s Santa Rosa City and Sonoma County Directory 1908.*

²⁰ Peninou, 1998:32

²¹ Peninou, 1998:32. The War Prohibition Act of 1918 went into effect in July 1919, causing a large sell-off of wine in the Sonoma County Viticultural District.

²² Peninou, 1998:32.

²³ Peninou, 1998:264

²⁴ Peninou, 1998:264; Downey, 2013:80.

²⁵ Downey:2013:80.

or the exportation thereof from the United States....," drinking in Sonoma County, particularly at the resorts, still went on behind closed doors.²⁶ It would appear that the larger, established wineries in the Glen Ellen area were able to withstand Prohibition, whereas many of the smaller, lesser known names suffered. In the month of January 1920, the same month that Prohibition was enacted nationally, the 1920 census was taken in the Glen Ellen Township, which included west and east Glen Ellen, Glen Ellen Village, and Kenwood. The enumerator noted that the following names were still involved in the wine industry: Charles J. Pagani, viticulturist; Rose Pagani, bookkeeper at winery; Leopold Justi, winemaker; Felice Pagani (owner of the old Chauvet Winery), vineyardist and winemaker; and Louis C. Kunde, vineyardist.²⁷

In contrast, in the 1910 census of the Glen Ellen Township, the following called themselves farmers/vineyardists: Louis C. Kunde, John B. Valle, Arundel Pagani, Ramiges Abati, Christopher H. Bruning, Richard Pagani, William and Benjamin Bihler, Leopold Justi, Emile Graziani, Attilio Romani, Julius Wegener, Henry J. Chauvet, and Robert Hill.²⁸ Whether or not the larger wineries bought out some of these smaller growers in these years, explaining the expansion of vineyards as a whole in the Sonoma County Viticultural District, would take additional research.

World War II and Beyond – 1941 to the Present

The United States entered into World War II in December 1941. As explained by historian Lynn Downey in *A Short History of Sonoma*, World War II brought unexpected benefits for local winemakers: "Alcohol was an important raw material for the war effort. The tartaric acid produced as a result of winemaking was a vital component for the production of rayon, used for tents and parachutes."²⁹ Another by-product used by the war effort was pomace (the skins and seeds left over after pressing), which was used for medicine, paints and cattle feed.³⁰ New wineries were even established in the war years, a Glen Ellen example being Val-Moon, the new name for the Madrone vineyards, which were purchased by Enrico Parducci and Peter Domenici in 1941. In 1943 Felice Pagani expanded his winery in Glen Ellen by building a new, concrete block winery and experimenting with concrete, rather than steel tanks. Buena Vista Winery, which at that time was not producing wine, was also purchased in the war years, with its first wine released in 1947.³¹

The Sonoma Valley was actively promoting their wines in this time frame. They were featured with other California wines at the 1939 Golden Gate International Exposition at Treasure Island and in March 1941 the Sonoma Valley vinyardists attended a meeting in Santa Rosa with other winemakers that were interested in more actively promoting their wines.³² In 1944 four newsreel companies traveled to the Sonoma Valley to film the grape harvest. The results were shown in theaters in the United States, South America, and England and at army bases worldwide. And in 1947 the first Valley of the Moon Vintage Festival was held on Sonoma Plaza.³³

²⁶ Downey, 2013:124.

²⁷ U.S. Census, 1920, Series T625, Roll 150, Pages 105-111. Henry J. Chauvet referred to himself as a landlord at this time.

²⁸ U.S. Census, 1910, Series T624, Roll 109, Pages 150-164.

²⁹ Downey, 2013:81.

³⁰ Downey, 2013:81.

³¹ Downey, 2013:82.

³² Downey, 2013:81

³³ Downey, 2013:82.

Table 2: Glen Ellen Building Construction Dates by Decade		
Dates	District³⁴	Corridor
1880-1889		3
1890-1899	1	2
1900-1909	3	8
1910-1919	14	3
1920-1929	20	10
1930-1939	42	13
1940-1949	61	25
1950-1959	67	7
1960-1969	53	14
1970-1979	37	11
1980-1989	41	7
1990-1999	15	4
2000-2009	4	6
Vacant	59	13
No date	74	1
Not on list	35	
Other	23	1
	549	128³⁵

Changes in the war years are reflected in development in Glen Ellen. While growth in Glen Ellen as a whole was more or less evenly distributed in the decades of the 1940s, 1950s and 1960s, by far the largest number of structures built in the corridor (that are still extant) were built in the 1940s, many in 1940. Most of these are residences, and some former residences now serving commercial purposes. This may be attributed to the need for housing for war industry workers at Mare Island and elsewhere, which put a strain on housing stock throughout the Bay Area.³⁶ For example, historian Mel Scott has noted that 14,000 workers at Mare Island traveled three-to-five hours a day to work in Vallejo, which is 28 miles from Glen Ellen. And the Navy commissioned Pacific Greyhound Lines to bring workers from as far away as Healdsburg.³⁷

As seen above, the wine industry continued to grow in the postwar years, regaining its health after the Prohibition. A third factor that may be attributed to growth in Glen Ellen during and after the war years is the fact that the Northwestern Pacific Railroad abandoned its line in Glen Ellen in 1942. The land formerly occupied by rail lines, between Sonoma Creek and Arnold Drive, then became available for development.

³⁴ Note that the construction dates for the district have not been corrected, whereas the construction dates for the corridor have, which accounts for some of the differences in numbers between the two.

³⁵ Note that the discrepancy between the number of properties in the corridor identified in the survey and the number of properties in the corridor in this table is due to the fact that the list of properties that tabulated construction dates has more than one entry per property in some cases. more than one building was recorded on some properties.

³⁶ Albrecht, 1995:101. For example, Kaiser Shipyards in Richmond, California employed 4,500 people in the summer of 1941, and 100,000 by the end of 1943.

³⁷ Scott, 1985:249.

As mentioned above, Glen Ellen continued to see steady – primarily residential - development in the postwar years. This was the case throughout the Bay Area and Sonoma County as a whole, as subdivisions, as well as individual lots, were developed for housing for returning soldiers. It was common, on the west coast, for soldiers who had been stationed in bases on the west coast to return to those areas after the war. The Bay Area as a whole also saw massive immigration of war workers at Kaiser Shipyards and others defense industries during the war years, and it is likely that many of those people stayed as well. Housing continued to be in high demand. In the Bay Area as a whole, 40,000 building permits for single family homes were issued in 1950, more than half of them in unincorporated areas in the counties.³⁸ The table above shows that the largest period of growth in Glen Ellen’s history occurred from 1950 to 1959.

Famous Glen Ellen Residents

Another aspect of Glen Ellen that has not been discussed here, but which is certainly an important aspect of its history, is its association with the famous personages and celebrities that have made their homes in the Glen Ellen and vicinity over time. General Vallejo, who in essence settled Sonoma County, built his sawmill in Glen Ellen, which is still extant, although he lived outside Sonoma and in his ranch house outside Petaluma. The most famous Glen Ellen resident would have to be Jack London, who first visited Glen Ellen in 1903 and made his home there in 1906.³⁹ Historically, many of the first residents of the Glen Ellen area are now ‘famous’ by virtue of the fact that they settled the area and gave their names (and sometimes their buildings) to this area. An example is Charles V. Stuart, who settled in the Glen Ellen area in 1869 and founded Glen Oaks Ranch. Many are famous now for having helped to found the Sonoma Valley’s wine industry, including Joshua and Henry J. Chauvet, Captain J. H. Drummond, and Mrs. Kate F. Warfield, and W. McPherson Hill.⁴⁰ Charles J. Poppe lent his name to the building in which he was a long-time merchant and postmaster in Glen Ellen.⁴¹ Others with ‘high profile’ names who lived in the Glen Ellen area include the Rudolf Spreckles, son of Charles Spreckles, the industrialist, and later Rudolf’s sister-in-law Alma Spreckles; George and Phoebe Hearst, of the newspaper family; Henry “Hap” Arnold, a World War II general who is credited with creating the modern U.S. Air Force and who gave his name to one of the most important roads in Sonoma Valley;⁴² the food writer M. F. K. Fisher, who lived on the Audubon Bouverie Preserve property in her last years; and David Pleydell Bouverie, the 8th Earl of Radner, a well-known architect in his native England, and founder of the Audubon Bouverie Preserve.

³⁸ Scott, 1985:273.

³⁹ Downey, 2013:91.

⁴⁰ Finely, 1937:362.

⁴¹ Tuomey, 1926:13.

⁴² Downey, 2013:132.

Assessment of Historic Resources for the Community of Glen Ellen

III. Architectural Context

Location and Setting

Glen Ellen is located approximately eight miles north-northwest of the town of Sonoma, which is in turn located in the southeast portion of Sonoma County, north of San Pablo Bay. Glen Ellen is within the Valley of the Moon, a valley distinguished by the presence of Sonoma Creek, which runs north-south through Sonoma Valley. At the heart of Glen Ellen is the convergence of Sonoma and Calabazas Creeks, which occurs just north of the bridge over Sonoma Creek. The crossing of Sonoma Creek occurs between the north and south commercial centers of the town, dividing the two areas. Sonoma Creek also defines the third commercial center of Glen Ellen, forming the eastern edge of Jack London Village. Jack London Village formed around a sawmill at the confluence of Sonoma and Asbury Creeks established by General Vallejo, which was purchased by Joshua Chauvet in the mid-1850s. The reason for the sawmill was the presence of the creek. The waterwheel for the sawmill – later a grist mill – is still there today. Beyond Glen Ellen are rolling hills and wilderness. The town backs up against Jack London State Park to the west, and Sonoma Valley Regional Park and eventually the Mayacama Mountains to the east.

Patterns of Growth

Within the corridor considered by this study is a broad range of building types and, to a lesser extent, architectural styles. The historic heart of Glen Ellen, signaled by a cluster of its most important historic structures, occurs just west of the crossing of Sonoma Creek. This is marked by the presence of the 1906 Hotel Chauvet, the 1906 Poppe Building, and 1905 Jack London Saloon. But there are other significant historic structures along the corridor as well, from the Grist Mill and H. J. Chauvet house at Jack London Village to the Gaige House, at the center of the northerly node of commercial development in Glen Ellen.

Clearly the first decade of the twentieth century was important for Glen Ellen, but only a handful of extant buildings that reflect that era. There are numerous other more modest, historically significant structures as well, however, from the several intact cottages along the corridor to Marshall's Auto Body Shop, at the site of a former blacksmith shop.

There are distinctive periods of development in the town as well. The earliest extant building appears to be the 1839 mill, portions of which still exist despite the ca 1860 conversion of the mill to a grist mill and the addition of a second story, as well as numerous later renovations.

The largest periods of growth within the historic district as a whole occurred in the 1940s and 1950s. Growth in the 1940s, which can be seen along the corridor, was the addition of housing and related businesses that supported the war effort, specifically the need for housing for workers at Mare Island and other World War II industry sites. More recent development includes residences and commercial/institutional buildings from the 1960s, including the Glen Ellen Post Office and Glen Ellen Grocery, and residences and commercial buildings from the 1970s, including a cluster of 1970s residences south of Glen Ellen, and the Jack London Lodge (1978). Another small spurt of development occurred in the 1980s.

Architectural Styles and Building Types

The character of the larger Glen Ellen district, which is largely residential, differs from the character of development along the corridor, not only because the corridor contains most of the commercial development, but also because more postwar residential development occurred in the outlying areas, including the largest period of growth in the decade of the 1950s, followed by another period of growth in the 1960s. Within the corridor, by far the largest period of growth represented by extant buildings today occurred in the 1940s. About 20% of the properties include at least one building from this era.

The commercial corridor within Glen Ellen is characterized by relatively modest architecture, even among the most distinguished buildings. The Hotel Chauvet and Jack London Saloon are both examples of vernacular commercial buildings, distinguished by their segmental arched window openings with modest label molding and Victorian-era details. Two Victorian-era houses reflect the high period of the Queen Anne as it occurred in Sonoma Valley, the Gaige House and the J. H. Chauvet House, although some detailing and features of both of these buildings have been altered.

Building styles and types from other eras reflect fairly typical versions of their types, including early twentieth century hip roof bungalows, commercial buildings, ca 1940s Minimal Traditional houses, modest Ranch houses, and residential buildings or residential-like buildings that contain commercial businesses. A few buildings are constructed to emulate earlier styles or types, from a Western Falsefront to a “new” Victorian residence. All these factors contribute to the eclectic character of Glen Ellen’s commercial core.

Summary

It is possible to define a historic district or to identify historic properties in Glen Ellen, in general, using following the guidelines. A building or structure may be a historic resource if it is over 50 years of age, generally speaking;⁴³ it meets one of more of the following criteria; and it retains integrity.

Criteria 1:

- 1: It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

Properties in Glen Ellen may be eligible for listing in a historic register individually or as a district if they maintain an association with the important themes outlined in the historic context. Themes include Glen Ellen’s development as a resort community, properties associated with the railroad, and properties associated with the wine industry. Additional themes, however, might be the development of the town in general, or its development at a specific period in time. There is no sizable concentration of properties associated with specific period, but individual properties, such as the Glen Ellen Community Church, could be eligible under this criterion. Additionally, a historic district could be defined very broadly. That is, Glen Ellen could be defined as a small agricultural center that from its founding, that operated as a market center for the surrounding vineyardists, with a Period of Significance from its founding to 1963. This

⁴³ For a building or collection of buildings less than 50 years of age, it typically has to demonstrate “exceptional” significance to be eligible for listing.

definition would focus on the commercial nodes, rather than the outlying residential neighborhoods.

Criteria 2:

2. It is associated with the lives of persons important to local, California, or national history;

Properties associated with ‘famous’ people or with people with a strong association with Glen Ellen’s history may also be eligible for listing in historic register. For properties that may be eligible under this criteria, the property must maintain integrity from the time it was associated with the person under discussion and in many cases, must be the property with the strongest association with that person. The buildings associated with Joshua Chauvet would meet this criterion.

Criteria 3:

3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values;

Properties in Glen Ellen may be eligible for listing in a register if they represent a good example of a particular architectural style, since ‘high-style’ architecture is relatively rare in Glen Ellen, and the examples that exist are often singular in the town. Properties may also represent a good example of a type, however. The wide range of styles and types in Glen Ellen make nomination of a district associated with a specific architectural style or building type less likely here.

Criteria 4:

4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

This Criterion most commonly applies to archaeological properties and is not as relevant to evaluating buildings or structures.

In addition to meeting one or more of the above criteria, properties must retain integrity in order to be eligible for listing in the California or another register. Integrity is a function of a property’s setting, design, location, materials, workmanship, feeling and association. A property must maintain most of the aspects of integrity in order to be historically significant, and ideally it will maintain the aspects for integrity most relevant to its importance. For example, a property that is historically significant for its architectural design should retain integrity of design, materials, workmanship and feeling. In order to be eligible as a historic district, more than half of the properties in the group should retain integrity, in addition to representing the Area(s) or Significance and Period(s) of Significance for the district.

Assessment of Historic Resources for the Community of Glen Ellen

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EXHIBITS

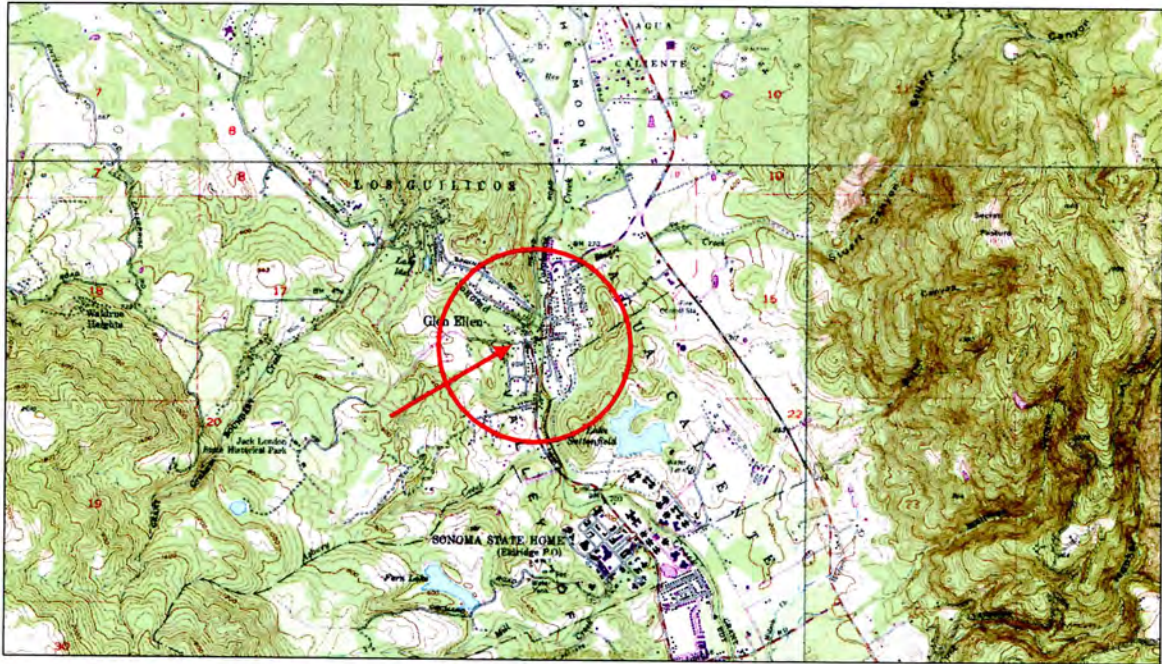


Figure 1 - Regional vicinity map

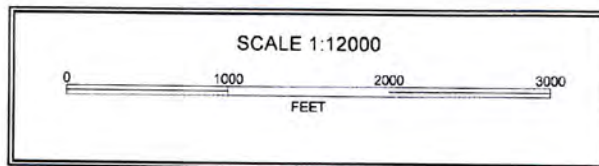
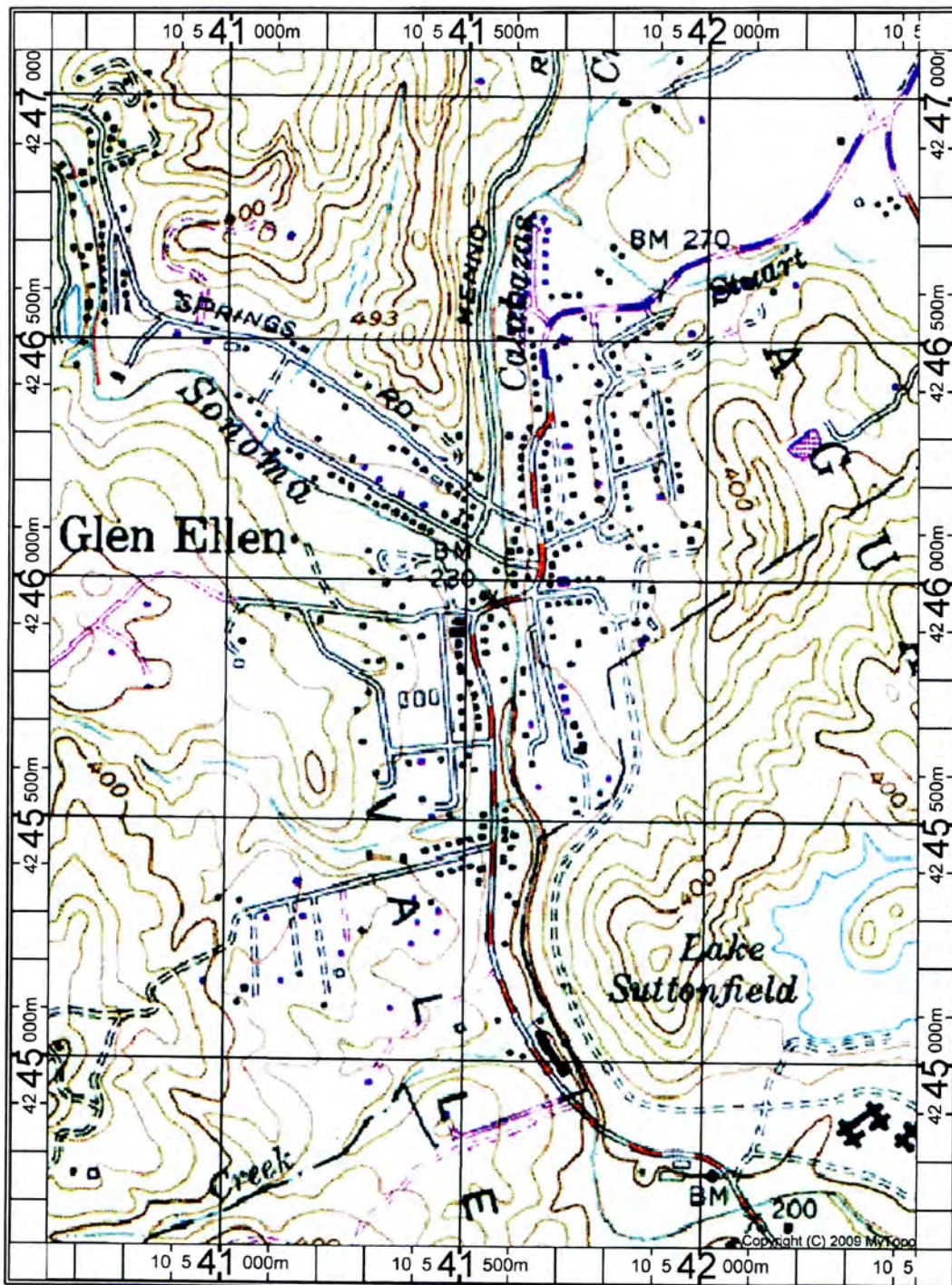


Figure 2 – Current USGS map of Glen Ellen (1954 rev. 1980)

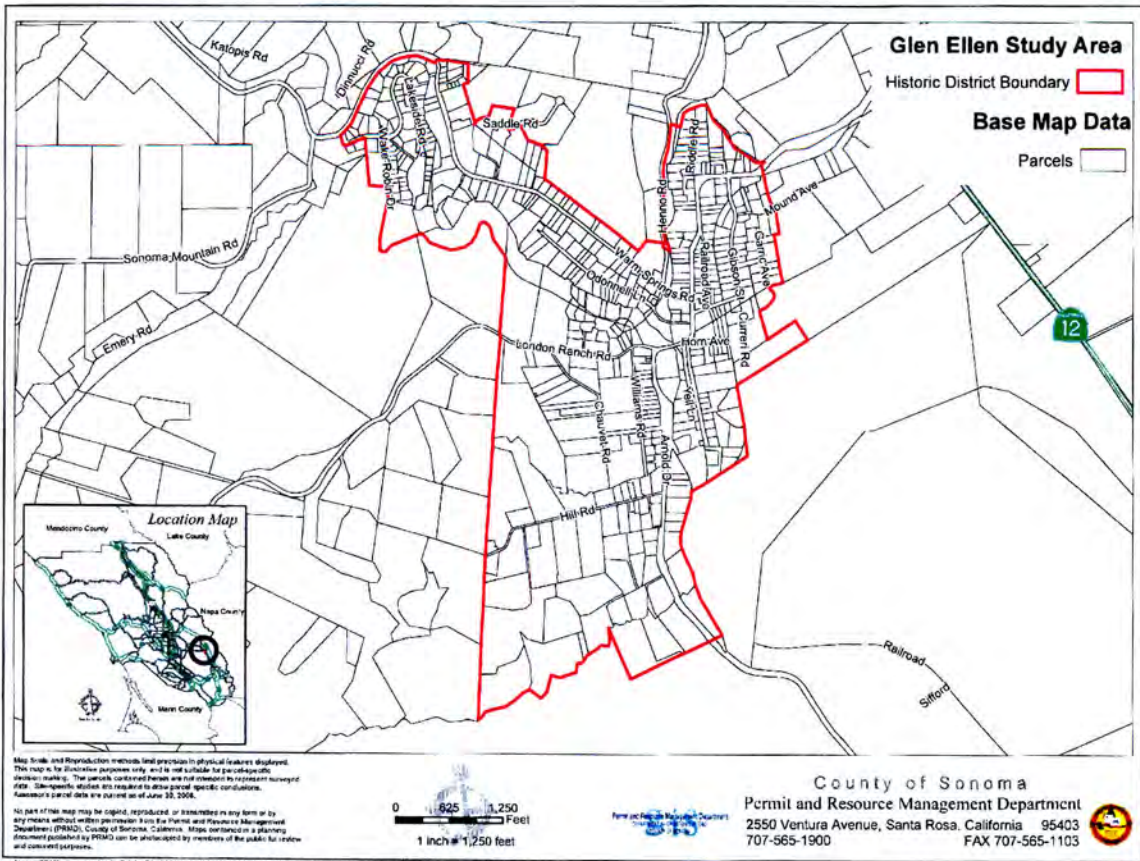


Figure 3 – Glen Ellen Historic District as adopted in 1990

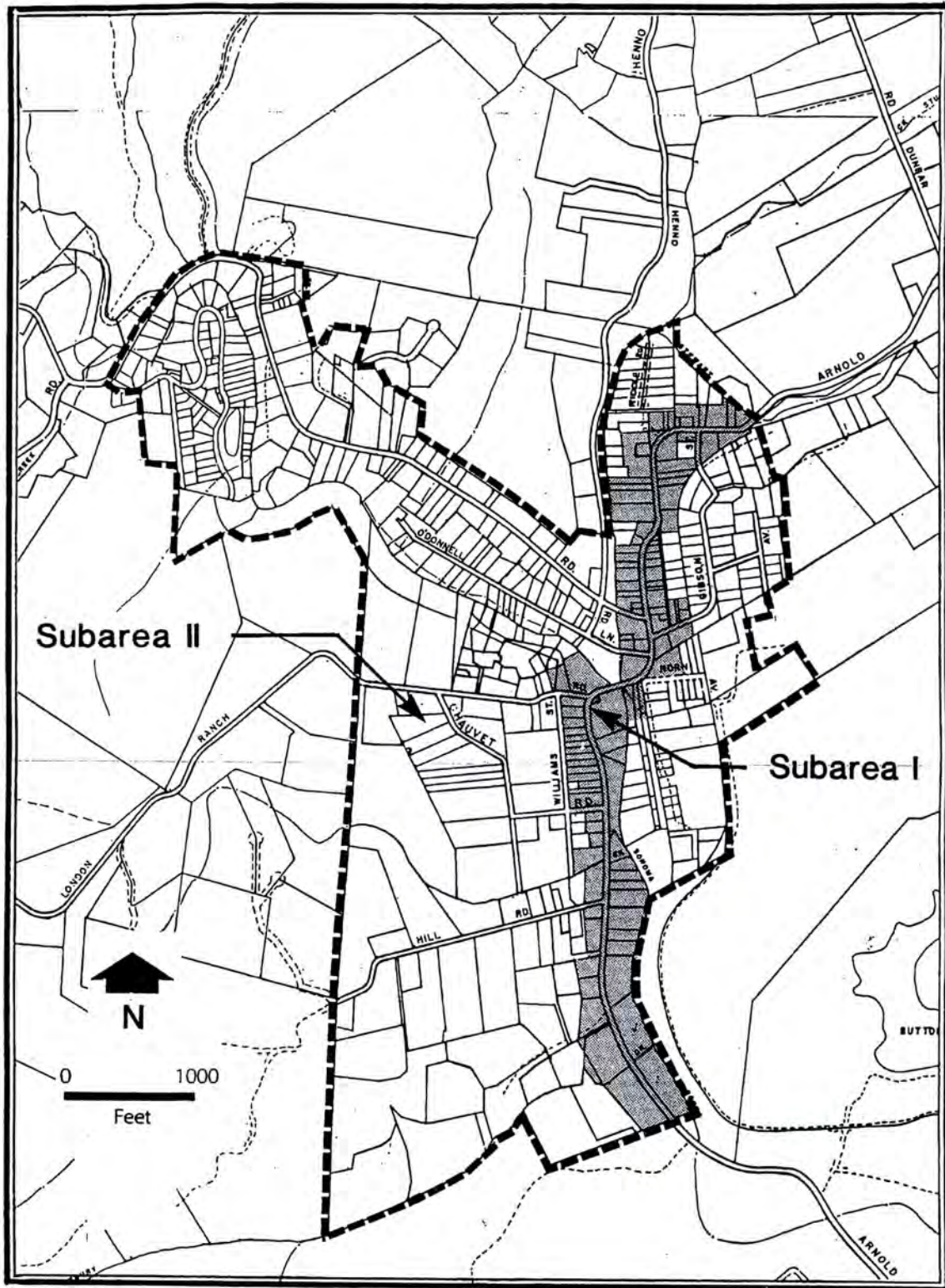
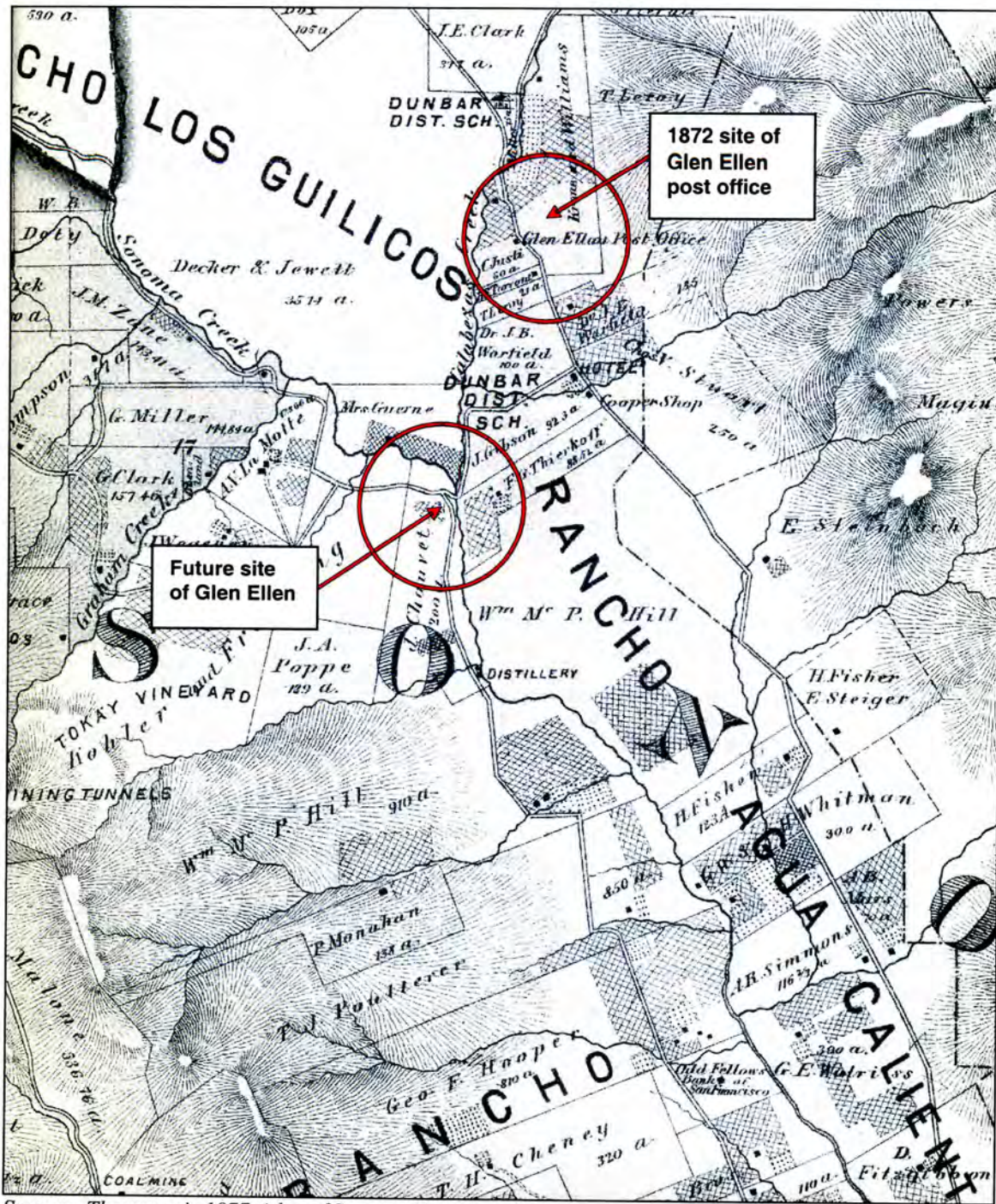


Figure 4 – Glen Ellen Historic District Arnold Drive corridor (Subarea 1)



Source: Thompson's 1877 Atlas of Sonoma County

Figure 5 - Glen Ellen in 1877



Source: Reynolds and Proctor illustrated atlas, 1897

Figure 7 - Arnold Drive corridor in 1898



Courtesy Sonoma County Library

Figure 8 - View of Glen Ellen, 1890



Courtesy Glen Ellen Historical Society

Figure 9 - The 1905 Chauvet Building, n.d.



Courtesy Sonoma County Library

Figure 10 - View of Poppe Building, 1906



Courtesy Sonoma County Library

Figure 11 - Looking north from Poppe Building, 1910



Courtesy Sonoma County Library

Figure 12 - View of Hotel Chauvet from the north, 1910



Courtesy Glen Ellen Historical Society

Figure 13 - Arnold Drive, looking north from Sonoma Creek Bridge, n.d.



Courtesy Sonoma County Library

Figure 14 - Stone Winery at Jack London Village, 1911, looking south (no longer extant)

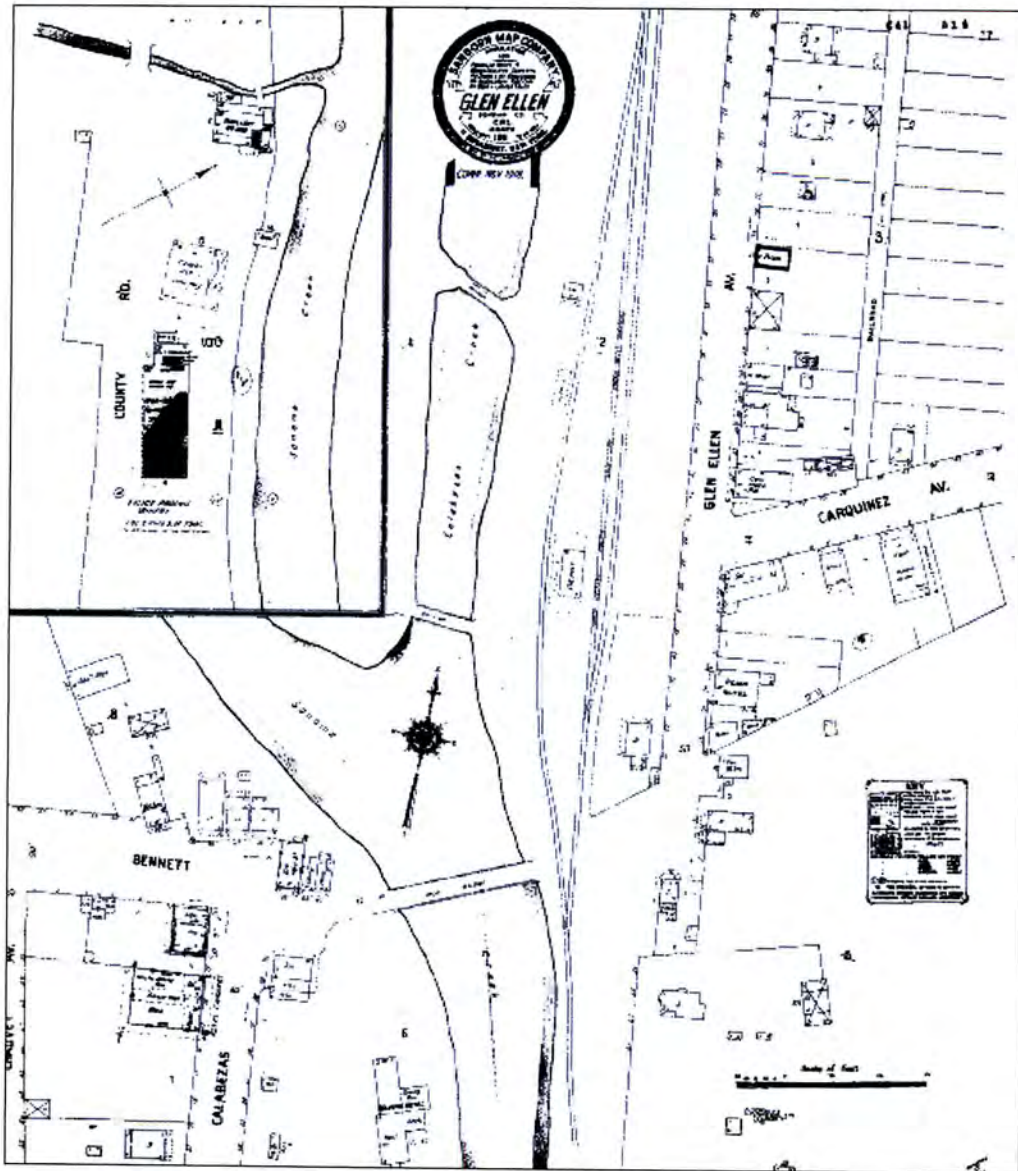


Figure 15 - Glen Ellen in 1916 (Sanborn Fire Insurance map)



Courtesy Sonoma County Library

Figure 16 - Hotel Chauvet and Poppe Building in 1933

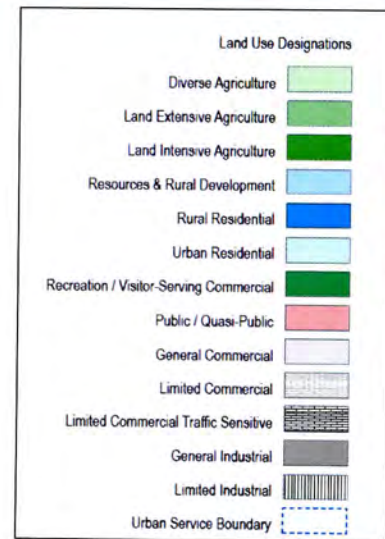
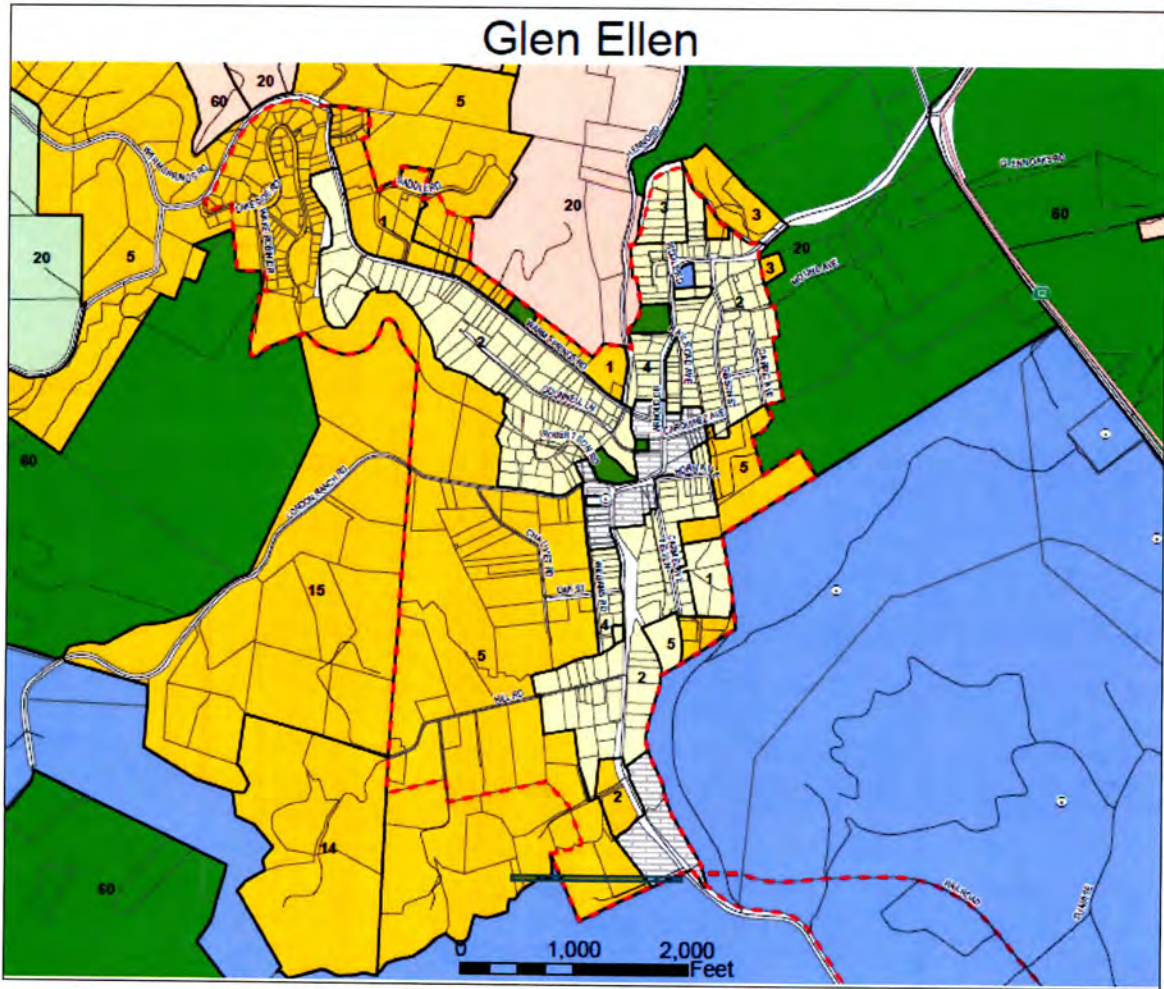


Figure 17 – Land use designations in Glen Ellen today

**APPENDIX A –
Previous Surveys and Listings**

APPENDIX A

Previous Surveys and Listings in the Corridor

The following properties in the study area were surveyed in 1973 as part of project sponsored by the Sonoma County Parks and Recreation Department and found historically significant (additional properties in the vicinity were also surveyed).

- 13540 Arnold Drive, George Beatty Residence (Gauge House)
- 13740 Arnold Drive, Chauvet Building (London Lodge Restaurant)
- 13750 Arnold Drive, C. Poppe's Store
- 13756 Arnold Drive, Hotel Chauvet
- 14301 Arnold Drive, Chauvet Mill and Distillery (Jack London Village)
- 5311, 5319 O'Donnell Lane, First Congregational Church of Glen Ellen

The following properties in the study area were surveyed as part of the 1978 survey of Glen Ellen undertaken by members of the Sonoma League for Historic Preservation.

- 13540 Arnold Drive, Gauge House
- 13560 Arnold Drive, J. Chauvet House
- 13570 Arnold Drive, C. Poppe's Store
- 13740 Arnold Drive, Chauvet Building (London Lodge Restaurant)
- 13756 Arnold Drive, Hotel Chauvet (Glen Ellen Hotel)
- 13760 Arnold Drive, Joshua Chauvet House
- 13985 Arnold Drive, residence
- 14070 Arnold Drive, Henry Chauvet House
- 14301 Arnold Drive, Glen Ellen Mill & Winery & Distillery (Jack London Village)
- Corner of Horn and Arnold Drive, Norrbom House
- London Ranch Road from Arnold Drive to Jack London State Park
- Bridge, O'Donnell Lane and Calabazas Creek
- 5311 O'Donnell Lane (O'Donnell Land and Henno Road), First Congregational Church of Glen Ellen.

The following properties in the survey area are Sonoma County Landmarks:

- 13540 Arnold Drive, Gauge House (designated in 1980)
- 13740 Arnold Drive, Chauvet Building (designated in 1981)
- 13751 Arnold Drive, Mervyn Hotel site (demolished in 1930s) (designated in 1990)
- 13756 Arnold Drive, Hotel Chauvet (Glen Ellen Hotel) (designated in 1981)
- 13760 Arnold Drive, Joshua Chauvet House (designated in 1980)
- 14301 Arnold Drive, Jack London Village: Stone Winery Building (no longer extant) (designated in 1981)
- O'Donnell Lane, Calabazas Creek Bridge #20C-324 (designated in 1981).
- Arnold Drive Bridge #20C-213 (designated in 1998)

There are no properties in Glen Ellen that are California Historical Landmarks.

Most of the above properties are ranked #1, #2 or #3 in the State of California's Property Data File, which means they are listed in the California or National Register, are Determined Eligible for listing in the California or National Register, or appear eligible for listing through Survey Evaluation.¹

The following property in the survey area is listed in the National Register of Historic Places:

- 13756 Arnold Drive, Hotel Chauvet (listed in 1990).

¹ California Historical Resource Status Codes, <http://www.scic.org/docs/OHP/chrstatus%20codes.pdf>, accessed November 2013.

**APPENDIX B –
Tables and Survey Map**

TABLE 3: PROPERTIES IN SURVEY AREA - GLEN ELLEN

FID	APN	NUMBER STREET	CA	NOTES	C/NC
1	054-260-021	Vacant ARNOLD DR			
2	054-260-025	Vacant ARNOLD DR			
3	054-260-024	13340 ARNOLD DR	ca	1950 Assessor reports 1904	NC
4	054-260-037	13350 ARNOLD DR	ca	1970	OP
5	054-260-029	13352 ARNOLD DR		2006 "New" Tuscan	OP
6	054-260-016	13370 ARNOLD DR		1952	NC
7	054-260-006	13360 ARNOLD DR		1940	C
8	054-260-005	13386 ARNOLD DR	ca	1960	C
9	054-260-004	13394 ARNOLD DR		1926	C
10	054-260-003	13410 ARNOLD DR		1960	C
11	right-of-way	Vacant			
12	054-281-004	13335 ARNOLD DR		1988 Storybook house	OP
13	054-281-005	13351 ARNOLD DR		1997 "New" Victorian	OP
14	054-282-001	13356 ARNOLD DR	ca	1930	NC
15	054-282-002	13445 ARNOLD DR		1967 Fire station	OP
16	054-282-018	13481 ARNOLD DR		1910	C
17	054-282-005	13495 ARNOLD DR		1955	NC
18	054-282-006	13521 ARNOLD DR	ca	1978	OP
19	054-282-020	13535-13537 ARNOLD DR		1968/2002 New 2nd unit rear	OP
20	054-282-021	13539-13541 ARNOLD DR		1979	OP
21	054-284-004	13470 ARNOLD DR		1978	OP
22	054-284-001	13440 ARNOLD DR		1948	NC
23	054-284-006	13480 ARNOLD DR		1948	C
24	054-284-007	13500 ARNOLD DR		1947	C
25-26	054-284-016	13540 ARNOLD DR	ca	1890 Gaige House	C
27	054-284-010	1001 CREEKSIDE CT		1969	OP
27	054-284-011	1005 CREEKSIDE CT		1967	OP
28	054-284-013	1002 CREEKSIDE CT		1968	OP
28	054-284-012	1006 CREEKSIDE CT		1968	OP
29	054-284-014	13570 ARNOLD DR		1935	NC
30	054-284-015	13576 ARNOLD DR		1941	C
31	054-290-001	13580 ARNOLD DR		1941	C
32	054-290-002	13586 ARNOLD DR		1941	C
33	054-290-003	13594 ARNOLD DR	ca	1941	NC

33	054-290-003	13600 ARNOLD DR		1949	C
34	054-290-004	Vacant ARNOLD DR			
35	054-290-077	13606 ARNOLD DR		1995	OP
36	054-290-065	13608 ARNOLD DR		1947	NC
37	054-290-045	13648 ARNOLD DR		1940 Glen Ellen Star	NC
38	054-283-001	Vacant			
39	054-283-001	13559 ARNOLD DR		1951	C
40	054-283-002	13571 ARNOLD DR		1920	NC
41	054-283-003	13577 ARNOLD DR		1946	C
42	054-290-082	13581 ARNOLD DR		1964	NC
43	054-290-083	13583 ARNOLD DR		1998	OP
44	054-290-018	13587 ARNOLD DR	ca	1900	C
45	054-290-017	13615 ARNOLD DR		1940 New addition on front	NC
46	054-290-016	13619 ARNOLD DR		1932	C
47	054-290-066	13623 ARNOLD DR	ca	1910 Cyclops Iron Works	NC
48	054-290-011	13647 ARNOLD DR		1937 Garden Court Café & Bake	C
49	054-290-051	969 CARQUINEZ AVE		2004	OP
50	054-290-060	945 CARQUINEZ AVE		1925	NC
51	054-290-061	939 CARQUINEZ AVE		1973	OP
52	054-290-057	987 CARQUINEZ AVE	ca	1900	C
52	054-290-057	13651 ARNOLD DR	ca	1899 Talisman Tasting Rm, Opa	C
52	054-290-057	13675 ARNOLD DR	ca	1940	C
53	054-290-084	950 CARQUINEZ AVE		1930	C
53-56	054-290-087	930, 942, 948 CARQUINEZ AVE		2002	OP
57	054-290-062	5450 WARM SPRINGS RD		1961	C
57	054-290-062	5456 WARM SPRINGS RD	ca	1940	C
58	054-290-063	5460 WARM SPRINGS RD	ca	1940	C
59	054-290-008	5465 O'DONNELL	ca	1940 Glen Ellen Inn Cottages	NC
60	054-290-009	13670 ARNOLD DR		1940 Glen Ellen Inn, Glen Ellen	NC
61	054-290-010	13690 ARNOLD DR		1940 Fig Café	NC
61	054-290-010	13692 ARNOLD DR	ca	1940 Dentist's Office	NC
61	054-290-010	13700 ARNOLD DR	ca	1930 Veterinary Hospital	NC
61	054-290-010	13710 ARNOLD DR		1962 Glen Ellen Grocery	C
61	054-290-010	13716 ARNOLD DR	ca	1910 Allen Real Estate	C
61	054-290-010	13720 ARNOLD DR		1961 Glen Ellen Post Office	NC
62	054-350-056	13695 ARNOLD DR		1967 Marshall's Body Shop	C
63	054-330-034	13740 ARNOLD DR		1905 Jack London Saloon, Chai	C

63	054-330-034	13740 ARNOLD DR	ca	1905 Wolf House Restaurant	NC
63	054-330-034	13740 ARNOLD DR		1975 Jack London Lodge	OP
64	054-350-022	13721 ARNOLD DR		1954 Bella Terra Realty	NC
65	054-350-067	13751 ARNOLD DR		1992 Glen Ellen Village Market	OP
66	054-350-077	13785 ARNOLD DR		2007 Under construction	OP
67	054-340-013	13750 ARNOLD DR		1906 Charles J. Poppe Bldg	C
67	054-340-013	13750 ARNOLD DR	ca	1960 Glen Ellen Coin Laundry	NC
68	340-001 to 006	13756 ARNOLD DR		1906 Hotel Chauvet	C
69	054-340-032	13758 ARNOLD DR		1953 ArtHouse Gallery	C
70	054-340-015	13541 WILLIAMS RD	ca	1940	C
70	054-340-015	13760 ARNOLD DR		1906 J. Chauvet House	C
71	054-340-016	13766 ARNOLD DR		Vacant	
72	054-340-017	13790 ARNOLD DR		Vacant	
73	054-340-027	13790 ARNOLD DR		1976	OP
74	054-340-026	13803 WILLIAMS RD		1984	OP
75	054-340-019	13827 WILLIAMS RD		1967	OP
76	054-340-020	13817 WILLIAMS RD		n.d.	NC
77	054-340-021	13823 WILLIAMS RD		1920	NC
78	054-360-008	13835 WILLIAMS RD		1954	NC
79	054-360-009	13833 WILLIAMS RD		1925	NC
79	054-190-014	14083 ARNOLD DR		Vacant	
80	054-360-010	13836 WILLIAMS RD		1930	C
81	054-360-011	13843 WILLIAMS RD		1941 1048 & 1050 Chauvet Rd.	NC
82	054-360-022	1039 CHAUVET RD		1920	C
83	054-360-023	13912 ARNOLD DR		1986	OP
83	054-070-032	vacant ARNOLD DR		Parking lot	
84	054-360-025	13910 ARNOLD DR		1987	OP
85	054-360-008	13950 ARNOLD DR	ca	1940	C
85	054-360-008	13960 ARNOLD DR	ca	1935	C
86	054-360-028	13939 ARNOLD DR		1988	OP
87	054-180-008	13974 ARNOLD DR	ca	1935	C
87	054-180-008	13976 ARNOLD DR	ca	1935	C
87	054-180-008	13992 ARNOLD DR	ca	1935	C
87	054-180-008	13994 ARNOLD DR	ca	1935	C
88	054-190-016	13963 ARNOLD DR		2001	OP
89	054-190-018	13975 ARNOLD DR		1975	OP
89	054-190-022	13985 ARNOLD DR	ca	1900	C

89	054-190-011	14005 ARNOLD DR	ca	1920	C
90	054-190-011	14007 ARNOLD DR	ca	1920	C
90	054-190-011	14009 ARNOLD DR	ca	1960	C
90	054-190-011	14011 ARNOLD DR	ca	1960	C
91	054-190-011	14023 ARNOLD DR	ca	1930	C
92	054-190-012	14040 ARNOLD DR		1940	C
93	054-190-013	14075 ARNOLD DR		1920	C
94	054-190-015	14095 ARNOLD DR		1920	C
95	054-070-030	14301 ARNOLD DR		1881 Jack London Village	C
96	054-180-013	14020 ARNOLD DR		1940	NC
97	054-180-014	14045 ARNOLD DR		1910	NC
98	054-070-045	14072 ARNOLD DR		1977	OP
99	054-070-044	14100 ARNOLD DR		1978	OP
100	054-070-043	14148 ARNOLD DR		1978	OP
101	054-070-035	14170 ARNOLD DR	ca	1880 H. J. Chauvet House	C
102	054-070-029	14300 ARNOLD DR		1986	OP
103	054-070-038	14300 ARNOLD DR		1986	OP
	054-290-013	Vacant ARNOLD DR		Parking lot	
	054-330-033	Vacant ARNOLD DR			
	054-330-024	Vacant ARNOLD DR			
	054-330-017	Vacant ARNOLD DR			

KEY

Bold DPR form completed

Not bold No DPR form

Gray Vacant lot

C Contributing

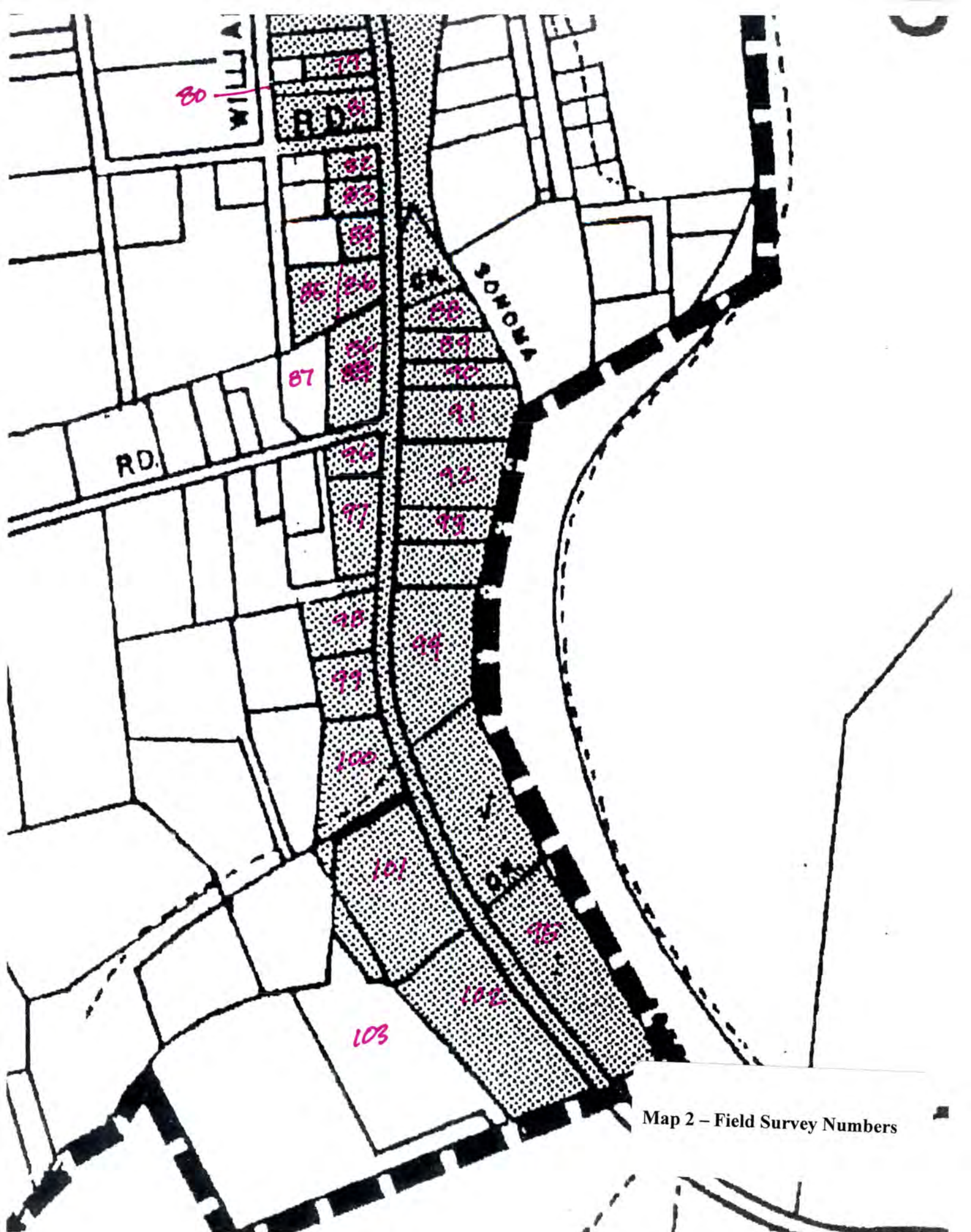
NC Noncontributing

OP Out of Period

Note: Buildings with the same Field ID number and same APN number are considered one property



Map 1 - Field Survey Numbers



80

WILLIAM
RD.

77

RD.

82

83

84

85

86

87

88

89

90

95

96

97

98

RD.

96

92

97

93

98

94

99

100

101

100

102

103

102

CANYON

SONOMA

Map 2 - Field Survey Numbers

**APPENDIX C –
Department of Parks and Recreation Forms**



November 29, 2022

To: Sonoma County Planning Commission

cc: Permit Sonoma
Tennis Wick, Director AICP

Re: Sonoma County Housing Element Update

Dear Planning Commissioners,

Housing is one of the most critical needs and biggest problems in our county and region. Lack of workforce and truly affordable housing for our agricultural and food-related communities has an enormous impact on worker retention, food purchasing ability, business viability and personal health. The County Housing Element will impact housing options for years to come and we request you consider our comments with the needs of agriculture and food production in mind.

Our Chapter has long been a local advocate for the protection of agricultural lands from development, both commercial and residential. While there is need for housing for those who work on the land in rural areas, the percentage of farm workers who live permanently in the area has steadily increased as seasonal workers have decreased and many of these resident families wish to live in towns and cities near schools, stores and other services.

Regulations encouraging ADUs and JADUs in all areas have resulted in more such units being built but 3/4 of ADUs built are priced for moderate or above-moderate buyers and renters, so are not helping with affordable housing needs. Also, the loophole that allows an owner to move into an ADU and rent the main house for short term rentals must be removed. (This loophole should be removed in all areas.)

In addition, the vacancy rate in our unincorporated areas is very high. With 17% of total unincorporated housing stock counted as "vacant", this rate is more than twice as high as the county's as a whole and almost 3x as high as the Bay Area average. This both increases rental prices as well as reduces rural housing by almost 2,000 units. Measures should be taken to reduce these vacancy rates and prevent loss of existing permanent housing. We commend the inclusion of Housing Element Program 8: Protect Residential Land and Units, and request acceleration of the time frame for moving forward with these efforts.

While we appreciate that the draft Housing Element includes strategies to increase the availability and variety of housing options available to farmworkers within the unincorporated County. However, we are concerned that unless these units are specifically limited for affordability and use by those working in rural agriculture, they will do nothing to address the needs of farmers and farm workers.

We generally agree with Policy HE-5g:



Encourage construction of new ownership and rental farmworker housing, including housing for farmworker families, year-round housing for unaccompanied farmworkers and other migrant workers, and seasonal housing for unaccompanied farmworkers. Assist housing developers in seeking funding, including grants, loans, and Joe Serna funds, for various types of farmworker housing.,

However, we feel that this housing **must be** limited to farm workers and farm families, (which needs to be redefined), and/or are strictly affordable.

The same applies to Policy HE-3d:

Expand allowance for non-traditional housing and consider amending the zoning ordinance to allow long-term residential occupancy of travel trailers, recreational vehicles, and similar facilities such as tiny homes on wheels when public health, safety and welfare criteria are met.

We support Program 18 - Housing Land Trust Model and feel this should be a high priority to develop.

The county should adopt housing Policies that support beginning farmers who require smaller Ag parcels with affordable housing in order to provide locally grown food, which is another solution to long-term sustainability.

An addition we would recommend is the conversion of underused or unused structures to affordable housing, including when appropriate single occupancy rooms with shared kitchen and bath are possible.

Many of these issues could also be addressed with an updated Farm Worker Housing ordinance. The County has acknowledged for quite some time that the current ordinance is far out of date. We propose that Program 32c, Proactive Program Outreach, include outreach to the farming community and begin the process of updating the Farm Worker Housing ordinance as a high priority. We would be happy to assist with this outreach and process.

Thank you for considering our comments.

Wendy Krupnick, Vice President, CAFF Sonoma County



Comment on the County of Sonoma draft 6th Cycle Housing Element

December 5, 2022

Dear Permit Sonoma staff and consultants to the Housing Element,

Sonoma Valley Collaborative is a forum of community leaders from a wide range of sectors across Sonoma Valley, finding solutions and taking action to address our community's biggest challenges.

We helped write, and signed onto, two joint letters you have already received from Generation Housing and Legal Aid of Sonoma County. This letter provides additional comments on the draft 6th Cycle Housing Element (the Draft).

There are many good proposed actions in the Draft, but altogether it is not strong enough or innovative enough, considering the crushing housing affordability crisis we face in Sonoma County. Facing the demographic evidence of Sonoma County losing so many of the people who make our County thrive, it's clear we need a Housing Element that forcefully changes our course. We're not there yet.

There are many instances in the draft Housing Element where the language is so vague that we are not able to comment usefully. Please describe in more detail the proposed policies, actions, and commitments. In several instances, language is not enforceable, measurable, or accountable. Please make the language less interpretable, provide measurable standards for fulfillment, and give more milestones with timeframes. Examples:

- Discussion under Goal 1 says investment ownership is a problem, but Programs 7 and 15f provide insufficient specifics to address that problem.
- Discussion under Goal 1 says that incentives for density bonus ownership projects (Ownership Housing Opportunity Area Program) are insufficient, but where is this problem addressed?

- Policy HE-2c says to “Prepare objective design and development standards and checklists for new residential and mixed-use development.” Where are these standards and checklists to review, or even a description of what they would cover?
- Policy HE-2d says to “Continue to provide priority permit processing.” Where are the measurable standards for this policy, e.g. number of days for review?
- Discussion under Goal 1 says vacation rentals (VR) are a problem. Policy HE-2g, on vacation rentals and empty homes, does have good clear language such as “Prohibit the use of residential land in urban land-use designations for vacation or time-share uses” is good. But “continue to regulate the use of existing residences on residential lots for vacation rentals” does not convey what the regulations are or will be, so it is not meaningful. “Encourage owner- and long-term renter-occupied residential uses” is not enforceable, measurable, or accountable.
- Policy HE-1c says “Where possible, reduce permitting levels and replace discretionary review processes with objective standards.” “Where possible” is not enforceable or a commitment.
- Policy HE-3a-3h: These are all good, but vague. Where do we see how these are being accomplished?
- Program 12, regarding streamlining permitting, refers to unspecified Objective Design and Development Standards that, again, can not be responded to.

Sonoma Valley Collaborative asks for a new program to be added to the Housing Element, committing the County to institute, as soon as possible, reasonable tenant protections including rent stabilization, just-cause eviction policies, strong anti-displacement policies applied to even small multi-unit properties, and a rental registry.

There are many proposals in the Draft that we strongly support and would like to see strengthened and/or accelerated:

- Program 16a: Please add these areas to the AH Combining District, not “Continue to consider” adding them.
- Program 23: Please make a commitment here, not “Evaluate potential changes...”
- We are happy to see Programs 18b and 27 (interjurisdictional housing coordinating committee).
- Our members strongly support public and nonprofit ownership of land and housing units as a way to keep costs of rent or ownership low in perpetuity. We ask you to add more specific actions with meaningful commitments to accomplish this.

- We support creation of a subregion for the 7th cycle. Because we support city-centered growth, we support cities, particularly the City of Sonoma, taking some RHNA from the County.
- We support re-adopting the County’s earlier regulations regarding mobile home owners having more say in park conversion. Mobile homes are a critical component of affordable housing in Sonoma Valley.

Page 38 has several background paragraphs on Sonoma Developmental Center, but it’s not clear why. SDC appears nowhere else in the Draft. The HE should state whether or not Sonoma County is including any units from SDC in the 6th Cycle, why or why not, and if units at SDC could appear on annual revisions of the site inventory during the 6th cycle.

Program 25, regarding ADUs: Our members are concerned that ADU will not, without strong policies, provide much or any affordable homes for people in Sonoma Valley. Even very small units are renting for high prices. Therefore, we ask that the costs of ADUs and JADUs be surveyed thoroughly, early, and often, such as every two years.

The actions proposed under Program 32 are insufficient. Please add real-world outcomes that are measurable, such as reporting annually on the number of funding applications submitted, the dollar amount of submitted funding applications, the dollar amount awarded, and the number of affordable units entitled.

In Program 32d, please change the wording to “The County will partner with one or more a-qualified non-profit organizations...” The County should not restrict itself.

Our members are united in feeling that the County does not sufficiently recognize or prioritize the poverty, segregation, and housing disparities of the Springs. In part, this is because census boundaries so poorly match the geography of the Springs. We ask that Housing Element staff and consultants examine Fred Allebach’s analysis of the Springs and either use it as is, or include in the Housing Element commitments to promptly produce a granular analysis of housing needs and disparities in the Springs.

We look forward to reviewing the next draft of Sonoma County’s Housing Element.

Sincerely,
The members of Sonoma Valley Collaborative

Boys & Girls Club Of Sonoma Valley/Teen
Services Sonoma
Disability Services & Legal Center
F.I.S.H. Sonoma Valley
Impact100 Sonoma
Hanna Institute
Homeless Action Sonoma
La Luz Center
Midstate Construction
Sonoma Community Center
Sonoma Ecology Center
Sonoma Overnight Support
Sonoma Valley Chamber of Commerce
Sonoma Valley Climate Coalition

Sonoma Valley Community Health Center
Sonoma Valley Education Foundation
Sonoma Valley Golden State
Manufactured-Home Owners League
Sonoma Valley Hospital
Sonoma Valley Housing Group
Sonoma Valley Mentoring Alliance
Sonoma Valley Vintners and Growers
Alliance
Sonoma Valley Visitors Bureau
Transition Sonoma Valley
Valley Bar + Bottle
Vintage House Sonoma
Winery Sixteen 600

Staff contact: Kim Jones, Sonoma Valley Collaborative Coordinator.

kim@sonomavalleycollaborative.org, 707-933-7747

From: [Celia Kruse De La Rosa](#)
To: [PermitSonoma-Housing](#)
Cc: [Susan Gorin](#); [kim jones](#); [greg99pole@gmail.com](#)
Subject: Sonoma Valley Housing - Permit Sonoma
Date: Wednesday, November 30, 2022 8:09:43 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

For inclusion as part of public comment for the Housing Element –

I am Celia Kruse de la Rosa, a Director from Sonoma Valley Hospital. Sonoma Valley Hospital is part of the Sonoma Valley Health Care District which serves 45,000 residents in its district. With 345 employees we are one of the largest employers based in City of Sonoma and in Sonoma Valley. We are in support of the development of housing, specifically affordable housing throughout Sonoma Valley (City of Sonoma included). The hospital sees housing insecurity in both our patients and our staff. It contributes to health issues within our community, rent vs prescriptions. It is even an impediment to the recruitment of new graduates and early career physicians. Currently 70% of staff does not live in the health care district, this number is unfortunately growing. Our workforce represents the "missing middle" without which our community will struggle to remain balanced as a "live-here and work-here" community. It makes recruitment and retention of hospital employees challenging. We support creative collaborations that yield fair and inclusive results for all in need of housing for buyers, renters, multigeneration families, individuals, and those currently without shelter. We are part of the Sonoma Valley Collaborative and support their core recommendations as articulated in their statements.

Sincerely,

Celia

C.M. Kruse de la Rosa  
Director, Community Outreach/Marketing

[Chat with me on Teams!](#)

Sonoma Valley Hospital
347 Andrieux Street, Sonoma, CA 95476
707.935.5257
www.sonomavalleyhospital.org



in f

PTO:

Working Remotely: November 28 – December 1

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

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

County of Sonoma Housing Element

My name is Collin Thoma and I am the Systems Change Advocate Disability Services and Legal Center (DSLCL). My following comments are to address the many challenges and barriers that people with disabilities face while looking for housing.

The affordable housing crisis is widely felt across the state and is even more severe for many who rely on Social Security Insurance (SSI) and/or other public benefits. All of these benefits can pay up to over a thousand dollars less than the average rent in both the city and county. Thus, they fall into the very and extremely low-income categories. Furthermore, the recipient may receive the money from their benefits after rent is due resulting in late fees. This can further reduce one's budget for the month as they may not have the luxury of getting paid every two weeks. In addition to everyday expenses, extra costs may include medical, support services, or assistive technology to help them with their disability. It is also important for ADUS & JADUS to be affordable to those in very to extremely low income. Given the severe crisis it is good to see the Rental Housing opportunity program. In addition, it is also good to see the creation of policy HE-1d. This should be a priority since it is a good way to maintain and increase the affordable housing stock while new affordable homes are being built. While it is good to see HE-3g it is important that very to extremely low housing is built. This is important as those in these categories may not have a car and rely on public transit or walking to get around. Furthermore, for some their disability may prevent them from driving and rely on public transit. Given the severe housing crisis the county should prioritize housing for those who are acutely low income. The redevelopment of the Boyes Food Center should also include very to extremely low-income units. Given the lack of grocery stores immediate area it would be good to see a grocery store or a community market, with a pharmacy to occupy one of the commercial spaces.

Another significant barrier in affordable housing is the reluctance to accept Section 8 and other housing vouchers. These vouchers are a very popular way for people with disabilities to obtain housing that would otherwise be unaffordable. However, it can be extremely challenging to find a landlord that will accept these vouchers further restricting one's housing options. The county should work with landlords so they are more willing to accept these vouchers. A way to do this will be to educate landlords and clear up misconceptions on who uses them. The county should also consider providing incentives to landlords that accept housing vouchers. In addition,

it's also important for the county to review its homeless services to ensure it can get people housed. This may mean helping with rent, security deposits or providing wrap around services. The county should also encourage developers to develop multifamily homes to be in accordance with Assembly Bill 2483. This bill will provide incentives for multifamily homes with at least a hundred units to have a certain amount set aside for those experiencing homelessness. The county will need to make sure the law can be incorporated into the housing element when it goes into effect in 2023. The county should also strongly consider pursuing the California Department of Housing and Community Development Pro Housing designation. If acquired it will be quite beneficial by making it easier to obtain state and federal funding. Another top priority should be to peruse all private, state and federal funding to help develop affordable housing. The county should also continue to identify and remove all governmental and finical constraints to affordable housing development.

Another barrier to housing is the lack of accessible housing for those with mobility, vision, sight disabilities. The Visibility method is a great way to increase the accessible housing supply. Visitability requires a zero-step entrance with a slope no greater then (1:12), 32-inch width pathways and doorways. Bathrooms are equipped with grab bars and are large enough for a mobility device user. Additionally, the climate controls and light switches are low enough for those who use a mobility device. Earlier this year Petaluma passed their own Visitability ordinance and is a great example. One of the many highlights is that the width measurements are several inches great then the minim 32 inches. It is also important for ADU's and smaller homes to have a good amount of storage space. This is because some people with disabilities may have medical equipment or mobility devices that will require storage. The county should also apply design requires in Policy HE-5d for housing with people with disabilities. The development of Ortiz plaza II is great to see since it will create affordable and acesaaible housing. However, given the severe lack of accessible housing the 7 units set aside to be accessible are to few. It would be good to see as many of the units in the development be accessible. Furthermore, it will be important to have a good amount of those units have multiple bedrooms. This is because some people with a disability may have a full or part time care taker that will need their own room Some may also have additional medical equipment and/or mobility devices that will require a large storage space.

It is also important for the county to make sure that it has a bike and pedestrian network that is accessible to all levels of mobility. This will mean having sidewalk network that has no sidewalk gaps and are well maintained. Intersections and crosswalks will need to be highly visible by being painted in large bold stripping. Additionally, curb cut outs or curb extensions should be built to increase visibility. Crosswalks will need to be signalized and adequately timed as it may take someone with a disability an extra 5-10 seconds to safely cross. Ideally a majority of the bike lanes have some sort of physical buffer such a raised curb or vertical cones. This will reduce stress for disabled bicyclist who may use a bike that is lower to the ground. It also provides protection is someone needs to go into the street to avoid heavy foot traffic or an obstacle. The bike and pedestrian network should also provide easy access to public transit which is important for those who have disability(s) that prevents them from driving. The county should strongly consider adding routes to neighborhoods where there is no transit. Another top priority should be to change low resource neighborhoods into high resource neighborhoods. High resource neighborhood is important for those who don't drive due to their disability and will need to be close to shops, transit and other amenities. The county should also design neighborhoods be more fire resistant given the areas high fire danger. Homes should be built to be more fire-resistant and landscaping to reduce fire loads and create a defensible space. It is also important that the city reviews it road network to ensure it can handle the increase in people during an evacuation.

Thank you for taking time to review my comments on the 2023-2031 housing. I hope that addressing the various challenges and needs that people with it has raised more awareness of these issues. Resolving these issues will not only make vast improvements for the disability community and the whole community by creating an affordable and acesaaible community for all.

Thank You,

Collin Thoma

Systems Change Advocate

Disability Services & Legal Center (DSLCL)

521 Mendocino Avenue

Santa Rosa, CA 95401

(707)636-3076





CALIFORNIA RURAL LEGAL ASSISTANCE, INC.



**PUBLIC INTEREST
LAW PROJECT**

CELEBRATING 25 YEARS OF ADVANCING JUSTICE

SENT VIA EMAIL ONLY: PermitSonoma-Housing@sonoma-county.org.

December 3, 2022

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

Re: Sonoma County Draft Housing Element Update

Dear Permit Sonoma:

California Rural Legal Assistance, Inc., and Public Interest Law Project write to provide comments regarding the County's November 2022 Draft Housing Element Update (Draft Housing Element, Draft Housing Element Technical Report, and Draft Housing Element Appendices, collectively "Draft"), which the County has made available for public review and comment. Our offices represent the plaintiffs in *Vannucci v. County of Sonoma* (N.D. Cal. Case No. 3:18-cv-01955-VC); a copy of the Second Amended and Supplemental Complaint in that lawsuit is attached for your reference. Our clients are currently and formerly unhoused residents of Santa Rosa, as well as the advocacy organization Homeless Action!. Accordingly, these comments address the Draft's discussion, analysis, and programs regarding homelessness, the needs of unhoused County residents, and the housing and shelter resources necessary to respond to homelessness in the County.

1. The Draft does not adequately analyze fair housing issues related to homelessness.

The Housing Element's assessment of fair housing must analyze the disproportionate impacts of homelessness on protected groups, identify and prioritize contributing factors, and commit to actions that the County will take to address identified disparities. Gov. Code, § 65583(c)(10); see also California Department of Housing and Community Development, *Affirmatively Furthering Fair Housing: Guidance for all Public Entities and for Housing Elements* (April 2021 Update), 36-40, 49-56, available at https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf (HCD AFFH Guidance). While the Draft acknowledges the disproportionate impact of homelessness on Black and Native American County residents, as well as on members of other groups protected by fair housing laws, it lacks analysis of those disparities and, as a result, lacks adequate programs to address them. Draft Technical Report, 114

a. The Draft should incorporate local data and knowledge from the County’s 5-Year Strategic Plan to Prevent & End Homelessness.

“[L]ocal jurisdictions are . . . expected to use local data and knowledge to analyze local fair housing issues, including information obtained through community participation or consultation, such as narrative descriptions of people’s lived experiences.” HCD AFFH Guidance, 24. Since publishing the Draft, the County has released the draft Sonoma County 5-Year Strategic Plan to Prevent & End Homelessness (Draft Homelessness Strategic Plan). The County should incorporate analysis, goals, and action steps from the Draft Homelessness Strategic Plan into the the Housing Element to allow for a more robust discussion of homelessness issues and to ensure consistency across County plans and activities.

Similarly, the Draft uses data from the 2020 Homeless Census and Survey, but the 2022 Homeless Census and Survey results are now available; the County should update the Draft to reflect and respond to the most current data. The County should also make ongoing efforts to obtain and incorporate input from people who are currently or formerly unhoused into future drafts of the Housing Element, giving weight to their expertise about their own experience and needs.

b. The Draft does not adequately analyze contributing factors to disparities based on race, disability, and source of income.

Citing to the 2020 Homeless Census and Survey, the Draft includes data regarding the disproportionate impact of homelessness on Black and indigenous County residents. Draft Technical Report, 114. It also acknowledges—without quantifying—the disproportionate impact of homelessness on people with disabilities. *Ibid.* However, the County has data available about the prevalence of disabilities among its unhoused residents; 40% of unhoused residents have a disability, in contrast to only 12% of the County’s overall population. *See* Draft Homelessness Strategic Plan, 3, 270. “Critically, there are significant disparities by race within the population with disabilities, so jurisdictions should engage in an intersectional analysis of needs.” HCD AFFH Guidance at 36. The Draft, however, does not. It also does not engage in any analysis of the known or potential causes for these disparities. For example, the Draft Homelessness Strategic Plan identifies potential race equity issues in its Coordinated Entry System, but the Draft Housing Element does not include any discussion of Coordinated Entry. Draft Homelessness Strategic Plan, 14. The Housing Element must include a robust analysis of disproportionate housing needs and the ways in which County programs—including Coordinated Entry and other services intended to assist its unhoused residents—create, maintain, reduce, or exacerbate disparities based on race, disability, and other categories protected by fair housing laws.

The Draft also lacks information about and analysis of source-of-income discrimination, even though County relies on tenant-based vouchers, like the Section 8 Housing Choice Voucher program, to help unhoused people obtain housing. *See* Draft Technical Report, 14, 114; *see also* HCD AFFH Guidance, 68. The Draft also does not analyze how such source-of-income discrimination intersects with discrimination based on race and other protected characteristics.

The County received input during its public participation regarding voucher discrimination, and a recent report by Fair Housing Advocates of Northern California documented evidence of widespread discrimination based on race and source of income in Sonoma County. Draft Appendices, 8; Fair Housing Advocates of Northern California, *Race and Source of Income Discrimination in Rental Housing in Marin, Sonoma, & Solano Counties* (2021-2022 Audit Report), available at https://www.fairhousingnorcal.org/uploads/1/7/0/5/17051262/race_and_so_i_audit_report_2021-22_1.pdf. The Housing Element must analyze discrimination against voucher-holders, along with any other identified issues with voucher utilization and distribution, as both a fair housing issue and as a barrier to housing access for unhoused residents, and it must include programs to combat and/or mitigate the impacts of such discrimination.

c. The Draft does not identify or analyze civil rights complaints against the County.

The assessment of fair housing must analyze “[f]indings, lawsuits, enforcement actions, settlements, or judgments related to fair housing or civil rights.” HCD AFFH Guidance, 28. The *Vannucci* lawsuit alleges discrimination by the County on the basis of disability in the County’s administration of shelter, housing, and homeless services, as well as in its law enforcement practices that displace unhoused people from public land. Other lawsuits, including *McCloud et al. v. County of Sonoma* (22-cv-04284-HSG), have also alleged disability discrimination in the County’s treatment of its unhoused residents. The Draft does not identify these lawsuits, nor any other litigation, enforcement actions, etc., against the County for alleged violations of fair housing and civil rights laws.

d. The Draft does not analyze the availability, adequacy, and accessibility of housing and shelter resources for unhoused County residents.

The Housing Element must analyze the needs of unhoused people, including:

An inventory of the resources available, including shelters, transitional housing, and supportive housing units. The analysis should include the number, approximate location, and type of existing shelter beds; hotel/motel vouchers; and units of transitional housing available. Present shelter resources by type (e.g. family shelter beds, homeless adult female housing, supportive housing, transitional living units, etc.).

HCD, *Building Blocks: People Experiencing Homelessness*, <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/people-experiencing-homelessness>. The Housing Element must also engage in an “Assessment of Accessibility of Homelessness Programs.” HCD AFFH Guidance, 37. The Draft does not include an inventory of shelter beds and other resources within the County; it does not describe the types and conditions of available shelter and housing; and it does not analyze the accessibility shelter and housing.

The County lacks adequate shelter to accommodate its unhoused residents. According to the recently released 2022 Point-In-Time Count, over 72% (2,088) of the County’s 2,893 homeless residents are unsheltered. 2022 PIT Count, 8, 11. And, although the findings of the

Equity Working Group surveys presented in Appendix A showed the County has not adequately addressed the needs of unhoused persons for shelter beds or non-congregate housing, the Draft fails to address that critical deficiency. Most of the shelter resources that do exist are in congregate settings like Samuel Jones Hall. As described in the attached Complaint, many people with disabilities are unable to stay in crowded congregate settings for reasons related to their disabilities. For example, many people with PTSD do not feel comfortable in crowded settings where they cannot control their immediate surroundings or do not know the people around them; being in a congregate shelter setting triggers panic attacks or flashbacks, or exacerbates other mental health symptoms. See attached Complaint at ¶¶ 56-68, 83, 168-262. Others, including Ms. Vannucci, have experienced violence or abuse at shelters and do not feel safe returning. Samuel Jones Hall has also been the site of multiple COVID-19 outbreaks, resulting in over 150 infections and at least two deaths. The County has elsewhere acknowledged that “. . . in congregate shelter, there can be a higher likelihood that those who have experienced trauma, or struggled with mental health or substance abuse challenges, will be challenged by the close quarters. Providers called for greater investment in physical improvements to existing shelters to maximize noncongregate space. . . .” Draft Homelessness Strategic Plan, 21. The Housing Element should analyze the County’s reliance on congregate shelter as a barrier to access on the basis of disabilities. It should also analyze the implementation of strict program requirements, like curfews and room checks, in County-run and County-funded shelter—including non-congregate settings like Los Guilicos, the trailers, and hotel placements—as potential barriers to access for people with mental health disabilities.

e. The Draft does not analyze the fair housing impacts of criminalization practices.

Another contributing factor to the County’s failure to affirmatively further fair housing unaddressed in the Draft is the County’s continued reliance on law enforcement to remove unhoused people from encampments when there is no other place for them to be. As one commenter noted in the Draft Homelessness Strategic Plan: “Being unsheltered in this county is an extremely dangerous and endangering thing, and so much focus is going into our shelter system that the truly unsheltered are left to be swept from place to place by the police and the sheriff. . . .” Draft Homelessness Strategic Plan, 17. And, as alleged in the *Vannucci* complaint, the County’s practice of forcing unhoused people to leave County land, including the Joe Rodota Trail, without adequate, accessible shelter disproportionately harms people with disabilities. See also HCD AFFH Guidance, 69 (identifying policing and criminalization as disparities in access to opportunity). However, the Draft nowhere discusses the County’s criminalization practices, nor does it analyze the intersection of those practices with the geographic availability and/or relative inaccessibility of shelter in the County. The Housing Element should particularly analyze the County’s repeated removal of unhoused individuals and encampments from the Joe Rodota Trail, as well as the County’s proposed amendments to its anti-camping ordinance, currently awaiting a second reading, that are being made with the express purpose of increasing enforcement against unhoused County residents and that will, among other things, impose an absolute ban on camping in County parks. Our October 10, 2022, letter to the County, which detailed concerns regarding these proposed anti-camping ordinance amendments is attached for ease of reference.

2. The Draft does not analyze the capacity of the Public Facilities Zone to accommodate emergency shelters, and it does not describe the standards that the County applies to the siting of emergency shelters.

The Housing Element must identify “a zone or zones where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit. The identified zone or zones shall include sufficient capacity to accommodate the need for emergency shelter. . . .” Gov. Code, § 65583(a)(4). It must “also demonstrate that existing or proposed permit processing, development, and management standards are objective and encourage and facilitate the development of, or conversion to, emergency shelters.” Gov. Code, § 65583(a)(4). The Draft States that “[e]mergency shelters are allowed by-right in the Public Facilities (PF) Zone,” and that “[s]maller homeless shelters are allowed by-right in C3 and LC zones.” Draft Technical Report, 20. The Draft does not describe the location, capacity, or appropriateness of the PF, C3, or LC zones. The Draft also does not describe what standards the County applies to the siting and operation of emergency shelters. The Housing Element must provide this information, and it must analyze current policies and standards as potential barriers to the siting of emergency shelter in the County.

3. The Draft does not include adequate goals, quantified objectives, policies and programs to address homelessness.

The Housing Element must include “a statement of the community’s goals, quantified objectives, and polices relative to affirmatively furthering fair housing and to the maintenance, preservation, improvement, and development of housing” and. “[a] program that sets forth a schedule of actions during the planning period, each with a timeline for implementation, that may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element.” Gov. Code, § 65583(b),(c). While the Draft includes some goals and quantified objectives related to homelessness, they are limited and fall far short of grappling with this critical issue. The Draft also lacks sufficiently concrete programs to achieve even those goals and objectives. And these inadequacies stand in the context of the County acknowledging in the evaluation of the 2014 housing element that the it failed to meet any of its shelter bed objectives—providing *zero* additional beds. Draft Housing Element, 29. Examples of deficient objectives, policies, and programs include:

- Quantified Objective 2.32 specifies that the County only will succeed in providing 136 units of supportive housing over the eight-year period of the housing element, and it fails to provide an explanation as to how the quantity was determined. Draft, 59-61.
- Quantified Objective for “Non-Unit” Housing Needs (i.e. interim shelter beds or other interim housing) is 60 units over the entire eight-year period and fails to specify how that number was determined. Draft Housing Element, 62.
- Policy 3d provides for expansion of “Non-Traditional Housing” to include tiny homes and long-term occupancy trailers and RVs, but this policy is severely limited by Program 15j (see below). Draft, 36.

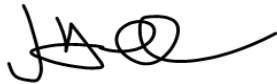
- Program 1 commits only to do what the County is already doing on an “ongoing” basis and to “maintain” existing production levels. Draft, 43.
- Program 15b commits to “[E]nsure compliance with State laws related to transitional housing, supportive housing, group homes, residential care facilities, and Low Barrier Navigation Centers” in 2023, but it does not state what amendments the County will make to its Zoning Ordinance to ensure compliance. Draft Housing Element, 55. For example, the County’s Zoning Ordinance does not currently allow supportive housing by right in all zones where multifamily and mixed uses are permitted, as required by Government Code section 65583(c)(3). Draft Technical Report, 38-39. The County’s Zoning Ordinance does not explicitly allow low-barrier navigation centers in any zone. Draft Technical Report, 20. Program 15b must explicitly commit to making specific amendments to the Zoning Code by a firm deadline.
- Program 15j specifies “allowances” for tiny homes but only allows them in areas zoned for “Cottage Housing Development” and not until the end of 2023. Draft Housing Element, 49-50.
- Program 16b provides for “enhanced affordability” by requiring Affordable Housing Combining Districts; it includes only the *option* for a developer to make available 15% of the units to existing homeless families and is not required to be implemented until the end of 2025. Draft Housing Element, 50-51.
- Program 23 requires only that the County to “evaluate” changes in County regulations to accommodate tiny homes and RVs, but not until the end of 2024. Draft, 54. And the number of homes/RVs is not quantified.
- The Draft also eliminates Program 19 of the County’s 2014 housing element, which had provided for “Long Term Residency in Campgrounds” allowing long term RV and travel trailer occupancy, despite the Draft’s conclusion that the program was successful. Draft Appendix C, 313.
- Program 27 likewise only commits to continue existing efforts. Draft Housing Element, 55.

The Housing Element should commit to concrete action to increase the supply, diversity, and accessibility of housing and shelter options for unhoused County residents; to address racial and other disparities related to homelessness; and to help unhoused individuals and families achieve and maintain stability. See HCD AFFH Guidance, 53 (programs to affirmatively further fair housing). The Draft Homelessness Strategic Plan includes a number of Action Items to which the County could commit as Housing Element programs, and such programs should also be informed by input from unhoused and formerly unhoused County residents. See Draft Homelessness Strategic Plan, 27-39.

4. Conclusion

Thank you for considering these comments and incorporating our input into the County's Housing Element. Please let us know if you have any questions, and please include us in future notices and correspondence regarding the County's Sixth Cycle Housing Element Update. Our email addresses are included with our signatures, below.

Sincerely,



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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Nicholle Vannucci, Juanita Butterfly, and
Stephanie Somersall, *individuals*; and
Homeless Action!, *an unincorporated
association*,

Plaintiffs,

v.

County of Sonoma, Sonoma County
Community Development Commission,
City of Santa Rosa, Does 1 to 10,

Defendants.

Case No.: 3:18-cv-01955-VC

~~PROPOSED~~ SECOND AMENDED AND
SUPPLEMENTAL COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF

DEMAND FOR JURY TRIAL

INTRODUCTION

1. Plaintiffs¹ brought this lawsuit in March 2018 to prevent Defendants County of Sonoma, Sonoma County Community Development Commission (Commission), and City of Santa Rosa, from clearing the Roseland Encampments, a set of homeless encampments on property owned by the Commission and located in the City of Santa Rosa, until the encampments' 100-plus residents had each been provided an adequate alternative place to go, and to enjoin the enforcement of Defendants' anti-camping and similar ordinances against unhoused people living on public property in the absence of adequate available shelter and housing to meet individuals' needs, including disability-related needs.
2. After the Court denied Plaintiffs' request for a Temporary Restraining Order to prevent the closure of the Roseland Encampments, Defendants cleared the Encampments.
3. Much has happened in the four years since Plaintiffs first filed their lawsuit and Defendants displaced the residents of the Roseland Encampments. The Parties agreed to, and the Court entered, a Preliminary Injunction regarding enforcement actions against unhoused people living on public property and the disposition of unhoused people's personal property; that Injunction that expired, after multiple extensions, on December 31, 2021. The COVID-19 pandemic began and has continued for over two years. Many new encampments have formed on

¹ The original Plaintiffs in this action include Steve Singleton, Samantha Jenkins, and Deborah Drake. residents of the Roseland Encampments who later dismissed their claims. They also included Ellen Brown, Nicholle Vannucci, and the advocacy organization Homeless Action!, who continue to be Plaintiffs in this matter. Shannon Hall, a former Roseland Encampments resident, joined the lawsuit in June 2018. As of June 10, 2022, the Parties have agreed to the voluntary dismissal Plaintiffs Ellen Brown and Shannon Hall; Plaintiffs await Defendants' final authorization to file a stipulation to that effect. This Second Amended and Supplemental Complaint now adds former Roseland Encampments residents Juanita Butterfly and Stephanie Somersall as Plaintiffs.

City and County property, only to be cleared by Defendants. Plaintiffs and other unsheltered residents have been pushed from place to place to place.

4. One fact that has not changed, however, is the severe shortage of adequate housing and shelter available to meet the needs of the City's and County's unhoused residents. The County's most recent point-in-time homeless count, in 2020, found that 1,702 homeless persons are without shelter on any given night, while the number of available emergency shelter beds is less than half that amount. More stable placements, such as transitional housing and permanent supportive housing, are even more scarce and often require people to wait for many months or even years before they can access housing.

5. The availability, adequacy, and safety of congregate settings has been even further limited by the pandemic. Samuel Jones Hall, the City of Santa Rosa's, primary emergency shelter has had at least three major outbreaks of COVID-19, resulting in over 150 infections and at least two deaths.

6. But the City and County continue to force unhoused people off of public land when there is no adequate shelter available for those people. For example, the City of Santa Rosa cleared an encampment on Sebastopol Road in July 2021 during an active COVID-19 outbreak at Samuel Jones Hall. The shelter was closed to intakes, and the City did not offer shelter placements to encampment residents, instead forcing them to leave under threat of arrest with nowhere else to go.

7. These practices disproportionately harm people with disabilities, who are more likely to be homeless than people without disabilities, and who are often unable to stay in congregate shelter settings due to their disabilities. Defendants have also denied reasonable accommodations

to unsheltered City residents who have requested housing or shelter placements that accommodate their disabilities.

8. Disabled persons who are unable to access congregate shelter and who have not received reasonable accommodations in shelter placement often have no other option but to continue residing on the streets. Due to the day-to-day instabilities and hardships of living on the streets, these persons are effectively denied meaningful access to government services and assistance critical to procuring basic necessities, including addressing their housing and disability needs. They must spend time and effort just to locate food, a place to sleep, a place to use the restroom, or a place to bathe. Many lack a computer or even a phone and are unable to have regular communications or regular access to electricity to charge a phone or other device. Many persons also lack reliable transportation and cannot easily reach services such as clinics and government offices. They cannot leave their belongings unattended to tend to their needs or access services for fear that Defendants will seize and destroy their possessions while they are away. And all these hardships are exacerbated both by Defendants' focus on often-inaccessible congregate shelter as the primary shelter available and by their enforcement activities that push unhoused people from place to place under constant threat of citation or arrest.

9. While it has been four years since Defendants destroyed the Roseland Encampments, the issues that gave rise to this lawsuit persist, and unsheltered individuals living on public land in Santa Rosa and Sonoma County continue to experience the violation of their constitutional and statutory rights by Defendants.

10. Accordingly, Plaintiffs file this Second Amended and Supplemental Complaint to reflect current facts, to update their claims, to add two new Plaintiffs, and to seek relief from the Court to prevent the ongoing and future violation of Plaintiffs' rights, as well as the rights of other

unhoused City and County residents who are served and represented by Plaintiff Homeless Action!.

JURISDICTION AND VENUE

11. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1343, 42 U.S.C. § 12132, and 42 U.S.C. § 1983 because Plaintiffs' claims arise under the laws and Constitution of the United States.

12. Pursuant to 28 U.S.C. § 1367, this Court has supplemental jurisdiction over Plaintiffs' state law and state constitutional claims because Plaintiffs' state claims are related to Plaintiffs' federal claims, arise out of a common nucleus of operative facts, and form part of the same case or controversy under Article III of the U.S. Constitution.

13. Venue is proper in the Northern District of California because the events and conduct complained of herein all occurred in Sonoma County.

PLAINTIFFS

14. Plaintiffs Nicholle Vannucci, Juanita Butterfly, and Stephanie Somersall are all former residents of the now-closed Roseland Encampments, homeless encampments that were located on land owned by Defendant Sonoma County Community Development Commission within City of Santa Rosa.

15. Ms. Vannucci was living unsheltered in Sonoma County for many years, including during the pendency of this lawsuit. While she is currently housed, the permanent supportive housing development where she lives has serious habitability conditions that render her housing unstable.

16. Plaintiffs Juanita Butterfly and Stephanie Somersall now join this lawsuit. They are all currently unhoused, living outdoors in and around Santa Rosa.

17. Plaintiff Homeless Action! (HA), an unincorporated association, is a group of grassroots activists in Northern California working towards ending the suffering of people who do not have a home. HA works with and for homeless people in Sonoma County.

DEFENDANTS

18. Defendant Sonoma County (County) is a government entity organized under the laws of the State of California with the capacity to sue and be sued. It is the larger government entity affiliated with Defendant Commission.

19. The County is responsible for enforcement activities against unhoused County residents, including enforcement by the Sonoma County Regional Parks Department in County parks within the City of Santa Rosa.

20. The County is a recipient of federal funds, including Community Development Block Grant funds.

21. The County, its employees and agents participated in the unlawful conduct challenged herein. To the extent they did not personally participate, they authorized, acquiesced, set in motion, or failed to take necessary steps to prevent the acts that resulted in the unlawful conduct and harm suffered or that will be suffered by the Plaintiffs. The acts complained of herein constitute policies, practices and customs of the County.

22. Defendant Commission is in part an agency of Sonoma County and is also the independent successor agency to the County's redevelopment agency. It is a government entity with the capacity to sue and be sued.

23. The Commission is the County's lead agency for its housing and homelessness programs, including its Continuum of Care. It administers federal housing funds on behalf of the County and oversees the County's housing and homelessness programs.

24. The Continuum of Care must have a “centralized or coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing services” as a condition of receiving HUD funds. The Commission, together with its contract agencies, is responsible for administering the County’s Coordinated Entry System, a countywide, multi-agency centralized intake system for matching individuals experiencing homelessness with housing programs, including permanent supportive housing placement and rapid rehousing services. Until January 2022, Defendants, through the Continuum of Care, also used the Coordinated Entry System to allocate emergency shelter resources. The Commission contracted with Catholic Charities of the Diocese of Santa Rosa to run the Coordinated Entry System until April 2022; it now contracts with HomeFirst.

25. The Commission was the owner of the Roseland site at the time Defendants forcibly removed unhoused people who were living there in the Roseland Encampments. The Commission holds the Roseland site in trust pursuant to the California Dissolution Law that dissolved California redevelopment agencies and placed much of the real property owned by the agencies in the Community Redevelopment Property Trust Fund administered by the successor agency to the former redevelopment agency.

26. The Commission, its employees and agents participated in the unlawful conduct challenged herein. To the extent they did not personally participate, they authorized, acquiesced, set in motion, or failed to take necessary steps to prevent the acts that resulted in the unlawful conduct and harm suffered or that will be suffered by the Plaintiffs. The acts complained of herein constitute policies, practices and customs of the Commission.

27. Defendant City of Santa Rosa (City) is a municipal corporation organized under the laws of the state of California and the Santa Rosa City Charter, with the capacity to sue and be sued.

The Departments of the City include the Department of Housing and Community Services and the Police Department.

28. The Santa Rosa Police Department, together with Commission staff and contractors, was the agency responsible for performing the eviction of the Roseland Encampments and subsequent encampments located within City limits.

29. The City, including its Police Department, is also responsible for many of the other enforcement actions against unhoused people described in this Complaint, including enforcement actions against unhoused people living outdoors in City parks, taking shelter under freeway overpasses within the City, and residing on other public land within the City's jurisdiction.

30. Defendant City of Santa Rosa is a recipient of federal funds, including Community Development Block Grant Funds.

31. Defendant City of Santa Rosa participates in the Sonoma County Continuum of Care and has a representative on the Continuum of Care board.

32. The City, the Urban (Sonoma) County, and the City of Petaluma are Sonoma County's three "entitlement jurisdictions" for purposes of HUD funding in Sonoma County; they jointly fund the Continuum of Care and have seats on its governing body.

33. The City funds and oversees housing, shelter, and homelessness programs within the City.

34. The City, its employees, and its agents participated in the unlawful conduct challenged herein. To the extent they did not personally participate, they authorized, acquiesced, set in motion, or failed to take necessary steps to prevent the acts that resulted in the unlawful conduct and harm suffered or that will be suffered by the Plaintiffs. The acts complained of herein constitute policies, practices and customs of the City.

PROCEDURAL HISTORY

35. Plaintiffs Deborah Drake, Samantha Jenkins, Steven Robert Singleton, Nicholle Vannucci, Ellen Brown, and Homeless Action! filed this action on March 30, 2018.
36. Plaintiffs filed a Motion for Temporary Restraining Order on March 31, 2018, seeking a temporary and preliminary injunction to prevent Defendants from forcibly removing the residents and closing (or sweeping) the Roseland Encampments until all residents of the encampments had the opportunity to complete assessments for emergency shelter placement, and had been offered sufficient shelter placements. Plaintiffs further sought a temporary and preliminary injunction to prevent Defendants from enforcing the City's anti-camping ordinance in a manner that violates the constitutional rights of Plaintiffs and other homeless individuals, and from seizing or destroying encampment residents' personal property without pre-deprivation process of law.
37. The Court entered a Temporary Restraining Order on March 31, 2018, staying enforcement of the City's Anti-Camping Ordinance against residents of the Roseland Encampments through April 5, 2018, and ordered the Parties to appear for the hearing on the Temporary Restraining Order on April 5.
38. The Court asked Defendants during the April 5 hearing whether they would agree to voluntarily postpone the sweep of the Roseland Encampments for 21-days if the Court would order Plaintiff Homeless Action! to assist encampment residents in accessing assessment and placement through the County's Coordinated Entry System.
39. Defendants declined the Court's proposal and scheduled the sweep for April 19, 2018.
40. The Court denied Plaintiffs' Motion for Temporary Restraining Order on April 7, 2018, allowing the sweep of the Roseland Encampments to move forward.

41. Plaintiffs filed an Amended Complaint on June 1, 2018, and a Supplemental Complaint on July 17, 2018. The Supplemental Complaint reflected the dismissal of claims by Plaintiffs Deborah Drake, Samantha Jenkins, and Steven Robert Singleton and also added Plaintiff Shannon Hall. The Supplemental Complaint updated Plaintiffs facts and claims to incorporate facts that occurred between March 30, 2018, and June 22, 2018, including facts related to Defendants' clearance the Roseland Encampments and their subsequent sweep of an encampment on the Joe Rodota Trail, a County park within the City of Santa Rosa.

42. The County and Commission Answered on August 7, 2018. The same day City filed a Motion to Dismiss and Motion for a More Definite Statement, which the Court denied on September 18, 2018. The City answered on November 7, 2018.

43. The Parties entered into settlement negotiations, agreeing to the participation of Judge Chhabria as mediator. They eventually stipulated to a Preliminary Stipulated Injunction, which the Court entered on July 12, 2019. Dkt. No. 109-1. The Preliminary Stipulated Injunction limited Defendants' ability to enforce certain anti-camping and other laws against unhoused people living on public property in the City of Santa Rosa, requiring advance notice, including notice of rights, and an offer of adequate shelter prior to most enforcement actions—the primary exception was in cases of “immediate hazard or obstruction.” The Preliminary Stipulated Injunction set forth standards for adequacy of shelter, including that a shelter placement be accessible to a person based on their disability-related needs. It also included provisions regarding the disposition of unhoused people's personal property, the development of a grievance process, and reporting of data.

44. The original term of the Preliminary Stipulated Injunction and its corresponding stay of litigation was until June 30, 2020, but the Parties agreed to, and the Court ordered, subsequent

extensions in light of the COVID-19 pandemic and to facilitate discussions for a final settlement of the case.

45. Plaintiffs sought enforcement of the Preliminary Stipulated Injunction twice during its term. Plaintiffs sought emergency relief to stop the County's closure of a large encampment on the Joe Rodota Trail in January 2020, which the Court denied. In October 2020, Plaintiffs moved to enforce and clarify the Preliminary Stipulated Injunction, and the Court issued an order clarifying the Injunction's terms.

46. The Parties were ordered to further mediation with Magistrate Judge Kim but did not settle, and the last extension of the Preliminary Stipulated Injunction expired on December 31, 2021.

FACTUAL ALLEGATIONS²

Homelessness in Santa Rosa and Sonoma County

47. Over the last decade, the problem of homelessness in Sonoma County, as in many parts of the state and the country, has become more visible and has reached crisis proportions. The 2014 update to the 10-Year Homeless Action Plan for the County of Sonoma states that the regional rate of homelessness for Sonoma County is almost four times the national rate.

48. The City of Santa Rosa has proclaimed a state of homeless emergency, which has been in place since August 2016. In its emergency declaration the City states "a significant number of persons within the jurisdiction of Santa Rosa are without the ability to obtain shelter," which has resulted in a "threat to the health and safety of those persons." The City most recently extended

² These allegations are current through May 19, 2022, the date that Plaintiffs sent the draft Second Amended and Supplemental Complaint to Defendants for their review.

this emergency declaration on March 29, 2022, and it is still in effect as of the date of this Second Amended and Supplemental Complaint.

49. At all times relevant to this litigation, Sonoma County has had a significant homeless population, and the majority of its homeless residents have been unsheltered, meaning that they are sleeping in places not designed for human habitation, including in tents, in vehicles, or outdoors without any type of shelter. The County's homeless point-in-time count estimated the County's homeless population to be 2,996 in 2018, 2,951 in 2019, and 2,745 in 2020. In all of these years, more than 60 percent of the County's homeless residents were unsheltered, with 66 percent living unsheltered in 2019. Due to the COVID-19 pandemic, the County did not conduct a point-in-time count in 2021.

50. Preliminary results from the 2022 point-in-time count, conducted in February 2022, found 2,893 homeless residents in the County, a five percent increase from 2020.

51. Point-in-time counts are widely understood to undercount the homeless population.

52. The large majority of Sonoma County's homeless residents live in Santa Rosa: 1,797 in 2018; 1,803 in 2019; and 1,524 in 2020, according to point-in-time counts.

53. Homeless residents of Sonoma County are disproportionately living with disabilities. According to the 2020 point-in-time count, 40% of survey respondents had "health conditions that prevent them from maintaining housing and/or a job." Forty percent identified as having a mental or emotional condition, 29 percent identified as having Post-Traumatic Stress Disorder (PTSD), and 23 percent identified as having a physical disability. In contrast, Census data indicate that only 8 percent of the County's population under 65 identifies as having a disability.

54. Homelessness in Sonoma County is endemic in large part because of an extreme lack of housing affordable to persons at the lowest income levels. According to the California Housing

Partnership, over 12,700 lower-income renter households in Sonoma County do not have access to an affordable home, and the income needed to afford the average asking rent is \$5,700 per month.

55. According to the City of Santa Rosa's Annual Progress Reports to the California Department of Housing and Community Development on its housing production from 2013-2020, it produced fewer than a quarter of the affordable units necessary to accommodate its lower-income housing need. But it produced over four times as many above-moderate-income housing units as lower-income housing units, deepening the mismatch between the cost of housing and what lower-income residents can afford.

The County's and City's Lack of Available Shelter

56. At all times relevant to this litigation, Sonoma County has lacked sufficient accessible, appropriate shelter options to meet the needs of its nearly 3,000 homeless residents.

57. As of 2020, the Sonoma County Continuum of Care reported a total of 1,112 total year-round beds for "emergency, transitional and safe-haven" shelter, 40% of the total number of homeless individuals identified in the 2020 point-in-time census. Each shelter in the County has a different intake process, and some shelters only serve specific populations and have different criteria for entry.

58. The primary shelter in Santa Rosa is Samuel Jones Hall, a co-ed homeless emergency shelter for individual adults operated by Catholic Charities. According to the Continuum of Care's 2020 report to HUD (pre-COVID-19), Samuel Jones Hall had 213 year-round beds. Samuel Jones Hall is a project of the City of Santa Rosa, the County of Sonoma, and the Community Foundation Sonoma County. The City spends 80% of its homeless services funds on Samuel Jones Hall. Except for some "Nightingale" beds that are set aside for individuals referred

by local hospitals, nearly all the beds at Samuel Jones Hall are bunk beds. Most beds are in large, congregate rooms without any separation between bunk beds.

59. The City requires at least 70 beds at Samuel Jones Hall to be set aside for encampment sweeps. Plaintiffs are informed and believe that these beds are only available for people who are referred by the police or Catholic Charities' Homeless Outreach Street Team (HOST), and that other people who want and need shelter cannot access these beds. Plaintiffs are informed and believe that Samuel Jones Hall often has a waitlist, and that people who try to access the shelter cannot get in immediately, in part because the shelter is holding beds open to accommodate encampment sweeps.

60. In response to the inadequacy of appropriate and sufficient shelter and housing for unhoused people in and in the surrounding region of the City, the City in March 2022 engaged a consulting company to come up with a five-year plan to reduce homelessness to a "functional zero."

61. Samuel Jones Hall, a large, crowded congregate shelter, is not accessible to many unhoused individuals with disabilities, including Plaintiffs Nicholle Vannucci, Juanita Butterfly, and Stephanie Somersall. Individuals who have experienced severe or sustained trauma often have flashbacks, panic attacks, or other mental health symptoms triggered by crowded, loud environments. Similarly, many individuals who are homeless have agoraphobia, anxiety, or certain other mental health impairments that make staying at shelters like Samuel Jones Hall impossible for them.

62. There is a strong correlation among trauma, disability, and homelessness, especially among unhoused women. According to one study, 92% of homeless women surveyed experienced severe physical and/or sexual assault at some point in their lives—60% of whom

experienced the assault by the age of 12. This childhood trauma often contributes to their experience of mental health disabilities and causes severe mental health symptoms throughout their lives.³

63. Further, Plaintiffs Nicholle Vannucci and many other unhoused people, including several other former residents of the Roseland Encampments, have experienced sexual assault or other traumas at shelters in the past. Staying at—or even visiting—a shelter can cause them to experience that trauma again.

64. As such, even when Samuel Jones Hall has beds available, many people with physical and/or mental disabilities cannot access those beds due to those disabilities.

65. Since the litigation began, the County opened Los Guilicos Village in January 2020. Los Guilicos has 60 pallet homes and is operated by St. Vincent de Paul. Los Guilicos has been at capacity nearly the entire time it has been open. Further, it is at least 10 miles from central Santa Rosa and most homeless services, and persons residing there are limited in the hours they may leave and return to the site, making it inadequate for many individuals.

66. The City also opened the Finley Center Safe Social Distancing Program, consisting of 68 tents on a City parking lot, in May 2020, but it closed the program in July of 2020. The Finley Center site filled up almost immediately upon opening and remained mostly full during the entire time it was operational.

67. Finally, neither staying in an emergency shelter nor enrolling in the Coordinated Entry System is likely to result in a person's transition from homelessness into housing—at least not in

³ A. Browne, SS. Bassuk, *Intimate Violence in the Lives of Homeless and Poor Housed Women: Prevalence and Patterns in an Ethnically Diverse Sample*, *Am. J. Orthopsychiatry* 67(2): 261–278 (1997); *Health Care for the Homeless Clinicians' Network*, National Health Care for the Homeless Council, *Trauma and Homelessness at 1* (1999).

the near term—because there is simply not enough supply of permanent supportive housing or otherwise deeply affordable housing to meet the community’s need. According to the County’s Coordinated Entry dashboard, the average wait time “between start and exit” for Coordinated Entry is 581.72 days for the 2021-22 fiscal year.

68. When a temporary stay in emergency shelter or some other short-term shelter option ends, people often end up going back onto the streets. According to the most recent Year-End Status Report for the Samuel L. Jones Homeless Shelter, only 60 out of the 622 of people placed at Samuel Jones Hall were exited to permanent housing during the 2020-21 fiscal year.

Defendants’ Enforcement of Anti-Camping and Other Laws Against Unhoused Individuals and Encampments

69. Both the City and County enforce anti-camping and other laws against unhoused people to remove them from public land. Some enforcement activities involve physical arrest, citation, or both. Others use verbal, written, or implied threats of criminal sanction by law enforcement officials to force unhoused people’s displacement.

70. During the pendency of this case, the Defendants have performed more than 40 enforcement actions to close larger (at least 5 or more residents) encampments. Some have involved all three Defendants, such as the enforcement actions at Roseland and the Joe Rodota Trail. Some have involved only the County and CDC, such as at Bane Avenue. Most have been conducted by the City in parks, beneath overpasses, and other public spaces within Santa Rosa. Defendants undertook enforcement actions notwithstanding the absence of adequate available alternative shelter placements. People can avoid citation, arrest, and/or criminal charges only by relocating to other areas that are outdoors, although they are not given permission to go to any location. The threat of criminal sanction exists for living outdoors in all public spaces, so

relocating does not resolve the threat of punishment. Instead, people are just forced to move from place to place to place.

71. In taking these enforcement actions to close encampments, Defendants have failed to afford Plaintiffs and other disabled encampment residents reasonable accommodations in their shelter placement when expressly or implicitly requested. This failure denies and has denied Plaintiffs and other disabled encampment residents with meaningful access to government services and programs for homeless persons.

72. At many encampments, Defendants have not provided toilets, handwashing stations, garbage service, or other sanitary services, even as encampments grew in size. In others, they have provided inadequate sanitary services to accommodate the number of people living in the encampment. Defendants have even removed toilets, handwashing stations, and garbage cans placed by HA and other nonprofit organizations. Then, notwithstanding their complicity, Defendants have then cited refuse and other health hazards that could have been prevented or mitigated with adequate sanitary services as grounds for closing the encampment and displacing its residents.

73. In addition to its anti-camping ordinance, Defendants have used other local ordinances to cite or remove unhoused people from public property, including: City Code Section 10-12.020: Obstructing tunnel, overpass by loitering; 10-12.030: Obstructing tunnel or overpass by sitting or lying on a street or sidewalk; 10-08.010: Public Excretion; and 9-12.050: Littering and Sonoma County Code sections 19-15 and 20-25: illegal camping. They also use state laws, including Penal Code 647(e): unlawful lodging, and Fish and Game Codes related to creeks and riparian areas to achieve the same purpose.

74. While there are legal campgrounds within Sonoma County, all of these charge a daily fee, and many are located far away from the City of Santa Rosa, businesses, and social services and are therefore not accessible to homeless persons who lack reliable transportation. Additionally, most legal campgrounds, including campgrounds at state and county parks, impose limitations on how long campers may stay. As such, the only viable camping option for most homeless people who lack shelter is to camp in “unsanctioned” encampments on public or private land.

The Roseland Encampments

75. The two encampments at “Roseland” site, located at 665 to 883 Sebastopol Road, in Santa Rosa, were among the largest encampments in the County at the time of filing. Over 100 people, including the current and former Plaintiffs in this matter, lived at the Roseland site, in two encampments (the Roseland Encampments).

76. The Roseland site is held by Defendant Commission and is located in Santa Rosa. The City annexed the site on November 1, 2017.

77. The first encampment at the Roseland site began forming in 2015, when approximately 20 people moved there after the City forced them to leave another encampment within the City. A second encampment formed in 2017 after the City cleared an encampment from under a Highway 101 overpass within the City.

78. These sweeps by the City, in turn, reflected a years-long escalation of enforcement by Defendants, in particular the City, against unhoused people. On July 11, 2017, the City approved the Homeless Encampment Assistance Pilot Program (HEAPP), which has since become the Homeless Encampment Assistance Program (HEAP). The program utilizes Catholic Charities’ Homeless Outreach Services Team (HOST), which includes a street outreach team working to engage unsheltered homeless into services and housing. However, the effect of HEAP has been

the City's more aggressive enforcement of its anti-camping and related ordinances, and the forcible displacement of homeless encampments and their residents.

79. As with the homeless population more broadly, Roseland Encampments residents were disproportionately persons living with disabilities relative to the general population.

80. On or about February 21, 2018, the Commission posted a written Notice to Vacate at the Roseland Encampments. The Notice provided a deadline of March 23, 2018, to vacate the encampments or face possible arrest and prosecution for the violation of California Penal Code section. 647(e) (unlawful lodging), Penal Code section 602(m)(trespass) and Santa Rosa City Ordinance 11-22-.030 (prohibited camping on private property without permission). The Notice indicated that the Commission was revoking any prior authority it may have granted for the occupants to reside at the encampment site. The Notice went on to state that other violations to which persons may be subject to arrest and prosecution include "unlawful storage of property", "unlawful refuse disposal", "unlawful failure to restrain an animal" and "unlawful fire."

81. On or about February 27, 2018, after posting the notice of its intent to sweep the Roseland Encampments, the Commission opened a "Navigation Center" in an unoccupied building near the encampment site. The Navigation Center was run and staffed by the Homeless Outreach and Services Team (HOST) program through Catholic Charities, which was funded by Defendants.

82. On or about March 7, 2018, the Commission posted a new Notice to Vacate, still dated February 21, 2018. This new Notice to Vacate contained substantially the same language as the previous February 21, 2018, notice, but changed the deadline to vacate to April 3, 2018.

83. The primary—and, in many instances, only—placement that Defendants offered to the Roseland Encampments' residents was a shelter bed in an emergency shelter. Placement in such

a shelter was not appropriate for many residents of the Roseland Encampments who are living with mental health disabilities or other disabilities that limit their ability to live in a crowded shelter setting. For example, many residents have mental health disabilities that cause them to experience fear and anxiety in situations where they are in close quarters with others, or where they must give up their privacy. As such, it is not possible for them to stay—even for a short time—in a shelter setting.

84. Plaintiffs sent letters to Defendants on March 9, 2018, and March 12, 2018, requesting that Defendants temporarily postpone the sweep of the Roseland Encampments until adequate alternative shelter placements, or an alternative encampment site, was available for the residents to be displaced by the sweep and inviting Defendants to enter into a dialogue about possible solutions.

85. Over the next ten days, Defendant Commission and Plaintiffs entered into a dialogue process to discuss the situation. Defendant Commission provided Plaintiffs documentation it alleged supported its claim it had adequate grounds to close the Roseland Encampments.

Plaintiffs also met with the City of Santa Rosa during this time.

86. On March 26, 2018, Plaintiffs requested that Defendants postpone their planned sweep of the Roseland Encampments temporarily, until adequate alternative shelter had been offered to all residents as a reasonable accommodation under federal and state disability rights laws.

87. While Defendant Commission offered to entertain specific accommodation requests from individual encampment residents if they could make them by April 3, the Commission refused to delay the sweep.

88. On March 28, 2018, Plaintiffs requested that the sweep be temporarily postponed for 14 days to ensure that the Roseland Encampments' residents were not forcibly removed from the site without first having been offered appropriate shelter placements or alternative housing.

89. However, on March 29, 2018, Defendants responded that they would proceed with the sweep on April 3, as planned.

90. As of March 30, 2018, the date of the initial filing of this action, Defendants had not identified adequate alternative placements for all of the residents of the Roseland Encampments.

91. Defendant Commission closed the Navigation Center adjacent to the Roseland Encampments on April 2, 2018.

92. Plaintiffs are informed and believe and so allege that HOST staff were not on the Roseland site between the TRO hearing on April 5 and Monday, April 9.

93. Plaintiffs are informed and believe and so allege that from April 10 to April 20, 2018, HOST staff visited the Roseland Encampments to conduct assessments and offer placements. HOST staff were not there every day, and their schedule was not always predictable to encampment residents.

94. Representatives of Plaintiff Homeless Action! (HA) made efforts to assist encampment residents in obtaining assessments for shelter placement with HOST between the TRO on April 5 and the sweep of the Roseland Encampments on April 19. HA volunteers located encampment residents who had not yet been assessed, encouraged them to complete assessments, brought them to assessment appointments, and, when residents requested, attended assessments to provide support to residents going through the assessment process.

95. HA also notified encampment residents of their right to request reasonable accommodations in the assessment and placement process and attempted to facilitate those requests to HOST and Commission.

96. Plaintiffs' counsel forwarded 22 encampment residents' written requests for reasonable accommodations in the assessment and shelter placement process to Counsel for Commission on April 12, 2018. Additional residents requested accommodations from Commission and HOST in the days leading up to the sweep.

97. Many of these individuals, including Plaintiffs Nicholle Vannucci, Juanita Butterfly, and Stephanie Somersall, requested alternatives to the generally offered placement at Samuel Jones Hall or requested partitioned beds or other accommodations at Samuel Jones Hall because their disabilities make placement in a large emergency shelter inappropriate for their health and wellbeing.

98. Defendants evicted the residents of the Roseland Encampments on April 19 and 20, 2018, seized and destroyed personal property, and cleared the site.

99. The Santa Rosa Police Department, staff from Commission and HOST, and counsel for all Defendants participated in the removal of the Roseland Encampments.

100. Commission workers and contractors used bulldozers and other heavy machinery to "clean" the site and destroy personal property that Commission identified as abandoned.

101. HA volunteers and Plaintiffs' counsel were also present during this time to assist and support residents.

102. Defendants removed all the portable toilets and hand washing stations on or before April 19, while many encampment residents remained on the site; some of the toilets and handwashing stations had been provided by Defendants County and/or Commission, and some by HA.

103. Defendants fenced off the Roseland Village site at approximately 3:00 p.m. on April 20, 2018; residents were not allowed to return to the site after that time.

104. Plaintiffs are informed and believe and so allege that persons seeking to store items through the Commission at the site of the former Navigation Center were only allowed two 16" x 18" x 18" cardboard boxes for storage. Plaintiffs are informed and believe that only one person from the Roseland Encampments stored belongings according to this process.

105. Plaintiffs are informed and believe and so allege that workers employed by Defendant Commission destroyed and did not inventory large amounts of personal property remaining on the site. Many of the encampment residents lost valuable personal property as part of the closure of that encampment, and many filed claims with the County and City for the loss.

106. HOST offered temporary motel placements on April 19 and 20 to approximately 9 persons who had requested placements in settings other than a large shelter as reasonable accommodations of disabilities. Approximately 15 persons who had made such requests were not placed by HOST and were forced to vacate the Roseland Encampments without having been offered temporary or permanent shelter placements that met their disability-related needs. Plaintiffs are informed and believe and so allege that other residents requested reasonable accommodations in shelter placement during the sweep of the site but were not provided such accommodations prior to Defendants' forcing them to leave the Roseland site.

Joe Rodota I (May 2018)

107. Approximately 60 residents of the Roseland Encampments, many of whom had requested reasonable accommodations in their shelter placements but who had not been offered placements that met their needs, relocated to the Joe Rodota Trail, an 8.5-mile-long public hike-and-bike-trail in Defendant Sonoma County's regional parks system when Defendants closed the Roseland Encampments. Plaintiffs are informed and believe and so allege that the individuals whom

Defendants forced to leave the Roseland site without alternative shelter were overwhelmingly people with disabilities who, because of their disabilities, were unable to stay in congregate shelter.

108. The Joe Rodota Trail Encampment grew to nearly 100 people, including both former Roseland Encampments residents and other homeless individuals.

109. Plaintiffs are informed and believe and so allege that the Roseland Encampments residents who had been placed by HOST in local motels with motel vouchers had all been removed from the motels by May 6, 2018, some without advance notice from the motel management, HOST, or Commission. Many returned to living on the streets after being ejected from the motels.

110. HA alerted HOST and Defendants that approximately 12 additional former Roseland Encampments residents with disabilities residing in the Joe Rodota Trail area had identified need for reasonable accommodations in shelter placement.

111. Plaintiffs are informed and believe and so allege that, many encampment residents experienced difficulty connecting with HOST workers, either in person or by telephone between April 23 and May 30, 2018.

112. HA members rented porta-potties and handwashing stations on or about May 5, 2018, providing them to homeless individuals living on the Joe Rodota Trail.

113. Defendant Sonoma County removed the porta-potties and handwashing stations on or about May 7, 2018, depriving encampment residents of facilities necessary to promote the health and safety of encampment residents, and the park more generally, and to prevent the spread of disease.

114. HA requested orally and in writing that the County allow installation and maintenance of the porta-potties and hand washing stations at HA expense, but the County refused to allow the sanitary facilities on grounds that Sonoma County Parks and Recreation had not authorized portable toilets or water on the Joe Rodota Trail. The County also stopped providing trash pickup services, allowing garbage to pile up.

115. HA volunteers attended camp meetings, spoke at Board of Supervisors and City Council meetings in support of transitional villages, surveyed camp residents regarding their needs for storage and shelter, serviced the garbage cans, paid for trash bags, purchased garbage cans with lids to help keep rodents away, delivered food and water, helped to pack and move residents' personal property during the week of May 26 to June 1.

116. HA also asked the County to delay the eviction until a new location for encampment residents to live safely and without fear of prosecution could be obtained.

117. Defendant County of Sonoma, through its Regional Parks Department, posted Notices to Vacate on the residents of the encampment on the Joe Rodota Trail on or about May 8 and May 16, 2018. The Notices did not provide a date by when residents were required to vacate the encampment, but threatened that, if residents did not vacate the area, they would be subject to arrest and possible prosecution for violation of California Penal Code §§ 602 and 647(e) as well as Santa Rosa City Code § 11-22.030 (prohibiting camping on public land). The notices also stated all that personal property needed to be removed from the area, that property that posed a risk to health and safety would be destroyed, and that the remaining property would be stored for a period of up to 60 days. The Notice did not provide a deadline for the removal of property.

118. The County announced through a press release dated May 23, 2018, that it would close a section of the Joe Rodota Trail on May 30, 2018, to remove the encampment and posted a Notice to Vacate Illegal Campsite/Lodging (Notice) that same day.

119. Many of the residents of the Joe Rodota Trail Encampment, including individual Plaintiffs, made written requests for reasonable accommodations, based on disability, in their shelter placement process. These requests sought alternatives to placement in Sam Jones Hall.

120. Approximately 32 of the former Roseland Encampments residents, identified by Homeless Action! as needing reasonable accommodations, including Plaintiffs Nicholle Vannucci, Juanita Butterfly and Stephanie Somersall, continued to reside in the Joe Rodota Trail Encampment as of May 30, 2018, and had not been placed in temporary or permanent shelter that met their disability-related needs.

121. Santa Rosa Police Officers and Sonoma County Regional Parks rangers closed the Joe Rodota Trail encampment on May 31 and June 1, 2018. At least 30 persons who had requested reasonable accommodations in their shelter placement, including Plaintiffs Nicholle Vannucci, Shannon Hall, Juanita Butterfly and Stephanie Somersall were not placed and were forced by Defendants to leave the area with nowhere to go.

122. After the Parties agreed to and the Court entered the Preliminary Stipulated Injunction in summer 2019, Defendants developed new notices, policies, and procedures for enforcement actions against unhoused people living on public land within the City of Santa Rosa. However, they continued to take such enforcement actions, often without having offered adequate shelter to prior to enforcement, especially in situations where encampment residents had requested reasonable accommodations in shelter placement based on disability-related needs that rendered congregate shelter inaccessible for them.

Joe Rodota II and Bane Avenue (January-February 2020)

123. Another encampment began to form along the Joe Rodota Trail in mid-2019. The encampment then began to grow until it had over 200 people by December 2019. The County for many months did not provide any sanitation facilities to the encampment. It also refused to allow HA to supply porta-potties, trash cans, or washing stations to the encampment, although it eventually allowed HA to provide sanitary facilities at the end of November 2019, after the encampment had grown to over 150 tents. The County then installed additional bathrooms in mid-December 2019.

124. On or about January 12, 2020, the County served Joe Rodota Trail encampment residents with a Notice of Legal Rights and Opportunity to Relocate.

125. On January 14, 2020, County staff reported to the Board of Supervisors that, throughout the County, there were 15 beds available for emergency shelter, 22 transitional housing beds, zero rapid rehousing units, and 16 permanent supportive housing units available—far fewer available shelter and housing placements than the 200-plus people living in the encampment. At the same meeting, the Board adopted staff’s proposed finding that conditions on the Joe Rodota Trail constituted an “immediate hazard requiring emergency action.” The Board also approved a site for the Los Guilicos Village indoor-outdoor shelter.

126. On or about January 15, 2020, the County and Commission issued a Notice to Vacate to Joe Rodota Trail residents that asserted residents had been offered opportunities for shelter placement and Coordinated Entry assessment and threatened citation and/or arrest if residents did not leave the Joe Rodota Trail by January 29, 2020.

127. Plaintiffs, through their counsel, sent a letter to Defendants on January 22, 2020, requesting that the County meet and confer with them pursuant to the terms of the Stipulated Preliminary Injunction and notifying them that many encampment residents had not been offered

adequate shelter. In this and subsequent correspondence over the next few days, Plaintiffs' counsel transmitted information to Defendants about 61 encampment residents who had not been offered adequate shelter, including individuals who had requested reasonable accommodations in shelter placement due to disabilities that made congregate shelter inaccessible to them.

128. On January 27, 2020, Plaintiffs filed a letter with the Court seeking immediate relief pursuant to the Stipulated Preliminary Injunction. Plaintiffs requested an “order restraining Defendants from removing and confiscating the belongings of any homeless individual camping on the Joe Rodota Trail without first offering the individual immediately available adequate shelter and an opportunity to be assessed for Coordinated Entry, as required by paragraph 3 of the Injunction, finding that not all residents of the Joe Rodota Trail have been afforded those opportunities, and requiring the County to make a showing to the Court that every known individual living on the Joe Rodota Trail has been offered both adequate shelter or housing and an opportunity for assessment prior to clearing the Joe Rodota Trail II encampment.” Dkt. No. 115 at 1. However, the Court denied the request, allowing Defendants to move forward with clearing the encampment.

129. The County and Commission, with support from the City’s police department, closed the Joe Rodota II encampment on January 30, 31 and February 1, 2020. At least 30 persons who had requested reasonable accommodations in their shelter placement, including Plaintiffs Juanita Butterfly and Stephanie Somersall, were not placed in shelter and were forced to move from the area with nowhere else to go.

130. Approximately 38 persons from the Joe Rodota II encampment who were not placed in shelter, including Ms. Somersall, moved from the Joe Rodota II encampment at the time of its closure to a new area in unincorporated Sonoma County just south of the City of Santa Rosa.

This newly formed encampment was located in an industrial area on Bane Avenue, a dead-end street.

131. But the County closed the Bane Avenue encampment on February 10, 2020, without providing Plaintiff Stephanie Somersall—along with approximately 28 other encampment residents—an adequate shelter placement. Without adequate alternative shelter or housing, these individuals scattered to attempt to find shelter and safety elsewhere, including in public parks within the City.

132. In February and March 2020, the City cleared encampments at least five city parks, involving approximately 20 to 30 people at each location: A Place to Play Park, Olive Park South Davis Park, and Fremont Park (aka Cancer Survivors Park or Cancer Park), and Doyle Park. Many residents of these encampments, including Stephanie Somersall, had been residents at Bane Avenue, Joe Rodota II before it, and other encampments stretching back to the Roseland Encampments and before. And many, also including Ms. Somersall, had made reasonable accommodation requests regarding their shelter needs, only to be forced to move again and again without having received any offer of shelter that met those needs.

Enforcement During the COVID-19 Pandemic

133. Sonoma County issued a shelter-in-place order on March 17, 2020, in response to the growing COVID-19 pandemic. The order recognized that unhoused people are unable to shelter at home but indicated that they were “. . . strongly urged to obtain shelter, and governmental and other entities are strongly urged to make such shelter available as soon as possible and to the maximum extent practicable (and to utilize Social Distancing Requirements in their operation).”

134. People experiencing homelessness are disproportionately vulnerable to COVID-19. They are both at higher risk of contracting COVID-19 than the general population and more likely to experience severe symptoms and/or die if they become ill. Unhoused people tend to be older, and

to have higher rates of respiratory and cardiovascular disease, than the general population.

Living in congregate shelter or unsheltered without access to adequate hygiene facilities also increases the risk of infection.

135. The Centers for Disease Control and Prevention (CDC) issued guidance regarding unsheltered homelessness and COVID-19 on March 22, 2020, which instructed: “Unless individual housing units are available, do not clear encampments during community spread of COVID-19. Clearing encampments can cause people to disperse throughout the community and break connections with service providers. This increases the potential for infectious disease spread.”

136. Although the CDC has updated the guidance multiple times over the last two years, its current guidance last updated February 10, 2022, says: “If individual housing options are not available, allow people who are living unsheltered or in encampments to remain where they are. Clearing encampments can cause people to disperse throughout the community and break connections with service providers. This increases the potential for infectious disease spread.” The CDC’s guidance also urges local governments to ensure that encampments have access to adequate toilet and handwashing facilities 24 hours a day and to install portable toilets and handwashing stations to encampments that lack access to 24-hour public restroom facilities.

137. In April 2020, after receiving a request from Plaintiffs, Defendants temporarily paused enforcement activities against homeless encampments in recognition of the pandemic’s risks and the CDC guidance.

138. But, contrary to the CDC guidance, in May 2020, the City announced systemic resumption of encampment sweeps during the last week of May 2020 and has cleared over 20 homeless encampments since then.

139. The City's enforcement actions during the ongoing pandemic have included the clearance of encampments at Highway 101 overpasses, Corporate Center Parkway, and Fremont Park in summer 2020.

140. During the spring of 2020, an encampment grew where Third, Fourth, Fifth, Sixth, and Ninth Streets pass under Highway 101 in downtown Santa Rosa.

141. When the City cleared the 101 overpass encampment in late June 2020, it had approximately 90 residents, including Ms. Butterfly.

142. While the City had placed some porta-potties, handwashing stations, and dumpsters at the 101 overpass encampment, there were not enough for the number of people who lived there. The City did not empty the dumpsters frequently enough, causing them to overflow.

143. Then, in April 2020, the City began removing the porta-potties and handwashing stations, in direct contravention of the CDC's guidance on COVID-19 and unsheltered homelessness.

144. The City posted notices regarding the planned clearance of the 101 overpass encampments in late May and early June 2020 but did not provide the Notice of Rights it had developed pursuant to the Preliminary Stipulated Injunction. HOST conducted outreach, but many encampment residents were not offered adequate shelter.

145. The City cleared the 101 overpass encampments on June 24 and 25, 2020, although none of the previously posted notices had indicated that the encampment clearance would occur on these dates.

146. Many residents still had not been offered adequate shelter on June 24. On information and belief, HOST and Santa Rosa police instructed individuals that, if they wanted a shelter placement, they needed to leave the area and go to the Homeless Service Center on Morgan Street. However, leaving to obtain a shelter placement would mean leaving behind any

belongings remaining in the area at a time when City staff and contractors were closing off and clearing out the area.

147. Due to the lack of adequate notice and the way in which the City conducted the clearance of the 101 overpass encampment, many encampment residents lost their personal property when the City forced them to leave. On information and belief, the City did not inventory or store any personal property during its clearance of the 101 overpass area.

148. On information and belief, the City booked at least three individuals for alleged violation of Penal Code section 647(e) (unlawful lodging) during its clearance of the 101 overpass area.

149. Many people forced from the 101 overpass area by the City in June 2020 relocated to other encampments at Corporate Center Parkway and Fremont Park.

150. Corporate Center Parkway is a public street in an industrial area of Santa Rosa. In spring of 2020, the encampment there was mostly people living in RVs, cars, or other vehicles parked along the street. However, it grew significantly after the City cleared the 101 overpass area, with more people living in tents or under tarps moving there.

151. Approximately 90 people, including Ms. Somersall, were living there when the City cleared the encampment on July 9, 2020.

152. As with other encampments, the City did not provide adequate bathrooms or handwashing facilities to accommodate the number of people living at Corporate Center Parkway.

153. The City did not provide Corporate Center Parkway encampment residents with the written notice of enforcement or notice of rights that it had developed pursuant to the Preliminary Stipulated Injunction before it forced encampment residents to leave on July 9, 2020.

154. The City forced many Corporate Center Parkway encampment residents, including Stephanie Somersall, to leave without having received an offer of adequate shelter.

155. An existing encampment at Fremont Park, a public park in Santa Rosa, also grew significantly following the City's clearance of the 101 overpass area—from approximately 15 or 20 people to approximately 60 or 70 people. Ms. Butterfly was one of the people who relocated to Fremont Park after the City forced her to leave the 101 overpass area.

156. Others, like Ms. Somersall, moved to Fremont Park after having been forced to leave Corporate Center Parkway.

157. The only bathroom at Fremont Park was a single porta-potty, even after advocates asked the City to add more bathrooms. There were no handwashing stations or dumpsters. Volunteer organizations provided trash bags and trash pickups for encampment residents because the City failed to do so. By late July, approximately 100 people were living at Fremont Park, but the City still had not provided handwashing stations, dumpsters, or additional toilets.

158. On July 28, 2020, Santa Rosa Police Department officers verbally told Fremont Park residents that the police would return to clear the western portion of the park the following day due to an alleged fire hazard, but they did not provide any written notice of the impending enforcement or notice of rights.

159. The Santa Rosa Police cleared the western half of the park on July 29, 2020, and closed it off with fencing.

160. Encampment residents, having not received sufficient advance notice, rushed to relocate, and many lost their belongings. On information and belief, the City did not collect and store any personal property during the July 29, 2020, sweep at Fremont Park.

161. Most residents relocated to the eastern side of the park, greatly increasing the density of tents and people there.

162. The City finally added two porta-potties, a handwashing station, and a dumpster *after* it cleared the western side of the park.

163. Then, on August 28, 2020, the City posted written notices to vacate the park by September 1, 2020.

164. The City cleared Fremont Park on September 1, 2020. Many residents, including Juanita Butterfly, were forced to leave without having been offered adequate shelter.

165. Many residents were unable to move their belongings in time during the September 1, 2020, clearance of Fremont Park, and the City seized and destroyed unhoused people's personal property.

166. Since the Fremont Park sweep, the City has continued to take enforcement actions against unhoused people on public property within the City, often when shelter is unavailable on a citywide basis, for a particular individual, or both.

167. The County has also continued to take enforcement action against unhoused people who attempt to live along the Joe Rodota Trail, including against Ms. Butterfly and Ms. Somersall.

Additional Facts Specific to Nicholle Vannucci

168. Plaintiff NICHOLLE VANNUCCI is 44 years old.

169. Ms. Vannucci is part-Native American and has lived in Santa Rosa since she was eight years old.

170. As of the date of filing, Ms. Vannucci had no income but had applied for CalFresh (aka Food Stamps).

171. Ms. Vannucci is a survivor of domestic violence. Because of her experience in a violently abusive relationship, Ms. Vannucci has post-traumatic stress disorder (PTSD).

172. The symptoms of Ms. Vannucci's PTSD make it extremely difficult for her to be around other people and to secure suitable work.

173. Ms. Vannucci became homeless in November 2016 after her husband attacked her and she fled her home. She was on the streets for several weeks, spending time in Marin County and Sacramento.

174. Around April 2017, Ms. Vannucci returned to Sonoma County and sought services from Catholic Charities through their Homeless Services Center. She has received mail at the Homeless Services Center, and has taken an occasional shower there, but she did not receive an appropriate temporary or permanent housing placement from the Homeless Services Center. Ms. Vannucci continued to live on the streets for several months but eventually moved into the Roseland Encampments.

175. Living at the Roseland Encampments provided Ms. Vannucci with a sense of safety and stability that she had not been able to find elsewhere while she had been homeless. Having her own tent, which she shared with her partner, made her feel secure and gave her a place where she could find some degree of peace when she was experiencing extreme symptoms of PTSD. Having the ability to zip up her tent and be alone made her feel more secure than she had felt in other settings, including homeless shelters. She felt her possessions were safe at the Roseland Encampments, and she slept better there than she had slept in many months.

176. Ms. Vannucci previously tried to stay at a homeless shelter, but, after being sexually assaulted during her first night there, she left. Because of this experience, her past history of abuse, and the symptoms of her mental health disability, Ms. Vannucci does not feel safe at homeless shelters.

177. As of March 30, 2018, Ms. Vannucci was unemployed. She had worked some service jobs in Sonoma County, but the symptoms of her PTSD made it hard to stay in a job, especially a job where she had to interact with other people.

178. During the time Ms. Vannucci was with her abusive husband, she was not able to work, due to his controlling behavior.

179. Ms. Vannucci does not have reliable transportation, and her credit rating is very low; it is hard for her to search for housing.

180. Ms. Vannucci sought assistance through the Navigation Center adjacent to the Roseland Encampments several weeks prior to the scheduled eviction of the encampments. Ms. Vannucci completed an assessment with the Navigation Center staff. At the time she did her assessment, Ms. Vannucci informed HOST as to the nature of disabilities and her needs regarding a shelter placement. The Navigation Center staff offered her a referral to a shelter bed at Sam Jones Hall, but Ms. Vannucci declined that offer as she cannot stay at a shelter due to her PTSD symptoms.

181. As of the date of filing this lawsuit, neither Defendants nor their agents had offered Ms. Vannucci a placement that met her disability-related needs.

182. At the time Defendants closed the Roseland encampments Ms. Vannucci had no other place to go and was concerned that, until she would be able to locate better shelter, she would not be able to find a place she would be able to reside without possible harassment by the authorities. She was also concerned that about the well-being of the other encampment residents. If they are scattered to other locations, they will face additional hardship and difficulty in accessing services and obtain shelter placements.

183. Ms. Vannucci and her partner Bryan actively participated in the County's placement process and sought alternative housing following the TRO hearing in this case.

184. Neither Ms. Vannucci nor her partner had been offered any placement that met their disability-related needs when the sweep of the Roseland Encampments began, and they were still living at the Roseland site.

185. Ms. Vannucci visited Samuel Jones Hall to view the partitions on April 19, 2018, and broke down in tears. She was terrified of staying there because she had been previously assaulted there. She concluded that she could not stay at Samuel Jones Hall, even with individualized partitions.

186. On April 20, HOST placed Ms. Vannucci and her partner in a local Motel 6 with a motel voucher; the placement was for a maximum of 14 days. HOST then extended the placement to May 9, 2018.

187. Motel 6 management forced Ms. Vannucci to leave her motel room with less than a day's notice on May 4, 2018, before Ms. Vannucci's hotel voucher expired.

188. She did not have alternative shelter, so Ms. Vannucci returned to living outside and joined the Joe Rodota Trail Encampment.

189. At the time the Joe Rodota Trail Encampment was closed at the end of May 2018, Ms. Vannucci had not been offered another suitable shelter placement and so she was forced to move from that location with nowhere to go. She continued to reside at various spots along the Joe Rodota Trail.

190. Ms. Vannucci continued to reside on public property both in Santa Rosa and in Stockton, California, and in Oregon, during the rest of 2018 and 2019. She faced continual displacements by the police during this time. In August 2019 Ms. Vannucci began residing at an encampment that had formed along the Joe Rodota Trail in the City of Santa Rosa (Joe Rodota II). She continued to reside at that encampment until January 2020.

191. In January 2020, after three years of attempting to access housing and services from Defendants, and after two years as a Plaintiff in this lawsuit, Ms. Vannucci finally received a placement in permanent supportive housing at the Palms Inn in Santa Rosa.

192. However, the Palms Inn has serious and ongoing habitability issues—including cockroach and rodent infestations, as well as extreme mold and moisture problems—that threaten the stability of Ms. Vannucci’s housing, putting her at risk of becoming homeless once more.

193. Ms. Vannucci is further concerned that Defendants’ continuing practices to force removal, seize property, arrest or threaten to arrest, and fail to provide reasonable accommodations of persons experiencing homelessness harms the well-being of other homeless encampment residents. The practices cause Ms. Vannucci and others experiencing homelessness to be scattered to other locations and face additional hardship and difficulty in accessing services and obtaining appropriate shelter or housing placements.

Additional Facts Specific to Juanita Butterfly

194. Plaintiff JUANITA BUTTERFLY is 39 years old. She has lived in Santa Rosa since 2016. Ms. Butterfly was homeless when she moved to Santa Rosa, and she began living on the streets immediately upon her arrival.

195. Ms. Butterfly is Native American and a member of the Karuk Tribe of Northern California. She is a widow and has four minor children who are currently living with relatives.

196. Ms. Butterfly has a high school diploma and has previously worked as a nursing assistant. She currently has no income other than from occasionally collecting and turning in recyclables.

197. Ms. Butterfly has various disabling health conditions which have rendered her unable to work. She has an anxiety condition as well as a mental disorder arising from severe trauma she has experienced, including one incident when she was kidnapped and raped and another where

she was physically attacked. These conditions make it difficult for her to be in a congregate shelter setting where she is in close contact with persons she does not know. Due to the violence she has experienced, she is fearful of further attacks and cannot share living space with large numbers of persons she does not know well.

198. When Ms. Butterfly came to Santa Rosa in 2016, she was accepted into the Roseland area homeless encampment which, at that time, was called Camp Micaela.

199. In the fall and winter of 2017, as many more people started coming to the Camp Micaela (after several homeless encampment sweeps that took place in other areas of Santa Rosa) Ms. Butterfly assisted in forming the new encampment, called “Last Chance,” right next to Camp Micaela and then began to reside there.

200. Shortly before Defendants closed the Roseland Encampments, Ms. Butterfly made a written request to the County and City for an alternative shelter placement. The request explained that she has PTSD and dyslexia and that she needed a private or partitioned space to feel safe. It also requested the accommodation of communicating with her in writing because she has trouble understanding oral communication and needs time to think things over.

201. Someone working for one or more Defendants—Ms. Butterfly is informed and believes it was a representative from HOST—told her that they could place her at Samuel Jones Hall in a smaller room with other people she knew from the encampment. Ms. Butterfly would have accepted a placement like that, but the HOST representative did not follow through with arrangements for that placement, and the offer never materialized. Defendants had not offered Ms. Butterfly any other placement when they closed the Roseland Encampments in April 2018.

202. When Defendants closed the Roseland Encampments, Ms. Butterfly was not able to move all of her belongings, and she was not aware of any option to store them. As a result, is informed

and believes that Defendants destroyed the following belongings that she was unable to remove from the site: her tent, camping items, clothes, items for her dog.

203. After the closure of the Roseland Encampments, Ms. Butterfly moved to the Joe Rodota Trail, along with other displaced Roseland Encampments residents, and she was part of the encampment that formed there.

204. While she was living on Joe Rodota Trail, Ms. Butterfly was again offered a placement at Sam Jones Hall; she is informed and believes that HOST made this offer. This time, Ms. Butterfly was not offered the small room placement at Sam Jones Hall. Ms. Butterfly again requested an accommodation in her shelter placement process based on her disability to be placed in an alternate setting to the large emergency shelter. A May 23, 2018, letter from Plaintiffs' counsel to Defendants regarding the pending clearance of the encampment also reminded Defendants that Ms. Butterfly was among the encampment residents who had requested reasonable accommodations in shelter placement. Ms. Butterfly also enrolled in the Coordinated Entry System at that time.

205. When the City and County cleared the Joe Rodota Trail on May 31, 2018, Ms. Butterfly still had not been offered any shelter or housing placement that met her disability-related needs. She left the Joe Rodota Trail encampment on or about May 31, 2018, to avoid getting arrested.

206. After the closure of the Joe Rodota Trail encampment, Ms. Butterfly resided at various other locations elsewhere along the Joe Rodota Trail from 2018 to mid-2019. During that time County Park Rangers and Santa Rosa Police forced Ms. Butterfly to move under threat of arrest from those locations, without a prior offer of a suitable shelter or housing.

207. Starting in late 2019, Ms. Butterfly began residing at an encampment that began forming along the Joe Rodota Trail about a mile from the previous year's large Joe Rodota Trail

encampment. During the time that Plaintiff resided at the new Joe Rodota Trail encampment the County set up a table to offer assessments and placements. Ms. Butterfly was offered and accepted a placement at the Los Guilicos Village which opened on January 31, 2020.

208. Ms. Butterfly stayed at Los Guilicos for only a week before she was evicted for not checking in one evening. When she returned to Los Guilicos a few days later, they did not allow her back in. With nowhere else to go, she returned to living on the street again.

209. After leaving Los Guilicos, Ms. Butterfly moved to another location along the Joe Rodota Trail. In April 2020 the County park rangers served a Notice to Vacate that said the people where Ms. Butterfly was residing along the Joe Rodota Trail were violating “state laws and County Ordinances” and required them to vacate the area by April 26, 2020. The park rangers and Santa Rosa police then forced Ms. Butterfly to move from that location along the Joe Rodota Trail under threat of arrest. At the time she moved from that location, Ms. Butterfly had not been offered a suitable shelter placement.

210. Ms. Butterfly then moved to area in downtown Santa Rosa underneath the Highway 101 overpasses, where a larger encampment began to form.

211. The encampment at the 101 overpasses grew to about 90 people living under the overpasses along several City streets. At the end of June 2020, the Santa Rosa Police and other City staff arrived unannounced and gave the encampment residents only a few minutes to pack up their personal property and leave the area or face arrest. Ms. Butterfly was forced to move from her site at the 101 overpasses area by the City of Santa Rosa police under threat of arrest. Ms. Butterfly and many others were forced to leave with only what they could carry with them and did not have sufficient time to make other arrangements for their property. As a result, items of property were left behind. The City destroyed belongings that were left behind. Ms. Butterfly

lost various items of clothes, cooking supplies and blankets in the City's clearance of the 101 overpass area.

212. None of the Defendants offered Ms. Butterfly any shelter placement that met her needs while she was staying at the 101 overpasses, and she did not receive an offer of adequate shelter when the City forced her to move from that location.

213. Immediately after leaving the area of the 101 overpasses, Ms. Butterfly moved to Fremont Park in central Santa Rosa, where another encampment had formed. Approximately 60 other people at that encampment had, like Ms. Butterfly, been forced by the City to the 101 overpasses area encampment without an offer of adequate shelter placement.

214. While at Fremont Park, Ms. Butterfly received no response to her accommodation request and was not offered a shelter placement that was adequate for her. She left the Fremont Park encampment with nowhere to go when it was closed by the City on September 1, 2020.

215. When the City forced Ms. Butterfly to leave Fremont Park, she was forced to leave behind items of personal property she was not able to carry. Ms. Butterfly was not aware of any opportunity to store these items at the time she left the encampment, and she believes that the City destroyed these items. These items included: bedding, a tent, a backpack, clothes, jewelry and her unemployment benefits card.

216. During the next several months, from September 2020 to approximately April 2021, Ms. Butterfly continued to live on the streets in Santa Rosa, mostly in areas along the Joe Rodota Trail. County Park Rangers and the Santa Rosa Police forced her to move several times. She was in contact with Defendants during that time about her shelter placement needs. While she discussed various placements with outreach workers, she never received a placement.

217. At one point, in or about February 2021, as the County was about to close the encampment where Ms. Butterfly resided along the Joe Rodota Trail, a County representative told Ms. Butterfly that she had missed her chance to get a shelter placement that she would have accepted because she was not able to speak with them when they wanted to talk with her the day before. The County staff stated that, because Ms. Butterfly was not able to speak with them when they had wanted to talk with her, they considered her to have rejected the placement. When Ms. Butterfly asked the County representative the next day if she could have the placement, they told her it was no longer available for her, and they did not indicate where else to go.

218. When, a few days later on February 25, 2021, the County and the Santa Rosa Police came to force everyone to leave the Joe Rodota Trail, Ms. Butterfly was not offered any other placement and was forced to move under threat of arrest. Ms. Butterfly moved to another area near the Joe Rodota Trail.

219. At one point in March 2021, while living on the Joe Rodota Trail, Ms. Butterfly was again placed at Los Guilicos Village. But Ms. Butterfly stayed there for only a few weeks before Los Guilicos evicted her for arriving after the curfew one evening. Ms. Butterfly was late because she could not locate a ride or a shuttle back to the shelter location, which is several miles from the central Santa Rosa area. A representative from HOST said they would assist Ms. Butterfly in pursuing a grievance, but that assistance never materialized, and she was not able to pursue the grievance on her own.

220. After being exited from Los Guilicos, Ms. Butterfly went back to living on the street. She was residing with a group of people along a street near the Joe Rodota Trail. Ms. Butterfly spoke with the representatives of the County several times about possible placements that would meet her disability needs, including a possible placement at Samuel Jones Hall in a small room with

people she knew so that she would feel safer and less anxious. However, the County did not provide the placement.

221. When the County came to close the encampment at that site in April 2021, Ms. Butterfly asked County representatives to be placed at Los Guilicos with her partner because, after her previous experience there, she felt unsafe being placed there alone. She was experiencing depression and needed support, and not knowing who was coming and going around her made her anxious; so she wanted to have her partner there with her. The County would not agree to place her at Los Guilicos with her partner. Ms. Butterfly was not offered any other placement and was forced to leave again under threat of arrest without a placement.

222. Ms. Butterfly has continued to reside outside and has continued to be forced to move from various locations where she has resided when adequate shelter is not available for her.

223. Ms. Butterfly has lost many of her personal possessions, including clothes, shoes, lights, cooking utensils, food items, dog food, personal hygiene items, and blankets, when she has been forced to move without adequate time to gather her belongings or any offer by Defendants to store her items.

224. Although Ms. Butterfly signed up for Coordinated Entry in 2018 and recalls that she has periodically updated her information for Coordinated Entry, she has not received housing through Coordinated Entry.

225. Ms. Butterfly has no source of regular transportation and no stable income. The stresses and difficulties of living on the street, including the need to often relocate from where she is staying and locate a new spot to sleep that is safe, the need to constantly take steps to assure her safety and to safeguard her possessions, and the need to locate food and to secure personal hygiene on a daily basis make it incredibly difficult to look for housing and access services.

Defendants' practices of clearing encampments, seizing personal property, and moving people from place to place exacerbate all of these challenges, creating more and more barriers accessing resources, achieving stability, and transitioning out of homelessness.

Additional Facts Specific to Stephanie Somersall

226. Plaintiff STEPHANIE SOMERSALL is 54 years old. She was born in Santa Rosa, California, and has lived there most of her life.

227. Ms. Somersall is a Pomo Indian. Her tribe is indigenous to the Sonoma County area of California. Ms. Somersall has four children; three are adults, and one is a minor child who resides with the child's father. She also has seven grandchildren and one great grandchild.

228. Ms. Somersall has been homeless since 2004 and has not worked since that time. Her sole source of income is a small monthly payment from her tribe. Ms. Somersall has tried to apply for disability benefits but was unable to follow through on the application.

229. Ms. Somersall has various disabling health conditions which have rendered her unable to work. Ms. Somersall has an anxiety-related condition and depression, as well as a mental disorder arising from severe trauma she has experienced, including one incident when she was sexually assaulted and raped and several other incidents where she was physically attacked. Since living on the streets, Ms. Somersall has been physically attacked several times.

230. Ms. Somersall's mental conditions cause her to panic when she is in close contact with people she does not know or does not trust. She has a fear of being attacked again. She needs to have sufficient privacy or trust in those around her in order to feel safe and to avoid this exacerbation of her disabilities.

231. After living in Oakland for several years, Ms. Somersall returned to Santa Rosa in 2017. She began living at the Camp Micaela encampment at the Roseland site.

232. In April 2018, Ms. Somersall submitted a written request to Defendants indicating that, due to her disabling conditions, she was unable to reside in a large congregate emergency shelter because it would exacerbate her symptoms and cause her to have panic attacks. She stated she would feel unsafe being around men in that kind of situation. Ms. Somersall thus requested an alternative shelter or housing placement that would allow her more privacy than a congregate shelter and that would not require her to be in close contact with persons she did not know. When Ms. Somersall is camping on the street, her tent provides a level of privacy that helps her to feel relatively safe because she can close it and shut other people out. She also has the ability to move or leave if she is triggered by a particular situation, unlike at a shelter, where there are rules restricting when people are allowed to come and go. Ms. Somersall indicated that a tiny house, tent or apartment would be an appropriate placement for her because she would have her own dwelling unit where she can shut out other people if needed.

233. On or about April 20, 2018, Defendants forced Ms. Somersall to leave the Roseland site under threat of arrest. Despite having made a written reasonable accommodation request, Ms. Somersall had not been offered any housing or shelter placement except for the large congregate emergency shelter at Sam Jones Hall.

234. After Defendants closed the Roseland area encampments, Ms. Somersall moved to spot along the Joe Rodota Trail, near where she had been living at the Roseland Encampments. She moved to the Joe Rodota Trail along with 50 or 60 other people whom Defendants had displaced Roseland Encampments.

235. Ms. Somersall is informed and believes a HOST representative again offered her a placement at Samuel Jones Hall while she was residing on the Joe Rodota Trail, but she could

not accept that placement. Ms. Somersall again requested an accommodation based on her disability to be placed in an alternate setting to the large emergency shelter.

236. A May 23, 2018, letter from Plaintiffs' counsel to Defendants regarding the pending clearance of the encampment also reminded Defendants that Ms. Somersall was among the encampment residents who had requested reasonable accommodations in shelter placement.

237. Neither Defendants nor HOST had provided Ms. Somersall with any substantive response to her reasonable accommodation request when they cleared the Joe Rodota Trail on May 31, 2018. Defendants did not offer Ms. Somersall an adequate placement that took into account her disability-related needs. Due to the threat of arrest if she stayed, Ms. Somersall was forced to move from the area of the Joe Rodota Trail Encampment on or about May 31, 2018.

238. After Defendants cleared the Joe Rodota Trail encampment in May 2018, Ms. Somersall moved around among other smaller encampments at other locations along the Joe Rodota Trail for the rest of 2018 and into 2019. County Park Rangers and the Santa Rosa Police forced her to move from where she was staying several times.

239. During this time, Defendants did not offer Ms. Somersall a suitable placement or other necessary services. Plaintiffs' counsel sent a letter to the County—with the City cc'd—reiterating Ms. Somersall's reasonable accommodation request in October 2018. The letter, sent on behalf of Ms. Somersall, Ms. Vannucci, HA, and others, requested that the County “cease and desist from forcing individuals living on the Joe Rodota Trail to leave unless and until an appropriate placement has been offered to each individual. Such appropriate placement must account for individuals' disabilities and need for reasonable accommodations, in accordance with the Americans with Disabilities Act and other state and federal civil rights laws.”

240. The County did not respond to that letter or to Ms. Somersall's accommodation request, and it continued to force Ms. Somersall and others to move from their locations along the Joe Rodota Trail without adequate shelter options.

241. Starting in late 2019, Ms. Somersall began residing at an encampment that began forming along the Joe Rodota Trail about a mile from the prior year's large Joe Rodota Trail. During the time that Ms. Somersall resided at that encampment, the County set up a table to offer assessments and placements. Ms. Somersall sought assistance from workers at the table and told them would accept a placement at the newly formed Los Guilicos Village. But Ms. Somersall was not offered a placement at Los Guilicos. Instead, she was again offered a placement at Samuel Jones Hall which she informed the County she was declining to take due to the reasons she had previously articulated to the County. Ms. Somersall was not offered any other shelter placement at that time.

242. On or about January 31, 2020, the County, with assistance from the Santa Rosa Police Department, forced Ms. Somersall to relocate from her site on the Joe Rodota Trail without offering her an adequate shelter placement.

243. Ms. Somersall then moved to Bane Avenue, a dead-end street in an industrial area of the unincorporated County, along with approximately 38 other people whom Defendants displaced from the Joe Rodota Trail.

244. On or about February 8, 2020, while she was staying at the Bane Avenue encampment, Ms. Somersall made yet another request for reasonable accommodations in shelter placement to the County. This written accommodation request explained that Ms. Somersall is a survivor of violence and that she has PTSD, anxiety, depression, and panic attacks; the symptoms of these conditions make it impossible for her to stay in a large congregate shelter. She further indicated

she would accept a temporary placement in an outdoor encampment or permanent supportive housing.

245. The County did not respond to Ms. Somersall's reasonable accommodation request or offer her a placement other than Samuel Jones Hall; Ms. Somersall again declined to stay at Samuel Jones Hall because of her disabilities. The County forced Ms. Somersall to leave Bane Avenue on February 10, 2020, along with approximately 29 other persons who did not receive any offer of adequate shelter.

246. When the County closed the Bane Avenue encampment, they provided bins to Ms. Somersall in to store some of her personal belongings. Ms. Somersall placed several of her personal belongings in the bins, including a generator, television, tent, bike, and important paperwork. After she was forced to move from the Bane Avenue encampment, Ms. Somersall went to retrieve her personal property from the location where the County told her it would be held, but that location was no longer serving as a storage site, and Ms. Somersall had no further information as where her property was. Ms. Somersall has never been able to get back the personal property that she thought the County was storing.

247. After being swept from Bane avenue, Ms. Somersall moved with several others to a large public park area (Place to Play Park) in the City of Santa Rosa. Ms. Somersall and about 19 other persons who had previously resided at the Bane encampment set up an encampment that was away from most activity in the park and out of view from neighbors in the area.

248. At the Place to Play Park Encampment, representatives from HOST again offered Ms. Somersall a placement at the Samuel Jones Hall. Ms. Somersall again told them that could not accept a placement at Sam Jones Hall and made a verbal reasonable accommodation request, again asking to be placed in a non-congregate setting.

249. Santa Rosa Police closed the Place to Play encampment on or about February 17, 2020, and they forced Ms. Somersall to leave under threat of arrest. Ms. Somersall had not been offered any shelter placement other than Sam Jones Hall.

250. The City did not provide Ms. Somersall with an opportunity to store her belongings when they forced to leave Place to Play Park. She was not able to move her belongings in time—Santa Rosa Police told her that she had to leave and that she could not return to retrieve any possessions that she left behind. In her rush to leave so that she could avoid arrest, Ms. Somersall had to leave behind items of clothing, blankets, hygiene items, a mattress, several pairs of shoes and food. She was never able to retrieve these items, and she is informed and believes that the City threw them away.

251. In the week following her displacement from A Place to Play, Ms. Somersall moved to two different locations on public property within the City (Olive Park and South Davis Park), and the City forced her to leave both under threat of citation or arrest. No one offered any shelter or housing placements, other than Sam Jones Hall. During this week (from February 18 to 25, 2020), Ms. Somersall continued to seek a response to her accommodation request. Counsel for Plaintiffs wrote a letter dated February 24, 2020, to the City reiterating Ms. Somersall's February 8, 2020, accommodation request and seeking a response to her and others' accommodation requests. The City responded that it needed more information regarding the accommodation requests, but in the meantime, it would continue to take enforcement actions against Ms. Somersall and others who had made the accommodation requests.

252. Ms. Somersall then moved to an industrial area near Corporate Center Parkway in Santa Rosa, where an encampment of tents and parked vehicles was forming. The tents and vehicles were along an area of the street that bordered an empty field. Ms. Somersall lived in a tent at the

Corporate Center Parkway encampment, which had grown to approximately 43 vehicles and several tents, for several months, but she is informed and believes that no one from the City or HOST or any of the other Defendants offered her any shelter during that time.

253. On July 9, 2020, the Santa Rosa Police arrived at the Corporate Center Parkway encampment in the morning and gave residents only a few hours to leave the area or face arrest. Ms. Somersall was not present when the police arrived at the encampment. When she returned later that day, all of her personal possessions were gone. These included a tent, clothes, cooking items, blankets, and other items. Ms. Somersall is informed and believes that the City destroyed these items.

254. After leaving Corporate Center Parkway, Ms. Somersall went with several others to another large encampment that had been forming in Fremont Park in Santa Rosa. Residents of the Fremont Park encampment also included many people from encampments at the Highway 101 overpasses in Santa Rosa, which the City had forcibly cleared in June. While residing at Fremont Park, Ms. Somersall spoke with sever HOST representatives regarding possible shelter placements, but only congregate shelter was available. However, HOST also told Ms. Somersall she might be able to receive a temporary placement in a hotel room.

255. On September 1, 2020, the Santa Rosa Police forced everyone at the Fremont Park encampment to move under threat of arrest. The same day, Ms. Somersall was placed in a hotel room by HOST staff.

256. Ms. Somersall's stay in the hotel room only lasted a few weeks. During the time she resided at the hotel room, Ms. Somersall began going through her possessions and throwing out items she did not need. On one day the hotel staff searched her room and found a piece of old

drug paraphernalia. Ms. Somersall was then summarily evicted from the hotel room the same day her room was searched, having wrongfully been accused of using drugs.

257. After getting kicked out of the hotel, Ms. Somersall went to stay with relatives. But then, after only a few weeks, everyone living in the house was evicted, and Ms. Somersall returned to living on the streets.

258. Ms. Somersall stayed on public property on or near the Joe Rodota Trail throughout 2021. During that time, Ms. Somersall was forced to move under threat of arrest several times without having been offered adequate shelter. During that time, Ms. Somersall had very little contact with representatives from Defendants regarding shelter placement options, Coordinated Entry, or her reasonable accommodation request, and she was not offered a shelter placement that was suitable for her.

259. After being forced from place to place by Defendants without adequate shelter, never being able to stay in one place, Ms. Somersall ended up at a large encampment that formed on private property on Old Stony Point Road in the City of Santa Rosa. This location, which residents call the Mud Pit, has about 100 people living there in different types of structures, including vehicles and tents. The topography of the site causes it to flood when it rains, causing unsanitary conditions that can lead to infection and electrical hazards. The City is taking steps to close that encampment.

260. Except for when she was at the Bane Avenue encampment, Ms. Somersall does not recall being offered storage for her possessions during the times that Defendants forced her to move from an encampment where she was residing. When vacating an area Ms. Somersall just took whatever she could carry and always had to leave items behind such as clothes, lights, cooking utensils, and blankets.

261. In the almost four years since Ms. Somersall first signed up for the Coordinated Entry program, Ms. Somersall has not been notified as to her position or placement status, and she has never received a placement offer other than Sam Jones Hall.

262. Ms. Somersall does not have adequate funds to support herself. The stresses and difficulties of living on the street, including the need to often relocate from where she is staying and locate a new spot to sleep that is safe, the need to constantly take steps to assure her safety and to safeguard her possessions, and the need to locate food and to secure personal hygiene on a daily basis make it incredibly difficult to look for housing and access services. Defendants' practices of clearing encampments, seizing personal property, and moving people from place to place exacerbate all of these challenges, creating more and more barriers accessing resources, achieving stability, and transitioning out of homelessness.

Additional Facts Specific to Homeless Action!

263. Plaintiff Homeless Action (HA) is comprised of students, church members, people who are homeless or have been homeless, and concerned individuals working to obtain housing and better conditions for people without homes. HA has helped create the safe parking program, held events, protests, and marches, educated the public, done emergency response work, lobbied county and city officials, and published articles in local papers.

264. Starting in November 2017 (when the second encampment at the Roseland site began to form) and continuing through the closure of the Roseland Encampments in April 2018 and the Joe Rodota Trail encampment in May 2018, HA devoted majority of its time and financial resources to supporting the Roseland Encampments residents. These efforts included attending regular meetings with residents at the encampments, attending meetings with local officials to discuss logistics and issues related to the encampments, and holding weekly meetings with

members of Catholic Charities regarding support and available shelter resources for encampment residents.

265. HA representatives performed various tasks to support individual residents at the Roseland and Joe Rodota encampments in 2017 and 2018, including assisting residents in accessing assessments and placements through the Navigation Center, making arrangements for storage of Roseland Encampments residents' personal property to prevent or mitigate the destruction of residents' property by Defendants, and arranging for a volunteer Registered Nurse to visit,

266. After the first large Joe Rodota trail sweep, HA representatives continued to monitor and provide support to the residents of the many smaller encampments that formed and were closed along the Joe Rodota Trail and in other locations in Santa Rosa where there were larger encampments during the time period from mid-2018 to mid-2019.

267. From October 2019 to February 2020 HA representatives maintained a regular presence at the large encampment that was formed along the Joe Rodota Trail. This included assistance and support to individuals with shelter and housing placement related claims and reasonable accommodation requests for persons unable to stay in congregate shelter facilities, attendance at regular meetings of encampment residents and meetings with neighbors living in the area.

268. During the two and a half years that the Preliminary Stipulated Injunction was in effect, HA focused many of its resources on monitoring and enforcing the Preliminary Stipulated Injunction's implementation.

269. HA monitors the development of larger encampments in the Santa Rosa area as well as the City and County responses to those encampments. This includes sending representatives to

the encampment sites as well as interactions with City and County officials regarding homeless encampments.

270. In order to promote the health, safety, and wellbeing of unhoused individuals, and to mitigate potential hazards at homeless encampments on public property, HA has attempted to provide toilets, trash bins, and other sanitary facilities to those encampments. However, Defendants have prevented them from doing so, as described above.

271. Defendants' clearance of encampments and dispersal of their residents makes it harder for HA to maintain contact with its unhoused members and other unhoused individuals whom it provides support and assistance to.

272. HA has had to divert its resources from other work that it would be doing, including outreach, education, and advocacy for better local policies regarding homelessness, because of Defendants' enforcement actions against unhoused people on public property, seizure of unhoused people's belongings, and failure to accommodate individuals' disability-related needs in shelter placements and other programs.

FIRST CAUSE OF ACTION
Cruel and Unusual Punishment
Eighth Amendment to the United States Constitution
[42 U.S.C. § 1983]
(all Plaintiffs against all Defendants)

273. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

274. Defendants' threatened and actual enforcement of the anti-camping and other laws against unhoused people for attempting to live on public property in the absence of available adequate shelter or housing effectively punishes Plaintiffs and other homeless individuals by virtue of their homelessness.

275. The emergency shelter and housing available in the County for the homeless population are insufficient for the size of the homeless population in Sonoma County. A large portion of County's homeless population therefore must live and sleep outdoors. Defendants have criminalized camping and living outdoors for homeless persons who have no other available and appropriate option by enforcing laws that prevent homeless people from carrying out basic functions of survival--sleeping and resting—and staying dry and warm while doing so—without breaking the law.

276. Additionally, when shelter beds have been available at the time Defendants took enforcement action, those shelter beds have not been appropriate for or accessible to certain individuals with disabilities, including Plaintiffs Juanita Butterfly, Stephanie Somersall, and Nicholle Vannucci, who are unable to stay in a large, crowded shelter due to disability-related mental health symptoms.

277. Defendants have forced individual Plaintiffs and other unhoused people to leave public property under threat of citation or arrest when adequate housing and shelter is not available to them. The only way to avoid criminal sanction is to leave public property.

278. Defendant City of Santa Rosa has also actually cited and arrested unhoused people, including former Plaintiff Shannon Hall, for living on public property when adequate shelter is not available.

279. These actions by Defendants are part of an ongoing pattern and practice of criminalizing unsheltered homelessness despite the absence of adequate available shelter. They violate Plaintiffs' and other unhoused people's constitutional right to be free from cruel and unusual punishment.

280. Plaintiffs, including unsheltered Plaintiffs Juanita Butterfly and Stephanie Somersall, are at imminent risk for the future violation of their rights by Defendants.

281. Defendants' continuing unlawful conduct frustrates Plaintiff HA's mission to assist unhoused people in procuring adequate shelter and housing while safely sheltering outside until housed. It has also caused HA to divert resources away from other activities that would further its mission.

282. Defendants' actions and threatened actions are with deliberate indifference to the harm Plaintiffs have suffered and will suffer.

283. An actual controversy exists between Plaintiffs and Defendants as to whether Defendants have violated and/or are imminently threatening to violate the law.

284. Plaintiffs have no adequate remedy at law and are therefore entitled to injunctive, declaratory, and other equitable relief. Plaintiffs are also entitled to attorneys' fees and costs.

SECOND CAUSE OF ACTION
Cruel and Unusual Punishment
[Cal. Const., art. I, §17]
(all Plaintiffs against all Defendants)

285. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

286. The California Constitution, like the United States Constitution, prohibits cruel and unusual punishment.

287. Accordingly, the above violations of the Eighth Amendment also violate Plaintiffs' and others' rights under the California Constitution, and Plaintiffs are also entitled to injunctive and declaratory relief regarding their state constitutional rights.

THIRD CAUSE OF ACTION

Unreasonable Seizure

Fourth Amendment to the United States Constitution

[42 U.S.C. § 1983]

(all Plaintiffs against all Defendants)

288. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

289. The individual Plaintiffs possess property that holds both monetary and personal value. Plaintiffs have an expectation to be free from meaningful interference with those their property rights, even if their property is stored on public property.

290. Seizure of private property without a warrant or an exception to the warrant requirement constitutes an infringement upon Plaintiffs' Fourth Amendment rights. Infringement includes confiscation or destruction of property without adequate process including pre-deprivation notice and opportunity to be heard and post-deprivation notice and reclamation.

291. Such seizure also increases the resources and time expended by Plaintiff Homeless Action! to assist and serve homeless individuals.

292. Defendants unlawfully seized and destroyed the personal property of encampment residents in enforcing the closure of the Roseland Encampments and other encampments, including the personal property of Plaintiffs Juanita Butterfly and Stephanie Somersall.

293. As of result of Defendants' unlawful seizure and destruction of homeless individuals' personal property, individual Plaintiffs have suffered and will continue to suffer the loss of their personal property without adequate due process unless enjoined.

294. Defendants' continuing unlawful conduct has frustrated Plaintiff HA's mission and caused it to increase the resources and time expended to assist and serve homeless individuals.

295. An actual controversy exists between Plaintiffs and Defendants as to whether Defendants have violated and/or are imminently threatening to violate the law.

296. Plaintiffs have no adequate remedy at law and are therefore entitled to injunctive, declaratory, and other equitable relief. Plaintiffs are also entitled to attorneys' fees and costs.

FOURTH CAUSE OF ACTION
Unreasonable Seizure
[Cal. Const. art. I, § 13]
(all Plaintiffs against all Defendants)

297. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

298. The California Constitution, like the United States Constitution, prohibits unreasonable search and seizure by governmental entities.

299. Accordingly, the above violations of the Fourth Amendment also violate Plaintiffs' and others' rights under the California Constitution, and Plaintiffs are also entitled to injunctive and declaratory relief regarding their state constitutional rights.

FIFTH CAUSE OF ACTION
State-Created Danger
Fourteenth Amendment of the United States Constitution
[42 U.S.C. § 1983]
(all Plaintiffs against all Defendants)

300. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

301. Under the Substantive Due Process Clause of the Fourteenth Amendment, the state deprives a person of a substantive due process right if it affirmatively places the person in a position of danger.

302. Seizure of homeless individuals' property when homeless encampments are swept causes them to lose their possessions, including their only shelter from the elements, without adequate provision of appropriate and accessible alternative shelter.

303. Without any other available option for shelter, homeless individuals are forced to live exposed to the elements, including exposure to the cold, wind, and rain. These individuals' physical health will be jeopardized if forced to sleep with no protection from the cold, wind, and rain. Plaintiffs with mental health disabilities are likely to suffer aggravated and heightened mental health symptoms and psychological damage. Without protection, the health of homeless individuals with physical disabilities will be jeopardized and their disabilities exacerbated by exposure to the cold, wet, and wind.

304. Defendants' enforcement actions at the Roseland Encampments and other, subsequent encampments have deprived Plaintiffs and other unhoused people of the survival gear that they need for their safety.

305. Additionally, the City's and County's pattern and practice of depriving encampments of adequate toilets, handwashing facilities, and garbage service, then using the health and safety hazards that result from the absence of adequate sanitary facilities as justification to clear those encampments, threaten the health and safety of encampment residents.

306. These practices have been especially dangerous during the COVID-19 pandemic, when both the lack of adequate sanitary facilities and the dispersal of unsheltered people through encampment sweeps increase the risk of disease spread, severe illness, and death among unhoused people and other community members. But Defendants—the City in particular—has continued these practices contrary to the prevailing public health guidance.

307. That the City has continued to take enforcement actions when the only available shelter is a congregate setting that has been the site of multiple COVID outbreaks compounds this danger.

308. Defendants' continued enforcement actions, which force people from place to place without being able to stay safely in a single location on public property, have caused people to end up in more dangerous circumstances.

309. Defendants are aware that their actions endanger the health and safety of Plaintiffs and other homeless individuals.

310. By knowingly and deliberately placing the health and safety of individual Plaintiffs and other homeless individuals in danger through their actions, Defendants are acting with deliberate indifference and have violated, and will continue to violate, Plaintiffs' substantive due process rights under the Fourteenth Amendment to the U.S. Constitution.

311. Defendants' continuing unlawful conduct has frustrated Plaintiff Homeless Action!'s mission and caused it to increase the resources and time expended to assist and serve homeless individuals.

312. An actual controversy exists between Plaintiffs and Defendants as to whether Defendants have violated and/or are imminently threatening to violate the law.

313. Plaintiffs have no adequate remedy at law for the violations stated herein and are therefore entitled to injunctive, declaratory, and other equitable relief. Plaintiffs are also entitled to attorneys' fees and costs.

SIXTH CAUSE OF ACTION
State-Created Danger
[Cal. Const., art. I, § 7]
(all Plaintiffs against all Defendants)

314. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

315. The California Constitution, like the United States Constitution, protects individuals' right to substantive due process, and a government entity deprives a person of a substantive due process right if it affirmatively places the person in a position of danger.

316. Accordingly, the above violations of the Fourteenth Amendment also violate Plaintiffs' and others' rights under the California Constitution, and Plaintiffs are also entitled to injunctive and declaratory relief regarding their state constitutional rights.

SEVENTH CAUSE OF ACTION
Disability Discrimination
[42 U.S.C. § 12131 et seq.]
(all Plaintiffs against all Defendants)

317. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

318. Title II of the Americans with Disabilities Act (ADA), 42 U.S.C. § 12132, prohibits discrimination against people with disabilities by state and local governments and their programs. Title II provides that “no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.”

319. The City, the County, and Commission are all public entities covered by Title II of the ADA.

320. Individual Plaintiffs are “qualified persons with disabilities” as defined under the ADA. 42 U.S.C. § 12102; 42 U.S.C. § 12131; 28 C.F.R. § 35.104.

321. Likewise, many of the unhoused individuals on whose behalf HA advocates are people with disabilities.

322. The County's unhoused residents are disproportionately living with physical and mental disabilities relative to the general population.

323. Discrimination under Title II of the ADA includes administration of programs in a way that has a discriminatory effect on people with disabilities, or that has the “effect of defeating or substantially impairing the accomplishment of the objectives of the service, program, or activity with respect to individuals with disabilities.” 28 C.F.R. § 35.130 (f).

324. Defendants’ duty not to discriminate against people with disabilities under Title II of the ADA includes a duty to “make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.” 28 C.F.R. § 35.130 (b)(7)(i).

325. The homelessness and shelter services that Defendants fund and administer are programs, services, activities, or benefits for purposes of Title II. Enforcement by police, park rangers, and other departments of the City and County are also programs, as are public streets, sidewalks, parks, and trails.

326. Defendants, both individually and together, administer interrelated programs that rely on congregate shelter as the primary—and often only—source of emergency shelter.

327. Congregate shelter is not accessible to many people with disabilities, including Plaintiffs Juanita Butterfly and Stephanie Somersall, who are unsheltered and whose mental health disabilities make it impossible for them to stay in a congregate setting. Congregate settings also pose serious health risks to people whose disabilities make them particularly vulnerable to serious illness or death if they contract COVID-19.

328. At the same time, Defendants administer programs of enforcement that punish people who do not accept the shelter that is offered to them, even when that shelter is inaccessible,

removing and excluding them from public land under threat of criminal sanction with nowhere else to go.

329. Even when unhoused people make their disability-related shelter needs known to Defendants—as each of the individual Plaintiffs has done multiple times—Defendants continue to remove them from public property under threat of citation and arrest without offering housing or shelter that meets their needs.

330. Additionally, by pushing unsheltered people with disabilities from place to place, by taking their paperwork and other personal property, and by not offering shelter and housing that is responsive to their disability-related needs, Defendants also deprive those individuals of the stability necessary to access public benefits, housing services, and other government programs, including government programs administered by Defendants.

331. Plaintiffs have requested both systemic modifications to Defendants' policies and practices and individualized reasonable accommodations on behalf of Ms. Vannucci, Ms. Butterfly, and Ms. Somersall, and others, beginning on March 26, 2018, when Plaintiffs, through their counsel, asked Defendants to postpone the sweep of the Roseland Encampments temporarily, until all residents with disabilities had been offered placements that met their disability-related needs. Defendants, however, did not postpone the sweep, denying Plaintiff's request.

332. Defendants have likewise refused similar requests from Plaintiffs regarding other sweeps over the course of the intervening four years, as described in greater detail above.

333. Defendants have also refused requests from both HA and other advocates to modify their practices with respect to parks and other public spaces by providing toilets, handwashing

stations, and garbage service, to mitigate any hazards created by encampments and to reduce the risk of COVID-19 spread.

334. Ms. Vannucci, Ms. Butterfly, and Ms. Somersall, have all requested that Defendants (1) offer them housing or shelter that met their disability-related needs and (2) refrain from taking enforcement action against them until they were provided accessible housing or shelter. HA has also assisted other unhoused individuals in making similar requests. But Defendants have denied these requests and have continued to force these individuals to move from where they are staying under threat of arrest or citation when no accessible housing or shelter is available to them.

335. By concentrating housing and shelter resources in congregate shelter, by operating programs that effectively punish unhoused people with disabilities for failing to accept shelter that is inaccessible to them, by failing to make reasonable modifications to these programs to afford people with disabilities meaningful access, and by denying reasonable accommodations to individuals with disabilities—including individual Plaintiffs—Defendants have discriminated against people with disabilities, and this discrimination is ongoing.

336. The discrimination has caused injury to the individual Plaintiffs, as well as to Plaintiff HA via the frustration of its mission and the diversion of its resources.

337. An actual controversy exists between Plaintiffs and Defendants as to whether Defendants have violated and/or are imminently threatening to violate the law.

338. Plaintiffs have no adequate remedy at law for the violations stated herein and are therefore entitled to injunctive and declaratory relief, attorneys' fees and costs.

EIGHTH CAUSE OF ACTION
Denial of Reasonable Accommodation
[42 U.S.C. § 12131 et seq.]
(Juanita Butterfly against all Defendants)

339. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

340. Plaintiff Juanita Butterfly is a person with a disability for purposes of the ADA.

341. Ms. Butterfly has repeatedly requested accommodations in both shelter placement and Defendants' enforcement actions: that she be provided a non-congregate shelter or housing placement where she can have privacy and not be surrounded by people whom she does not know, and that Defendants not punish her for living on public land while such accessible housing and shelter is unavailable to her.

342. The accommodations that Ms. Butterfly has requested are necessary because of her mental disability.

343. The requested accommodations, if granted, would not constitute fundamental alterations in Defendants' programs.

344. Defendants have denied Ms. Butterfly's reasonable accommodation request by continuing to force her to move from public land under threat of criminal sanction when there is no accessible shelter or housing available to her.

345. Ms. Butterfly is experiencing ongoing harm due to Defendants' failure to provide her with reasonable accommodations, and injunctive relief is necessary to protect Ms. Butterfly from future harm caused by violation of her rights.

346. An actual controversy exists between Plaintiffs and Defendants as to whether Defendants have violated and/or are imminently threatening to violate the law.

347. Ms. Butterfly no adequate remedy at law for these violations and is therefore entitled to injunctive and declaratory relief, attorneys' fees and costs.

NINTH CAUSE OF ACTION
Denial of Reasonable Accommodation
[42 U.S.C. § 12131 et seq.]
(Stephanie Somersall against all Defendants)

348. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

349. Plaintiff Stephanie Somersall is a person with a disability for purposes of the ADA.

350. Ms. Somersall has repeatedly requested accommodations in both shelter placement and Defendants' enforcement actions: that she be provided a non-congregate shelter or housing placement that affords her privacy and that does not force her to be in close contact with people whom she does not know, and that Defendants not punish her for living on public land while such accessible housing and shelter is unavailable to her.

351. The accommodations that Ms. Somersall has requested are necessary because of her mental disability.

352. The requested accommodations, if granted, would not constitute fundamental alterations in Defendants' programs.

353. Defendants have denied Ms. Somersall's reasonable accommodation request by continuing to force her to move from public land under threat of criminal sanction when there is no accessible shelter or housing available to her.

354. Ms. Somersall is experiencing ongoing harm due to Defendants' failure to provide her with reasonable accommodations, and injunctive relief is necessary to protect Ms. Somersall from future harm caused by violation of her rights.

355. An actual controversy exists between Ms. Somersall and Defendants as to whether Defendants have violated and/or are imminently threatening to violate the law.

356. Ms. Somersall has no adequate remedy at law for these violations and is therefore entitled to injunctive and declaratory relief, attorneys' fees and costs.

TENTH CAUSE OF ACTION

Discrimination Against People with Disabilities in Federally Assisted Programs

[29 U.S.C. § 794]

(all Plaintiffs against all Defendants)

357. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

358. Section 504 of the Rehabilitation Act of 1973 provides that “[n]o otherwise qualified individual with a disability in the United States . . . shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” 29 U.S.C. § 794.

359. A “program or activity” includes “a department, agency, special purpose district, or other instrumentality of a State or of a local government” that receives or administers federal funds. 29 U.S.C. § 794 (b)(1)(A).

360. The homelessness and shelter services that Defendants fund and administer are “programs or activities” for purposes of Section 504 of the Rehabilitation Act of 1973. Enforcement by police, park rangers, and other departments of the City and County are also “programs or activities,” as are public streets, sidewalks, parks, and trails.

361. Plaintiffs are informed and believe and so allege that Defendants Sonoma County, City of Santa Rosa, and Sonoma County Community Development Commission all receive and/or administer federal funds and, as such, are covered by Section 504.

362. Individual Plaintiffs are qualified individuals with disabilities under Section 504.

363. Many of the other homeless individuals with and on whose behalf Plaintiff HA advocates are people with disabilities.

364. Section 504 prohibits covered entities from administering their programs in a way that has a discriminatory effect, or disparate impact, on people with disabilities. See 24 C.F.R. § 8.4 (b)(4).

365. Section 504 requires recipients of federal funds to provide people with disabilities with meaningful access to their programs. To ensure meaningful access, reasonable accommodations may be required unless the recipient of federal funding can demonstrate that such modifications would result in a fundamental alteration in the nature of the program.

366. For the reasons described above, Defendants' enforcement actions against Plaintiffs and unsheltered County residents have discriminated against people with disabilities and has denied them meaningful access to Defendants programs, services or activities, in violation of Section 504.

367. Such discrimination has caused injury to the individual Plaintiffs, as well as to Plaintiff HA via the frustration of its mission and the diversion of its resources.

368. An actual controversy exists between Plaintiffs and Defendants as to whether Defendants have violated and/or are imminently threatening to violate the law.

369. Plaintiffs have no adequate remedy at law for these violations and therefore are entitled to injunctive and declaratory relief, attorneys' fees and costs.

ELEVENTH CAUSE OF ACTION
Discrimination on the Basis of Disability
Cal. Gov't Code § 11135
(all Plaintiffs against all Defendants)

370. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

371. California Government Code Section 11135 states in relevant part that:

No person in the State of California shall, on the basis of . . . mental disability, physical disability, [or] medical condition . . . be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state. Gov't Code § 11135 (a).

372. Plaintiffs are informed and believe and so allege that Defendants Sonoma County, City of Santa Rosa, and Sonoma County Community Development Committee are all recipients of state funding, and the programs and activities of Defendants described in this Complaint are administered with the use of state funds. As such, Defendants are subject to section 11135's prohibition against disability discrimination.

373. Section 11135 is intended to prohibit all forms of discrimination prohibited under Title II of the Americans with Disabilities Act and, where possible, to be more protective of people with disabilities. Subsection (b) states:

With respect to discrimination on the basis of disability, programs and activities subject to subdivision (a) shall meet the protections and prohibitions contained in Section 202 of the federal Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12132), and the federal rules and regulations adopted in implementation thereof, except that if the laws of this state prescribe stronger protections and prohibitions, the programs and activities subject to subdivision (a) shall be subject to the stronger protections and prohibitions.

374. Accordingly, all violations of the Title II of the ADA and Section 504 by entities covered by section 11135 are also violations of section 11135.

375. Individual Plaintiffs are persons with disabilities under section 11135, as are a significant number of the individuals with and on whose behalf Plaintiff HA works.

376. For the reasons described above, Defendants' enforcement actions against Plaintiffs and unsheltered County residents have discriminated against people with disabilities in violation of section 11135.

377. Such discrimination has caused injury to the individual Plaintiffs, as well as to Plaintiff HA via the frustration of its mission and the diversion of its resources.

378. An actual controversy exists between Plaintiffs and Defendants as to whether Defendants have violated and/or are imminently threatening to violate the law.

379. Plaintiffs are without adequate remedy at law and unless compelled by this Court to refrain from acts as required by law, Defendants will continue to refuse to perform said duties and continue to violate the law, and Plaintiffs will be injured as a result.

380. Based on the foregoing, Plaintiffs are entitled to injunctive and declaratory relief, attorneys' fees, and costs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for relief against Defendants as follows:

1. For a preliminary and permanent injunction, enjoining and restraining Defendants from citing, arresting, or threatening to cite or arrest, any unhoused individual for camping or living on public property unless that individual has been offered available housing or shelter that is accessible to them.

2. For a preliminary and permanent injunction, enjoining and restraining Defendants from removing unhoused individuals under threat of citation or arrest for camping or living on public property unless that individual has been offered available housing or shelter that is adequate and accessible to them.

3. For a preliminary and permanent injunction, enjoining and restraining Defendants from seizing and destroying unhoused people's personal property in violation of federal and state laws as alleged.

4. For a preliminary permanent injunction ordering Defendants and their agents to cease actions which discriminate against people with disabilities in the administration of their programs, and to offer and provide reasonable accommodations to people with disabilities, including reasonable accommodations with respect to shelter and housing placements.

5. For a preliminary and permanent injunction ordering Defendants to grant Plaintiff Juanita Butterfly's request for reasonable accommodation in shelter placement, and not to take enforcement action against her for living on public property until she is provided shelter or housing that meets her disability-related needs.

6. For a preliminary and permanent injunction ordering Defendants to grant Plaintiff Stephanie Somersall's request for reasonable accommodation in shelter placement, and not to take enforcement action against her for living on public property until she is provided shelter or housing that meets her disability-related needs.

7. For declaratory judgment that Defendant's policies, practices, and conduct as alleged herein violate Plaintiffs' rights under the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, section 11135 of the California Government Code, and the Constitutions of the United States and California as alleged.

8. For costs of suit and reasonable attorney's fees as provided by law.

9. For such other relief as the court deems just and proper.

Dated: June 10, 2022

CALIFORNIA RURAL LEGAL ASSISTANCE
THE PUBLIC INTEREST LAW PROJECT

By: /s/Jeffery Hoffman
JEFFERY HOFFMAN, Attorneys for Plaintiffs

(Additional Counsel continued)

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CALIFORNIA RURAL LEGAL ASSISTANCE, INC.



**PUBLIC INTEREST
LAW PROJECT**

CELEBRATING 25 YEARS OF ADVANCING JUSTICE

October 20, 2022

SENT VIA EMAIL: _____

Sonoma County Board of Supervisors
575 Administration Drive, Rm. 100 A
Santa Rosa, CA 95403

Re: Proposed Amendments to Section 19-15 of the Sonoma County Code (anti-camping ordinance) [Item 23, Board of Supervisors September 27, 2022 meeting Agenda]

Dear Members of the Board of Supervisors:

California Rural Legal Assistance, Inc., and the Public Interest Law Project write on behalf of Homeless Action!, Nicholle Vannucci, Nina Butterfly, and Stephanie Somersall, who are Plaintiffs in *Vannucci et al. v. County of Sonoma et al.* (N.D. Cal. Case No. 3:18-cv-01955-VC) regarding the proposed amendments to Section 19-15.¹ The County’s camping ban, as amended by the proposed ordinance, would continue to criminalize persons because of their status as unhoused people who have no other place to go except to reside unsheltered. The proposed amendments would not end the constitutional and statutory violations that are the subject of *Vannucci et al. v. County of Sonoma, et al.*

Forbidding unhoused people from sleeping, resting or staying on any public property in the county except after dark in a few unclearly defined places violates the Ninth Circuit’s holdings of *Martin v. Boise*, 920 F.3d 584 (9th Cir. 2019), and the more recent *Johnson v. City of Grants Pass*, Nos. 20-35752, 20-35881 (9th Cir. Sept. 28, 2022). The contention in the staff report for the September 27, 2022, Board of Supervisors meeting (item 23) that the amendments would conform Section 19-15 to recent court decisions is, accordingly, incorrect. The purported permission to camp in limited and unidentified areas afforded by the proposed amendments is illusory and will not bring the County’s camping ban into compliance with *Martin*.

¹ Homeless Action! supports and advocates for unhoused individuals, including unhoused individuals living unsheltered in County parks and on public land in the unincorporated County. Ms. Vannucci, Ms. Butterfly, and Ms. Somersall have all lived in County parks when they had nowhere else to stay; Ms. Butterfly and Ms. Somersall are both still living unhoused in Sonoma County and will be directly harmed by the ordinance and its enforcement if the ordinance goes into effect.

Background

As detailed in the staff report, Section 19-15 was originally adopted in 2004 prohibiting camping on public property and then amended in 2014 to remove a prohibition on vehicle habitation in response to the Ninth Circuit's holding in *Desertrain v. City of Los Angeles*, 754 F.3d 1147 (9th Cir. 2014). Section 19-15 prohibits camping on public property without a permit or in designated campgrounds. A person violating the section is guilty of a misdemeanor and may be subject to imprisonment and a fine of not less than \$100 - \$500. In addition to other illegal policies and practices of the County, the *Vannucci* suit challenges the County's use of existing Section 19-15 to penalize unhoused people for living on public property, regardless of whether a person has or has been offered alternative housing or shelter that is realistically available and that will accommodate their needs.

Recent Court Decisions

After the filing of the *Vannucci* case, the Ninth Circuit held in *Martin*, 920 F.3d at 604, "that an ordinance violates the Eighth Amendment insofar as it imposes criminal sanctions against homeless individuals for sleeping outdoors, on public property, when no alternative shelter is available to them." As acknowledged in the staff report, the court stated that "so long as there is a greater number of homeless individuals in a jurisdiction than the number of available beds [in shelters]" the jurisdiction cannot prosecute homeless individuals for "involuntarily sitting, lying, and sleeping in public." *Id.* at 617. The County's available affordable housing and shelter resources remain woefully inadequate to meet the needs of its unhoused residents. According to the recently released 2022 Point-In-Time Count, over 72% (2,088) of the County's 2,893 homeless residents are unsheltered. 2022 PIT Count, 8, 11.² Over 160 of these unsheltered individuals live in the unincorporated County, and more live in County parks in incorporated areas—e.g., the Joe Rodota Trail.

The County acknowledges that amendments to Section 19-15 are required to conform to the requirements of the *Martin* decision. The proposed amendments, however, would not render the section compliant with *Martin*. They would continue the absolute prohibition of camping on public land, disingenuously purporting to comply with *Martin* by providing an illusory exception that permits camping solely between the hours of 9 p.m. and 7 a.m. in ill-defined and amorphous areas incapable of clear determination, especially by unhoused people. The proposed amendments do not delineate any place where unhoused people can exist together with their tents, tarps, and other survival gear during the day, embodying an unrealistic expectation that unhoused people will make camp after dark and break camp before dawn every day. This artificial allowance for nighttime camping together with the absolute ban on camping in expansive swaths of County public land—including within County parks, in or near residential areas, in high fire danger areas, in flood zones, and within 150 feet of all waterways--will still effectively ban camping throughout the County.

² Note the mathematical error on page 8, which incorrectly calculates 2,088 as 61% of 2,893.

The insufficiency of the proposed amendments come into focus in the light of the more recent Ninth Circuit decision *Johnson v. City of Grants Pass*. In *Johnson*, class members attacked City ordinances that included prohibitions against sleeping or camping on public land. The Ninth Circuit held, as it did in *Martin*, that it is “unconstitutional to [punish] simply sleeping *somewhere* in public if one has nowhere else to do so.” *Johnson*, Slip Op. at 49 (quoting *Martin*). The proposed amendments to Section 19-15 would continue that illegal practice—prohibiting sleeping or camping *anywhere* in public except after nightfall in ill-defined places.

Outlawing Camping Anywhere During the Day Effectively Prevents Sleeping and Resting Anywhere

There was recognition at the Board of Supervisors meeting on September 27 that requiring unhoused people to pack up camp every day at dawn, regardless of the weather and regardless of their condition, was a completely impracticable expectation. And there were several comments from the public and supervisors questioning how an unhoused person would be able to determine with even a modicum of certainty where camping would be permitted at night. For that matter, how would police or other County employees determine where camping was permitted? And if it was determined that camping was clearly not permitted, how would County employees or the unhoused people determine legal alternative areas for camping? Both the proposed ordinance and its anticipated enforcement will cause uncertainty for unhoused people and County staff alike, will promote arbitrary enforcement, and will likely result in violations of unhoused people’s constitutional rights.

The County staff indicated that, although mapping might be possible, they did not want to incorporate maps into the proposed ordinance. And there was no representation that maps indicating areas for after dark camping would be made available or displayed on the County’s website, or that there was any plan for comprehensive mapping of where camping would and would not be absolutely banned. And, even if areas are mapped, unsheltered people living outside will not practically know where camping is prohibited or permitted when looking for a place to rest.

The Proposed Amendments Will Disproportionately Affect People of Color and Persons with Disabilities.

Homelessness in Sonoma County disproportionately affects indigenous and Black residents, as well as people with disabilities. According to 2020 data, 10.9% of unhoused people identified as American Indian, Alaska Native, or Indigenous, compared to 0.9% of the general population and 0.7% of the population with incomes below the Federal Poverty Level.³ Black people made up 7.8% of the unhoused population, but only 1.6% of the general population and 3.1% of the population with incomes below the poverty level. The 2022 Point-In-Time Count found that 9% of unhoused people identified as American Indian, Alaska Native, or Indigenous and that 8% of unhoused people identified as Black. 2022 PIT Count, 8.

The 2022 Point-In-Time Count also found that 42% of survey respondents identified as having at least one disabling condition. PIT Count, 9. Thirty-seven percent identified as having a

³ Data available at <https://besh.ca.gov/calich/hdis.html>.

psychiatric or emotional condition; 34% identified as having PTSD; and 27% identified as having a physical disability. *Ibid.* In contrast, Census data indicate that only 7.6% of County residents under 65 have disabilities.⁴ Many people with disabilities are not able to stay the County's congregate shelters because of disability symptoms, and many have unique needs related to proximity to services and limitations on the ability to pack and move belongings when forced to move. The proposed amendments fail to take into account or to provide for accessibility and accommodation will violate state and federal laws providing rights and protections for persons with disabilities.

Conclusion

We recognize that providing appropriate housing and shelter for all unhoused people is difficult. We also recognize the County is making efforts to address homelessness. But, the enactment of the proposed amendments will undermine rather than advance progress. *Martin* requires that until enough adequate housing is realistically available, unhoused people may not be threatened with or subject to criminal or civil sanctions or penalties because of their homeless status. They are part of the community and have the right to be here.

Thank you for your consideration of these comments.

Sincerely,



Jeffery Hoffman, Directing Attorney
California Rural Legal Assistance, Inc – Santa Rosa Office



Melissa A. Morris, Staff Attorney
Public Interest Law Project

Cc: Matthew R. Lilligren, Deputy County Counsel, County of Sonoma

⁴ See <https://www.census.gov/quickfacts/sonomacountycalifornia>.

As a 60+ year resident of Sonoma Valley, educated in our public schools, working and volunteering for its nonprofits, I have long been concerned about the ever-increasing inequities of housing realities that ultimately affect all segments of our community.

I'd specifically like to call attention to the concerns of too many of our older citizens, especially those who fixed incomes are already challenged by changing health care and caregiving needs, home maintenance issues, inflation.

In 2019, preliminary to creating its 2020-2024 Area Plan, the *Sonoma County Area Agency on Aging* in 2019 conducted 19 focus groups and received 4000 survey responses to identify the most pressing concerns of local seniors. Housing was among the top 5 concerns (along with Caregiving, Health, Supportive Services and Transportation) - all identified with "having enough money to live on".

Also in 2019 *Vintage House* senior center reported the results of its own survey, noting that "We are increasingly seeing seniors who fall into three distinct categories of need: 1) those who would like to age in place but can't afford both their home and their everyday expenses, 2) those who are living in homes where they are no longer safe because they are unable to afford the deferred maintenance, and 3) renters who are feeling the housing crunch (exacerbated by the 2017 fires) and are being squeezed out of their homes due to rising rents and lack of affordable housing options."

I'm proud of the work of *Sonoma Valley Collaborative*, support its consensus-based Housing Platform and urge you to consider carefully each of its 15 points as you review the draft Housing Element.

With appreciation for your efforts,

Cynthia Scarborough
Chair, Sonoma Valley Collaborative Steering Committee
Area Agency on Aging Advisory Council Member, 2018-2022
Vintage House ED, 1998-2017
Sonoma Valley High School, Class of 1969

From: [Deb Pool](#)
To: [PermitSonoma-Housing](#)
Subject: Rezoning 2 parcels in downtown Glen Ellen
Date: Saturday, December 03, 2022 5:13:29 PM

EXTERNAL

November 25, 2022

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

Re: Comments on Sonoma County Draft Housing Element – Up-zoning downtown GE parcels, #054-290-057 and # 054-290-084 (Winters property)

To: The Staff at Permit Sonoma:

We have lived on Railroad Avenue which intersects Carquinez, since 1975. This letter is regarding the Draft Housing Element for the Sonoma County proposed housing dense **rezoning**, specifically regarding the two properties noted above at the corner of Carquinez and Arnold Drive.

Our concerns are:

-There is a lack of consideration for the previous comments that have been submitted about this property. The last review the SVCAC & County Design Review Board rejected the applicant's plans due to incompatibility with Downtown Glen Ellen. Comments were sent in about concerns for the density of the project, about environmental concerns.

-The inappropriateness of creating a high-density housing area in downtown Glen Ellen of such a large scale (16-20 units approx.) when the surrounding area does not reflect this same design. This is a rural area.

-Environmentally, to create high density building, the removal of existing trees is huge. With the last proposal, the removal of 32 out of 39 trees would have been necessary to accommodate all the manmade elements (structures, parking, sidewalks etc.).

- Traffic, parking and road conditions specifically pertaining to Carquinez Ave. are significant. Parking, due to the Sorkin project across the street, has already impacted Carquinez. 10 Units now exist, with each tenant able to have 2 cars each. Those tenants, because an extra fee is being charged by the landlord for parking in the garages provided for them, mostly park on the street. They are not allowed to park in the west parking lot in the evening, because the landlord/owner rents it out to Star Restaurant. The current tenants struggle daily with parking availability. One of the tenants has a total of 7 vehicles!! Carquinez is CROWDED. And that doesn't count the parking for the business' that are nearby and count on street parking.

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

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

As of November 2022, the Planning Commission passed a 4-1 vote to add **1000** new homes and **a HOTEL** in nearby Eldridge, one of the largest projects in Sonoma Valley History. Planners, Permit Sonoma, and our County Supervisors must keep in mind how all these separate projects create accumulative impact on the surrounding communities. Glen Ellen is not an urban center.

These two parcels should be removed from further consideration in the County’s rezoning proposal. These sites and are not appropriate to meet the County’s housing requirements.

Thank you for this opportunity to comment.

Sincerely,

Deb & Rory Pool

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

From: [Fred Allebach](#)
To: [Arielle Kubu-Jones](#); [Karina Garcia](#); Housing@sonoma-county.org; fidel.herrera@hcd.ca.gov; HousingElements@hcd.ca.gov
Subject: Sonoma County Public Draft Housing Element public comment
Date: Tuesday, November 29, 2022 9:47:10 AM
Attachments: [Sonoma Valley County Sanitation District Approved SOI Feb 2010.pdf](#)
[VOMWD copy.pdf](#)
[City Water map copy.pdf](#)
[city UGB USA SOI.pdf](#)
[Proving a DUC DAC.docx](#)
[Sonoma County draft HE public comment 11-29-22.docx](#)
[City east side Census Tract AFFH TCAC analysis .docx](#)

EXTERNAL

Fred Allebach

11/28/22

Sonoma County Housing Element public comment Focus on Planning Area 9, Sonoma Valley

Abstract

Comment take home points:

There is a historic pattern of segregation in Sonoma Valley. There is a racially concentrated Latino DAC/ DUC (disadvantaged community, disadvantaged unincorporated community) in the Springs. This community of interest needs to be recognized, accurately measured, accounted for, and factored into the County Housing Element in terms of: Housing Needs Assessment, Housing Constraints, past RHNA (Regional Housing Needs Allocation)/ Housing Element performance, and Affirmatively Furthering Fair Housing (AFFH) / equity plans going forward.

Sonoma Valley (SV) class and racial segregation needs a thorough analysis of disparate access to opportunity, low-income renter/ BIPOC displacement over time, and of concentrated areas of poverty and wealth. Planning Area 9 housing segregation issues need to be remedied in Planning Area 9, not somewhere on Hwy 101.

The site inventory for Planning Area 9 is presented in multiple disconnected formats. It is hard to tell what is where. There is also a failure to specify the location for very low (VL) income units. How can a clear AFFH plan to address past segregation and integration of racially concentrated areas of wealth and poverty unfold if the location of VL units is not disclosed? The site inventory needs way better transparency and to show everything that applies in one chart. The public needs to see the big picture for Planning Area 9. Why hide the ball?

ADUs area false hope to meaningfully defray low-income affordability issues, period. Rooms in SV alone rent for obscene prices in SV. \$1,450 a month for a room in the Donald Steet area;

\$2,400 for a room in Temelec. <https://www.roomies.com/rooms/sonoma-ca> Bottom line: green/open space and UGB housing constraints in SV have limited the market and run housing prices through the roof. Any ADU that does not have a deed restriction can be expected to rent for market rate.

The Springs Specific Plan (SSP) has proposed high density zoning changes for multiple locations that will presumably be for lower income housing. I don't see these on the site inventory or any accounting of planned-for lower-income SSP units. Program 5c says to "Utilize Specific Plans and master plans to target investment", however, the SSP overlays a Trump Economic Opportunity Zone, also known as a *displacement zone*, and the SSP DEIR says displacement is not a significant risk.

Overall, the lack of adequate identification of the Springs Hispanic DAC/ DUC leads to Planning Area 9 weak tea AFFH remedial housing policies bc the obvious historic segregation pattern is not admitted, addressed, and accounted for.

Geography

Sonoma Valley (SV) is a small, northwest/ southeast-trending California coastal valley running parallel to the San Andreas Fault system. The lower, wider part of the Valley is urbanized, with an urban service area (USA) extending on a NW/ SE axis from the Sanitation plant on 8th Street East to Glen Ellen.

See attached maps of SV urbanized area, Sanitation District, VOMWD (Valley of the Moon Water District), City water system, map of City within whole SV USA (Springs unincorporated area is to the northwest of the City), TCAC map, map of Springs, and map of SV core area Census Tracts/ Block Groups.

Sleepy Hollow Stasis

The Valley populace has fought urbanization since the 1960s and this has resulted in sub-par road and transit system and also exacerbated segregation by affording mostly white, wealthy property owners and those who benefit from that regime, to dominate all manner Valley policy making that protects their interests. This has led to a predominately Green, environmental preservation focus here with a tyranny of small decisions over the years that now sets the Valley in a place of extreme segregation of wealth, class and race.

Segregated residential patterns

SV demographics show a pattern of unincorporated TCAC (Tax Credit Allocation Committee) High and Highest Resource Opportunity Areas bordering the USA (urban service area). Rich whites have the unincorporated open land and hillsides locked up. Glen Ellen, Sonoma Mtn., golf course area west of Sonoma Creek, Springs East foothills, Lovall Valley, Castle Rd/ 7th Street east, all TCAC High/ Highest areas, mostly all out of the USA and therefore immune

from integration.

The incorporated City of Sonoma east side is also TCAC High and Medium, white and wealthy. The City east side could potentially be re-classified as TCAC High and Highest by a realistic vetting of the local TCAC educational score, i.e. not conflating City east side Block Groups with Springs Latino student scores.

TCAC High Census Tract [1502.02 Block Group 3](#) (east side north/ Sebastiani area)

TCAC Medium Census Tract [1502.04 Block Group 1](#) (near east side)

TCAC Low Census Tract [1502.04 Block Group 3](#) (far east side)

In SV, wealth and whiteness are segregated from Valley Latino poverty by incorporated/ unincorporated jurisdictional boundaries and by the USA boundary. The poorest Valley residents live in the USA in unincorporated Springs Census Tract 1503.05 and adjacent Block Groups.

The City's west side and the unincorporated Temelec area also have poverty with fixed-income white seniors and white working class. The latter are alternate Sonoma Valley poor, potential DAC and DUC communities of interest.

Blacks have been so thoroughly displaced by past governmental and real estate industry racial segregation policies and practices as to be nearly totally gone. This is unconscionable and in the context of the Housing Element, should not be treated as a normal baseline. Affirmatively Furthering Fair Housing (AFFH or AB-686) *meaningful actions* (reparations) to Blacks are called for by the City and County in the Housing Element (HE). HE analysis of historical patterns of segregation need to include an accounting of those already displaced.

Springs Hispanic DAC/ DUC needs recognition

Sonoma City and County HEs both elide segregated poverty problems in the Springs, both making efforts to not see and formally recognize the obvious, that there is a low-income, immigrant/ 1st generation Latino DAC/ DUC in the Springs.

Formally recognizing this DAC/ DUC would require something to be done about it. No formal DAC/ DUC recognition and no will to see the obvious leads me to believe that the City and County powers that be are content to maintain a segregated Plantation economy, other-side-of-the-tracks arrangement here in SV where wealthy donors and local non-profits trickle out aid but make no needed systemic changes to governmental-economic arrangements that caused the disparities and segregation in the first place.

Plantation-style residential patterns

This noblesse oblige, charity-based Plantation economy arrangement in SV is then backed up

by modern, tacit redlining residential patterns where POC (people of color) are segregated to, and doubled up in Springs multifamily housing pockets of poverty surrounded by predominantly single family zoned (SFZ) areas that fight like hell to never be rezoned to higher density. The Donald Street group fighting inclusion in the Springs Specific Plan (SSP) and the Glen Ellen cohort against the SDC (Sonoma Developmental Center) Specific Plan are cases in point. Other neighbor groups are organized to fight any dense infill as well, the Doyle lot on Napa Rd and 5th St East.

An affordable housing development needs approximately two acres and 50 units to pencil out. What needs to happen in SV is to put one or two of these in every TCAC High/ Highest, single family-zoned (SFZ) area in the SV USA. Plans need to be made now to extend SV USA infrastructure into the 2022 TCAC Highest areas west of Sonoma Creek and east of Sonoma so as to break up the monopoly of SFZ, white, wealthy segregation and afford Valley essential workers a chance to share in the socio-economic opportunity that is now being hoarded by SFZ wealthy whites.

Green Checkmate

SFZ, white property owners Valley-wide fight dense infill while at the same time making local policy protections against any growth of the City of Sonoma UGB (urban growth boundary.) Property owning NIMBY's and Green's interests intersect on UGB and open space protections. This alliance creates a Green Checkmate where nothing can happen anywhere; it's a white, wealthy NIMBY self-created perfect storm where all projects are CEQA-stalled, many to death. In this sense, the Sonoma UGB is a negative constraint on new housing supply, especially with its strategic poison pill language that ensures not one inch of extra-UGB land will ever be added for any purpose.

In order to supersede the Green Checkmate, the County need as many by-right affordable housing policy NIMBY work-arounds as possible, and plans to incentivize developers to take them.

SB-244 and LAFCO MSR DUC analysis

As per SB-244, the recent LAFCO MSR (Local Agency Formation Commission Municipal Services Review), DUCs adjacent to the City had to analyzed. This analysis was one paragraph long and did not take SB-244 direction to recognize a clearly existent, City-adjacent, cross-Block Group community of interest, Latino DUC.

The 2020 US Census American Community Survey (ACS) median household income (MHI) figures in the Springs show 5000+ households making less than \$50K, and even more households with an MHI of less that 80% of State MHI, and even more at less than 80% of County MHI, these all in contiguous Block Groups adjacent to the City of Sonoma. How is this not a DUC?

Housing Elements are required by SB-244 to incorporate LAFCO MSR DUC analysis. My contention in this letter is that the LAFCO MSR analysis of SV DUCs is not complete; further analysis is called for to conform with SB-244 direction that DUCs exist as a cross-Block Group community of interest. The Census ACS shows the data.* The HE needs to assess if the LAFCO MSR DUC analysis is correct or not, if not, HE staff and consultant need to do the proper research and not continue to be blind to and willfully underplay the obvious.

The public needs a DUC advocate here, someone willing to look at the evidence.

The City and County have both elided the plain-sight existence of this Springs Latino DUC, despite many studies showing it here in SV through the years. The 2017 [Hidden in Plain Sight](#) study is one of many. I have the US 2020 Census ACS evidence to prove a Springs Latino DUC. My research supports this conclusion, none of which I see cited in the County HE. At this point it IMO is up to the City, County, State, and LAFCO to prove me wrong. Please see attached Proving a DUC/ DAC position paper.

Anatomy of DAC/ DUC denial

Part of being realistic is to see the actual, not deny it. Why would jurisdictions and planning entities not want to see the actual and try to ignore it? Could it be that the inertia of US societal segregation is so great that all have become accustomed to not rocking the boat? Could it be that DUC/ DAC status would mean greater costs to the County and City and that lack of recognition is basically a cost avoidance strategy?

Fault for the lack of proper DUC/ DAC analysis also rests with the State of CA bc the SB-1000, CA EPA EnviroScreen 4.0 analysis has failed to include socio-economic factors in its scoring of the Springs area. The DWR (Dept of Water Resources) DAC tool also misses the mark, too high an altitude view; the facts on the ground need to be seen and dealt with here in SV. Do AFFH law and SB-244 say anywhere that lack of staff time is a valid excuse for not doing necessary research and thereby tacitly maintaining segregation?

The problem here is multi-fold.

-Primarily there is failure to research and analyze Valley demographic data at a meaningfully granular level and to see Valley-level patterns as they pertain to socio-economic equity and AFFH. This shows up, for example, in the Springs Specific Plan (SSP) draft Environmental Impact Report, with the assertion that gentrified development in an Economic Opportunity Zone (exact shape of Tract 1503.05) will not cause significant displacement of the Springs Latino DUC. The DUC is not admitted, therefore does not have to be dealt with.

-The Springs is a small geographic area which may draw less attention compared to the Hwy 101 Corridor area. Nevertheless, the exact same HDI (Human Development Index) index

disparate pattern seen between Bennett Valley and Roseland holds in Sonoma Valley between TCAC Highest areas: Glen Ellen-Sonoma Mtn.-west of Sonoma Creek-Lovall Valley-7th Street East- Sonoma City east side and the Springs DUC in Census Tract 1503.05 and adjacent Block Groups.

-State and County demographic methods center on discreet Census Tracts and Block Groups which dilutes and hides cross-Block Group communities of interest. If a community of interest exists across Block Groups in the same area, is it not still a community of interest? What planning parameter would ever say that a community of interest does not exist bc it is not all neatly in the same Tract or Block Group? SB-244 makes it so this excuse cannot be used to not recognize a DUC

SV needs an adult in the room to balance the scales

The State, HCD (Housing and Community Development), and the County could encourage or mandate City annexation of the Latino Springs. If anyone was designing a City and an urban area, it would not look like SV does now, with some having all the land use benefits and others very few. The only logical land use for the SV USA area as a whole and for AFFH law, is to not continue to concentrate poverty and density in the Springs but to open up high TCAC, SFZ (single family zoned) areas in the City and unincorporated County USA, particularly Glen Ellen and the City's east side. The whole-valley USA needs to be integrated and AFFH law, HE context, and rezoning of SFZ areas is the way to do it.

Glen Ellen, a TCAC Highest Resource Opportunity area needs to take dense infill for lower income housing; the same for the City's east side, TCAC High and Medium.

Failure to properly frame and address equity

Planning should be about full cost accounting, triple bottom line Sustainability. In that wide and ample frame, it's clear that in County business equity always comes in last place: economic and environmental factors rule. All the Land Trust, open space, UGBs, buffers and rich white people-funded non-profits etc. show that Bay Area liberals have plenty of money and energy to protect Green values and focus on VMTs** and parking but have nothing even close for equity. It's time to change this inequitable "liberal" stasis.

Smart growth as covert maintenance of segregation

The *du jour* wealthy white liberal plan is for a "smart growth" that continues to concentrate poverty in places like the Springs and leaves SFZ white neighborhoods untouched by AFFH and integration. IMO, the County HE needs to aggressively counteract Valley segregation trends in the name of AFFH. The place to start is by agreeing there is 5000+ household member DUC in the Springs, and then taking steps to spatially share the housing wealth to include these essential worker folks in all Planning Area 9 USA neighborhoods. The bountiful, great lifestyle everyone is so fond of saying is so great here needs to be equitably shared and the HE is a

great opportunity to start doing that.

*

[Census Tract 1503.05](#)

Contains parts of two Census Places: Boyes Hot Springs, Fetter's Hot Springs-Agua Caliente -the lower income Hispanic community of interest extends into the Eldridge and El Verano Tracts as well as to Tracts east of Hwy 12, and borders on City Block Groups.

1503.05 Block Groups. Click on BG below, then move cursor to all adjacent BGs (and Tracts) and in Sonoma Valley. The MHI data is listed for each BG, and the percent that qualify as DUC-level MHI. This percent in each BG is the cross-BG, Latino DUC community of interest.

[1503.05 BG1](#)

[1503.05 BG2](#)

[1503.05 BG3](#)

[1503.05 BG4](#)

Tract 1503.05 as a whole

Date 2020

Population 5,885

Housing units 1,827

Households 1,708

Persons per household 3.4

1.3 sq miles

Median age 30.9

Race 64% Latino

Spanish spoken at home 60-70%

Household income: 38% under \$50,000 a year (at least 38% DUC)

Per capita income: \$30,252

Median household income \$65,781

Poverty 9.5% below poverty line

Education: 33% no degree, 26% high school, 22% some college, 14% bachelor's, 5% post grad

Place of birth 33% foreign born, of foreign born 96% Latin America

Census Hard to Count Index

[Census Tract 1503.05](#) in **Sonoma County** has an estimated population of 5,858 and a 2022 California Hard-to-Count Index of **47**. The statewide median tract CA-HTC Index is 38. Read more about the CA-HTC Index [here](#).

The leading variables correlated with this tract's CA-HTC Index are:

- 1.** Crowded units
- 2.** Non-high school graduates

3. Renter-occupied units

**

VMT. To be realistic, the local SV price of food, goods, and services needs to be part of any SV, Planning Area 9 VMT equation. Prices for food in Sonoma Valley, even at Safeway and Lucky, and four times higher than at regional Grocery Outlets. Given existent rent and cost burdens in SV, anyone with a car is going to drive out of Valley for better prices, period: Winco, Costco, WalMart, Grocery Outlet, Trader Joe's. The Sleepy Hollow Stasis in SV has reduced supply of all goods and raised all prices. Any SV accounting for VMT must acknowledge that proximity to a grocery store means one of two things: essential workers will be reamed on prices bc they don't have a car, or they will drive out of Valley to avoid the inflated costs.

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From: [Fred Allebach](#)
To: [Eric Gage](#)
Cc: [Brian Oh](#); [Ross Markey](#); [Bradley Dunn](#)
Subject: Re: FW: [EXT] RE: County He question
Date: Tuesday, November 15, 2022 8:21:30 AM
Attachments: [Table 14, SV vacant and underutilized site inventory.iqg](#)
[SV pipeline site inventory map.jpg](#)

EXTERNAL

Thank you Eric, this is very helpful and gives me more to go on for the Sonoma Valley site inventory.

An additional question: how do I figure the other sites listed (see attached) in the HE for Planning Area 9 in the inventory? The Map ID for pipeline sites does not conform to Table 14. I'm trying to develop an accurate picture of what Permit Sonoma has in line for the complete Sonoma Valley store inventory

One initial thought, HCD also requires AFFH and analysis of AFFH needs, and if VL units are not accounted for in Planning Area 9, that seems to by default make any AFFH analysis weak, esp when there is a LAFCO DUC in the area.

I'm glad to see sites in the the Glen Ellen TCAC Highest Opportunity Area being earmarked best, Fred

On Mon, Nov 14, 2022 at 5:03 PM Eric Gage <Eric.Gage@sonoma-county.org> wrote:

Good Afternoon Fred,

Our consultant has prepared the attached HCD reporting spreadsheet, with each site broken down by income category. HCD does not require a breakdown of the low and very low income categories, which provides necessary flexibility for affordable housing developers. So you will only see Low, Moderate and Above Moderate in the distribution attached. Below are the sites for Planning Area 9. The attached does not sort them by planning area, but you could cross reference that information using APN in the [County GIS viewer if needed](#).

Address	APN	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity
15577 Brookview Dr	054-381-010	0	0	7	7
17881 Riverside Dr	133-150-038	0	0	10	10
188 Academy Lane	056-531-005	10	4	6	20
211 Old Maple Ave	056-531-006	57	23	34	114
18621 Railroad Avenue	052-272-011	27	11	16	54
13651 Arnold Drive	054-290-057	5	2	3	10
950 Carquinez Ave	054-290-084	0	0	1	1
20549 Broadway	128-311-015	8	3	5	16
20559 Broadway	128-311-016	8	3	5	16
20535 Broadway	128-311-014	8	3	5	16
20563 Broadway	128-311-017	8	3	5	16

Sincerely,

Eric Gage

Planner III

From: Fred Allebach <fallebach@gmail.com>
Sent: Sunday, November 13, 2022 6:20 AM
To: Eric Gage <Eric.Gage@sonoma-county.org>; Brian Oh <Brian.Oh@sonoma-county.org>; Ross Markey <Ross.Markey@sonoma-county.org>; Bradley Dunn <Bradley.Dunn@sonoma-county.org>
Subject: County He question

EXTERNAL

Hi, I sent the following e-mail on 11/6 and have not heard back, I know you all are busy, just a friendly reminder. My concern here is that I be able to tell what percent of VL, L, Mod and Above Mod the Housing Element has set for Planning Area 9. If there is no easy to read chart on this, it is hard to tell if Sonoma Valley is getting a fair share of each type of AMI unit .

best, Fred

Good morning,

I have a question. Is there anywhere in the County HE (site inventory) that lists the RHNA AMI breakdown, by site, for Planning Area 9, Sonoma Valley?

When I took a cursory look at the Site Inventory in the Appendix section, I didn't see any Area 9 master list of sites, addresses, and the AMI ranges that are projected to go with them. Obviously there are the Siesta Way and MidPen projects in the Springs, approx 166 units at 60% AMI and below; I assume these are intended to be counted as 6th cycle inventory, as pipeline projects.

Is there a place that shows what AMI units are intended to go where in Planning Area 9?

best, Fred

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From: [Geoff Lucas](#)
To: [PermitSonoma-Housing](#)
Subject: New Housing Update Draft 11/3
Date: Thursday, November 03, 2022 7:36:31 PM

Are you kidding? This ridiculously complex document can only be parsed or understood by lawyers... fail.

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From: [Greg Carr](#)
To: [Eric Gage](#)
Cc: [Scott Orr](#)
Subject: Draft Housing Element
Date: Friday, December 02, 2022 11:35:05 AM

Please accept the following suggestions for the Draft Housing Element.

- Add background text explaining how the site inventory can be reserved for deed restricted projects in order to increase the % affordability above the standard inclusionary percentage...and if applicable add specific implementing programs/policies.
- Remove any new policies or programs that increase dwelling units in rural areas of the County
- Provide notification of all proposed rezoning sites to the applicable property owner and neighboring parcels within 1000 feet of the proposed site.
- If allowed by State law, reduce the size of ADUs and JDUs to increase the likelihood that the units will be affordable to lower income households
- Revise Table 13 in order to accurately count the need for rezoning of sites to meet the RHNA. The remaining need shown in the Table should be 696 VLI and LI, 371 MI, 516 AMI and 1584 Total. In addition, reduce the number of surplus units to 10% of the remaining need, recognizing that the SDC, the Springs Plan, and the Airport Plan will provide additional surplus units during the early years of the 6th cycle.
- Provide the site address for each site that is proposed for rezoning and, if possible, the likely number of units in each of the affordability categories.

thx
greg



December 1, 2022

Re: Sonoma County Draft Housing Element

Dear Sonoma County Board of Supervisors, Permit Sonoma, and staff,

My name is Kaitlyn Garfield and I am Housing Administrator at Housing Land Trust of Sonoma County (HLT). Thank you for all your excellent work on the Sonoma County 2023-2031 Housing Element Draft. We especially appreciate the County's commitment to affordable homeownership for the local workforce. Sonoma County should make every effort to prioritize first time homeownership and reduce its barriers to entry through the creation of more affordable ownership units. This will keep the members of our local workforce here and stop them from being priced out and having to move away. Renters are more likely to be lower income and more cost burdened than owners so creating more affordable homeownership can lift the burden, and fixed mortgage payments allow for more stability than increasing rent payments. A house is also usually a family's largest financial asset and wealth builder so expanding access will help to combat income inequality, which has been exacerbated by recent events. Programs such as the County's inclusionary housing requirements and support of the community land trust model are excellent vehicles for addressing the issue of affordable and equitable homeownership; they help meet RHNA goals while also creating truly integrated affordable housing.

Below are HLT's comments on how the County can help meet its affordable homeownership goals through the 2023-2031 Housing Element. Thank you again for all your time and effort on this Housing Element and we look forward to continuing our partnership with you.

Program 1.1: Sustain Partnerships with Other Agencies

HLT looks forward to continue supporting the County in providing affordable homeownership and first-time homebuyer assistance.

Program 2: Retention of Affordable Units

Sonoma County should make all efforts to retain and maximize community investment by preserving its existing affordable housing stock. Units should be monitored at least annually and when ownership units are at risk of expiring, owners should be

stewarded through the process with the intention to preserve the unit. Eligible units should be converted at resale to a program that ensures affordability in perpetuity to a targeted income level, so that the unit is never at risk of expiration again and it can then serve endless generations of families.

There should also be the creation of a fund that is prepared to save affordable units as they expire and that can act swiftly as these opportunities for preservation appear.

Program 15: Review and Update Zoning Code

We ask that the County prioritizes onsite inclusionary ownership units over in-lieu fees and offsite alternatives in its Affordable Housing Program Requirements and Incentives Code. Affordable homeownership/BMR units that are built on-site within market rate developments encourage community and economic integration, reduce emissions and commute time due to people being able to live closer to where they work, stem the cycle of income inequality that can occur when affordable housing is relegated to lower resource areas, and actually create an opposite cycle where upward mobility becomes accessible to those it previously wasn't available to. Studies show the poverty rate in neighborhood where one grew up is a stronger indicator of mobility than parent's education level or occupation, so a commitment to this type of affordable housing is also an investment in people's future success.¹

Inclusionary units should also blend into the development and be indistinguishable from the market rate units. To uphold this objective, units should be comparable in size, basic finish options, construction quality, and exterior design to market rate units. Units also should not be clustered in one section of the development, but rather should be scattered and integrated throughout. The process of selecting units should be consistent with a true "set aside" model, where a unit is not planned with the intention of being a BMR unit but rather BMR designation is decided on after planning.

We also ask that all inclusionary ownership units be required to be affordable in perpetuity so that a one time investment can serve generations of households. There is no benefit to short term affordability covenants on affordable homeownership units: the developer has the same cost, the County will eventually lose or must fight to keep an affordable unit, and the community will inevitably end up with a smaller housing stock than they would with permanent affordability. Preserving affordable units in perpetuity will maximize the County's return on investment per unit and even if only a smaller number of affordable inclusionary units are created each year, they will add to existing stock and gradually create a large number of affordable units for the community.

¹ Sharkey, Patrick. 2009. *Neighborhoods and the Black-White Mobility Gap*. Economic Mobility Project: An Initiative of the Pew Charitable Trust.

Program 18: Housing Land Trust Model

Housing Land Trust supports the expansion of the community land trust model. As a community land trust, we have seen firsthand the benefits of the program, including creating the opportunity for lower income levels to have permanent housing while building equity, affordability of the units in perpetuity, and stewardship of first-time homebuyers through the entire homeownership process.

Program 20: Prohousing Designation

HLT supports the County's pursuit of the Prohousing Designation.

From: [John Donnelly](#)
To: [PermitSonoma-Housing](#); +susan.gorin@sonoma-county.org; +caitlin@sonomavalleycollaborative.org
Subject: Public comment on Sonoma Valley's housing crisis
Date: Wednesday, November 30, 2022 2:21:29 PM

EXTERNAL

Sonoma County Housing Element Public Comment:

Regarding tonight's meeting on Sonoma County's 8-year Draft Housing Element planning, we support the planning improvements advocated for the Draft HE by the Sonoma Valley Collaborative members.

Overall and collectively, we believe these improvements *call for the Draft Housing Element to better plan for the Sonoma Valley area as a whole in order to lessen the ongoing concentration of poverty and density in the Springs.* For this, the Draft needs to give priority to opening up high TCAC, SFZ (single family zoned) areas in the City and unincorporated County. The whole-valley's urban-service-area needs to be integrated with the Affirmatively Furthering Fair Housing law (AFFH or AB-686), and the rezoning of SFZ areas.

Here are the specific improvements that the SV Collaborative that need to be included more explicitly in the Draft Housing Element:

- Allow modest-sized multi-unit buildings like cottage courts or quadplexes in all residential zones.
- Tax vacant houses and second homes and put the money toward affordable housing.
- Reduce vacation rentals. Neighborhoods are for people who live here.
- More incentives for granny units/casitas/ADUs that are actually affordable.
- A higher priority on homes for people with low or very low incomes. That's the greatest need.

Reduce or eliminate parking requirements. Use space for people, not for cars.

- Share the increase in lower-cost homes across all communities in Sonoma Valley.

Thank you.

John & Sara Donnelly
578 7th St W / Sonoma, CA

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From: [Josette Brose-Eichar](#)
To: [PermitSonoma-Housing](#)
Subject: Sonoma County Draft Housing Element
Date: Friday, November 18, 2022 11:44:17 AM

EXTERNAL

To Permit Sonoma
11-18-2022

In reading your draft report it is stated:

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

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

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

As many consider the high vacancy rate one of the primary reasons for lack of housing and specifically affordable housing, I think you must find a better and more accurate count of what this vacant housing really is.

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

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

Here are some of the census definitions:

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

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

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

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

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

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

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

Sincerely,

Josette Brose-Eichar

Boyce Hot Springs

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From: [Kimberly Carfore](#)
To: [Arielle Kubu-Jones](#); [PermitSonoma-Housing](#)
Cc: [Susan Gorin](#); caitlin@sonomavalleycollaborative.org
Subject: Housing Statement
Date: Thursday, December 01, 2022 10:37:11 AM

EXTERNAL

Greetings,

Thank you for allowing the public to attend last night's meeting and comment, and for hearing our words. I would like to send along my comment in writing to advocate for the "missing middle."

My husband and I have lived in the Bay Area for 13 years and the city of Sonoma for 3. We are both professors at the University of San Francisco teaching ethics, ecology, and religion. Together we make around 110k/year. We love Sonoma because of the people and community and have been on the market as first-time homebuyers. We recently got pre-approved, and our number could only afford us a mobile home here.

A recent [study](#) came out from Northeastern University demonstrating that local crime rates rose as Airbnb vacation rentals rose. This was due to a decrease in social cohesion and behavioral accountability in neighborhoods. In short: the more vacation rentals and vacant homes in an area, the more detrimental it is to building robust and cohesive communities in the long term.

I echo others who spoke last night in support of taxing vacant and second homes (and allocating those funds to a trust) to incentivize community-building. Thank you for your time and your important work on this issue. Please let me know if I can be of service to this initiative in any other way.

Kind regards,
Kim
[Kim Carfore, PhD](#)
[Professor of Environmental Studies](#)
[Theology & Religious Studies](#)
[University of San Francisco](#)
[2130 Fulton Street](#)
[San Francisco, CA 94117](#)

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From: [Laurie Hobbs](#)
To: [PermitSonoma-Housing](#)
Cc: [Susan Gorin](#); caitlin@sonomavalleycollaborative.org; [Stewards](#); [Sonoma Valley Collaborative](#)
Subject: Comment on Sonoma County's housing crisis from Morton's Warm Springs
Date: Wednesday, November 30, 2022 4:26:31 PM

EXTERNAL

Dear Permit Sonoma & Supervisor Gorin (cc Caitlin Cornwall & Kim Jones of SVC)

This is our statement regarding the current housing crisis in our county. While it's not intended for public distribution, we submit the below as our comment in your current process of decision-making. (For our public statement, we intend to write a far briefer version of the below.)

Morton's Warm Springs is the last accessible, naturally spring-fed, outdoor geothermal springs anywhere within our tri-county region, and within the entire greater SF Bay Area. We made a commitment 7 years ago in becoming the stewards of this historic place that it would always remain accessible to families, young people, those on fixed incomes, as well as all the service workers and working class communities which Sonoma County is so culturally enriched by and upon which it utterly depends.

For us, this commitment extends not only to who comes here but also to whom we employ and how much we pay them such that they can reasonably lead lives of sustainability and wellbeing. Unfortunately, even paying our staff and stewards as much as we possibly can, for the past seven years we've still had to take on a ceaseless extra part-time job, one that gets harder every year: attempting to locate and secure literally ANY affordable housing units for our crew so they are able to live and work here and contribute to our community.

One young family I'd like to highlight is a local family of four whom we've had the privilege of working with now at Morton's for over 6 years. They recently just moved out of state, having finally given up on finding stable and affordable housing anywhere meaningfully nearby. The mom, a skilled baker, farmer, early childhood educator and full-time parent to her two young children, also managed to get our cafe off the ground. She then went on to create and manage our organic farm & garden. Her talented partner, a professional artist and magician, supported our facilities and grounds needs with carpentry, welding, and wildland tending. We began co-raising our kids together. This is a young family born and raised right here in the North Bay, one of them having grown up just a few blocks away from Morton's on Warm Springs Road. And today they can't afford to raise their own family here while doing meaningful work that they love and bringing such talent, capacity and value to us and our community. It's just so, so sad.

For over four years we tried to help this wonderful family find stable affordable local housing to no avail. While inquiring after or pursuing rental units for them, I personally experienced clear discrimination time and time again. The discrimination always centered around not wanting 'extra people,' or even specifically children, in the unit (even at or below occupancy standards), or they centered around unreasonable obstacles and exorbitant pricing designed to extract maximum profits or specifically to be a barrier to working class families. I was

shocked and dismayed as I began to learn the depths of just how broken our current system is. When I've privately shared these experiences, most people are also surprised this could be so. So clearly, it's very hard to see, let alone mitigate, these ubiquitous and caustic discriminatory practices.

Additionally revealing is that, for all these years we've known this particular family, it's been just us -the only two families with young children (that we know of) within the entirety of our surrounding neighborhoods in upper Warm Springs canyon– neighborhoods with absolutely no shortage of empty vacation homes and short-term rentals owned largely by out-of-area folks for investment purposes. I have personally emailed almost every nearby vacation rental owner to ask politely if they would consider renting to a long-term tenant instead. So far I have had a zero percent success rate. Why are there so few families anymore? That used to be the majority of who called this area home. For a working class family, the totality of these circumstances have made it very challenging and at times quite lonely and discouraging to live here. When we see worker shortages in the hospitality, service and agricultural industries, this is one of the contributing factors. When we see lowering enrollments in local schools, or a widening dearth in local arts communities who make our cultural life here vibrant, or when we see a further flattening out of the diversity of ages, stages, backgrounds, classes and professions that make up our community, this is one of the contributing factors.

And if we find ourselves tempted to demonize "those people out there" who are the ones balking at renting full-time to a local working family with children... wouldn't these same economic pressures, assumptions and motivations also fall heavily on any of us in the same situation? Good and otherwise ethical people are doing this, many whom it seemed were middle or working class themselves just yesterday, but who are today, by simple virtue of home ownership which began a decade or more ago, suddenly thrust into this new "unintended elite" class in a system that powerfully skews our good morals and values as it incentivizes discrimination and maximum extraction. If you could rent your house for just one or two weekends a month for far more money to tourists who hardly even use the kitchen, why would you instead rent it full-time to a family with young kids who will have a bunch of wear and tear, take more management involvement, and come along with tenant rights to boot? Or, what would motivate you to go against the grain and rent your large 3-bedroom house to a family of three with an aunt and uncle who will all live together to make it affordable and help out with the kid, when you can rent it for even more money to a single retired person who wants peace and privacy? (Both of these are situations we've experienced.) And even if you did swim against the grain, you'd have to absorb the costs and impacts of the current system yourself. How many are willing or able to do that? The answer is, very few. Very, very few. The cards are absolutely stacked against fair practices.

So what can be done? It's going to take a multi-pronged approach to shift this, and it won't happen overnight. First we need an educational campaign to help us all remember why diverse and affordable communities are so essential to what makes life worth living in Sonoma Valley and everywhere. We've actually had not just one, but actually *many* (generally older-aged) people tell us with admirable honesty that they experience the sound of happy children playing outdoors to be too disruptive to the peace and quiet they prefer to have in their neighborhood. For some reason, far too many people are simply no longer able to connect their own quality of life with what makes a community actually functional, healthy, safe or resilient. And we need to educate everyone on what housing discrimination even looks like along with creating better policies for enforcement that are non-punitive, educational and reparative. It's not often a nefariously intended act to discriminate, it's ignorance, and that's not even entirely their fault,

as, where's the access to any training or easy and ongoing information/support when one becomes a landlord or vacation rental owner?

We also need to reduce the number of whole-house or un-hosted vacation rentals, reduce the number of second and empty homes, and reduce the amount of money leaving Sonoma County from real estate investors whose primary residence is outside the county and who don't contribute meaningfully enough to the fabric of our community to warrant extracting such easy profits from here and at such a high cost to our community. We also need to realize that simply relying on the tax benefits from such an erosive practice perpetuates this harm to our communities while exacerbating an unsustainable dependency that also powerfully limits local resiliency. We also need to somehow completely upend the privileged assumption that low-income and working class renters should naturally, or by some basic right, be the primary ones to absorb the impacts of inflation. We somehow assume it's the hardest hit folks who need to keep stretching to cover all these extra costs from rising mortgage prices for someone who's purchased a second or third house for passive income or as an investment. If I can't rent my second or third home out at a controlled, affordable rate while covering all my debts from purchasing said home, then I actually can't afford that home and shouldn't be buying it to begin with. We need to re-incentivize this truth and put it into practice with a humane set of policies and protections.

We absolutely need to maximize the percentage of planned housing at SDC that is affordable to those making middle incomes or less. We need to increase the number of affordable units within reasonable distances to places of work, schools, and services. We need to allow diverse types of homes in all residential *and* commercial/mixed zones, most especially standalone small and tiny home cottage "villages" where middle and low income folks can enjoy pride of place with access to nature out their front doors. It's misguided to think that building more large-scale high-density condominium complexes will allow us to "develop our way out of this housing crisis." Very few people prefer to live in high-density affordable condos if given the choice between that and a modest small or even tiny cottage or ADU in an actual neighborhood with trees, yards and walkability—especially families with kids!

We also desperately need to allow greywater system deductions to all existing and new septic budgets along with allowing permitted composting toilets for regular people, most especially in areas where septic systems simply cannot be feasibly (or physically) updated/expanded. We need actual renter protections, including rent control and community land trusts which secure affordable housing forever. We need to lower the threshold to homeownership through innovative and alternative programs like rent-to-own agreements, first-time home buyer subsidies, or policies that encourage more modular, small-scale and gradual housing development, so that the working class families who make our world run can actually put down roots here.

Thank you for taking the time to read this, and for advocating for these necessary changes to happen. It will help to keep small organizations like Morton's Warm Springs alive and thriving, and it will help protect the legacy, beauty, and resiliency of this wonderful place we all so love.

Laurie Hobbs (she | her)
Co-Director & Core Team Steward
cell (510) 366-5067 | office (707) 833-5511
1651 Warm Springs Road, Glen Ellen, CA 95442



www.MortonsWarmSprings.org



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SONOMA VALLEY COLLABORATIVE
EQUITY. ENVIRONMENT. ECONOMY



November 30, 2022



SENT VIA EMAIL

Sonoma County Board of Supervisors

Permit Sonoma and Staff

Email: PermitSonoma-Housing@sonoma-county.org; bos@sonoma-county.org

cc: HCD, HousingElements@hcd.ca.gov

Re: Public Comments Regarding Sonoma County 6th Cycle Housing Element Draft

Dear Sonoma Board of Supervisors, Permit Sonoma and Staff,

We, the undersigned, provide this letter as public comment on the 2023-2031 Housing Element Draft (“Draft”). We represent a coalition of advocates and policy experts in Sonoma County, actively working together to ensure the region is one where everyone can find a home.

We know that tackling the combined crises of housing affordability, inequality, and climate change in all its complexity requires structural and cultural change. Our recommendations can help the Draft meet statutory requirements and affirmatively further fair housing (“AFFH”). These recommendations fall within two main topics:

- **Strengthen fair housing goals and programs;**
- **Add new programs to protect tenants and prevent displacement.**

At the outset, we urge the County’s planners and consultants to strengthen specificity throughout the Draft to ensure it is clear, aligned, and actionable. State law requires all Housing Element programs to have beneficial impact within the planning period, including identification of specific actions, which agency or official is responsible for those actions, and a timeline. Programs to affirmatively further fair housing must identify clear “metrics and milestones for

determining what fair housing results will be achieved.” Furthermore, a recent survey of HCD reviews of draft housing actions from Southern California jurisdictions emphasizes that time bound actions with “specific commitments [from local actors], metrics, and milestones” are required.¹ Similar commentary was recently made by HCD in response to Santa Rosa’s submitted housing element draft.²

1. Strengthen fair housing goals and programs

The Draft acknowledges that “State law requires state and local agencies to take proactive measures to correct any housing inequalities related to race, national origin, color, ancestry, sex, marital status, disability, religion, familial status, or other protected characteristics.” (p. 22). The County should revise the Draft to include concrete and measurable commitments to achieve this goal, including fair housing enforcement and education, advancing policies that protect tenants, who are more likely to have their fair housing rights violated, and other policies and programs that advance housing opportunities for members of protected classes.

Fair Housing Advocates of Northern California (FHANC) has conducted investigations and audits over the past several years to determine the prevalence of discrimination in rental housing in Sonoma, Marin, and Solano counties. In 2019-20, FHANC conducted an audit to test for national origin and source of income (SOI) discrimination,³ and in 2021-22, FHANC conducted an audit to test for race and SOI discrimination.⁴ Both of these audits revealed that Sonoma County had the highest rate of discrimination of the three counties, with evidence of discrimination found in 86% and 92% of tests conducted in each audit, respectively. In 2019-20, FHANC found evidence of SOI discrimination in 62% of tests in the county, national origin discrimination in 5% of tests, and both national origin and SOI discrimination in 19% of the tests. In 2021-22, FHANC found evidence of SOI discrimination in 88% of tests in the county, race discrimination in 63% of tests, and both race and SOI discrimination in 62% of the tests. FHANC continues to see increases in complaints of SOI discrimination, and in the past fiscal year FHANC received more SOI complaints than any other type except disability. FHANC’s May 2021 Audit Report also found evidence of disability discrimination in 60% of tests in the County.⁵ This evidence highlights a need for strengthened fair housing education and enforcement.

The Sonoma County Housing Authority has been proactive in identifying fair housing issues in the County and communicating with FHANC, the County’s fair housing service provider, and other stakeholders to address these issues. To strengthen the County’s fair housing education and enforcement, we suggest that the Housing Authority commit to continue frequent communication with Legal Aid of Sonoma County (LASC) and FHANC, ideally by establishing quarterly meetings with these organizations, and collaborating with these organizations to provide fair housing training to county staff, housing providers, and residents.

¹ [Summary of Housing Element Review Letters V6.pdf \(ca.gov\)](#)

² [sonSantaRosaDraftOut11-1-22.pdf \(santarosafoward.com\)](#)

³ See [2019-2020 Audit Report: National Origin and Source of Income Discrimination in Rental Housing](#)

⁴ See [2021-2022 Audit Report: Race and Source of Income Discrimination in Rental Housing](#)

⁵ See <https://www.fairhousingnorcal.org/resources--more-information.html>

Further, programs to affirmatively further fair housing must identify clear “metrics and milestones for determining what fair housing results will be achieved,” which are not included in the current Draft (Gov. Code § 65583(c)(10)(A)(iv)). The County should revise the Draft to commit to concrete, meaningful, measurable actions that will ensure fair housing enforcement and education for all residents and housing providers.

The Draft further acknowledges that “racial and income segregation” are persistent and pertinent fair housing issues in the County (p. 22). The Draft should also be revised to make clear how the County will meet its requirement to “take meaningful actions...that overcome patterns of segregation,” as required. The draft does not indicate how site inventory selected, for example, will overcome the patterns of segregation, and the Draft should include analysis demonstrating how the County will meet this AFFH requirement.

Additionally, the Draft does not analyze the disproportionate impact of homelessness on groups protected by fair housing laws. In Sonoma County, Black and indigenous people are disproportionately homeless, as are people with disabilities. Per data from the 2022 point-in-time count, 13% of homeless County residents identified as Black or African American despite making up 1.5 percent of the County’s general population.⁶ However, the Draft falls short of acknowledging these disparities, exploring their root causes, and adopting programs that meaningfully address these concerns. Of note, the Draft:

- Fails to analyze criminalization practices, including the County’s proposed amendments to its anti-camping ordinance and its forced removal of people from the Joe Rodota Trail/County parks, as creating barriers to stability and housing access, and as disproportionately harming BIPOC and disabled County residents;
- Fails to analyze relative accessibility of shelter and housing resources, including failure to analyze reliance on congregate shelter for disparate impact on unhoused people with disabilities, including mental health disabilities;
- Fails to identify or analyze civil rights litigation against the County related to homelessness and discrimination;
- Fails to analyze strict rules in County programs--like Los Guilicos Village and the trailers--for barriers to access for people with mental health disabilities; and
- Fails to analyze the Coordinated Entry System for racial and other disparities.

The lack of adequate analysis of homelessness issues and their disproportionate impact on people with disabilities and people of color results in a lack of adequate programs to address these issues. Program 27, the Draft’s program for the Interjurisdictional Housing Committee primarily commits only to do what the County is already doing on an “ongoing” basis. The County could, for example, commit to consideration—or even adoption—of policies to dedicate County land for non-congregate shelter, expand SROs and ensure the need for emergency shelter is met, as a few examples. The County should amend the Draft to include more concrete actions, including actions informed by a more robust fair housing analysis, as required by the Housing Element statutes.

⁶ [Attachment 1 - County of Sonoma 2022 Point-in-Time Count Results \(ca.gov\)](#); [A Portrait of Sonoma County 2021 Update \(upstreaminvestments.org\)](#)

Finally, we urge the County to commit to advancing strong tenant protection policies, due to the disparate impact on renters with disabilities, renters of color, and other members of protected classes when there is a shortage of affordable housing options and inadequate tenant protections. 1 of every 2 renters in the county spends more than 30% of their income on rent — a high housing burden that Latino and Black renters were more likely to have than their white or Asian counterparts. Fifty-two percent of Asian and 53 percent of white renters in the county face a high housing burden, compared to 59 percent of Latino renters and 68 percent of Black renters.⁷

Add new programs to protect tenants and prevent displacement

Sonoma County is legally required to develop concrete, measurable, and realistic actions to address disparities identified in the Assessment of Fair Housing, including displacement risk. (Gov. Code § 65583(c)(10)(A)(ii).) Additionally, the County is legally required to analyze fair housing issues, including “disproportionate housing needs” and “displacement risk” of members of protected groups, and identify and prioritize concrete actions to remedy these injustices. One of the three P’s of Housing Element requirements is “protection.” Protection from displacement.

When we refer to displacement of tenants, what we mean is eviction or self-eviction due to the inability to afford increased rents. When we refer to displacement of homeowners due to economic pressures, we think of foreclosure.

Displacement of residents due to economic pressures is listed in the Draft as a high priority on p. 23. Throughout the community input, the high cost of housing is listed as a concern or burden. However, Housing Element Program 5: Displacement Avoidance at p. 45 consists of incentivizing production or “marketing strategies” for subsidized housing projects. Program 5 completely misses the mark and contains no real anti-displacement strategies. There are a number of proven policies that specifically and meaningfully address displacement (or eviction) of residents, a number of which are being implemented across the state as part of various housing element plans.

To illustrate the importance of “protection” in the larger scheme of housing, picture a bathtub. The faucet is dripping slowly into the tub. The drip is our notoriously stunted housing production. The water in the tub is our existing housing stock. The water is gushing out of the drain because the tub is not plugged. The absent plug is the lack of protections for tenants and homeowners facing foreclosure. Meeting RHNA requirements, even if it means turning up the water coming from the faucet, will not solve our housing crisis. We must also preserve and protect our communities from displacement.

One of the most stark and urgent housing disparities in Sonoma County is that Black, Latinx, Native American, and mixed-race households are dramatically more likely to rent rather than own their homes. As a result of systemic racism in education, employment, and intergenerational wealth, Black residents in Sonoma County have lower levels of well-being than Black residents

⁷ [A Portrait of Sonoma County 2021 Update \(upstreaminvestments.org\)](https://www.upstreaminvestments.org/2021/04/a-portrait-of-sonoma-county-2021-update/)

of the state as a whole. Black residents of Sonoma County live over three years fewer, on average than Black Californians. Black children and young adults are enrolled in school at a rate 6 percentage points lower than Black children and young adults statewide. Sonoma County's Black residents have a lifespan ten years shorter than any other racial and ethnic group in the county and have lower educational attainment rates than the county average.⁸

This means that BIPOC residents are disproportionately vulnerable to exploitation and displacement due to predatory rent hikes, arbitrary evictions, being forced to live in uninhabitable conditions and enduring landlord harassment and retaliation- a fact that the Housing Element must recognize and remedy. Unfortunately, the Draft fails to include meaningful actions to address them.

A robust analysis is required of the needs of renters, including the numbers and demographics of renters who are forced to pay more than they can afford for rent, trends in the displacement of renters over time, evidence of landlord harassment, and other issues facing renters.

Sonoma County needs to move on from the status quo. The Draft indicates that many of the same policies the County employed to sustain existing housing and address displacement will be continued; see Draft p. 32 (“Policy HE-1b: **Continue** the County’s existing housing programs...Policy HE-1e: **Continue** to protect mobilehome park residents, including administration of the County's Mobilehome Park Space Rent Stabilization Ordinance...Policy HE-1f: **Continue** existing County employee housing programs); p. 40 (“Policy HE-5g: **Continue** to encourage the retention and further construction of small rental units such as accessory dwelling units, studios, and single-room occupancy (SRO) units”); p. 43 (“**continue** support of the CDC’s activities”) and p. 118 (“**continue** to implement the County’s density bonus”). If these policies failed to produce adequate success in the 5th cycle, where is the evidence that they will produce a different outcome in the 6th cycle? Hundreds of residents in Sonoma County’s unincorporated areas urgently need protection from arbitrary evictions, predatory rent hikes, and landlord harassment. We recommend the County consider the following options to meet Housing Element requirements, address the vulnerabilities and needs of all tenants, including those of protected classes, and improve and conserve existing non-subsidized affordable housing stock.

a. Rental Registry

We request that the Housing Element commit to developing and using a Rental Registry. A Rental Registry is the baseline, and will provide the County with the data required to enact meaningful policies to prevent tenant displacement. It can collect data on evictions and identify systemic housing issues in unincorporated areas. It can be used to facilitate a proactive rental inspection program to address maintenance and preservation of rental housing. It can also be used to implement eviction protections that prevent displacement of tenants should the County choose. Without such a registry, the County will be unable to accurately assess the needs of renters.

⁸ [A Portrait of Sonoma County 2021 Update \(upstreaminvestments.org\)](https://www.upstreaminvestments.org/sonoma-county-2021-portrait)

b. Rent Stabilization and Just Cause Eviction Protections

Rent Stabilization and Just Cause protections preserve existing non-subsidized affordable housing stock and affirmatively further fair housing. Rent Stabilization policies limit how much a landlord can raise the rent on an existing tenant each year by tying the allowable increase to inflation thereby maintaining affordability. Just Cause for eviction policies protect tenants from being evicted without a specific justification, such as nonpayment of rent. It is essential to pair Rent Stabilization with Just Cause to prevent landlords from evicting tenants in order to raise rents or from raising rents so much that tenants are forced to leave.

Together, Rent Stabilization and Just Cause are an essential cornerstone of protecting renters from displacement, harassment, and uninhabitable living conditions — all of which the Housing Element must address. Unaffordable rent hikes and no-cause evictions disproportionately impact protected classes; these are fair housing issues causing displacement. Rent Stabilization and/or Just Cause protections exist in over 30 cities and counties across California and have a strong track record of success. Most recently, the Town of Fairfax passed a strong tenant protection ordinance with a rental registry. The County of Marin included expanded tenant protections beyond those provided by the State as part of their submitted Housing Element Draft.⁹

The statewide Rent Cap and Just Cause protections of the Tenant Protection Act of 2019 (“TPA”) fall short of providing the needed tenant protections. The statewide Rent Cap limits massive annual rent increases, which can help prevent rent hikes that force renters out overnight, but it is not true rent stabilization, which ensures that rents do not rise faster than inflation and can provide long term stability. Statewide Just Cause protections fail to protect tenants from arbitrary evictions in the first year of their tenancy, and tenants who rent certain types of homes (like duplexes where the landlord lives in one of the units) are not covered.

Certain no-cause evictions are rampantly abused, especially those sought through the Ellis Act (where the landlord is allegedly withdrawing a unit from the rental market). A local ordinance is necessary to prevent that abuse, and is authorized in the text of the Ellis Act itself. The TPA’s “Substantial remodel” loophole allows landlords to evict a tenant, to remodel their unit, and the tenant is not allowed to return.

During public outreach, every single focus group indicated that the “high cost of housing” was a top concern. (Appendices, pp. 6-12). Those focus groups were conducted with primarily protected classes and special needs populations, who have a greater likelihood of renting. Surveys indicate a desire for just cause tenant protections in Sonoma County, not just information on existing protections (which are few). [See survey results here.](#) Information distribution is not a program affirmatively furthering fair housing or an anti-displacement

⁹ [marin-county-hc-hcd-review-draft-\(071922\).pdf \(marincounty.org\)](#) (see p. 231-Program 31: Tenant Protection Strategies, which include rent stabilization, just cause for eviction expansion to all units, strengthening no-fault eviction protection to include higher relocation payments, longer eviction notice periods and a right to return; local relocation assistance; tenant commission; right to purchase; right to return; a Tenant Bill of Rights; and community or tenant right to purchase (COPA/TOPA).

measure.¹⁰ Local governments have clear authority to pass Rent Stabilization and Just Cause ordinances that are more protective than state law. We urge inclusion of a just cause ordinance in the Housing Element, with particular attention to the following:

- Protections for Subletting - Subletting not a just cause for eviction IF landlord unreasonably withheld consent following written request by tenant, so long as max number of occupants does not exceed allowable limits
- Protections for Families - Addition of family members not just cause for eviction, so long as number of occupants does not exceed allowable limits
- Substantial Repairs - Repairs for health and safety concerns only and permits obtained before notice to vacate served; tenant has right to return under same terms/rent, subject to allowable rent increases
- Owner Move-In – Limited during the school year when a minor or educator lives in the unit; IN addition, a landlord may not evict if the tenant (1) has lived in the unit for at least 5 years and is either at least 62 years old or disabled; or (2) is certified as being terminally ill. However, a landlord may evict a tenant who qualifies for this exemption if the landlord or relative who will occupy the unit also meets the criteria for this exemption and no other units are available.
- Withdrawal from the Rental Market – Implement Gov. Code 7060.1-7060.5 (Ellis Act); clarify that a sale of the property is not “withdrawal” and not a just cause for eviction; owner required to file notice with the city/county; 120 day notice period (one year for seniors and disabled persons); right to return for displaced tenants; period of recorded constraints on the property in accordance with Ellis Act
- Increased relocation payments and longer notice periods for no-cause evictions

We call on Sonoma County to protect renters and comply with Housing Element requirements by adding Rent Stabilization and Just Cause policies and programs to their Housing Element.

c. Mandatory/Proactive Rental Inspection Program

Traditionally, code enforcement programs have operated primarily on a complaint basis: a resident complains about a potential code violation, a city code inspector or enforcement officer investigates the complaint, and if a violation is verified, enforcement actions are initiated. We ask that as part of its Housing Element, Sonoma County commit to a proactive rental inspection (PRI) program, also known as a systematic or periodic code enforcement program, in which covered rental housing is inspected mandatorily and routinely to identify issues and protect the health and safety of tenants more effectively. PRI programs shift the burden of code enforcement from reliance solely on tenant complaints to a more prevention-based, equitable approach to improve housing quality. Nearly eight in ten farmworker/immigrants live in rental housing, nearly double the rate in the county overall. Frequently, due to fear of losing their housing,

¹⁰1,003 survey respondents asked for just cause protections. Informational programs are not anti-displacement measures as presented in the surveys. See [Sonoma County Housing Policy Survey - Responses | SurveyMonkey](#) question 8 (“Enact anti-displacement protections like educating tenants on their rights and preventing eviction unless there is “just cause” (like not paying rent or causing property damage) [emphasis added].)”)

farmworkers and immigrants do not submit complaints about substandard conditions in their rental housing.

Survey results indicated a strong desire for the County to “Proactively conduct routine inspections to ensure that landlords meet habitability standards (like having heat and not having pests and mold).” See survey results [here](#). Nearly all focus groups surveyed indicated that the quality and conditions of housing was a top concern. (Appendices, pp. 6-12). Those focus groups were conducted with primarily protected classes and special needs populations, who have a greater likelihood of renting. A mandatory proactive rental inspection program could improve the housing conditions these communities live in.

(Note that Sonoma Valley Collaborative, a signatory on this letter, actively supports all other points herein, but has not yet taken a position on a proactive rental inspection program.)

d. Tenant Bill of Rights

The Housing Element Draft lacks any real anti-displacement programs. Therefore, we urge the County amend the Draft to include adoption of a Tenant Bill of Rights (TBR). The purpose of a TBR is to state unequivocally that all Sonoma County residents have the right to clean, safe, and secure housing, which includes but is not limited to:

- Protection from arbitrary evictions and skyrocketing housing costs - discussed above.
- Safe housing - protections for tenants from eviction if they deduct repairs from rent.
- Tenant Commission - Seats reserved that represent low-income seniors, persons with disabilities, federally subsidized housing including LIHTC, and communities of color that provides information, referrals, and advice to tenants and advises the Board of Supervisors on programs and policies affecting unincorporated Sonoma County tenants.
- Fair Chance Housing - Criminal and/or eviction history and credit checks for Sec. 8 should be limited to AFTER a prospective tenant is accepted by a landlord and given opportunity to explain/cure.
- Nonpayment notices - Require landlords to provide a 7-day warning letter before a 3-day notice to pay or quit.
- Anti-retaliation - Rebuttable presumption if tenant asserted rights, including but not limited to, requesting a reasonable accommodation, reporting sexual harassment, and otherwise filing complaints against housing provider staff within six months.
- Anti-harassment - A landlord cannot in bad faith engage in conduct intended to influence a tenant to vacate their rental unit.
- Community or Tenant Right to Purchase (“COPA/TOPA”) - TOPA/COPA gives tenants and/or qualified organizations advance notice that the landlord intends to sell the building, along with specified timelines to exercise the “right of first offer” to buy the property before it goes on the market and the “right of first refusal.” A TOPA or COPA will prevent displacement, stabilize current residents TOPA/COPA expands stability and wealth-building opportunities for tenants by creating pathways to homeownership.

Permit Sonoma planners were informed of many concerns that can be addressed by a TBR during their extensive public outreach, such as the high cost of housing, landlord retaliation, intimidation, discrimination, health and safety concerns such as black mold, rodents and asbestos, and racism. (See Appendices, pp. 6-12).

(Note that Sonoma Valley Collaborative, a signatory on this letter, actively supports all other points herein, but has not yet taken a position on a tenant bill of rights.)

e. Amend the Mobile Home Rent Stabilization Ordinance (MHRSO)

There are 4,447 mobile homes in unincorporated Sonoma County, and the majority of residents are seniors. Mobile Home Parks are some of the last naturally occurring affordable housing. In order to protect seniors and ensure their ability to age in place as well as maintain the affordability of these communities, the MHRSO must be amended. It currently allows for an annual space rent increase of 100% of the change in the Bay Area CPI, or 6% cap. This year, seniors simply cannot afford this increase. Santa Rosa passed an ordinance amending their MHRSO last night to prevent their residents from paying a 5.7% space rent increase. City Council reduced the cap to 4% and CPI change to 70%. The County has considered an amendment in the past and likely already has a draft amendment. Policy HE-1e should go beyond continuing to protect mobilehome park residents, and state a timeline and parameters for amending the Ordinance as soon as possible.

Conclusion

The Draft should specify the above proven policies and programs to improve and conserve existing, non-subsidized, affordable housing stock and address the unmet needs of low-income, protected class tenants in order to meet the obligations under Housing Element Law. We urge the County to revise the Draft to include a commitment to advancing policies and programs that offer strong tenant protections as a crucial component of affirmatively furthering fair housing. The housing element update process is a big undertaking and we welcome the opportunity to be partners in the process and help the County meet its housing development and fair housing goals.

Sincerely,

Margaret DeMatteo, Housing Policy Attorney
[Legal Aid of Sonoma County](#)

Caroline Peattie, Executive Director
[Fair Housing Advocates of Northern California](#)

Valerie Feldman, Staff Attorney
[Public Interest Law Project](#)

Kirstyne Lange, President
[NAACP Santa Rosa-Sonoma](#)

Zoe Siegel, Director of Climate Resilience
[Greenbelt Alliance](#)

Fred Allebach, Member
[Sonoma Valley Housing Group](#)

Aura Aguilar, Board Member
[Sonoma County Tenants Union \(SCTU\)](#)

Caitlin Cornwall, Project Director
[Sonoma Valley Collaborative](#). Members include: Boys & Girls Club of Sonoma Valley Teen Program, Disability Services & Legal Center, Friends in Sonoma Helping, Golden State Manufactured-Home Owners League, Greenbelt Alliance, Hanna Institute, Impact100 Sonoma, La Luz Center, Midstate Construction, SHARE Sonoma County, Sierra Club, Sonoma Community Center, Sonoma County Regional Parks, Sonoma Overnight Support, Sonoma Police Department, Sonoma Valley Chamber of Commerce, Sonoma Valley Climate Coalition, Sonoma Valley Community Health Center, Sonoma Valley Education Foundation, Sonoma Valley Hospital, Sonoma Valley Housing Group, Sonoma Valley Interfaith Ministerial Association, Sonoma Valley Mentoring Alliance, Sonoma Valley Museum of Art, Sonoma Valley Vintners & Growers Alliance, Transition Sonoma Valley, Valley Bar + Bottle, Vintage House Sonoma, Winery Sixteen 600

From: [Patrick OLoughlin](#)
To: [PermitSonoma-Housing](#)
Subject: Comment for District 5 Draft Housing Element Update
Date: Tuesday, November 15, 2022 12:11:18 PM
Attachments: [SAVS Santa Rosa ARPA Transitional Housing Village Pre-Application Narrative & Plans July 18 2022.pdf](#)

Dear Permit Sonoma:

Sonoma Applied Village Services – SAVS (pronounced “saves”) is a local homeless service provider that operates homeless villages in Sonoma County. We currently operate Horizon Shine Village in Sebastopol (<https://sonomavillages.org/horizon-shine/>) and are preparing to open a new village in Santa Rosa. We are writing to urge you to consider two improvements to Sonoma County planning that will significantly help reduce homelessness in Sonoma County.

First, create a streamlined planning process to help homeless service providers receive faster approvals and reduce developer burdens on them. The cities of Sebastopol and Santa Rosa have been a good planning partners for our villages. Sebastopol used an emergency order related to homelessness and Santa Rosa uses a “resilient city” order to reduce planning requirements. Those orders allowed the cities to make decision regarding approving new projects at the planning department level. They also allowed the cities to waive traditional developer requirements that have held up other projects and made costs far too steep for us to develop. Specifically, we were not required to develop sidewalks, bike lanes, execute traffic studies, grade the properties, etc. The orders also allowed us to build in any zoning district since we were providing ultra-low income housing. It also provides protection against lawsuits that typically hold up traditional developers by specifically creating a defined use for homeless solutions. Here is Santa Rosa’s Resilient City Development Measure: <https://www.srcity.org/2802/Resilient-City-Development-Measures>

Second, crate two new definitions of “temporary homeless housing” and “permanent homeless housing” – these definitions will allow homeless service providers to follow a logical set of guidelines that are lower than traditional building standards (yet still safe) and allow us to apply for a well-defined housing type when we bring projects forward. Today, there is no definition in Sonoma County that will allow us to create temporary housing (safe parking, tiny homes) or permanent homeless housing. The definitions go beyond describing the buildings, they also define the site – what kind of lighting, fencing, sewer/water/electric service is needed to qualify. This significantly helps service providers plan and helps the county avoid lawsuits or other contentious issues by having a well-defined, and affordable housing type. We recommend two housing types – “temporary homeless housing” – aimed at allowing RVs/trailers, cars and tiny homes to be placed within a defined homeless temporary housing village (Santa Rosa would call this safe parking). These houses are typically moveable and hooked up to power. We also recommend a definition of “permanent homeless housing” – these facilities would be typically trailers or tiny homes secured on a foundation and would have well defined safety and comfort requirements that fit the minimum HUD housing requirement that will allow clients residing in the space to receive Federal Housing Vouchers (often know as Section 8) housing. That will allow for a more consistent funding stream using vouchers to fill those permanent homeless housing slots. Santa Rosa

https://library.qcode.us/lib/santa_rosa_ca/pub/city_code/item/title_20-division_1-chapter_20_16 is a good starting point temporary housing definition states that the operator must provide

supportive services for the client and may allow a client to live there for 6-24 months. This is allowed in zone R-1-6 with a minor use permit -the review authority is the zoning administrator.

We are working with David Kiff and Lynda Hopkins to create a plan for a West-County specific homeless housing village – and these permitting and zoning improvements will help make more affordable homeless temporary and permanent housing a reality in Sonoma County. The SAVS Board would like to work with Permit Sonoma to understand the potential for improvements to permitting to allow for faster, more affordable of homeless service options.

Sincerely,

Patrick O'Loughlin

Vice President, SAVS Board of Directors

C: 707.800.5784

E: patrick@sonomavillages.org

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December 4rd, 2022

Roy Smith
9480 Willow Ave, Cotati
emailrsmith@gmail.com

To: Sonoma County Planning Commission (Via email)

Re: General Plan Housing Element Update – Public Comment

Dear Planning Commissioners,

Thank you for your ongoing efforts to ensure our current and future quality of life in Sonoma County. My comments below are in the capacity of a private resident. I have lived in the County since 1978, in both rural and urban districts, as both a renter and an owner. I have not submitted comment before, but have come to recognize that my County is now at a crucial juncture in regards to the Housing Element.

Primary Considerations:

Please consider the following observations in all General Plan updates.

- Sonoma County is resource and space limited. The appropriate balance between population, activity levels, and land use was likely surpassed in the early 1980's. Since then, the County has experienced declines in all measures of environmental and human well-being.
- Any continuation of growth or expansion of housing will necessarily cause additional injury in environmental and human terms.

Specific Comments:

- Address Housing and Land Costs: [Retrofit existing structures rather than construct new housing on virgin land.](#)
- Address lack of available land with access to sewer service (in unincorporated County): [Limit additional housing to Tiny Houses, home splitting, and barn conversion utilizing grey water + composting toilets.](#)
- Address Environmental conditions – ground water availability: [Prioritized rain water catchment and storage, both potable and large scale irrigation storage.](#)
- Address economic housing displacement: [Shift focus from construction and retention of “affordable” housing to progressive taxation based on square footage and land use. Levy increasing permit fee tax for housing in excess of 1500sf, escalating each 500sf. Subsidize or eliminate permit fees below 1000sf. This inherently shifts housing towards density and affordability.](#)
- Housing Element Program 16: Convert industrial to mixed residential, [but emphasize work / live arrangements. Eliminate 100% affordable unit requirement, as this can result in economic apartheid in these neighborhoods, effecting schools and social makeup. . Replace with square footage constraints to favor smaller housing. Include requirements for urban ag community plots for each apartment unit.](#)
- Housing Element Program 18: Housing Land Trust Model Program. [Modify trust to pass into](#)

food and cottage industry mixed use. Such a rezoning would solve housing, transport, and local economic issues with a single investment

- Policy HE-3d: Non-traditional housing. Without the adoption of standardized composting toilet systems, such housing will be blocked by the need for sewage connections.
- Policy HE-5e, -5f: Farmworker housing. As with -3d above, without a revision to avoid polluting water with flush toilets, such housing is largely unworkable both in engineering and economic terms.
- Policy HE-6f: High quality public services. Amend to emphasize live / work arrangements, and community urban agriculture plots for each housing unit.
- Policy HE-6i: Affordable / farmworker housing code enforcement. Amend “unsafe conditions” to exempt fire truck access requirements. This requirement eliminates the majority of alternative housing due to physical locations away from the primary road egress. Amend to exempt greywater or composting toilets as “unsafe”.

General Comments:

1. Any housing development should avoid the remaining potential agricultural bottom lands. All food producing soils must be protected for future need.
2. Consider encouraging the splitting of existing large family homes, while addressing vehicle use by rezoning to include home-based livelihoods.
3. Building ever more housing units is a problem multiplier: It solves for one factor (the RHNA) while exacerbating multiple factors (water resources, sewage and waste collection, traffic, noise, pollution, infrastructure demands, open space and ag land loss, etc).
4. Include within the Housing Element a focus on work / live integration. If we do not, we only degrade conditions through increased commute traffic.
5. All “commuter” housing is detrimental to our County's health and quality of life. All additional housing is commuter housing unless the ability to make a livelihood is integrated within the neighborhood.
6. Limit housing size, rather than push “affordability”. The former is conceptually simple, easy to implement through permit fees, and does not require additional public funding to realize the affordability goal.
7. Transport hubs or centers are a myth, as public transport does not exist at a meaningful scale, and probably can never address the structural issue in SC of widely separated and sprawling housing, shopping, schools, and work places.
8. The only achievable solution to mobility, population, and traffic pressure is to reduce or eliminate mobility needs by targeting work / live housing. Not just by integrating residential districts within commercial, but by specifically creating worker living units within walking distance of employment. This could include all sectors and zones, such as office, retail, industrial, service, or on-farm housing.

Thank you for your consideration.

- Roy Smith



SONOMA COUNTY TRANSPORTATION & LAND-USE COALITION

To: Permit Sonoma
From: Steve Birdlebough, Chair
Date: December 4, 2022
Re: Housing Element Update

The update of the Housing Element presents a golden opportunity to make Sonoma County a leader in supporting the State Air Resources Board's effort to cut greenhouse gas emissions 48% below 1990 levels by 2030. The update can also further the Regional Climate Protection Authority's goal for carbon neutrality in Sonoma County by the year 2030, together with the County's long-standing efforts to preserve open space by concentrating residential developments within existing urban growth boundaries.

Low-density housing that leads to car-dependency is an important contributor to greenhouse gas emissions from the transportation sector. Although the shift to electric cars will gradually help reduce tailpipe emissions, there must be significant reductions in driving over the next decade, because all cars and roads require embedded carbon. We estimate that it will be necessary to reduce vehicle miles traveled at the rate of at least 1% per year to meet State goals, and at least 5% per year to meet the RCPA goal for carbon neutrality.

Most of the RHNA goals for new housing units can be met by agreements that transfer housing projects from lands in the County to land in the cities. Instead of incurring the costs of infrastructure improvements to support developments on properties outside of city-limits, the County can compensate cities for their costs to digest such transfers. The new residential developments can be located within walking distance of bus stops or train stations, with sidewalks and safe cycling pathways that enable driving to be minimized.

Significant reductions in driving can be accomplished by "un-bundling" the cost of parking spaces associated with apartment projects." In mixed-use developments, employees can pay each day to park, and net parking fee proceeds can be distributed equally among employees who drive, and those that walk or cycle to the job site. Some examples of ways to accomplish these objectives are at: <http://www.councilofinfillbuilders.org/wp-content/uploads/2019/12/Hayward-Infill-Report.pdf> and <https://norcalapa.org/2019/09/reclaiming-downtown-for-people/>

Please incorporate these objectives in the County's update of the Housing Element.

cc: Each Member of the Board of Supervisors

SCTLC, 684 Benicia Drive, Santa Rosa, CA 95409
Address correspondence to scbaffirm@gmail.com



NAACP

Santa Rosa - Sonoma County Branch



**PUBLIC INTEREST
LAW PROJECT**

CELEBRATING 25 YEARS OF ADVANCING JUSTICE



November 30, 2022

SENT VIA EMAIL

Sonoma County Board of Supervisors

Planning Commission and Staff

Email: PermitSonoma-Housing@sonoma-county.org; bos@sonoma-county.org;

PlanningAgency@sonoma-county.org

cc: HCD, HousingElements@hcd.ca.gov

Re: Public Comments Regarding Draft Sonoma County 6th Cycle Housing Element

Dear Sonoma County Board of Supervisors, Planning Commission, and Staff:

We, the Sonoma County Housing Element Working Group (“SCHEWG”), are advocates and policy experts in Sonoma County, working together to ensure the region is one where everyone can find a home.

Overall, we support the draft Housing Element (“Draft”), but we want it to go farther and do more. We know that tackling the combined crises of housing scarcity, housing affordability, inequality, and climate change requires structural and cultural change. SCHEWG has several recommendations to help the Draft meet statutory requirements and affirmatively further fair housing (“AFFH”). These recommendations include but are not limited to the following:

1. Enhance specificity around programmatic metrics and timelines
2. Allow small plexes in all residential zones
3. Reduce or eliminate parking requirements
4. Implement a vacant parcel tax

5. Add specificity to Housing Element Program 18: Housing Land Trust Model
6. Include programs and policies that ensure an equitable and robust output of ADUs
7. Strengthen fair housing goals and programs
8. Add programs to prevent displacement and preserve existing rental housing stock
9. Improve the site inventory
10. Continued and meaningful public engagement

1. Enhance specificity around programmatic metrics and timelines

SCHEWG urges the County’s planners and consultants to strengthen specificity throughout the Draft to ensure it is clear, aligned, and actionable. State law requires all Housing Element programs to have beneficial impact within the planning period, including identifying specific actions, which agency or official is responsible for those actions, and a timeline. Programs to affirmatively further fair housing must have clear “metrics and milestones for determining what fair housing results will be achieved.” A recent survey of the California Department of Housing and Community Development (“HCD”) reviews of draft housing actions from Southern California jurisdictions emphasizes that time-bound actions with “specific commitments [from local actors], metrics, and milestones” are required.¹ HCD made similar commentary recently about Santa Rosa’s draft Housing Element.² The Draft currently lacks the detail and specificity needed to make its commitments meaningful, preventing its policies and programs from being measured, reported, or enforced. In many cases, such as objective design and development standards, the Draft language is so vague that we cannot meaningfully comment on it. Please address this by adding multiple metrics and milestones for each program.

SCHEWG asks that the Housing Element commit the County to report annually on Housing Element progress on the front page of a County website. Reporting should include a clear dashboard that uses visuals to show progress on the Housing Element’s actions, metrics, quantified objectives, and milestones.

2. Allow small plexes in all residential zones

SCHEWG asks the Housing Element (in Program 15, p. 51 of the pdf) to commit Sonoma County to immediately permit by-right development of “plex-style” housing (2-12 units) in all residential zones. Commonly referred to as “Missing Middle Housing” (“MMH”), these are house-scale buildings that contain more than one home, such as duplexes, triplexes, fourplexes, and cottage (or bungalow) courts³, usually built to a similar scale as surrounding single-unit homes. These buildings are “middle” in form and scale, between single-family and multi-family buildings. They also can deliver homes at a price that is more attainable for “middle”-income households, for both rental and entry-level home ownership. The reason they are “missing” is that due to many factors, including zoning restrictions, these housing types have not been

¹ [Summary of Housing Element Review Letters V6.pdf \(ca.gov\)](#)

² [sonSantaRosaDraftOut11-1-22.pdf \(santarosafoward.com\)](#)

³ Missing Middle Housing typically consists of projects ranging from 2-12 units. For more information, please visit <https://missingmiddlehousing.com/types>

produced by the market for many decades. In a report released earlier this year, a local housing nonprofit discovered that over 90% of owner-occupied homes in the County are single family homes.⁴ This may be even more extreme in unincorporated areas.

Allowing by-right (or ministerial) development of MMH in all residential zones will help reverse the decades-old impact of exclusionary zoning practices while also increasing the availability of less expensive housing types that support diverse, vibrant, and walkable neighborhoods. The Draft needs to also commit the County to developing objective design standards that foster predictable outcomes for these developments, limiting possible adverse “material” impacts to the surrounding neighbors.

3. Reduce or eliminate parking requirements

The County should take immediate action to reduce or eliminate parking requirements for new or redeveloped residential projects, and incentivize driving less (Transportation Demand Management or “TDM”). These measures can create connected and healthy communities that meet our nationally recognized climate goals, reduce traffic congestion along Highway 101 and other major corridors, and ensure the feasible development of more, more diverse, and more affordable housing.

A new parking space costs \$30,000-\$80,000,⁵⁶ and with inflation, two spaces may now cost up to \$200,000. This raises the cost of housing development and makes it hard to meet production goals. Though some locations lack available parking, especially during peak usage, solutions abound that can ensure we produce only the minimum parking needed in new development while maximizing our public and private parking stock. To achieve this, SCHEWG requests the following actions in Program 15:

- a. Fund a study of potential parking reforms, particularly how smart parking policies could positively impact housing, transportation and other goals.
- b. Require unbundled parking for transit oriented developments. This is easier for building managers to implement now with new parking tech tools like [Parkade](#).⁷
- c. Reduce parking requirements for developments that provide subsidized transit passes.

Consider exploring a “Shared Parking” program upon or prior to the completion of a parking study. Shared Parking leverages private parking assets that are often underutilized during the work day, after hours, and on weekends. An incentive program that encourages owners of these properties to open them to the public, using Parkade or a similar tool, would allow greater density along transit corridors while also ensuring efficient management of public and private parking assets during design-day parking conditions. For a region like Sonoma County where

⁴ https://generationhousing.org/wp-content/uploads/2022/02/2022_Feb_SOH_Sonoma-County.pdf

⁵ <https://terncenter.berkeley.edu/research-and-policy/cost-to-build-housing-legislation-2022/>

⁶ <https://www.shoupdogg.com/wp-content/uploads/sites/10/2016/05/Cutting-the-Cost-of-Parking-Requirements.pdf>

⁷ This application is included as an example and is not an endorsement thereof.

parking is still a necessary evil, it's important to leverage all available tools to curb vehicle use, promote mode shift, and where that is infeasible, make available adequate parking.

The recent *Bay Area Parking Census* by SPUR and Mineta Transportation Institute found that there are 2.4 parking spaces per car.⁸ TransForm's study of 80 Bay Area buildings found that 28% of residential parking spaces were unused. This excess parking represented 1,164,600 square feet of space that could have gone to better use and cost over \$198 million dollars to build. Continuing to require a minimum of two parking spaces per unit in most places will continue these wasteful mandates that drive up housing costs. For these reasons, SCHEWG recommends that not every micro-apartment be required to have a full parking space and that the Draft be amended to reflect a commitment aimed at addressing this under Program 15, or the most appropriate program identified by the consultant or staff. Flexibility of this standard should be contingent on the location of the project and availability of street parking. Alternatively, please consider a fractional parking requirement for micro-apartments.

By eliminating the cost of parking, homes can be offered at more affordable prices, reducing the number of people who face high housing burdens, get priced out of their community, or lose their housing. Residents, new and old alike, will benefit from the reduction in vehicle traffic and associated air pollution.

4. Implement a vacant parcel tax

While most jurisdictions in Sonoma County have limits on vacation rentals, the larger issue remains: how can a destination like Sonoma County mitigate the impacts of underutilized properties and/or second homes? SCHEWG proposes the following:

- Quantify the impact of second and/or vacant homes on County housing stock;
- Evaluate programs that other jurisdictions have implemented to address this issue;
- Make recommendations on policies to address second and vacant homes.

Program 8b in the Draft has no action on this issue until the end of 2025. We request this effort begin in 2023 since estimates in the Draft suggest that as many as 11,500 units are vacant in unincorporated Sonoma County.

A discussion on implementing a Real-Estate Transfer Tax would also be germane.

5. Add specificity to Housing Element Program 18: Housing Land Trust Model

SCHEWG supports wider use of the housing land trust model to preserve existing units and convert market rate units to a model that ensures affordability in perpetuity. We ask that Program

⁸<https://www.spur.org/publications/spur-report/2022-02-28/bay-area-parking-census#:~:text=There%20are%20approximately%202.4%20spaces,person%20in%20the%20Bay%20Area.>

18 commit to working with “Housing Land Trust of Sonoma County and other organizations using the housing land trust model to create permanently affordable housing.”

6. Include programs and policies that ensure an equitable and robust output of ADUs

Accessory Dwelling Units (“ADUs”) are an important tool for meeting our housing challenge. [Napa Sonoma ADU](#) has created opportunities for our communities to modestly increase density and ensure our workforce, our families, and our friends can safely, stably, and in some cases, affordably maintain residence in the region.

SCHEWG recommends the following options to promote deed-restricted affordable ADUs/JADUs:

- Avoid affordability restrictions that exceed 10 years – Homeowners do not want to make long-term, particularly multi-decade, commitments.
- Offer an out for homeowners – Ensure they can pay back the loan and exit the system when desired.
- Match the incentives to the requirements – If a jurisdiction wants to offer more restrictive conditions (e.g., renting to a Section 8 tenant, etc.), the incentives need to be larger.
- Reduce uncertainty in the process for the homeowner – The more fixed costs and clarity in the permitting process, the better.

It’s crucial to consider equity when creating an affordable ADU program, especially to Affirmatively Furthering Fair Housing via ADU development. For example, to support BIPOC and/or low-income tenants via ADUs:

- Estimate accurately the number of ADUs that can reasonably be expected to accommodate Very Low and Low Income households, *especially* without implementing any incentives with concurrent affordability restrictions. SCHEWG asks for a Housing Element program to survey the cost to occupants of ADUs and JADUs every year or every other year, to inform these estimates.
- Allow family members (or at least low-income family members) to live in an ADU. Limiting tenants to non-family members excludes some BIPOC communities that value multi-generational living for cultural and/or financial reasons.
- Grants are better than loans. Debt averseness is a barrier for BIPOC homeowners to benefit from ADUs, due to discriminatory lending practices they’ve witnessed or suffered from in the past. White and affluent homeowners have conversely been able to literally leverage debt to access more wealth. For this reason, grants are better than loans for many BIPOC homeowners to build ADUs. At the very least, any ADU loan program should have clear upfront marketing that includes financial education to build trust in the program.
- Allow homeowners to use either an ITIN number or a Social Security number to access ADU financing. This avoids excluding undocumented homeowners.

- Ensure the program has bilingual capacity so non-English speaking homeowners can access it.
- Partner with grassroots and community based organizations with targeted marketing to BIPOC subgroups. Trusted organizations in these communities can help spread the word about the ADU program.

Another example: To support community members with disabilities via ADUs:

- Include the option for an additional grant or other subsidy to build an accessible ADU.
- Include an incentive (e.g., financial or expedited permitting) for all ADUs to be built to be accessible or at least with principles of Universal Design.

Finally, increasing ADU density in low-density, single-family residential areas beyond the requirements of state ADU law (e.g., permitting more than one ADU or JADU per single-family lot) can earn two points toward the thirty required to secure the Prohousing Designation.

7. Strengthen fair housing goals and programs

The Draft acknowledges that “State law requires state and local agencies to take proactive measures to correct any housing inequalities related to race, national origin, color, ancestry, sex, marital status, disability, religion, familial status, or other protected characteristics.” (p. 22). The County should revise the Draft to include concrete and measurable commitments to achieve this goal, including fair housing enforcement and education, advancing policies that protect tenants, who are more likely to have their fair housing rights violated, and other policies and programs that advance housing opportunities for members of protected classes.

Fair Housing Advocates of Northern California (FHANC) has conducted investigations and audits over the past several years to determine the prevalence of discrimination in rental housing in Sonoma, Marin, and Solano counties. In 2019-20, FHANC conducted an audit to test for national origin and source of income (SOI) discrimination,⁹ and in 2021-22, FHANC conducted an audit to test for race and SOI discrimination.¹⁰ Both of these audits revealed that Sonoma County had the highest rate of discrimination of the three counties, with evidence of discrimination found in 86% and 92% of tests conducted in each audit, respectively. In 2019-20, FHANC found evidence of SOI discrimination in 62% of tests in the county, national origin discrimination in 5% of tests, and both national origin and SOI discrimination in 19% of the tests. In 2021-22, FHANC found evidence of SOI discrimination in 88% of tests in the county, race discrimination in 63% of tests, and both race and SOI discrimination in 62% of the tests. FHANC continues to see increases in complaints of SOI discrimination, and in the past fiscal year FHANC received more SOI complaints than any other type except disability. FHANC’s May 2021 Audit Report also found evidence of disability discrimination in 60% of tests in the

⁹ See 2019-2020 Audit Report: National Origin and Source of Income Discrimination in Rental Housing, <https://www.fairhousingnorcal.org/resources--more-information.html>

¹⁰ See 2021-2022 Audit Report: Race and Source of Income Discrimination in Rental Housing, https://www.fairhousingnorcal.org/uploads/1/7/0/5/17051262/race_and_soi_audit_report_2021-22_1.pdf

County.¹¹ This evidence highlights a need for strengthened fair housing education and enforcement.

The Sonoma County Housing Authority has been proactive in identifying fair housing issues in the County and communicating with FHANC, the County’s fair housing service provider, and other stakeholders to address these issues. To strengthen the County’s fair housing education and enforcement, we suggest that the Housing Authority commit to continue frequent communication with Legal Aid of Sonoma County (LASC) and FHANC, ideally by establishing quarterly meetings with these organizations, and collaborating with these organizations to provide fair housing training to county staff, housing providers, and residents.

Programs to affirmatively further fair housing must identify clear “metrics and milestones for determining what fair housing results will be achieved” (Gov. Code § 65583(c)(10)(A)(iv), which are not included in the current Draft. The County should revise the Draft to commit to concrete, meaningful, measurable actions that will ensure fair housing enforcement and education for all residents and housing providers.

The Draft acknowledges that “racial and income segregation” are persistent and pertinent fair housing issues in the County (p. 22). The Draft should be revised to make clear how the County will meet its requirement to “take meaningful actions...that overcome patterns of segregation,” as required. The Draft does not indicate, for example, how site inventory selections will overcome patterns of segregation. The Draft should include analysis demonstrating how the County will meet this AFFH requirement.

The Draft does not analyze the disproportionate impact of homelessness on groups protected by fair housing laws. In Sonoma County, Black and indigenous people are disproportionately homeless, as are people with disabilities. Per data from the 2022 point-in-time count, 13% of homeless County residents identified as Black or African American, despite making up only 2% of the County’s general population.¹² In addition, 1 of every 2 renters in the County spends more than 30% of their income on rent, a burden that Latino and Black renters were more likely to have than their white or Asian counterparts. However, the Draft does not acknowledge these disparities, explore their root causes, or adopt programs that meaningfully address these concerns. Of note, the Draft:

- Fails to analyze criminalization practices, including the County’s proposed amendments to its anti-camping ordinance and its forced removal of people from the Joe Rodota Trail/County parks, as creating barriers to stability and housing access, and as disproportionately harming BIPOC and disabled County residents;
- Fails to analyze relative accessibility of shelter and housing resources, including failure to analyze reliance on congregate shelter for disparate impact on unhoused people with disabilities, including mental health disabilities;

¹¹ See <https://www.fairhousingnocal.org/resources--more-information.html>

¹² [Attachment 1 - County of Sonoma 2022 Point-in-Time Count Results \(ca.gov\)](#); [U.S. Census Bureau QuickFacts: Sonoma County, California](#)

- Fails to identify or analyze civil rights litigation against the County related to homelessness and discrimination;
- Fails to analyze strict rules in County programs--like Los Guilicos Village and the trailers--for barriers to access for people with mental health disabilities;
- Fails to analyze the Coordinated Entry System for racial and other disparities.

The lack of adequate analysis of homelessness issues and their disproportionate impact on people with disabilities and people of color results in a lack of adequate programs to address these issues. Program 27, the Draft's program for the Interjurisdictional Housing Committee, commits only to do what the County is already doing on an "ongoing" basis. The County could, for example, commit to policies that dedicate County land for non-congregate shelter, expand SROs, and ensure the need for emergency shelter is met, as a few examples. The County should amend the Draft to include more concrete actions, including actions informed by a more robust fair housing analysis, as required by the Housing Element statutes.

8. Add programs to prevent displacement and preserve existing rental housing stock

Sonoma County is legally required to develop concrete, measurable, and realistic actions to address disparities identified in the Assessment of Fair Housing, including displacement risk (Gov. Code § 65583(c)(10)(A)(ii)). Additionally, the County is legally required to analyze fair housing issues, including "disproportionate housing needs" and "displacement risk" of members of protected groups, and identify and prioritize concrete actions to remedy these injustices. This is nearly impossible without a rental registry.

One of the most stark and urgent housing disparities in Sonoma County is that Black, Latinx, Indigenous, and mixed-race households are dramatically more likely to rent rather than own their homes. As a result of systemic racism in education, employment, lending practices, and housing policies, Black households have had limited opportunity to build intergenerational wealth, and Black residents in Sonoma County have lower levels of well-being than Black residents of the state as a whole. Black residents of Sonoma County live over three years fewer, on average than Black Californians. Black children and young adults are enrolled in school at a rate 6 percentage points lower than Black children and young adults statewide. Sonoma County's Black residents have a lifespan ten years shorter than any other racial and ethnic group in the County and have lower educational attainment rates than the county average.¹³

This means that Black, Indigenous and People of Color (BIPOC) residents are disproportionately vulnerable to exploitation and displacement due to predatory rent hikes, arbitrary evictions, being forced to live in uninhabitable conditions and landlord harassment and retaliation- a fact that the Housing Element must recognize and remedy. Unfortunately, the Draft fails to include meaningful actions to address them. A legally adequate assessment of housing needs should identify that low wage earners, as well as many vulnerable populations, are disproportionately likely to rent rather than own their homes, and it should dig deeper into what causes those

¹³ [A Portrait of Sonoma County 2021 Update \(upstreaminvestments.org\)](https://www.upstreaminvestments.org/2021/04/20/sonoma-county-2021-update/)

patterns and the specific needs of renters. For example, a legally adequate assessment of housing needs should examine how the dramatic increase in rents over the past ten years, combined with stagnating wages for low wage earners workers has increased overpayment for housing, led to overcrowding, driven displacement, and made it more difficult for low-income people to find homes in the community.

The analysis should also consider “jobs-housing fit” – the number of low-wage jobs in the jurisdiction compared to the number of homes affordable to low-wage earners, which is woefully inadequate almost everywhere in California. A robust analysis is required of the needs of renters, including the numbers and demographics of renters who are forced to pay more than they can afford for rent, trends in the displacement of renters over time, evidence of landlord harassment, and other issues facing renters. The element must describe any concentrations of substandard housing. The element must also provide demographic information on the homeless population and evaluate impacts on protected characteristics and disparities in access to opportunity (e.g., access to services).

Continuing existing programs is insufficient. If similar policies failed to produce success in the 5th cycle, why would the same policies produce a different outcome in the 6th cycle? The Housing Element needs specific programs to prevent displacement and preserve existing housing, as required. A stable and safe home is crucial for renters and the communities where they live to thrive and prosper.

a. Rental Registry

We request that the Housing Element commit to developing and using a Rental Registry. A Rental Registry will provide the County with the data required to enact meaningful policies to prevent tenant displacement should it so choose. It can collect data on evictions, rent increases, and identify systemic housing issues in unincorporated areas. It can be used to facilitate a proactive rental inspection program to address maintenance and preservation of rental housing. Without such a database, the County will be unable to accurately assess the needs of renters.

b. Proactive Rental Inspection Program

Traditionally, code enforcement programs have operated primarily on a complaint basis: a resident complains about a potential code violation, a city code inspector or enforcement officer investigates the complaint, and if a violation is verified, enforcement actions are initiated. However, under a proactive rental inspection (PRI) program, also known as a systematic or periodic code enforcement program, covered rental housing is inspected mandatorily and routinely to identify issues and protect the health and safety of tenants more effectively. PRI programs shift the burden of code enforcement from reliance solely on tenant complaints to a more prevention-based, equitable approach to improve housing quality. As discussed below, eight in ten farmworker/immigrants live in rental housing, nearly double the rate in the county overall. Frequently, due to fear of losing their housing, farmworkers and immigrants do not

submit complaints about substandard conditions in their rental housing. A mandatory proactive rental inspection program could improve the housing conditions these communities live in.

(Note that Sonoma Valley Collaborative, a signatory on this letter, actively supports all other points herein, but has no position on a proactive rental inspection program.)

9. Improve the site inventory

The County uses multiple methods to determine if it has adequate site to accommodate its revised Regional Housing Need Allocation (“RHNA”), including projecting the number of Accessory Dwelling Units over the planning period by income level, reducing the RHNA by the number of approved projects that can demonstrate the affordability level of those units, counting sites from the prior planning period, inventorying additional sites, and including a program to rezone sites to allow higher density development. The chart below reflects the County’s plan to accommodate its 2022-2030 housing need. As described below, this chart will have to be revised, and additional sites identified, to reflect the fact that the Draft overestimates the number of ADU’s that will be affordable to lower income households and overestimates the number of approved projects that are affordable to lower income households. In addition, all of the factors included in Government Code section 65583.2(g) have not been considered for the non-vacant sites identified for future residential development.

	Extremely Low-Income	Very Low- Income	Low - Income
Revised RHNA	512 units	512 units	627 units
Approved Projects	10 units (Redwood Apts)	141 units	296 units
Projected ADU’s		76 units	176 units
Sites from Prior Planning Period			59 units
Underutilized Sites			64 units
Rezoned Sites		525 units	526 units

a. Planned/Approved Projects

The Hanna Boys Mixed-Use Project is still in the pre-application stage and therefore it is premature to reduce the RHNA by 160 low-income units when there is no applicable funding source ensuring the units will be affordable and the development has not been approved for development. The chart above should be adjusted to remove credit for those 160 units.

Also, additional information is required regarding the 10 units affordable to low income households that may be available at the Sonoma Low Barrier Navigation Center (“Center”). Navigation centers are typically not housing units, but instead serve as shelter beds. Without

additional information regarding the Center and the potential funding source, the 10 units attributed to the Center should not be credited against the low-income RHNA.

b. ADU's

Since 2018 the County has averaged 71 ADU's per year since 2018 and estimates 586 ADU's over the 6th cycle planning period. The County bases its ADU affordability assumptions on a formula created by ABAG that does not include enough explanation to be reliable. In addition, although most ABAG jurisdictions have high housing costs and high incomes, they are not identical. Assumptions about ADU affordability in San Mateo County and Sonoma County should not be identical. It is unclear if the ABAG formula calculated units where no rent is charged, perhaps to a friend or family member, as a unit that is affordable to very low-income households if it were made available for rent to any possible tenant. Therefore, the County must survey its ADU housing stock to determine how many ADU's are rented at affordable rents before extrapolating how many of the future potential ADU's will be affordable to lower income households.

The County has to monitor the affordability of ADU's that are built, to track whether these units are accommodating the RHNA in the fashion anticipated in the Draft. The County also needs a mechanism to accommodate the RHNA if ADU production or affordability lags behind what the County projects for ADU development. Currently, Program 25g is designed to monitor ADU development, but this program does not monitor the affordability of the units developed. Program 25g provides that if production lags what is anticipated, then 2 ADU's will be permitted on single-family lots if certain circumstances are present. It is difficult to imagine how allowing more ADU's, without incentives, will make up for a lack of production of ADU's. The County should design a program that will allow a second ADU for owners that might find that attractive, but also provide incentives to increase production. Last, in addition to collecting information about what ADU's have accessibility or adaptability features (Program 25f), the Housing Element should provide incentives for all ADU's to be developed with universal design features.

c. Underutilized Sites

Government Code section 65583.2(g) requires the County to evaluate the realistic development potential for non-vacant sites using predetermined factors. These factors must be analyzed in addition to whatever factors the County also proposes to use. The County has failed to analyze all of the required factors included in the statute, including identifying whether "there are any existing leases or other contracts that would perpetuate the existing use or prevent development of the site for additional residential development" or whether any regulatory incentives exists to encourage residential development on these non-vacant sites. This analysis must be completed in order to determine whether the non-vacant sites that would support 64 lower income units are actually feasible.

10. Continued and meaningful public engagement

As noted in a letter we sent November 1st, SCHEWG requests the following actions to ensure that the community can understand and influence your decisions.

- a. Publish the review letter you receive from HCD on your Housing Element website as soon as you receive it. This will ensure that community members have as much time as possible to understand HCD's perspective, so that they can participate in updating the Housing Element.
- b. Hold one or more community meetings, work sessions, and/or public hearings to take comments on the HCD review findings and how best to address them before the next draft is prepared. Incorporate as much community input as possible, including expertise from local community based organizations, about housing needs and solutions. Consider all proposed analyses and recommendations. A diverse range of methods for soliciting comments from the community will facilitate the input of residents with disabilities and language access needs. This input is necessary to your ability to fully consider the housing needs of disabled residents and English Language Learners in your jurisdiction, as the State Housing Element law requires.
- c. Once the revised draft is finalized, post it on your Housing Element website in both a clean version and a version with visible redlines against the initial public review draft. This will allow community members to see the changes you have made, which will in turn enable the community to help ensure compliance with state law; clarify the reasons behind the jurisdiction's decisions regarding revisions and community input; and help build trust. Ensuring transparency and accountability in the process will yield a stronger final Housing Element.
- d. Publish a summary of comments received and a list of changes made to the original draft identifying which comments or policy suggestions were accepted, which were not, and why. This, again, enables the community to see and understand the changes made. It is similar to the federal Administrative Procedure Act standards for public input in decision-making processes, and provides a best practice towards developing trust between governments and their constituents.
- e. While state law only requires a 7-day comment period, we ask you to provide a 30-day public comment period after releasing revised drafts. Allowing more time for community members to review the Housing Element will improve the quality of the public input, which increases the likelihood of certification by HCD, as the Housing Element will better address the needs of the community. Providing a 30-day public comment period furthers the spirit of the legal requirements under California Housing Element law.

Closing Comments

SCHEWG is committed to working with the County of Sonoma to ensure that the Housing Element update process is inclusive, laying out a roadmap to effectively and equitably address

the housing crisis. All Sonoma County residents deserve a safe, accessible, and affordable place to call home, with a range of choices free of barriers to fair housing.

We recognize this will be a marathon, not a sprint. That is especially true for the rezoning process that will take place over the course of 2023. We support this effort and look forward to continuing this work with you.

SHEWG supports the comments submitted by Fred Allebach on November 29, 2022 (via email), and encourages the County to meaningfully consider his observations.

Best Regards,

Margaret DeMatteo, Housing Policy Attorney

[Legal Aid of Sonoma County](#)

Jen Klose, Executive Director

[Generation Housing](#)

Caitlin Cornwall, Project Director

[Sonoma Valley Collaborative](#). Members include: Boys & Girls Club of Sonoma Valley Teen Program, Disability Services & Legal Center, Friends in Sonoma Helping, Golden State Manufactured-Home Owners League, Greenbelt Alliance, Hanna Institute, Impact100 Sonoma, La Luz Center, Midstate Construction, SHARE Sonoma County, Sierra Club, Sonoma Community Center, Sonoma County Regional Parks, Sonoma Overnight Support, Sonoma Police Department, Sonoma Valley Chamber of Commerce, Sonoma Valley Climate Coalition, Sonoma Valley Community Health Center, Sonoma Valley Education Foundation, Sonoma Valley Hospital, Sonoma Valley Housing Group, Sonoma Valley Interfaith Ministerial Association, Sonoma Valley Mentoring Alliance, Sonoma Valley Museum of Art, Sonoma Valley Vintners & Growers Alliance, Transition Sonoma Valley, Valley Bar + Bottle, Vintage House Sonoma, Winery Sixteen 600.

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1 December 2022

Eric Gage, Planner III
Permit Sonoma

Via email

Re: Comments on Public Review Draft 6th Cycle Sonoma County Housing Element

Dear Mr. Gage:

Following are my general and specific comments regarding the Public Review Draft 6th Cycle Sonoma County Housing Element (hereinafter the Housing Element).

GENERAL COMMENTS

1. The Housing Element Environmental Impact Report (hereinafter EIR)

Unfortunately, the Housing Element EIR will not be available for review until AFTER comments are due to the Housing Element. I have concerns related to the environmental impacts of the selection of sites for housing to meet Sonoma County's RHNA, which I will briefly address below, that may or may not be relevant. And I won't know until I see the EIR.

2. Use of Conditional Words

The Housing Element has a number of policies/programs that are just "suggestions." As we all know, everything is possible with the application of political will and, usually, money. I believe that every single instance of a conditional policy in the Housing Element should be noted, and there should be a robust discussion as to whether the proposed policy/program is actually possible and/or desirable. If the policy/program is possible/desirable, a determination should be made of how to implement the policy/program so that the conditional policy would become a requirement. The Board of Supervisors should take this action simultaneously with accepting the Housing Element.

Several examples of the use of conditional words are:

Policy HE-1d – "[C]onsider utilizing tax exempt bonds to fund the acquisition of existing market-rate properties or affordable properties at-risk of conversion to market-rate uses where those units will be restricted to long-term occupancy by low-, very low- and extremely low-income households"

Policy HE-2g – “[C]onsider extending this prohibition [of vacation/time-share uses] to primary residences on lots containing Accessory Dwelling Units”

Housing Element Program 16: Expand AH Combining District, 16a – “[C]onsider adding the Affordable Housing (AH) Combining District to additional sites in light industrial, commercial, or other appropriate zones as requested where the following conditions are met...” (I oppose a portion of this program, as I will discuss later in this letter.)

Housing Element Program 8: Protect Residential Lands and Units, 8b – “Evaluate options to mitigate the impacts of the loss of resident-occupied housing, including evaluating the feasibility and effectiveness of a vacant home fee or tax that exempts owner and long-term renter-occupied units. Funding derived from such a program could/may be used to mitigate the impacts of loss of resident-occupied housing, such as subsidies to build and sustain low and moderate, income housing units.”

3. Additional Funding for Permit Sonoma

It is clear that there will need to be additional funding for Permit Sonoma to allow the hiring of additional personnel, and to cover training for existing and new personnel.

The success/failure of the proposed policies/programs in the Housing Element will rest on the abilities of Permit Sonoma staff, who I believe will need additional resources to be effective.

4. Negotiations with Incorporated Jurisdictions

To the best of my knowledge, no incorporated jurisdiction (other than the small Cloverdale annexation agreement mentioned in the Housing Element) has agreed to take some/any of Sonoma County’s RHNA. Also to the best of my knowledge, this is NOT because the incorporated jurisdictions are not willing to at least consider it, and likely do it, but because Sonoma County has not pursued negotiations, nor offered any resources to offset the costs of that housing.

With regard to incorporated jurisdictions taking some of Sonoma County’s RHNA, please state with specificity what negotiations Sonoma County has initiated and/or completed with each incorporated jurisdiction in the County, including the status of those negotiations.

The bottom line, of course, is that every unit of housing built costs the jurisdiction (and that jurisdictions’ residents) where it is built money, and there needs to be an appropriate sharing of resources with the jurisdictions who take the housing.

We all believe in city-centered growth. I believe that there needs to be better cooperation/coordination between the County and incorporated jurisdictions within the county.

5. Urban Service Areas Should be Defined and Locked In

Many of us have been advocating for decades that Urban Service Areas (hereinafter USAs) should be clearly defined – areas where there are services, including sewer, water, police coverage, parks, schools, etc. – and should be locked in by the voters the way Urban Growth Boundaries are clearly defined and locked in by the voters.

The Board of Supervisors should immediately begin this process, and put County USAs on the ballot for a vote.

With USAs locked in, it would be clear to everyone where housing and other development should take place, and where it should not take place.

6. Environmental Constraints to New Housing

Again, I have no idea if the following comments are necessary, since I haven't yet had the opportunity to review the Housing Element EIR.

As was made abundantly clear in all of the community outreach, individuals want housing that is safe, including safe from wildfire threats, on safe roads, and have the ability to safely evacuate if necessary. Further, all housing should have access to clean and safe water, and be able to safely remove sewage.

The Housing Element states, on page 19 of the pdf, that:

Other non-governmental constraints that impact housing development include environmental factors: high wildfire hazard areas, lack of groundwater availability, steep slopes, earthquake and landslide hazard zones, flood hazard zones, and environmental protection for special status species and habitats. Most of Sonoma County's rural lands are impacted by one or more of these environmental constraints.

Additionally, on page 43 of the pdf of the Housing Element, it is stated that:

The High Resource areas of the Unincorporated County with sewer access necessary to accommodate higher density housing development are Glen Ellen, Forestville, and Graton. However, these areas are encumbered by environmental constraints, including wildfire and flood risk, and by greater distance from jobs and services with minimal public transportation options available.

These statements are appropriately stated. Unfortunately, in the Housing Element Appendices, however, all of these environmental constraints are NOT listed. In fact, only four of these environmental constraints are apparently considered important:

- Flooding
- Steep Slopes and Septic Suitability
- California Tiger Salamander

This is both confusing and unacceptable.

Further, while the Technical Background Report that accompanies the Housing Element does cover wildfire danger, it inappropriately only uses a CalFire Fire Hazard Severity Zone map that is not only out of date, it ignores Wildland Urban Interface areas identified by other jurisdictions, and, more importantly, ignores the best evidence available, which are the Community Wildfire Protection Plan (hereinafter CWPP) Wildfire Risk Index maps (the CWPP is part of the Multijurisdictional Hazard Mitigation Plan, and although it has not yet been finalized, it is still quite relevant).

The Housing Element does not specifically require that all housing be built only in areas that are not subject to very high and/or high fire danger risk.¹ Further, the Housing Element does not require that all housing – including additional ADUs – must only be allowed on roads that are not in violation of the Department of Forestry and Fire Protection regulations on fire safe roads. Finally, the Housing Element does not require that all housing should only be allowed where it is possible to safely evacuate when necessary.

Of course, all housing must have a safe and reliable source of water, and evaluation of groundwater availability is crucial before siting any housing – including ADUs – in the unincorporated portions of Sonoma County.

With this letter I state my expectation that all sites for any additional housing in the unincorporated county, including all ADUs/JADUs, be evaluated for:

- Wildfire risk, including whether the location is in a high or very high fire danger area,
- Fire safe roads, including whether the location is on a road that meets the Board of Forestry and Fire Protection State Minimum Fire Safe Regulations (Title 14, Division 1.5, Chapter 7, Subchapter 2, Article 1-5),
- Ability to safely evacuate, including whether the location is in an area that has constraints to safe evacuations (assuming that everyone will have hours of warning to evacuate is not acceptable, as oftentimes it will not be true),
- Adequate reliable water source, specifically whether the location has ample groundwater or will be connected to municipal water.

It is unclear whether the Housing Element has performed these evaluations on the sites proposed for new housing, and since ADUs and JADUs have a different approval process, it is not clear that this evaluation ever will be conducted before ADUs and/or JADUs are located in unincorporated Sonoma County.

These evaluations must be done, and I hope that the Housing Element EIR has adequately evaluated these and other CEQA required topics.

7. Community Separators/Protected Open Space Lands

Under no circumstances should housing be allowed in voter protected Community Separators or in voter protected open space lands.

8. Housing on Industrial Designated/Zoned Lands

It's impossible for me to overstate my absolute opposition to redesignating/rezoning any Industrially designated/zoned lands for housing of any sort.

¹ To help evaluate this risk, please see the Community Wildfire Protection Plan Wildfire Risk Index maps at <https://sonoma-county-cwpp-hub-site-sonomacounty.hub.arcgis.com/apps/c0783237c4244ac49838f8b7e9f54691/explore>

I have been fighting this battle ever since a Santa Rosa City Council with Pat Wiggins as a member (just so you understand how long ago this was) approved an affordable housing project smack in the middle of industrial lands in SW Santa Rosa, which immediately impacted all the industrial uses then existing and discouraged future industrial uses on surrounding properties otherwise designated and zoned for the same.

No City and no County can be economically healthy unless they have adequate lands designated and zoned for industrial uses. Industrial uses, by their very nature, often operate long hours (including in the middle of the night), generate noise and have different noise standards, and create dust and odors (even when properly environmentally controlled), as well as have other impacts.

None of those “side effects” of industrial uses are compatible with housing. None of them.

Just to be clear, industrial uses don’t just mean a large scale manufacturing operation. They include the places where you get your car repaired, they include the places where an artist builds your custom dining room table or a cabinetmaker builds your new kitchen cabinets, they include the places where the new HVAC system for your business/home is stored and constructed, the places where your plumber (who you desperately need when your toilet backs up) is located, and more. In other words, the industrial uses we’re talking about curtailing are uses that we ALL need, and we ALL use. They’re also uses that generally create good paying, skilled jobs that help our economy.

It’s neither fair to the industrial uses we all need, nor to the new residents of housing, to combine the two uses.

The reality is that when you put housing into or even directly adjacent to industrial uses, the new residents rarely (and frankly shouldn’t) have to tolerate the long hours, noise and dust/odors, etc. – instead, the rules are all changed to limit the industrial uses’ ability to work long hours, make noise and generate dust/odors, etc. Of course, what that means is that the industrial uses no longer are able to effectively and economically operate.

And, that appears to be exactly what the Housing Element is proposing in Policy HE-3h:

Review the noise standards for Urban Residential land uses in the next General Plan update and consider options to modify the standards to facilitate the development of housing in these areas while continuing to protect public health.

Let’s be clear, that review of noise standards will not be resolved in the industrial uses’ favor. Instead, their ability to operate will be constrained.

Ironically, Sonoma County has an Affordable Housing Combining District and is proposing a Workforce Housing Combining District, which both allow those types of housing in Industrial lands. So, it’s OK for poor and working people to be subjected to the potential side effects of being surrounded by industrial uses?

Some of the sites designated for future housing in the Housing Element are in fact in Industrial zones, so these conflicts will happen, and Sonoma County’s ability to be an economically healthy County will be reduced. Yes, we’re just doing it to a “few” locations – but as we continually chip away at our lands that

can be used for industry, without identifying replacement industrial lands, we will ultimately become less and less self-sustaining, and will be consigning our County to a limited job base.

Either remove industrial lands from consideration for housing, or for every industrially designated/zoned property converted to residential uses, identify an equivalent site without residential neighbors or other constraints that will be designated/zoned for industrial uses.

If you haven't gathered by now, I am absolutely opposed to putting any housing in any industrial lands. Period.

9. Vacation Rentals, Time-Share Housing and Second/Vacant Homes

There are two policies that should be part of the Housing Element:

1. Require (not consider, as the Housing Element wording now states) prohibition of vacation or other short term rentals use in all buildings on any property with an ADU and/or a JDAU. Since use of an ADU as a vacation rental is prohibited, for property owners who want to game the system the logical course of action is to either live in the ADU themselves or rent it conventionally, and then use the main house as a vacation rental. This clearly subverts the intent of the protection for ADUs.
2. Require a tax or fee on vacant residential properties that are not being remodeled/repaired or which are not in the process of being sold or rented conventionally. While it is nice that wealthy individuals can own a second/third/etc. home that is generally vacant, allowing that practice to continue harms Sonoma County's housing supply. Clearly there is an overwhelming public good to discouraging this practice by enactment of a substantial tax or fee on those vacant properties.

The Board of Supervisors themselves realize the consequences of the proliferation of vacation rentals and vacant homes in the unincorporated County, as it was one of the primary reasons that a tax was proposed to prevent a West County High School from closing (the tax failed).

The Housing Element clearly states the rather horrifying statistics: 63% of vacant homes – 7300 – in unincorporated Sonoma County are used for seasonal, recreational or occasional use. Obviously, reduction of this number would reduce the number of new housing units needed to be built, which would reduce the cost on the County as a whole for the new infrastructure, etc. new housing will require.

SPECIFIC COMMENTS

I also have a few comments about specific sections of the Housing Element, as follows.

1. "Siloed" Permitting Process

This is discussed in several locations in the Housing Element, including on page 20 of the pdf. Housing Element Program 12: Permitting Procedures and Priority Processing addresses the "silo" complaint.

I agree that the County should commence a no-cost pre-application meeting for all County projects, and should schedule a regular weekly time for these meetings. During these meetings the applicant should be in a room with representatives of all departments to discuss applicant's project. This allows issues to

become clear, and applicant gets to hear all the proposed conditions – conflicts can be worked out, or at least addressed. Then applicant can come back with a more informed actual application, which will save a great deal of time and frustration for everyone. This process does require work by the applicant up front, but for those applicants willing to do the work the process has clear benefits, as has been shown in other jurisdictions.

Because of the complexity of many County projects, even small projects, it may be appropriate to offer these meetings to any/all project applicants.

2. Length of Housing Affordability/Preservation of Affordable Housing

Policy HE-4d proposes to give nonprofit organizations building legally affordable housing funding priority because those units may be affordable for a longer period of time.

I support this policy, but would prefer a policy requiring a minimum 55 year period for affordability for all legally affordable housing built in Sonoma County, regardless of who builds it.

Also, on a related note, the Housing Element correctly wants to preserve affordable housing whenever possible, but states that only 5 subsidized units are at risk during the duration of this Housing Element. I of course support preservation of all affordable housing, but have a hard time believing that there will only be 5 units at risk during this time period. I would recommend that the number of units at risk be evaluated and updated if necessary on an annual basis. And then preserved if at all possible.

Another related issue is adequate oversight and inspections to ensure that all legally affordable units remain that, and are appropriately rented to persons who qualify for those units. I believe the Housing Element should have a policy stating the procedures that will be followed to guarantee this oversight and necessary inspections, for obvious reasons.

3. Special Needs Housing

I support the policies/programs contained in the Housing Element on the topic of special needs housing, but want to mention one thing that can be done to increase accessibility – require whenever possible the creation of single level “flats” instead of multi-level apartments. While no substitute for Universal Design, single level ground story flats are more accessible and have fewer barriers than multi-level apartments, opening them up to seniors and those with minor mobility issues.

I have been advocating for this for many years, and believe that properties who have constructed flats instead of multi-level apartments have been helpful.

Again, it’s not a solution, but is something that can help.

4. Joint Powers Authorities

Housing Element Program 21 proposes that Sonoma County partner with a Joint Powers Authority to purchase market rate apartment complexes and convert them to affordable housing and/or construct new deed restricted affordable housing.

I'm not necessarily opposed to this idea in theory, but not all Joint Powers Authorities are the same. There are, in fact, several Joint Powers Authorities who I have grave concerns about, including the California Community Housing Agency (hereinafter CalCHA). CalCHA was selected by the Board of Supervisors at one point to purchase the Chanate property, but they withdrew, at least partially because their prospectus was eviscerated by the community. Further, CalCHA purchased the Annadal Apartments in Santa Rosa, and to the best of my knowledge that has turned out poorly for both CalCHA and for the City of Santa Rosa, and hasn't really helped the residents of that complex or those needing legally affordable housing.

The Press Democrat did an article about CalCHA – see <https://www.pressdemocrat.com/article/news/central-valley-government-agency-jumps-into-sonoma-county-housing-market/>

Forbes also did an article about CalCHA – see <https://www.forbes.com/sites/schifrin/2021/12/02/california-scheming-municipal-bonds-workforce-housing-crisis-luxury-apartments/?sh=3862aefc3001>

Another JPA that I also have significant concerns about is the California Statewide Communities Development Authority (hereinafter CSCDA). I do not have nearly as much information/experience with CSCDA as I do with CalCHA, but they are mentioned (and not in a great light) in the Forbes article, link above, and in other less than favorable ways elsewhere. See <https://www.fullertonsfuture.org/2021/housing-scam-averted/> and <https://milpitasbeat.com/the-trouble-with-turing-milpitas-new-middle-income-housing-deal/>. This causes me to have equally grave concerns about CSCDA as a possible JPA the County could become involved with.

Remember, all properties purchased/built by these types of JPAs will pay no property taxes. This would be fine, if the community benefit they offer is adequate to compensate for the jurisdictional loss of property taxes, including school bonds. However, in my opinion, based on what I've seen so far, these types of deals do NOT provide an adequate community benefit, although they certainly appear to enrich those behind the JPAs.

Briefly, my problems with these JPAs include that instead of using HUD affordability income levels, these types of deals use the California Tax Credit affordability income levels, which are significantly higher than HUD levels, meaning that people end up paying more in rents. Further, federal, state and local guidelines state that no one in a legally affordable unit should be paying more than 30% of their income for rent/utilities, but both of these JPAs appear to be requiring that their tenants set aside between 35% to 40% of their income for rent. Additionally, oftentimes the alleged affordability levels of these deals, in combination with the higher rents that can be charged and greater percentage of income required for rents, means that the units are actually more expensive than market rate units, rendering them useless in helping to solve the affordability crisis.

I won't belabor this point in this letter, but I will go on record as strenuously opposing Sonoma County's participation in ANY JPA like this, with these types of terms/conditions and the negative results that flow therefrom.

Thank you for the opportunity to comment on the Housing Element. I look forward to reviewing the Housing Element EIR when it is available.

As always, please don't hesitate to contact me if you have any questions or would like additional information.

Very truly yours,

Sonia E. Taylor

Cc: Tennis Wick, Director, Permit Sonoma



Sonoma Valley Collaborative and community members comment on the draft Sonoma County Housing Element

November 30, 2022

To: Members of the Sonoma Valley Citizens Advisory Commission, Springs Municipal Advisory Council, North Sonoma Valley Municipal Advisory Council, and Supervisor Susan Gorin

These are personal statements about housing and housing policy, collected in 2022 from Sonoma Valley Collaborative members and community members involved with those members. We provide these statements to support pro-housing policies.

Esme, 10th Grade Student at Sonoma Valley High School, Teen Services member

Living in a household of 6 in a small trailer home, an obstacle that my family and I feel is the limited space we deal with, the high prices, and poor house condition. Something I value about housing is privacy that each of my family members don't have. We all live in a crowded environment where we need to pile up in a few rooms. The high cost of rent and bills causes struggle to afford basic daily-life necessities. My daily-life obstacles are a broader problem, because if I don't have privacy, that limits my ability to study and have a place to do my school work without interruptions. Many of my school peers can relate to my struggle. The high cost will cause people to move out of Sonoma to a more affordable place. This will cause the school population and community population to decrease in a town that should be our home. There needs to be a vital change to occur in our community. Instead of having people escape and seek out different places to call a home, you need to help families and people stay and receive the resources they need for living an enjoyable lifestyle.

Litzy, 12th grade student at Sonoma Valley High School, Teen Services member

I don't think decision makers understand how not having a stable home can mess with a young person's mental health and well-being.

John Hennelly, Sonoma Valley Hospital, CEO

At the hospital, it's becoming more and more evident that the lack of affordability is affecting us. Ten years ago, 40% of our employees lived in Sonoma Valley, now it's about 30%. That has significant impacts to staff availability, commuting costs, and community engagement.

Jay, 11th grade student at Sonoma Valley High School, Teen Services member

I live in a one bedroom apartment that can't hold a family of five. Our rent has gone up, and it is far from school. I am always late. Housing can bring more families, make a diverse and connected community, provide privacy, and can be comfortable, letting you sleep well. It is crowded everywhere, with big families trying to live in small spaces. It's a broader problem, because it can also cause the population to decrease, with less students, teachers and families. Make housing affordable for families with low income!

Lauren Feldman, Valley Bar + Bottle Owner, SVC Council Member

My name is Lauren Feldman and I am a small business owner in the City of Sonoma. I own a restaurant called Valley on the Sonoma plaza. I love our community, care passionately about the environment, and am incredibly frustrated by the housing crisis in our small town. As a business owner and life-long local, I have to believe that there is a place where all three of these values can intersect. In trying to staff my restaurant, I became increasingly frustrated by the number of single-family homes and "vacation condos" that sit empty the majority of the year. These are homes that could be rented by my staff members or lived in full-time by fully engaged members of our community, and potential guests in my restaurant. I believe that, while we do need more affordable housing within the city limits, there are a number of large properties where additional dwelling units could easily be built while still preserving the existing neighborhoods that we know and love, but also increasing some new density building up JUST ONE LEVEL, close to downtown where potential staff wouldn't have as much need for transportation – better for the environment as well. We need to ease approvals and reduce costs for people willing to build additional units on their own land and we need to reduce the number of whole-house vacation rentals and second/empty homes. We need to create access and opportunities for diversity of our population by creating housing in places where housing/buildings already exist and are underused.

Cris, 10th Grade student at Sonoma Valley High School, Teen Services member

I struggle with housing as I am in a family of four in a one bedroom apartment. My parents do what they can to stay in Sonoma without going bankrupt—that is what we don't want.

They have to take care of two kids and pay bills and rent. It's very expensive in Sonoma and in the future it might result in leaving Sonoma. The thing about housing is that it gives you a place to stay at night. Having it is the way we live and needs to lower in price, and lower income housing needs to be built.

Charlotte Hajer, Sonoma Community Center Executive Director, SVC Council Member

I'm lucky. I'm a nonprofit executive, and I'm the highest-paid employee at my organization. My husband makes a similar wage. But, we are renters. We can't afford to buy a house in Sonoma. Neither of us has family wealth, we continue to pay off student debt, and we have childcare costs. If our rent goes up, I'm not sure where we'll go, or whether we'll be able to stay in Sonoma Valley.

If my family can't afford a house, then many other families in Sonoma must be worse off. All of us are stuck in uncertainty, unsure whether we'll be able to stay here, unsure of whether we can raise our family here, and unsure of whether we can continue to serve this community. But the thing is, we are your teachers, your healthcare workers, your firefighters, your police officers, and even your community leaders. If we can't afford to stay here, that means a big loss for Sonoma.

To create stability for families like mine, we need to establish stronger protections for tenants, including rent control. And we need to lower the purchase price of housing, so that families like mine can enter the market and put down real roots here. Let's increase our local housing stock by reducing second homeownership and curbing vacation rentals, so that more of our existing housing becomes available to the local families who contribute to Sonoma's economy, culture, and well-being.

Diego, student at Sonoma Valley High School, Teen Services member

[We need] more lower-income houses, less larger houses being occupied by individuals instead of families, less vacation homes where locals don't live. People growing up here can't afford to stay. Protect people from getting moved out and being unable to be somewhere after it's renovated.

Staff and Board of Sonoma Community Center

For our local nonprofits, it's getting harder and harder to hire talented staff because the cost of living in Sonoma is prohibitive.

Nonprofits operate on lean margins. Here at the Sonoma Community Center we've committed to paying our staff as much as we can, but even a competitive salary in the nonprofit sector isn't nearly enough to match the cost of living here in Sonoma. We have trouble attracting talent for our open positions, and continually face the possibility of losing the wonderful staff we already have, because they are increasingly priced out of decent housing within a reasonable distance from work.

The nonprofit sector provides essential and vital services to the Sonoma Community. We are your healthcare, your education, your social services, your parks, your extracurricular activities, your culture, your wellbeing, your gathering places. We are your key to creating a diverse and equitable community where everyone has an opportunity to thrive. But if we can't offer our staff the decent living they deserve and need, we can't continue to operate. And we can't provide our staff with that stability on our own. We need support from the community – and one of the most crucial things we need is more affordable housing now. We need tenant protection, including rent control. We need increased housing stock within a reasonable distance of work, schools, and services. Additionally, we need to lower the threshold to (and cost of) homeownership through innovative and alternative programs like rent-to-own agreements or policies that encourage more modular housing, so that working families have a real chance at putting down roots here in the Valley.

Hunter, 10th grade student at Sonoma Valley High School, Teen Services member

Considering how many low-paying jobs support Sonoma being a tourist destination, the lack of housing that people in those jobs can afford is going to slowly cripple this community.

Reverend Dr. Curran Reichart, First Congregational Church, SVC Council Member

I am the pastor at the First Congregational Church in Sonoma. In 2017, a number of my parishioners lost their homes. Long-time Sonoma Valley residents had to ask neighbors or friends for places they could live for an indeterminate amount of time until their houses could be rebuilt. One of those families eventually was able to buy a house. The house they bought has no internal heating. It had plumbing that didn't work. It had repairs that needed to be made for over 30 years. This was the only house they could afford. They'd lived in Sonoma for 45 years. After the Tubbs Fire, housing became more difficult to find for everyone.

Our Preschool Director approached me yesterday with tears in her eyes, to tell me that she needed to close a classroom. Not because she didn't have students to enroll, but because she couldn't attract a teacher to live in Sonoma at work for what the school could afford to pay her. There are children in our Valley who need school support. We can't afford teachers for the children in need.

Vinnie, 10th grade student at Sonoma Valley High School, Teen Services member

My math teacher, a person who most people at the high school know, is struggling to afford to live in Sonoma. One time in class me and my friends were discussing why we don't really like Sonoma. We looked up the average mortgage for a house in Sonoma County and looked up the average paycheck for a teacher in Sonoma County: the average mortgage was about \$2,700 while the paycheck came to around \$2,500. We brought this up to the teacher, and she says the only reason she can afford her home is because her dad was in the military. Stability is important with housing. We can't have our teachers moving every couple years because they can't afford housing. This affects teachers and civilians. It can make civilians want to leave Sonoma County. We need the municipal and County government to build and make plans for more affordable housing in the Springs, unincorporated and city areas.

Joel, 11th grade student at Sonoma Valley High School, Teen Services member

Glen Ellen is a pretty expensive place and some people have to work all the time to afford it. Rent also gets more expensive and sometimes there are multiple families in apartments so it is a struggle to pay for other things like gas and food. It is also difficult to save up for things and have spare time. Being able to afford housing is extremely important for caring for a family when relying on one source of income. This affects more people in Sonoma County due to how expensive it is and how jobs pay little. This is a horrible act of injustice since there are so many single family homes and people resist affordable housing, so the policy makers should listen to all the people in need and make changes.

Satya, student at Sonoma Valley High School, Teen Services member

My aunt lives in a comfortable two bedroom condo downtown. This is well located and good for one person, but very costly. My cousin has access to walking to school, nice restaurants and near the central location of our community's events. In comparison, I live in a low income trailer park in a three bedroom home. I have a much tougher time getting around to work and places I'm expected to be as a student.

Omar Paz, Lifelong Boyes Hot Springs Resident, SVHS Class of 2011

As a lifelong resident of Sonoma Valley (having lived in Boyes Hot Springs, Glen Ellen, the City of Sonoma, and Kenwood) the time for serious investment in affordability, retention of local community, and bold leadership for a housing blueprint that promotes equity for the workers and families that are the backbone of the community and local economy is long overdue. Please consider the hard work and countless hours invested in the broadly supported recommendations such as those brought to you by the Sonoma Valley Collaborative. Inaction has only led to stagnation and further delayed the community investment owed to both City and Unincorporated residents. We need only look towards the type of work and collaboration accomplished during the fires and other natural disasters of the last 5 years to know that we can come together now WITHOUT crisis at our doorstep...and the economic and less visible crisis has been around for quite some time.

Sonoma Valley Collaborative is a forum of community leaders from a wide range of sectors across Sonoma Valley, finding solutions and taking action to address our community's biggest challenges.

Sonoma Valley Collaborative's consensus Housing Declaration is,

Sonoma Valley suffers from a housing affordability crisis that affects every aspect of our community. We pledge to work together, across boundaries, to increase, improve, and preserve housing that is affordable, for people who live or work in Sonoma Valley, within already developed areas, to create diverse, safe, complete neighborhoods.

The members of Sonoma Valley Collaborative represent many of your constituents. We are united in urgently calling for commitments to affordably housing our fellow community members. We look forward to reviewing the next iteration of Sonoma County's Housing Element.

Boys & Girls Club Of Sonoma Valley/Teen Services Sonoma

Disability Services & Legal Center

F.I.S.H. Sonoma Valley

Impact100 Sonoma

Hanna Institute

Homeless Action Sonoma

La Luz Center

Midstate Construction

Sonoma Community Center

Sonoma Ecology Center

Sonoma Overnight Support

Sonoma Valley Chamber of Commerce

Sonoma Valley Climate Coalition

Sonoma Valley Community Health Center
Sonoma Valley Education Foundation
Sonoma Valley Golden State
Manufactured-Home Owners League
Sonoma Valley Hospital
Sonoma Valley Housing Group
Sonoma Valley Mentoring Alliance

Sonoma Valley Vintners and Growers
Alliance
Sonoma Valley Visitors Bureau
Transition Sonoma Valley
Valley Bar + Bottle
Vintage House Sonoma
Winery Sixteen 600

Staff contact: Kim Jones, kim@sonomavalleycollaborative.org, 707.933.7747.

From: [Vicki Hill](#)
To: [PlanningAgency](#)
Cc: [PermitSonoma-Housing](#)
Subject: Draft County Housing Element - Glen Ellen parcels #054-290-057, 054-290-084
Date: Wednesday, November 16, 2022 12:37:46 PM
Attachments: [Comments on EIR for Housing Rezoning.docx](#)

EXTERNAL

Dear Planning Commissioners and Staff,

I am unable to attend the workshop tomorrow on the Draft Housing Element.

My comments are regarding the two Glen Ellen parcels (# 054-290-057 and # 054-290-084, items 65 and 66 in Housing Appendix Table) proposed for rezoning in the Draft Housing Element. These parcels were part of the “Rezoning Sites for Housing Project” and were included in the Draft EIR for that rezoning effort. During that process, many people submitted comments with valid concerns regarding the inappropriateness of substantially upzoning these parcels in the tiny village of Glen Ellen at an unsignalized intersection. My comments on that EIR are attached, for your information. I will be submitting detailed comments on the Draft Housing Element by the due date but in summary, our community is very concerned about the project-specific and cumulative effects. Given that Glen Ellen and Sonoma Valley have now been handed 1000 housing units and as many jobs, as part of the SDC Specific Plan (a few blocks from the Glen Ellen parcels to be rezoned), it seems that this area has taken on more than its fair share of housing and deserves a break. Please do not do any further damage to this rural area by upzoning these parcels. Tripling the number of housing units on this site will only add to the significant impacts caused by implementation of the Specific Plan. Furthermore, the proposed rezoning is not consistent with General Plan policies regarding Glen Ellen nor is it consistent with the Glen Ellen Development Guidelines.

Thank you,

Vicki Hill, MPA

Land Use Planner

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From: [Vicki Hill](#)
To: [PermitSonoma-Housing](#)
Subject: FW: Draft County Housing Element Comments - Glen Ellen parcels #054-290-057, 054-290-084
Date: Sunday, December 04, 2022 4:06:35 PM
Attachments: [Comments on EIR for Housing Rezoning.docx](#)

Dear Planning Staff,

My comments are regarding the two Glen Ellen parcels (# 054-290-057 and # 054-290-084, items 65 and 66 in Housing Appendix Table) proposed for rezoning in the Draft Housing Element. These parcels were part of the “Rezoning Sites for Housing Project” and were included in the Draft EIR for that rezoning effort. During that process, many people submitted comments with valid concerns regarding the inappropriateness of substantially upzoning these parcels, which are outside of the urban growth boundary in the tiny village of Glen Ellen at an unsignalized intersection. My comments on that EIR are attached, and are submitted as comments on the Draft Housing Element, with regard to these two parcels.

In summary, Glen Ellen and Sonoma Valley have now been required to accommodate 1000 housing units and as many jobs, as part of the SDC Specific Plan (a few blocks from the Glen Ellen parcels proposed for rezoning). With the large scale SDC development, it is clear that this area has taken on more than its fair share of housing and should not be required to accommodate even more housing that will contribute to the significant traffic impacts identified for the SDC Specific Plan. It will also require removal of several heritage trees. Furthermore, the property owner has not stated any intention to develop the property at the proposed density, which would be completely out of scale for the site and surrounding neighborhood. Densifying this area that is not served by existing or planned transit, is not near a job center, and is not near or adjacent to an urban growth area makes no sense from a land use planning perspective and would be in conflict with climate change policies.

Please do not do any further damage to this rural area by upzoning these parcels. Tripling the number of housing units on this site will only add to the significant impacts caused by implementation of the Specific Plan. Furthermore, the proposed rezoning is not consistent with General Plan policies regarding Glen Ellen nor is it consistent with the Glen Ellen Development Guidelines.

Thank you,
Vicki Hill, MPA
Land Use Planner

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Vicki A. Hill, MPA
Environmental Planning

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

June 17, 2021

DELIVERED VIA EMAIL

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

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

Dear PRMD Staff:

This letter contains comments regarding the Draft EIR for the Sonoma County proposed Rezoning Sites for Housing Project, specifically regarding the two properties in Glen Ellen at the corner of Carquinez and Arnold Drive (parcels GLE-1 and GLE-2 on the County rezone map). As a professional land use planner and CEQA specialist, I have reviewed the above referenced Draft EIR and have determined that there are numerous inaccuracies and inadequate or missing analyses. My comments address: 1) absence of analysis of the appropriateness of applying the Workforce Housing Zone district; 2) infeasible mitigation measures; 3) inadequate land use policy analysis; 4) inadequate cumulative impact analysis; 5) insufficient analysis of significant environmental and land use policy impacts; and 6) lack of consideration of alternatives.

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

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

Specific Comments on Draft EIR

- Page ES-1 – “Potential Sites are within Urban Growth Boundaries, near incorporated areas located in Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, and Sonoma.” This statement is incorrect and misleading. Glen Ellen is not within an urban growth boundary and it’s unlikely that sites in some of the other small unincorporated towns are within urban growth boundaries. Furthermore, Glen Ellen is not near an incorporated area. This points out the misunderstanding that somehow Glen Ellen is an urban area suitable for workforce housing.
- Page 2-1 – “All Potential Sites are within General Plan-designated Urban Service Areas, and near incorporated areas, within voter-approved Urban Growth Boundaries.” As commented above, this statement is incorrect and misleading, making the reader think that Glen Ellen is near an incorporated area and within an Urban Growth Boundary. This incorrect assumption provides the basis for an incomplete and inaccurate analysis of land use policy consistency issues.
- Page 2-18, Criteria for including sites in the proposed rezoning: “In addition to these criteria, the General Plan sets forth additional criteria to be used in considering which sites to rezone for housing (Housing Element Policy HE-2f and Programs 11 and 20). These factors include proximity to jobs, transit, services, and schools.” Clearly the GLE-1 and -2 parcels are not consistent with this General Plan policy because they are not in close proximity to jobs, transit, or services.
- Aesthetics, page 4.1-59, Impact AES-3: “INDIVIDUAL PROJECTS IMPLEMENTED ON POTENTIAL SITES HAVE THE POTENTIAL TO ADVERSELY AFFECT PUBLIC VIEWS AND COMMUNITY AESTHETIC CHARACTER. IN URBANIZED AREAS, THE PROJECT WOULD CONFLICT WITH REGULATIONS THAT GOVERN DEVELOPMENT DESIGN STANDARDS. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION MEASURES INCORPORATED.” The mitigation measures listed in the Draft EIR are either infeasible or would not reduce impacts to a level that is less than significant. Mitigation measure AES-1, Project Design Constraints, and AES-2, Structure Envelope Constraints, are not feasible because of the small parcel size, existing historic resources, and Workforce Housing zone minimum development requirements (16 units minimum). The property would have to be cleared of all vegetation, including large trees, which would render the site an eyesore and incompatible with the community character. There is no feasible way to develop a project of this density without significantly impacting community aesthetic character or conflicting with the Glen Ellen Development and Design Guidelines. The mass, scale, and building coverage required to meet the density requirements would not be flexible enough to be modified in such a way as to incorporate the siting and design features outlined in these mitigation measures.
- Cultural resources, page 4.5-11 – “Although there are no known historical resources on the Potential Sites, 35 of the sites contain buildings and/or structures that are over 45 years of age and may not have been evaluated previously for historical resources eligibility (Table 4.5-1 above).” I believe the historic structure on GLE-1 has been documented. It may be the oldest commercial structure in downtown Glen Ellen. This resource and its historic setting would be significantly impacted by redevelopment of GLE-1 and -2 allowed by the WH zone district.
- Hazards, page 4.9-12 – “Impact HAZ-4 - DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN ANY PHYSICAL CHANGES THAT COULD INTERFERE WITH OR IMPAIR EMERGENCY RESPONSE OR EVACUATION. THEREFORE, THE PROJECT WOULD NOT RESULT IN INTERFERENCE

WITH THESE TYPES OF ADOPTED PLANS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.” This finding that the impact is less than significant is flawed. The proposed rezoning will result in an increased number of people and vehicles in high fire hazard areas, which will impede emergency response in the event of a catastrophe such as wildfire. During recent fire evacuations, Arnold Drive and Highway 12 were severely impacted by Oakmont, Kenwood, and Glen Ellen residents fleeing the fire. People sat in their cars for hours, waiting to get out. Increasing housing density in these high-risk areas will exacerbate the emergency response impact.

- Land use section (and elsewhere) - There is no real analysis of the appropriateness of applying the Workforce Housing (WH) zone district to Glen Ellen’s 2 block long village. I am in full support of housing, especially affordable housing, but housing must be placed in an appropriate location that meets the needs of residents and does not further contribute to sprawl and associated impacts. There are county policies regarding city-centered growth, to discourage sprawl, reduce vehicle trips, and ensure that new residents have adequate access to services and jobs. The WH zone was intended for urban areas where jobs are available. Glen Ellen is not within an urban growth boundary, transit is all but non-existent, and there’s no job center. This significant impact must be disclosed in the EIR, as applying the WH zone is inconsistent with the zone district’s stated intent and inconsistent with other land use policies. Applying this zone in the village of Glen Ellen completely ignores the many policies in place to ensure good planning and protect land use integrity.
- Land use section 4.11, setting subsection – In the setting section, there is no description of the Glen Ellen Development and Design Guidelines other than a passing reference in one of the General Plan policies. This important land use document should be described, with a clear presentation of its purpose and intent.
- Land use section 4.11, impacts subsection - The Draft EIR fails to address consistency with the Glen Ellen Development and Design Guidelines in the impacts section. This consistency analysis is required by CEQA. It cannot be postponed until a specific project is proposed for the site. The full implications of applying the WH zone district must be evaluated in light of the many policies in this document. The proposed densification of the Glen Ellen parcels is clearly in conflict with the Glen Ellen Development and Design Guidelines and should be identified as a significant unavoidable impact.
- Land use section, page 4.11-38 – One of the considerations, as outlined in General Plan policy LU-20gg, requires evaluation of “the compatibility of rural development with protection of agriculture, scenic landscapes, and resources.” The Draft EIR fails to analyze consistency with this provision. Instead, the Draft EIR states: “The project does not propose development on these sites at this time but rezoning to allow for medium-density residential development. Future projects on these sites would be required to comply with the County Code and Glen Ellen Development and Design Guidelines, and compliance would be evaluated by the County during the project application and approval process.” This statement represents postponing the analysis to a later time, which is not adequate under CEQA. There will be no subsequent discretionary analysis, as future projects will be ministerial and exempt from CEQA, according to the Draft EIR. No public decisionmaker hearing would be required and the public would have no real opportunity to weigh in on property proposals. Given the density allowed/required, one cannot assume that future projects will comply with General Plan policies and the Glen Ellen Development and Design Guidelines. The consistency analysis needs to be conducted for the current EIR, not delayed. The EIR must evaluate the full

buildout potential (including density bonuses, ADUs, etc.) that the Workforce Housing zone district will allow. The EIR needs to address how this buildout under the WH zone does or does not comply with specific growth policies and policies/guidelines to protect Glen Ellen’s semi-rural character. The aesthetics analysis states that impacts are significant, but mitigable. As I described above, these mitigation measures are not feasible for the Glen Ellen parcels due to location, density, etc. Therefore, this land use conflict is a significant unavoidable impact.

- Land use section – The Draft EIR fails to address the following policies. The WH ordinance requires that:
“(d) The proposed rezoning is consistent with the overall goals, objectives, policies, and programs of the General Plan and any applicable Area or Specific Plans as amended from time to time.”

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

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

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

- Land use section, page 4.11-43 - “Cumulative development, listed in Table 3-1 in Section 3, Environmental Setting, would be required to meet current applicable design standards and would undergo environmental review, including consideration of whether the projects would physically divide an established community.” This is completely inadequate. The whole purpose of conducting a cumulative impact analysis is to determine whether other projects would create substantial impacts and whether the proposed rezoning would substantially contribute to those cumulative impacts. The EIR cannot postpone this analysis to some future time.
- Land use policy consistency analysis – In addition to inconsistencies with growth policies and the intent/purpose of the zone district, the very nature of the WH district is clearly in direct conflict with General Plan polices and the local Glen Ellen Development and Design Guidelines regarding density, mass, and scale. At a density of 24 units per acre, the proposed Workforce Housing would allow 22 units on the Glen Ellen property that is just under one acre (0.85 acre), representing a substantially increased density. The WH Combining Zone also provides for additional density allowed under the County’s density bonus programs for affordable units.

The WH zone would quadruple the existing onsite density of 5 units. This density is not consistent with the limited roadway network and fire risk. Please note that over 180 homes in Glen Ellen burned in the 2017 fires; the only reason the village was spared was because of some brave local volunteers.

The density would result in buildings with such a large mass and lot coverage that it would be completely out of scale and dramatically change the small village. There is no feasible mitigation for

this impact. A previous proposal for the Glen Ellen parcels (for 15 units) was rejected by the Design Review Board because of the mass and scale issue. It's not possible to fit 22 homes onto the property without creating significant impacts. Furthermore, the WH zone district requires a **minimum** development density, which would be 16 units on the Glen Ellen site (composed of the 2 parcels). Therefore, the property owner couldn't redevelop with fewer units than that. There is no place in downtown Glen Ellen where housing density is close to density allowed by the WH zone. For a larger urban area, the change would not be that significant. However, for the small Glen Ellen village, it represents a substantial increase in density. This is further exacerbated by the fact that the property across the street has already been redeveloped with 8 residential units and two more ADUs are now proposed there - a major change to the downtown.

Rather than conducting this important policy consistency analysis now, the EIR assumes that future projects will comply with policies. However, as noted above, future projects will be ministerial with no CEQA required so there will be very little review. The Draft EIR states that design review approval will still be required for all multi-family or mixed-use housing development of more than three units. Design review is limited to building and site design, architecture, colors, lighting, signs, landscaping and other design-related issues, **not consideration of density and intensity of development and associated impacts**. Once the rezoning is approved, properties may move forward with ministerial permits for increased housing. As part of the EIR, the County needs to address how future redevelopment allowed by the WH zone complies with policies/guidelines to protect Glen Ellen's semi-rural character.

- It appears that the Glen Ellen properties were included in the rezoning merely because the property owner had already applied for the WH zone. There is no evidence of an independent analysis of the appropriateness of this zone district for this site.
- Project Alternatives - Despite requests in my scoping comments to look at alternative zone districts for the Glen Ellen parcels that would still increase the amount of housing but be more consistent with the existing surrounding land uses, the EIR does not consider other zone districts. This could be corrected in the Final EIR, as a means to reduce impacts related to traffic, aesthetics, land use inconsistencies, historic resources, and fire risk.
- Cumulative Impact Analysis - The cumulative impact analysis is inadequate, especially given the planned redevelopment of the Sonoma Developmental Center, which is required by State law to have a substantial housing component. Again, the County is postponing analysis that should be conducted now.
- Growth Inducement – Applying the Workforce Housing Combining Zone in an area outside of an Urban Growth Boundary will set a significant growth-inducing precedent for future projects in downtown Glen Ellen. This impact has not been evaluated in the Draft EIR.
- History of concerns regarding GLE-1 and -2 - Over the past several years, the GLE-1 and -2 property owner has attempted to redevelop the property at a higher density than is currently allowed. Dozens of community members submitted comments opposing the increased density on the site, referencing serious environmental concerns. It does not appear that these previous comments were considered when the County chose to include these parcels in the rezoning proposal nor were they considered when preparing the EIR.

My scoping comments requested inclusion of all of the previous comments, as well as comments made to the SVCAC in March 2019 regarding this property.

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

Please feel free to contact me if you have any questions or would like to discuss my comments.

Regards,



Vicki A. Hill, MPA

Dear Sirs.

12/1/22

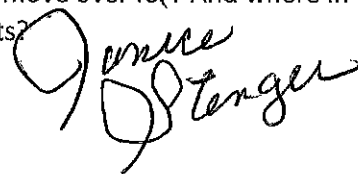
I wanted to protest this property infringement, that is just one in a long list since zoning began here in the early sixties, when most of us native bumpkins had no idea that it was malicious incremental takings with a never-ending list of tiny-printed new rules. Being educated in the middle of the 20th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

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

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

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

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

A handwritten signature in black ink that reads "James Stenger". The signature is written in a cursive, flowing style.

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

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.

What I put on Russian river Municipal committee site.

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

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

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

Knowledgeable Representatives from the RR Sanitation, and the limited bus system with an emphasis on West County should have been at a meeting in person with the stakeholders able to answer questions about the true viability of the transit and sewage capacity. I emphasize knowledgeable. Ever tried to find the ridership of the Guerneville buses? Impossible. Crime statistics from the buses? Fires started by arsonists? Emergency ambulance rides?

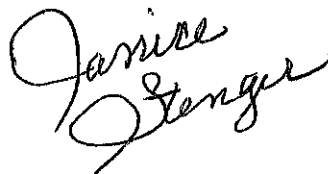
This plan is causing my family uncalled for trauma an Only the two other property owners on Laughlin Rd. had been been notified (as of late December.) of the profound change coming to our little neighborhood

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

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

At a time when the governor calls for more local control, the county seems willing to off load planning/zoning to people who don't know our county at all. Considering this, do we need a planning department? Does 50 years of fairly consistent zoning mean nothing?

Our property was chosen on the basis of being in the RR sewer district, where millions of dollars from the Federal govt were spent, (and corners were cut) based on a the sanitation district's promise that "we" would not build the collection system or the plant for any growth. The feds eventually sued us for millions of dollars for just that expansion and I don't believe there was anywhere in that settlement that put an expired clause for the original promises. Can you assure me that the district has learned their lesson and now obeys the Federal Governments sensible mandates? We already have about 1000 more hook ups than the collection system was built for. We, by the way, tried to get out of the sewer district, being on the farthest borders. But the district needed every hook up they could get because they underestimated the final cost and needed more ratepayers.. That Sewer debacle EIR was also quite un-fact filled. What was promised as a sewer charge of about \$40 a month to begin with. Now raised, this year, from \$1774 to \$1932. A 8.9% raise.



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

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

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

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

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

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

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

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

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

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

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Reply

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February 1, 2023

Linda Hopkins
Sonoma County 5th District Supervisor
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Eric Gage
Sonoma County Planner III
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To Everyone It Concerns:

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

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

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

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

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

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

Sincerely,

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

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

Feb.1, 2023

RECEIVED

FEB 14 2023

PERMIT AND RESOURCE
MANAGEMENT DEPARTMENT

RE: Draft EIR Comments, Housing Element Update

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

The Neighbors of FOR-2 request that FOR-2 be removed from the rezoning plan for the reasons stated in the EIR found in Alternative 3. *Alternative 3 - The 6 Rezoning Sites removed from this Alternative include FOR-2. "These Rezoning Sites have greater than average environmental constraints compared to the other Rezoning Sites. In particular, these sites would require off-site infrastructure, water and sewer improvements to serve future development. Under this alternative, the remaining 53 Rezoning Sites would be rezoned, per this plan, for future medium density development."*

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

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

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

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

~~Neighborhood (FOR-2 Neighborhood)~~

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

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Public Services and Recreation

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

Sewer System

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

Wildfire

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

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

FRANK SAIZ

Address:

7070 Winter Orchard Lane

Signature

Frank Saiz

Forestville, CA 95436

Print Name

John Wilkinson

Address:

7635 Minibel

Signature

John Wilkinson

Print Name

KEN WRIGHT

Address:

5961 Anderson Rd

Signature

Ken Wright

Forestville CA 95436

Print Name

TIM KAUN

Address:

9677 RIO VISTA RD
FORESTVILLE, CA 95436

Signature

Tim Kaun

Print Name

Dave Doty

Address:

TTⁿ
8894 TRENCH
Forestville, CA 95436

Signature

Dave Doty

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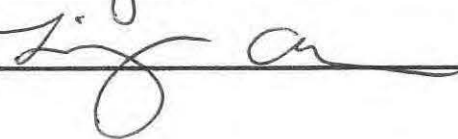
Print Name

Lindsay Arnold

Address:

6350 Anderson Rd

Signature



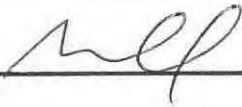
Print Name

SUSAN DEHMAN

Address:

6350 VAN KEEPEL RD

Signature



Forestville, CA 95436

Print Name

MERVANA FOREMSTI

Address:

8800 green valley #31

Signature



Sebastopol CA 95472

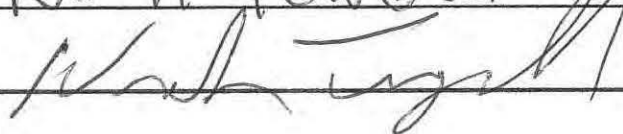
Print Name

NOAH TEWLOWAY

Address:

8109 ^{MAPLE} ~~MAPLE~~

Signature



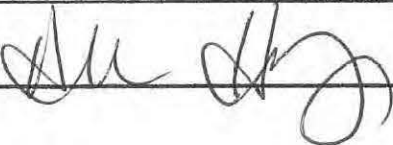
Print Name

Amber Hernandez

Address:

125 Hilltop rd Forestville

Signature



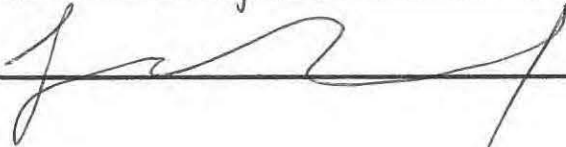
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Print Name

Address:

Taylor Neubergner 125 Hilltop rd Forestville

Signature



Print Name

Address:

Madeline Solomon 6794 Clara Lane Forestville

Signature

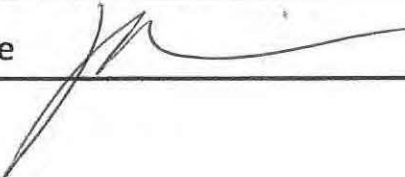
Madeline Solomon

Print Name

Address:

Rob AKINS 7410 Poplar Dr.

Signature



Forestville

Print Name

Address:

RICK Pollio

Signature



Print Name

Address:

Steve Sell Forestville

Signature

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Print Name

Address:

Yvonne Green 10747 Armstrong Woods rd

Signature

Yvonne Green

Print Name

Address:

BRAD GRANIGAN 6628 FIRST ST.

Signature

Brad FORESTVILLE, GA. 95436

Print Name

Address:

Bob Brouwers 7361 Covey Rd

Signature

Bob

Print Name

Address:

Cindy Garcia 1100 Holmes Hill Rd, Forestville

Signature

Cindy Garcia

Print Name

Address:

Liz Vorsatz 7800 Grusti Road

Signature

Liz Vorsatz

Forestville

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Print Name

Address:

Lisa Johnson

7666 Marabel Rd.

Signature

Lisa Johnson

Forestville, CA 95436

Print Name

Address:

LAURI LUCK

11931 Hillside Rd

Signature

Lauri Luck

Forestville - CA 95436

Print Name

Address:

David Redden

PoB 1145 Forestville Ca 95436

Signature

David Redden

Print Name

Address:

Brian Whittle

8381 Vila Rd Ext Forestville 95436

Signature

Brian Whittle

Print Name

Address:

William G. McKinley

10786 River Dr.

Signature

W.G. McKinley

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Print Name

Address:

Robin Dorn

8987 Trenton Rd

Signature

Robin Dorn

Forestville CA 95436

Print Name

Address:

Eileen Moore

8894 Trenton Rd, Forestville 95436

Signature

Eileen Moore

Print Name

Address:

Kami Korring

9150 Hwy 116

Signature

Kami Korring

Forestville CA 95436

Print Name

Address:

Wendy Flowers

6623 Covey Rd

Signature

Wendy Flowers

Forestville

Print Name

Address:

Brad Giamari

6623 Covey Rd

Signature

Brad Giamari

Forestville

From: [Leila Allen](#)
To: [PermitSonoma-Housing](#)
Subject: "Upzoning" objection
Date: Wednesday, February 1, 2023 9:52:35 PM

Dear BOS,

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

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

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

Thank you,
Leila Allen
(Forestville)

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February 1, 2023

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

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

PermitSonoma-Housing@sonoma-county.org

To Everyone It Concerns:

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

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

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

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

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Sincerely,

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

A handwritten signature in black ink, appearing to read "Chris Bross". The signature is stylized with a large, sweeping initial "C" and a long horizontal line extending to the right.

From: [Rio Olesky](#)
To: [PermitSonoma-Housing](#)
Subject: Planned development in Forestville
Date: Wednesday, February 1, 2023 12:55:31 PM

EXTERNAL

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

- > The streets encircling FOR-2 (Guisti/Nolan/Mirabel) are not built to withstand this type of quantitative developing. They are the same streets I played with childhood friends on in the early 1970's. They are one lane each way, no space for going around, not good for emergency evacuation situations, not built for dense populations. These are small country roads built to sustain neighborhood housing, at most, single family homes suburban in nature. They are not built nor would logic say they are prudent for a development the likes of rezoning specified as FOR-2 units. There is no mention that these are small country roads, where pedestrians and bicyclists often very little room for error. That description seems glaringly omitted for a project of such large changes discussed. That point actually goes for the parcels throughout much of Forestville as well as many others.
- >
- > I've seen nothing in the document that speaks to what would be done with respect to urban renewal effects for the people displaced to enact these potential build-outs, displacing locals, loss of character, threat to local business and the introduction of community conflicts, pollution-related health conditions, around town parking needs and sanitization challenges. This feels omitted, as does any mention of an infrastructure plan to accommodate the potential influx such as roads that are simply not built to accommodate such a large increase.
- >
- > Where is the mention of how the county plans on widening roads, adding left turn lanes, round-a-bouts and crosswalks for public safety on roads that are used by commuters, visitors, pedestrians and gravel trucks all coming through town in an environment that is only 1.7 miles to get through town (Speer's Market @ one end of Mirabel Road to the Elementary School on the other side of town).
- >
- > Where is the study for the safety of it's citizens just trying to get through the day without a horrible accident when there's an extra thousand or so cars and pedestrians jaywalking, risking their lives, with such a large increase of traffic on such a small stretch of travel. I am gravely concerned about the implications. These are urban services as much as sewer and water are per: page xviii yet there is no study about this as far as I'm able to tell.
- >
- > There's the discussion of no feasible mitigation measures available for the elements that would damage the scenic route along FOR-1, FOR-3, FOR-5. They would create detrimental significant and unavoidable impacts whereas other areas would be far less significant along the 101 corridor.
- >
- > FOR-1, FOR-5 and FOR-6 are all listed as being on "Existing Hazardous Material Contamination". Tables 4.9-1 and 4.9-2 on pages 4.9-1 thru 4.9-3. I have not been able to find a study in this EIR as to what the health risks to pending future potential residents, students located .1-.2 miles from the sites, and to the surrounding community during the excavation and build would at risk to. If I'm not mistaken, some of these properties were once considered by the Elementary School nearby and decidedly declined due to their toxic nature (and possibly the cost of remediation).
- >
- > I also am not seeing any study of the risk of these hazardous elements ending up in the watershed in Forestville (all sites) for Lower Russian River and sub-watershed to Green Valley Creek and ground water basins - especially in an area notorious for flooding when rains really kick in as they did in 1940, 1955, 1964, 1986, 1995, 1997, 2006, 2019, 2023 - this isn't an unknown problem nor is it going away drought or no drought.

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

Rio Olesky

6357 Van Keppel Rd.
Forestville, CA 95436

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

From: [Sally or Bob Percich](#)
To: [PermitSonoma-Housing](#); [Eric Gage](#); [district5](#)
Subject: Forestville draft EIR opinion
Date: Wednesday, February 1, 2023 11:35:03 AM
Attachments: [planning comm letter.pages](#)

From: [Sean Maley](#)
To: [Eric Gage](#); [PermitSonoma-Housing](#)
Subject: FW: opposition letter
Date: Wednesday, February 1, 2023 2:45:37 PM

Hi Eric,

I am Sean Maley and live at 16390 Laughlin Road in Guerneville. Thank you for taking the time to talk to me today. I just want to put in writing why I oppose the affordable housing projects slated for Laughlin Road and Cutten Drive. Here are my comments and concerns:

How will the county deal with the flooding on Armstrong Woods Road if we all have to evacuate?

Also, Armstrong Wood Road is heavily traveled in the summer with tourists to the forest.

Fire risk is only getting worse. Evacuating this neighborhood now is even tough to do, let alone with another 200 plus homes built would be catastrophic.

Laughlin Road and Cutten Drive are very narrow in some spots, for only 1 car to pass. How will they solve this?

Traffic around this neighborhood is a nightmare when it is crush season. I can't imagine another 200 plus cars around here.

Laughlin Road dead ends which makes the egress/ ingress problem of evacuation even more difficult.

How does the county plan on addressing the present condition of the sewer system which has problems dealing with the current level of homeowners now?

Respectfully Submitted,

Sean Maley

415 845 9700

word.

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

Feb.1, 2023

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Public Services and Recreation

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

Sewer System

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

Wildfire

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

The undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

FRANK SAIZ

Address:

7070 Winter Orchard Lane

Signature

Frank Saiz

Forestville, CA 95436

Print Name

John Wilkinson

Address:

7635 Mirabel

Signature

John Wilkinson

Print Name

KEN WRIGHT

Address:

5961 Anderson Rd

Signature

Ken Wright

Forestville CA 95436

Print Name

TIM KAUN

Address:

9677 RIO VISTA RD

FORESTVILLE, CA 95436

Signature

Tim Kaun

Print Name

Dave Doty

Address:

TT
8894 TRENCH
FORESTVILLE, CA 95436

Signature

Dave Doty

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Print Name

Lindsay Arnold

Address:

6350 Anderson Rd

Signature



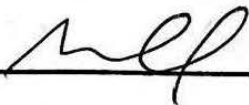
Print Name

SUSAN DEANAD

Address:

6350 VAN KERPPEC RD

Signature



Forestville, CA 95436

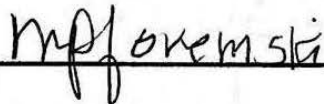
Print Name

Mervana Foremski

Address:

8800 green valley #31

Signature



Sebastopol CA 95472

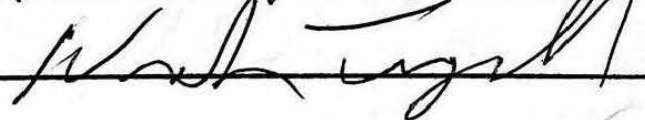
Print Name

NOAH TEWLOWAY

Address:

8109 ^{MAPLE} ~~MAPLE~~

Signature



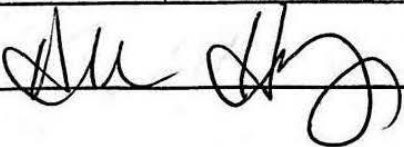
Print Name

Amber Hernandez

Address:

125 Hilltop rd Forestville

Signature



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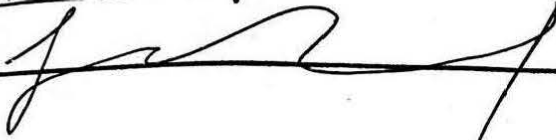
Print Name

Taylor Neuburger

Address:

125 Hilltop rd Forestville

Signature



Print Name

Madeline Solomon

Address:

6794 Clara Lane Forestville

Signature

Madeline Solomon

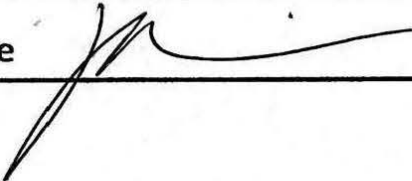
Print Name

Rob AKINS

Address:

7410 Poplar Dr.

Signature



Forestville

Print Name

RICK Pollio

Address:

Signature



Print Name

Steve Sell

Address:

Forestville c

Signature

The undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wetland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

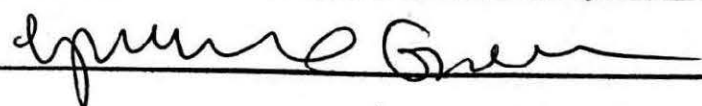
Print Name

Yvonne Green

Address:

16747 Armstrong Woodway rd

Signature



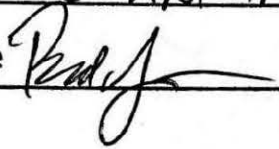
Print Name

BRAD GRANIGAN

Address:

6628 FIRST ST.

Signature



FORESTVILLE, CA. 95436

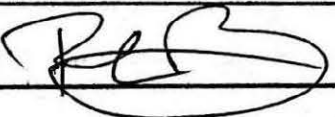
Print Name

Bob Brouwers

Address:

7361 Covey Rd

Signature



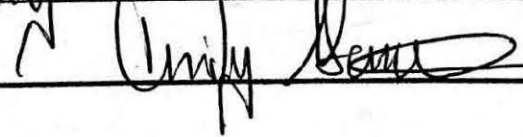
Print Name

Andy Garcia

Address:

1100 Holmes Hill Rd, Forestville

Signature



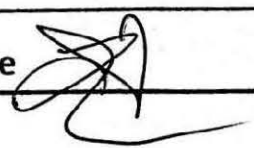
Print Name

Liz Vorsatz

Address:

7800 Gusti Road

Signature



Forestville

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Print Name

Address:

Lisa Johnson

74686 Mirabel Rd.

Signature

Lisa Johnson

Forestville, CA 95436

Print Name

Address:

LAURI LUCK

11931 Hillside Rd

Signature

Lauri Luck

Forestville - CA 95436

Print Name

Address:

David Redden

PoB 1145 Forestville Ca 95436

Signature

David Redden

Print Name

Address:

Brian Whittle

8381 Vila Rd Ext Forestville 95436

Signature

Brian Whittle

Print Name

Address:

William G. McKinley

10286 River Dr.

Signature

William G. McKinley

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Print Name

Address:

Robin Dorn

8987 Trenton Rd

Signature

Robin Dorn

Forestville CA 95436

Print Name

Address:

Eileen Moore

8894 Trenton Rd, Forestville, 95436

Signature

Eileen Moore

Print Name

Address:

Kami Korring

9180 Hwy 116

Signature

Kami Korring

Forestville CA 95436

Print Name

Address:

Wendy Flowers

6623 Covey Rd

Signature

Wendy Flowers

Forestville

Print Name

Address:

Brad Guzman

6623 Covey Rd

Signature

Brad Guzman

Forestville

From: [Betty Brachman](#)
To: [PermitSonoma-Housing](#)
Cc: [Susan Gorin](#)
Subject: Comments on Sonoma County Housing Element proposed rezoning of parcels #054-290-057 and #054-290-084 (GE-1 and GE-2)
Date: Thursday, February 2, 2023 4:09:27 PM

Dear Eric Gage and Permit Sonoma

I have lived in Glen Ellen since 1994. My address is now 1040 Robertson Road but the original address was 1010 London Ranch (same property but the county changed the address). I am a full time resident, pay taxes and vote in Glen Ellen.

Over the decades I have watched the deliberate negligence of Marty Winters with his properties referenced above. It has been a blight on our charming community that most residents take pride in preserving.

I have been through a major flood which destroyed my original home and two fires that came uncomfortably close. We are a strong-knit community and rely heavily on neighbors and our neighborhood, especially in times of crisis.. We all agree the county needs housing, but there are many other possibilities that do not involve desecrating what is left of our little village. For those of us that evacuated in the middle of the night in 2017 with only Arnold Drive as an escape route, the concept of SDC's pending increase in density is frightening enough without adding more strain to an already overtaxed transportation crisis.

Mr. Winters reputation speaks for itself. I have been watching him deliberately allow the collapse of his houses for decades while relentlessly pursuing his personal ambition to develop in our little village. He has vacancies in his commercial spaces for years.. Needless to say, he does not live in Glen Ellen and has no interest in our community other than personal financial gain .

This is in contrast in the great pride our neighborhood has taken in re-building and surviving the challenges of the last few years. Although we are quite diverse as individuals, we are all united in loving our village and willing to lend a hand to help support each other. Mr. Winter's development project does not belong here.

I strongly request the County remove the two Glen Ellen parcels from rezoning consideration.

Please feel free to contact me if you have any questions.

Thank you

Regards,

Betty Brachman

BRE#00671304

Real Estate Broker

P. O. Box 1523, Glen Ellen, CA. 95442

C 415.630.0222 | O 707.939.1050

Betty@BrachmanGroup.com | www.BrachmanGroup.com

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From: [Janice Stenger](#)
To: [PermitSonoma-Housing](#)
Subject: We can't build our way out of this.
Date: Thursday, February 2, 2023 2:38:40 PM

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

So my first questions are:

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

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

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From: [Eric Gage](#)
To: [PermitSonoma-Housing](#)
Subject: FW: Multiple Housing Units Planned for Forestville
Date: Thursday, February 2, 2023 4:15:05 PM
Attachments: [image001.jpg](#)

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

Hello Mr. Gage,

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

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

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

This plan needs to be thought out more thoroughly.

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

Thank you for your careful consideration to this matter.

Louis Hughes

5950 Hughes Road, Forestville

Louis Hughes

447 Aviation Blvd. Suite 3

Santa Rosa, CA 95403

707-575-0255



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From: [Lucy Hardcastle](#)
To: [PermitSonoma-Housing](#)
Subject: Housing element rezoning
Date: Thursday, February 2, 2023 1:42:34 PM

EXTERNAL

Forestville

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

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

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

Lucy Hardcastle , president of the Forestville Planning Association.

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Date: 2/3/2023

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

Dear Mr. Gage,

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

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

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

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

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

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

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

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

Name: GERRY DO

Address: 14756 MARYS LANE, GUERNEVILLE CA 95446

Date: 2/3/2023

Signature:



From:

To:17075653778

02/03/2023 11:01

#002 P.001/001

Date:

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

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Name: Mary Helt

Address: 16542 Laughlin Rd Guerneville CA 95446

Date: 2/3/23

Signature: MBHelt

From: andreaoreckfa
To: [PermitSonoma-Housing](#)
Subject: Housing Element planned for Sonoma County is a colossal mistake!
Date: Friday, February 3, 2023 10:04:14 AM

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

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

This is insane.

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

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

It is time to organize and push back!!

Thank you,
Andrea Oreck

103 Morris St
Sebastopol, Ca 95472
707 695-6288

Sent from my Verizon, Samsung Galaxy smartphone

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From: [Becky Boyle](#)
To: [PermitSonoma-Housing](#)
Subject: Re: Permit Sonoma / Planning - FOR-1, FOR-2, FOR-3, FOR-4, FOR-5, FOR-6 - Alternative: fewer rezoning sites.
Date: Friday, February 3, 2023 12:48:45 PM



Hi Eric, will this letter go into the DRAFT EIR as zoom comments would? Or should I send this an alternate way to ensure that occurs?

Much appreciation,
Becky

On Feb 1, 2023, at 2:00 PM, PermitSonoma-Housing <PermitSonoma-Housing@sonoma-county.org> wrote:

Thank you for your written comments on the Housing Element DEIR. They will be provided to decisionmakers for their consideration.

Sincerely,

Eric Gage

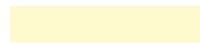
Planner III

From: Becky Boyle <becky.boyle@gmail.com>

Sent: Tuesday, January 31, 2023 10:25 AM

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

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



Dear Sonoma County,

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

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

<image001.png>

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

Total population allowed under current designation: 167

Total population under proposed designation: 1,652

<image002.png>

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

<image003.png>

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

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

I've seen nothing in the document that speaks to what would be done with respect to urban renewal effects for the people displaced to enact these potential build-outs, displacing locals, loss of character, threat to local business and the introduction of community conflicts, pollution-related health conditions, around town parking needs

and sanitization challenges. This feels omitted, as does any mention of an infrastructure plan to accommodate the potential influx such as roads that are simply not built to accommodate such a large increase.

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

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

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

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

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

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

With respect to greenhouse gas emissions, page 556 of section 5.2.1 correctly calls out "Additional vehicle trips associated with the proposed project would incrementally increase local traffic and regional air pollutant and greenhouse gas emissions." It also states, "These are considered irreversible environmental effects." The last paragraph of that section goes on to say, "CEQA requires decision makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether

to approve a project. The analysis contained in the EIR concludes that the proposed project would result in significant and unavoidable aesthetic, cultural resources, greenhouse gas emissions, hazards, transportation, utilities and wildfire impacts. Although development facilitated by the project would be required to implement mitigation measures, impacts would remain significant and unavoidable due to the irreversible loss." With all these potential rezone projects in what are zoned as Rural Residential and Low Density, does it not make more sense to seek locations for housing that is more directed to areas and communities that are not so car dependent? In particular for the low income population, does it not make more sense for them to have housing opportunities in communities that have better price points in urban/suburban areas with things around them? In implementing the proposal as it is, we are also pushing the very people that need it the most into situations where they have to drive further when gas prices are among the highest levels the last few years. The EIR calls out that Forestville has stores and restaurants. It does not call out that it offers one small-family type grocery store, one Mexican grocery store that has a sitting area/restaurant, one pharmacy, one gas station, one expensive fancy restaurant coupled with a couple casual spots being the local drive in, a coffee shop with sandwiches and a pizza joint. There's a bakery, there's a wine tasting place, there's one hardware store and all these places are great but they're not built to sustain the kind of growth that Forestville is now being considered for. Where are an additional 1,600 people going to park? How are they going to go to one of the 3 restaurants that might be open to serve them (one is closed at 2pm). That growth, that population needs more support than is currently able to be offered in this town. It's a half hour drive to: Costco, Target. It's a 15 minute drive to Safeway, Walgreens, Coddington (this is in 'good' traffic).

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

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

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

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

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

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

Respectfully,

Becky Boyle

Forestville, California

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

From: [DURS KOENIG](#)
To: [PermitSonoma-Housing](#)
Subject: Housing Element Update DEIR
Date: Friday, February 3, 2023 8:00:21 AM

Ladies & Gentlemen,

I am writing to you from Forestville. The rezoning to allow a potential 50% increase to Forestville's population by 1,652 (Total Population [Change] Under Proposed Designation p. 2-26 or 100) is ill-advised.

While supportive of affordable housing, straining our roads and services by a significant amount will diminish Forestville's character.

My concerns specifically are traffic and police services. We don't want more traffic. Forestville vibrates from the rumble of traffic during commute hours. Police services are provided by the Sonoma County Sherriff department. There are very few patrols in the West County. Increasing population in Guerneville, Forestville and Graton will certainly require more resources from the Sherriff.

Sincerely,
Durs Koenig
Forestville, CA

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

From: [Stacie Gradney](#)
To: [PermitSonoma-Housing](#)
Subject: Fwd: Forestville West County Zoning for low income housing
Date: Friday, February 3, 2023 12:49:28 PM



Regarding the Forestville zoning idea I think housing in Forestville is not a reality. Forestville is a very small community. Having a developer develop low income housing or any type of large dwellings should really think about that. The vector unit???? That building and ground below and around that building is so contaminated its deadly hence the reason it has been sitting there untouched. How are you going to build at that location????

The school is right below it. How is that tiny school going to have room for over 500 families with children??? And the high school that was closed???? Forestville does not have El Molino anymore. That location is now Laguna which is a continuation school. Can Analy handle more students???? Analy can barely handle what they have adapted taking Forestville High School Students as well as ALL of the west county out to Ft. Ross. I would rather see you develop a place where the kids can go. There is no place in Forestville the kids can go. There is nothing to do in Forestville. All the families you are inviting into Forestville will have nothing to do. This is where trouble starts.

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

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

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

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

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

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

Regards,

Stacie,
20 + year forestville resident

| |

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Vicki A. Hill, MPA
Environmental Planning

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February 6, 2023

Please distribute copies of this letter to all concerned County staff & Decision Makers.

RE: Comments on Sonoma County Housing Element Draft EIR, specifically regarding Glen Ellen parcels, # 054-290-057 and # 054-290-084 (GLE-1 and GLE-2)

Dear PRMD Staff:

This letter contains comments regarding the Draft EIR for the Sonoma County Housing Element, including both general comments and specific concerns regarding the two properties in Glen Ellen proposed for rezoning in the draft Housing Element. The parcels are at the corner of Carquinez and Arnold Drive (Assessor Parcel # 054-290-057 and # 054-290-084, identified as GLE-1 and GLE-2 in the DEIR) and total a little less than one acre. These parcels were part of the “Rezoning Sites for Housing Project” and were included in the Draft EIR for that effort. **My comments on that previous EIR are attached and are hereby included in my comments on the Housing Element DEIR** since it appears that the Housing Element DEIR drew heavily from the Rezoning Sites for Housing DEIR. During that process, many people submitted comments with valid concerns regarding the inappropriateness of substantially upzoning these parcels (from 5 units to 22 units plus ADUs and density bonuses), which are outside of the urban growth boundary in the tiny village of Glen Ellen at an unsignalized intersection. It does not appear that previous comments were considered.

Please consider the requests expressed in this letter and in other community comments:

- 1) Remove the two Glen Ellen parcels from the rezoning list due to significant impacts identified in the EIR and other issues stated in this letter; and/or
- 2) Consider an alternative zone district that reduces the number of allowed units on the site and does not require a minimum number of units, as required by the WH zone.

As a professional land use planner and CEQA specialist, I have determined that there are numerous inaccuracies and inadequate or missing analyses in the Housing Element DEIR. My comments address: 1) absence of analysis of the appropriateness of applying the Workforce Housing Zone district; 2) infeasible and missing mitigation measures; 3) inadequate land use

policy analysis; 4) inadequate cumulative impact analysis; and 6) lack of consideration of feasible alternatives that would reduce impacts of the proposed project.

General DEIR Comments:

1. Purpose and Need: There is no justification for including the Glen Ellen parcels, which are already developed. Also, up to 1000 homes have been approved a few blocks down Arnold Drive at the Sonoma Developmental Center (SDC). Glen Ellen has already absorbed many times more than its fair share of future housing whether or not the SDC development is counted towards the current RHNA.
 2. Plan Inconsistencies: While the proposed rezoning of the Glen Ellen parcels may appear nonthreatening to those who are unfamiliar with the historic village, the rezone site represents a large part of the downtown core (which is only two blocks long) and will dramatically change it by tripling the existing number of housing units allowed. Furthermore, the Workforce Housing (WH) zone district **REQUIRES** a minimum number of units (16) so the property owner will have no choice but to overdevelop the property. The proposal is **clearly inconsistent with the intent of the Glen Ellen policies established in the General Plan and Glen Ellen Development and Design Guidelines.**
 3. Land Use Impacts: The proposal for the two Glen Ellen parcels involves **inappropriate and precedent-setting rezoning to a high-density zone district, which is out of scale and would result in significant adverse impacts on the small village of Glen Ellen.**
 4. Due to the Workforce Housing zone minimum development requirements (16 units minimum), the Glen Ellen parcels would have to be cleared of all vegetation, including large trees, which would render the site an eyesore and incompatible with the community character. There is no feasible way to develop a project of this density without significantly impacting community aesthetic character or conflicting with the Glen Ellen Development and Design Guidelines. The mass, scale, and building coverage required to meet the density requirements would not be flexible enough to be modified in such a way as to incorporate the siting and design features outlined in these mitigation measures. For this reason alone, an alternative lower density residential zone district should be considered.
- Cumulative Impacts: The DEIR cumulative impact analysis is flawed in that it does not consider the two massive projects in close proximity to rezoning sites in Glen Ellen and Sonoma Valley – the adopted SDC Specific Plan and the Hanna Center housing, hotel, and commercial development a few miles down Arnold Drive. Also, there is the Elnoka housing project in the north Sonoma Valley. The tiny village of Glen Ellen has now been required to accommodate up to 1000 housing units and as many jobs, as part of the SDC Specific Plan (a few blocks from the Glen Ellen parcels proposed for rezoning). With the large scale SDC development, it is clear that this semi-rural area (without adequate infrastructure, transit, and jobs) has taken on more than its fair share of housing and should not be required to accommodate even more housing that will contribute to the significant traffic impacts identified for the SDC Specific Plan. The cumulative impacts are widespread throughout Sonoma Valley. Arnold Drive simply cannot handle the level of traffic that will result

from cumulative development. The planned road connection from SDC to Hwy 12 is no longer part of the Specific Plan, except for emergency access.

There is no evidence that these large-scale developments were considered in the cumulative impact analysis for transportation, land use policy consistency, GHG, visual resources, public services (water, wastewater), or wildfire evacuation and emergency response. These projects are not included in the General Plan buildout or in the MTC regional plan as they are outside urban areas and not originally slated for development.

5. Traffic Level of Service (LOS): Although CEQA no longer requires LOS analysis, the DEIR must consider consistency with adopted plans and policies. The existing General Plan contains LOS policies and standards, which will be violated with implementation of the Housing Element (and cumulative impacts).
6. ADUs: The DEIR does not consider the fact that many of the sites will qualify for the addition of ADUs.

Specific Comments on Draft EIR

- Page ES-2- “The project would implement existing General Plan Policies and Programs that require the County to identify urban sites near jobs and transit which may appropriately accommodate additional housing. The project would also identify appropriate sites on which to place the WH Combining District, which would allow the development of jobs and/or housing on the same site or within walking distance from one another. The WH Combining District is an overlay added to sites with non-residential base zoning to allow for housing to be built on sites containing or adjacent to jobs.” This statement points out how incompatible the proposed WH zoning is for the two parcels in Glen Ellen, which are NOT in an urban area, are not near jobs, and are not near transit. Nor is there land to develop additional jobs on the same site or within walking distance. Glen Ellen is a rural historic village, not an urban center, and it is not near any incorporated urban area.
- Page ES-2: The proposed rezoning of the Glen Ellen parcels is in conflict with Project Objective #6, which calls for new housing in urban areas near jobs, transit, and services.
- Page ES-4, Alternative 3: The two Glen Ellen parcels should be added to the list of sites removed from consideration in this alternative, based on all of the comments regarding environmental constraints and the EIR’s own findings of significant impacts.
- Page 2-6, “All 59 Rezoning Sites are within General Plan-designated Urban Service Areas, and near incorporated areas, within voter-approved Urban Growth Boundaries.” This is incorrect – the GLE-1 and GLE-2 parcels are not near incorporated areas nor are they near or within an Urban Growth Boundary. This incorrect assumption leads to a flawed analysis.
- Table 2-3, Proposed Land Use and Zoning Districts: Why aren’t the two Glen Ellen parcels considered for R-2 zoning rather than the WH overlay? Clearly the WH overlay is not appropriate, as pointed out in my earlier comments. WH zoning is for urban areas, with nearby jobs and transit, neither of which exist at these sites. There is no explanation of why R-2 was not considered. Further, the WH zone requires a minimum development, which would more than triple the number

of existing units on the site, with limited roadway and access functions. Please consider a less intensive zone district for these two parcels in the Final EIR.

- Table 2-4: The number of existing allowable units at the Glen Ellen parcels is incorrect in the table. There are 4 or 5 existing units, which is a reasonable number for the site and its location.
- Page 4-1: “Under the policy detailed in the Housing Element and allowed by SB 10, parcels that meet these criteria would be allowed to build a maximum of X du if they are between 10,000 square feet and 20,000 square feet in size, and a maximum of X du if they are above 20,000 square feet in size.” What are the X values?
- Page 4-2, Cumulative: “CEQA analysis of cumulative impacts for a housing element is general in nature and considers cumulative development that could occur within the County to the extent it is reasonably foreseeable.” Both the SDC Specific Plan and Hanna Center development are reasonably foreseeable projects and must be included in the cumulative impact analysis. Since neither of these major developments are mentioned in the DEIR, it appears neither were considered. The Hanna development has been in the works since 2004 and the County is well aware of it. The SDC Specific Plan process started in 2019-2020 and is now approved.
- Aesthetics, Table 4.1-6: The table lists mitigation measures that don’t exist. There are only two aesthetic mitigation measures.
- Aesthetics, Impacts: Significant visual impacts are identified for the Glen Ellen parcels but no realistic mitigation measures are identified. Measure AES-1 calls for screening, but that is infeasible given the number of units that will be allowed and their proximity to public streets (Arnold Drive). Measures limiting building massing, staggered heights, building materials, and other design features should be included in the DEIR to partially reduce these significant impacts.
- Aesthetics, page 4.1-54: “... development facilitated by the project cannot be made to comply with subjective design guidelines...” Please clarify what this means and why future development is exempt from design guidelines. Also, who determines which guidelines are objective vs. subjective? This seems to dismiss all relevant County policies and provisions.
- It is not clear if the WH zone district will still require architectural review, which is critical in a place like Glen Ellen where specific design guidelines and standards are in place.
- Table 4.11-3, page 4.11-37: “This Program EIR analyzes potential transportation impacts of GLE-1 and GLE-2 in Section 4.16, Transportation. Traffic congestion is not analyzed because it may not be considered a significant impact under CEQA.” This assumption and dismissal without analysis is erroneous. While it is true that the transportation analysis is no longer required to address LOS, there is still a requirement, under CEQA, to assess the proposed project’s compliance with adopted land use policies. The EIR fails to assess the project’s consistency with General Plan policy LU-20gg, which calls for consideration of traffic congestion.
- Table 4.11-3, Policy Consistency, page 4.11-37: There is no analysis of consistency with the Glen Ellen Development and Design Guidelines, which is required by CEQA. The table includes the following flawed statement: “The project does not propose development on these sites at this time

but rezoning to allow for medium-density residential development, and future projects would be allowed by-right and would not be subject to review under the Glen Ellen Development and Design Guidelines as discussed in Section 4.1, Aesthetics, as only objective design standards would apply.” As a program EIR, under CEQA, development at these sites must be analyzed and compared to existing policies. One cannot defer analysis to some point in the future, especially since future development will be exempt from CEQA. The General Plan policies regarding Glen Ellen and the Glen Ellen Development and Design Guidelines cannot be merely dismissed. The proposed rezoning will be in direct conflict with the guidelines and General Plan policies and this should be identified as a significant impact in the EIR. Who determines whether policies are objective or subjective? The full implications of applying the WH zone district must be evaluated in light of the many policies in this document. The proposed densification of the Glen Ellen parcels is clearly in conflict with existing policies and should be identified as a significant unavoidable impact.

- Impact BIO-5, Heritage Trees: The impact statement for BIO-5 does not state what the impact is, just references county policies. Increasing the housing density on the two Glen Ellen parcels will require removal of several heritage trees. This is a significant unavoidable impact because it would be inconsistent with the County heritage tree ordinance. There is no way to avoid heritage tree removal under the densification of the parcels. There simply is not space. The DEIR defers analysis of heritage tree removal to individual projects, but individual projects will be exempt from CEQA.
- Cultural resources, page 4.5-11 – “Although there are no known historical resources on the Potential Sites, 35 of the sites contain buildings and/or structures that are over 45 years of age and may not have been evaluated previously for historical resources eligibility (Table 4.5-1 above).” I believe the historic structure on GLE-1 has been documented. It may be the oldest commercial structure in downtown Glen Ellen. This resource and its historic setting would be significantly impacted by redevelopment of GLE-1 and -2 allowed by the WH zone district. The EIR must address this historic resource in more detail. With the rezoning, there is no possible way to protect this resource.
- Land use section (and elsewhere) - There is no real analysis of the appropriateness of applying the Workforce Housing (WH) zone district to Glen Ellen’s two-block long village. I am in full support of housing, especially affordable housing, but housing must be placed in an appropriate location that meets the needs of residents and does not further contribute to sprawl and associated impacts. There are county policies regarding city-centered growth, to discourage sprawl, reduce vehicle trips, and ensure that new residents have adequate access to services and jobs. The WH zone was intended for urban areas where jobs are available. Glen Ellen is not within an urban growth boundary, transit is all but non-existent, and there’s no job center. This significant impact must be disclosed in the EIR, as applying the WH zone is inconsistent with the zone district’s stated intent and inconsistent with other land use policies. Applying this zone in the village of Glen Ellen completely ignores the many policies in place to ensure good planning and protect land use integrity.
- Land use section – The Draft EIR fails to address the following policies. The WH ordinance requires that:
 - “(d) The proposed rezoning is consistent with the overall goals, objectives, policies, and programs of the General Plan and any applicable Area or Specific Plans as amended from time to time.”

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

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

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

- Land use section, page 4.11-43 - "Cumulative development, listed in Table 3-1 in Section 3, Environmental Setting, would be required to meet current applicable design standards and would undergo environmental review, including consideration of whether the projects would physically divide an established community." This is completely inadequate. The whole purpose of conducting a cumulative impact analysis is to determine whether other projects would create substantial impacts and whether the proposed rezoning would substantially contribute to those cumulative impacts. The EIR cannot postpone this analysis to some future time.
- Land Use: The density (22 homes plus ADUs plus density bonuses) would result in buildings with such a large mass and lot coverage that it would be completely out of scale and dramatically change the small village. There is no feasible mitigation for this impact. A previous proposal for the Glen Ellen parcels (for 15 units) was rejected by the Design Review Board because of the mass and scale issue. It's not possible to fit 22 homes onto the property without creating significant impacts. Furthermore, the WH zone district requires a **minimum** development density, which would be 16 units on the Glen Ellen site (composed of the 2 parcels). Therefore, the property owner couldn't redevelop with fewer units than that. There is no place in downtown Glen Ellen where housing density is the same as density allowed by the WH zone. For a larger urban area, the change would not be that significant. However, for the small Glen Ellen village, it represents a substantial increase in density. This is further exacerbated by the fact that the property across the street has already been redeveloped with 8 residential units and two more ADUs - a substantial change to the village.
- The DEIR states that design review approval will still be required for all multi-family or mixed-use housing development of more than three units. Design review is limited to building and site design, architecture, colors, lighting, signs, landscaping and other design-related issues, **not consideration of density and intensity of development and associated impacts**. Once the rezoning is approved, properties may move forward with ministerial permits for increased housing. As part of the EIR, the County needs to address how future redevelopment allowed by the WH zone complies with General Plan policies/guidelines to protect Glen Ellen's semi-rural character.
- It appears that the Glen Ellen properties were included in the rezoning merely because the property owner had already applied for the WH zone. There is no evidence of an independent analysis of the appropriateness of this zone district for this site.

- Project Alternatives - Despite previous requests (in comments on the Rezoning for Housing DEIR) to look at alternative zone districts for the Glen Ellen parcels that would still increase the amount of housing but be more consistent with the existing surrounding land uses, the EIR does not consider other zone districts. This could be corrected in the Final EIR, as a means to reduce impacts related to traffic, aesthetics, land use inconsistencies, historic resources, and fire risk.
- Growth Inducement – Applying the Workforce Housing Combining Zone in an area outside of an Urban Growth Boundary will set a significant growth-inducing precedent for future projects in downtown Glen Ellen. This impact has not been evaluated in the Draft EIR.

With the devastating loss of established neighborhoods during the 2017 fires, it is more important than ever to not overtax our rural infrastructure and resources. It is not understandable why the County would pursue rezoning this developed site in light of valid concerns expressed by the community. Please do not do any further damage to this rural area by upzoning these parcels. Tripling or quadrupling the number of housing units on this site will only add to the significant impacts caused by implementation of the SDC Specific Plan.

Please feel free to contact me if you have any questions or would like to discuss my comments.

Regards,



Vicki A. Hill, MPA

Environmental Land Use Planner

ATTACHMENT 1
PREVIOUS COMMENT LETTER ON REZONING SITES FOR HOUSING DEIR

Vicki A. Hill, MPA
Environmental Planning

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

June 17, 2021

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

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

Dear PRMD Staff:

This letter contains comments regarding the Draft EIR for the Sonoma County proposed Rezoning Sites for Housing Project, specifically regarding the two properties in Glen Ellen at the corner of Carquinez and Arnold Drive (parcels GLE-1 and GLE-2 on the County rezone map). As a professional land use planner and CEQA specialist, I have reviewed the above referenced Draft EIR and have determined that there are numerous inaccuracies and inadequate or missing analyses. My comments address: 1) absence of analysis of the appropriateness of applying the Workforce Housing Zone district; 2) infeasible mitigation measures; 3) inadequate land use policy analysis; 4) inadequate cumulative impact analysis; 5) insufficient analysis of significant environmental and land use policy impacts; and 6) lack of consideration of alternatives.

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

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

Specific Comments on Draft EIR

- Page ES-1 – “Potential Sites are within Urban Growth Boundaries, near incorporated areas located in Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, and Sonoma.” This statement is incorrect and misleading. Glen Ellen is not within an urban growth boundary and it’s unlikely that sites in some of the other small unincorporated towns are within urban growth boundaries. Furthermore, Glen Ellen is not near an incorporated area. This points out the misunderstanding that somehow Glen Ellen is an urban area suitable for workforce housing.
- Page 2-1 – “All Potential Sites are within General Plan-designated Urban Service Areas, and near incorporated areas, within voter-approved Urban Growth Boundaries.” As commented above, this statement is incorrect and misleading, making the reader think that Glen Ellen is near an incorporated area and within an Urban Growth Boundary. This incorrect assumption provides the basis for an incomplete and inaccurate analysis of land use policy consistency issues.
- Page 2-18, Criteria for including sites in the proposed rezoning: “In addition to these criteria, the General Plan sets forth additional criteria to be used in considering which sites to rezone for housing (Housing Element Policy HE-2f and Programs 11 and 20). These factors include proximity to jobs, transit, services, and schools.” Clearly the GLE-1 and -2 parcels are not consistent with this General Plan policy because they are not in close proximity to jobs, transit, or services.
- Aesthetics, page 4.1-59, Impact AES-3: “INDIVIDUAL PROJECTS IMPLEMENTED ON POTENTIAL SITES HAVE THE POTENTIAL TO ADVERSELY AFFECT PUBLIC VIEWS AND COMMUNITY AESTHETIC CHARACTER. IN URBANIZED AREAS, THE PROJECT WOULD CONFLICT WITH REGULATIONS THAT GOVERN DEVELOPMENT DESIGN STANDARDS. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION MEASURES INCORPORATED.” The mitigation measures listed in the Draft EIR are either infeasible or would not reduce impacts to a level that is less than significant. Mitigation measure AES-1, Project Design Constraints, and AES-2, Structure Envelope Constraints, are not feasible because of the small parcel size, existing historic resources, and Workforce Housing zone minimum development requirements (16 units minimum). The property would have to be cleared of all vegetation, including large trees, which would render the site an eyesore and incompatible with the community character. There is no feasible way to develop a project of this density without significantly impacting community aesthetic character or conflicting with the Glen Ellen Development and Design Guidelines. The mass, scale, and building coverage required to meet the density requirements would not be flexible enough to be modified in such a way as to incorporate the siting and design features outlined in these mitigation measures.
- Cultural resources, page 4.5-11 – “Although there are no known historical resources on the Potential Sites, 35 of the sites contain buildings and/or structures that are over 45 years of age and may not have been evaluated previously for historical resources eligibility (Table 4.5-1 above).” I believe the historic structure on GLE-1 has been documented. It may be the oldest commercial structure in downtown Glen Ellen. This resource and its historic setting would be significantly impacted by redevelopment of GLE-1 and -2 allowed by the WH zone district.
- Hazards, page 4.9-12 – “Impact HAZ-4 - DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN ANY PHYSICAL CHANGES THAT COULD INTERFERE WITH OR IMPAIR EMERGENCY RESPONSE OR EVACUATION. THEREFORE, THE PROJECT WOULD NOT RESULT IN INTERFERENCE

WITH THESE TYPES OF ADOPTED PLANS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.” This finding that the impact is less than significant is flawed. The proposed rezoning will result in an increased number of people and vehicles in high fire hazard areas, which will impede emergency response in the event of a catastrophe such as wildfire. During recent fire evacuations, Arnold Drive and Highway 12 were severely impacted by Oakmont, Kenwood, and Glen Ellen residents fleeing the fire. People sat in their cars for hours, waiting to get out. Increasing housing density in these high-risk areas will exacerbate the emergency response impact.

- Land use section (and elsewhere) - There is no real analysis of the appropriateness of applying the Workforce Housing (WH) zone district to Glen Ellen’s 2 block long village. I am in full support of housing, especially affordable housing, but housing must be placed in an appropriate location that meets the needs of residents and does not further contribute to sprawl and associated impacts. There are county policies regarding city-centered growth, to discourage sprawl, reduce vehicle trips, and ensure that new residents have adequate access to services and jobs. The WH zone was intended for urban areas where jobs are available. Glen Ellen is not within an urban growth boundary, transit is all but non-existent, and there’s no job center. This significant impact must be disclosed in the EIR, as applying the WH zone is inconsistent with the zone district’s stated intent and inconsistent with other land use policies. Applying this zone in the village of Glen Ellen completely ignores the many policies in place to ensure good planning and protect land use integrity.
- Land use section 4.11, setting subsection – In the setting section, there is no description of the Glen Ellen Development and Design Guidelines other than a passing reference in one of the General Plan policies. This important land use document should be described, with a clear presentation of its purpose and intent.
- Land use section 4.11, impacts subsection - The Draft EIR fails to address consistency with the Glen Ellen Development and Design Guidelines in the impacts section. This consistency analysis is required by CEQA. It cannot be postponed until a specific project is proposed for the site. The full implications of applying the WH zone district must be evaluated in light of the many policies in this document. The proposed densification of the Glen Ellen parcels is clearly in conflict with the Glen Ellen Development and Design Guidelines and should be identified as a significant unavoidable impact.
- Land use section, page 4.11-38 – One of the considerations, as outlined in General Plan policy LU-20gg, requires evaluation of “the compatibility of rural development with protection of agriculture, scenic landscapes, and resources.” The Draft EIR fails to analyze consistency with this provision. Instead, the Draft EIR states: “The project does not propose development on these sites at this time but rezoning to allow for medium-density residential development. Future projects on these sites would be required to comply with the County Code and Glen Ellen Development and Design Guidelines, and compliance would be evaluated by the County during the project application and approval process.” This statement represents postponing the analysis to a later time, which is not adequate under CEQA. There will be no subsequent discretionary analysis, as future projects will be ministerial and exempt from CEQA, according to the Draft EIR. No public decisionmaker hearing would be required and the public would have no real opportunity to weigh in on property proposals. Given the density allowed/required, one cannot assume that future projects will comply with General Plan policies and the Glen Ellen Development and Design Guidelines. The consistency analysis needs to be conducted for the current EIR, not delayed. The EIR must evaluate the full

buildout potential (including density bonuses, ADUs, etc.) that the Workforce Housing zone district will allow. The EIR needs to address how this buildout under the WH zone does or does not comply with specific growth policies and policies/guidelines to protect Glen Ellen’s semi-rural character. The aesthetics analysis states that impacts are significant, but mitigable. As I described above, these mitigation measures are not feasible for the Glen Ellen parcels due to location, density, etc. Therefore, this land use conflict is a significant unavoidable impact.

- Land use section – The Draft EIR fails to address the following policies. The WH ordinance requires that:
“(d) The proposed rezoning is consistent with the overall goals, objectives, policies, and programs of the General Plan and any applicable Area or Specific Plans as amended from time to time.”

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

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

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

- Land use section, page 4.11-43 - “Cumulative development, listed in Table 3-1 in Section 3, Environmental Setting, would be required to meet current applicable design standards and would undergo environmental review, including consideration of whether the projects would physically divide an established community.” This is completely inadequate. The whole purpose of conducting a cumulative impact analysis is to determine whether other projects would create substantial impacts and whether the proposed rezoning would substantially contribute to those cumulative impacts. The EIR cannot postpone this analysis to some future time.
- Land use policy consistency analysis – In addition to inconsistencies with growth policies and the intent/purpose of the zone district, the very nature of the WH district is clearly in direct conflict with General Plan polices and the local Glen Ellen Development and Design Guidelines regarding density, mass, and scale. At a density of 24 units per acre, the proposed Workforce Housing would allow 22 units on the Glen Ellen property that is just under one acre (0.85 acre), representing a substantially increased density. The WH Combining Zone also provides for additional density allowed under the County’s density bonus programs for affordable units.

The WH zone would quadruple the existing onsite density of 5 units. This density is not consistent with the limited roadway network and fire risk. Please note that over 180 homes in Glen Ellen burned in the 2017 fires; the only reason the village was spared was because of some brave local volunteers.

The density would result in buildings with such a large mass and lot coverage that it would be completely out of scale and dramatically change the small village. There is no feasible mitigation for

this impact. A previous proposal for the Glen Ellen parcels (for 15 units) was rejected by the Design Review Board because of the mass and scale issue. It's not possible to fit 22 homes onto the property without creating significant impacts. Furthermore, the WH zone district requires a **minimum** development density, which would be 16 units on the Glen Ellen site (composed of the 2 parcels). Therefore, the property owner couldn't redevelop with fewer units than that. There is no place in downtown Glen Ellen where housing density is close to density allowed by the WH zone. For a larger urban area, the change would not be that significant. However, for the small Glen Ellen village, it represents a substantial increase in density. This is further exacerbated by the fact that the property across the street has already been redeveloped with 8 residential units and two more ADUs are now proposed there - a major change to the downtown.

Rather than conducting this important policy consistency analysis now, the EIR assumes that future projects will comply with policies. However, as noted above, future projects will be ministerial with no CEQA required so there will be very little review. The Draft EIR states that design review approval will still be required for all multi-family or mixed-use housing development of more than three units. Design review is limited to building and site design, architecture, colors, lighting, signs, landscaping and other design-related issues, **not consideration of density and intensity of development and associated impacts**. Once the rezoning is approved, properties may move forward with ministerial permits for increased housing. As part of the EIR, the County needs to address how future redevelopment allowed by the WH zone complies with policies/guidelines to protect Glen Ellen's semi-rural character.

- It appears that the Glen Ellen properties were included in the rezoning merely because the property owner had already applied for the WH zone. There is no evidence of an independent analysis of the appropriateness of this zone district for this site.
- Project Alternatives - Despite requests in my scoping comments to look at alternative zone districts for the Glen Ellen parcels that would still increase the amount of housing but be more consistent with the existing surrounding land uses, the EIR does not consider other zone districts. This could be corrected in the Final EIR, as a means to reduce impacts related to traffic, aesthetics, land use inconsistencies, historic resources, and fire risk.
- Cumulative Impact Analysis - The cumulative impact analysis is inadequate, especially given the planned redevelopment of the Sonoma Developmental Center, which is required by State law to have a substantial housing component. Again, the County is postponing analysis that should be conducted now.
- Growth Inducement – Applying the Workforce Housing Combining Zone in an area outside of an Urban Growth Boundary will set a significant growth-inducing precedent for future projects in downtown Glen Ellen. This impact has not been evaluated in the Draft EIR.
- History of concerns regarding GLE-1 and -2 - Over the past several years, the GLE-1 and -2 property owner has attempted to redevelop the property at a higher density than is currently allowed. Dozens of community members submitted comments opposing the increased density on the site, referencing serious environmental concerns. It does not appear that these previous comments were considered when the County chose to include these parcels in the rezoning proposal nor were they considered when preparing the EIR.

My scoping comments requested inclusion of all of the previous comments, as well as comments made to the SVCAC in March 2019 regarding this property.

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

Please feel free to contact me if you have any questions or would like to discuss my comments.

Regards,

A handwritten signature in blue ink that reads "Vicki A. Hill". The signature is written in a cursive, flowing style.

Vicki A. Hill, MPA

From: [Linda Hunter](#)
To: [PermitSonoma-Housing](#)
Subject: DIER affecting Laughlin Road area and Armstrong Woods Road area in Guerneville.
Date: Saturday, February 4, 2023 11:14:17 AM

EXTERNAL

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

Submitted by lynnhunter@comcast.net

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From: [lynn woolley](#)
To: [PermitSonoma-Housing](#)
Subject: Re: Sonoma County Housing Element Updates. Rezoning of DEIR, GUE 2-16450 Laughlin Rd.; GUE 3-16500 Cutten Ct.; and GUE 4-16050 Laughlin Rd. located...
Date: Saturday, February 4, 2023 4:02:54 PM

EXTERNAL

attn: Mr. Eric Gage, Project Planner

Dear Mr. Gage,

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

Thank you.

Lynn Woolley
Lynnbw@att.net

16427 Melody Lane, Guerneville, CA 95446

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From: [lynn woolley](#)
To: [PermitSonoma-Housing](#)
Subject: Attn: Mr. Eric Gage, Project Planner
Date: Saturday, February 4, 2023 3:20:12 PM
Attachments: [IMG_8862.jpg](#)

EXTERNAL

Re: Rezoning of DEIR, GUE 2-16450 Laughlin Rd.; GUE 3-16500 Cutten Ct.;
and GUE 4-16050 Laughlin Rd. located off of Armstrong Woods Rd., Scenic Corridor in
Guerneville, CA

Attached letter signed and dated today, February 4th, 2023

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From: [Michael](#)
To: [PermitSonoma-Housing](#)
Subject: Sonoma county housing element, Eric Gage
Date: Saturday, February 4, 2023 1:16:48 PM

My name is Michael Gomez; my house is located on 188 Academy lane in Boyes Hot Springs. I am writing to you in order to express my opposition to the proposed zoning changes for my property (agu1) and my neighbor (agu2) both of these properties have existing development constraints. The newest burden imposed on my property occurred last year (2022) when Sonoma sewer and water installed a sewer easement across my property, this easement is 15ft wide and is located north to south across the full with of the property . I have been informed by Sonoma sewer and water that no trees or landscaping are to be on this easement or in the vicinity of the easement This in effect renders part of my land a landscape barren sewer roadway! Now Permit Sonoma plans to zone for 20 units per acre, there by ending my single- family home use, this I view as a first step toward the taking of my property. There are additional constraints on both Agu1 andAgu2, that being both properties are bordered by Sonoma creek to the west and Lily creek to the east. The presence of these creeks requires a 50ft riparian set back from each creek further, reducing the use of the property. Because of these facts I believe the proposed new base zoning of R2 is not a good fit in this area. The Boyes Springs area is already receiving a great deal of new housing, these two properties should not be part of an enormous increase in use. The proposed zoning change is not a good fit for the land, not a good fit for the surrounding neighborhood and not for the environment. I am concered this zoning change targets my property for development and will bring unwanted pressure on me to give up this house! Thank you for this opportunity to state my concerns. Respectfully, Michael Gomez

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From: [Olga Gishizky](#)
To: [PermitSonoma-Housing](#)
Subject: DER- stop unsustainable " housing" growth in Agricultural Unincorporated "West COUNTY "Sonoma due to "capacity limit" of water resources in drought- fire / climate change times !
Date: Saturday, February 4, 2023 12:46:46 PM

We on River Drive are inundated as is-- more congestion with population density will be unbearable

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

Vty,Olga Gishizky
10536 River DRIVE
FORESTVILLE, CA
95436

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From: [Patti Sinclair](#)
To: [PermitSonoma-Housing](#)
Subject: Fwd: Fw: Draft EIR Comments: Housing Element Update
Date: Sunday, February 5, 2023 10:42:06 AM

February 5, 2023

Mr. Eric Gage
Permit Sonoma, Project Planner
[2550 Ventura Ave.](#)
[Sant Rosa, CA 95403](#)

Mr. Gage,

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

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

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

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

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

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

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

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

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

Sincerely,

Patricia Sinclair
16510 Cutten Dr.
[Guerneville, CA](#)

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From: r.grandmaison@comcast.net
To: [PermitSonoma-Housing](#)
Subject: Personal Opposition to the Housing Project Proposed for 14156 Sunset Avenue, Guerneville, CA
Date: Sunday, February 5, 2023 1:30:27 PM

Permit Officials,

As a local resident, and one particularly adjacent to the proposed project, I stand opposed to approval for this 30 unit housing project for many reasons.

I have lived at 14160 Sunset Avenue for over 30 years. I have seen many great changes in the community, and while I welcome new residents and development (I am an educator and an architect, C22127) and see the urgent need for affordable housing, placing this project with its proposed density on the top of the Highland Terrace subdivision is a very bad idea. The roadways in our neighborhood, and Sunset in particular, is very narrow, without any sidewalks, driveway curb cuts, accessibility cuts, or gutters. Streets are so narrow that often cars must negotiate a backup routine for one driver to allow for an upward driving vehicle to pass. Often emergency vehicles, like the local fire trucks and ambulances, are blocked due to parked cars and must blare horns to alert local residents to move their vehicles before they can move forward on their route. This could be a life-endangering situation if the result of this project means more cars on an already heavily used and impacted roadways. In the summertime, as visiting guests swell the local population, it's even difficult to find parking in the area on the lower neighborhood streets due to events in town and the vacation rental situation. Delivery trucks often refuse to make deliveries on Sunset and nearby streets due to the narrowness of the roads and the slope of the roadways.

As mentioned, there are no sidewalks or gutters anywhere in the neighborhood until the downtown area is reached. Residents will have to walk on uneven pavement, repaired of many years, by Sweetwater Springs Water District. Street lighting is so bad in some areas that, given the tree canopy, one must walk some areas in near pitch blackness.

Please do not allow this project to move forward in development. Surely there are better suited areas for this kind of density that will also give the residents more opportunity for engagement in the local town and make available to them resources that will otherwise require increased pedestrian and vehicular access on already potentially dangerous roads.

Sincerely,

Robert Grandmaison
14160 Sunset Avenue
Guerneville, CA 95446
(707) 290-3084

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From: [Anthony Gmail](#)
To: [PermitSonoma-Housing](#)
Subject: 14156 Sunset Ave., Guerneville
Date: Monday, February 6, 2023 9:19:18 AM

EXTERNAL

Hello Permit Sonoma,

Re: Development of 14156 Sunset Avenue, Guerneville for 30 units of residential

We are neighbors of the property at 14156 Sunset Avenue, Guerneville, where 30 units are being considered for housing development.

Sunset is a tiny, one lane street, with sharp turns, no passing areas, and certainly an absurd spot for a four unit building, and DEFINITELY problematic for a 30 unit residence. Re-zoning this particular parcel is totally outsized for this neighborhood, this street and this town.

I'm sure I speak for all our neighbors, developing more housing is needed. Doing it on glorified deer trails, isn't a fit.

That said, I can't stand whiners with no ideas. I offer this, another solution to adding more housing, could possibly start with identifying vacant housing to purchase as low-income residences. I can attest, there are at least three unoccupied homes in my neighborhood, and certainly more in the area. Overall, I feel building housing should be where jobs, more services, transit is better, like Santa Rosa or Windsor, which both offer far more to residents, but if it has to be in Guerneville, this is a viable solution. Inspired by my shock that years ago, Fife Creek Commons cost \$20 million to build (in 2012) for 48 units. Even at 2012 pricing, that is \$417k per unit. In this market, there are unused homes (which, admittedly might need work) in that price range. Further, in today's market, at today's building costs, I doubt these proposed units on Sunset could be built for \$417k per unit. Probably 75% more, equalling \$729,750 per unit (at the published, 2012 cost to build Fife Creek Commons + 75%).

Please consider the inappropriate location for this proposed development, and moreover, a creative way to house families in real homes, for likely, far less expenditure.

With many thanks,

Anthony Albertus
14170 Woodland Drive, (just below Sunset), Guerneville, CA

Sent from my iPhone

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From: [Eric Gage](#)
To: [PermitSonoma-Housing](#)
Subject: Becky Boyle: Forestville Concerns
Date: Monday, February 6, 2023 9:19:14 AM

From: Dr Synde Acks <drsyrndeacks@gmail.com>

Sent: Friday, February 03, 2023 10:53 AM

To: Susan Gorin <Susan.Gorin@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; shirlee.zane@sonom-county.org; Pat Gilardi <Pat.Gilardi@sonoma-county.org>; Andrea Krout <Andrea.Krout@sonoma-county.org>; tracy.cunha@sonoma-county.org; district4 <district4@sonoma-county.org>; Jenny Chamberlain <jchamber@sonoma-county.org>; district5 <district5@sonoma-county.org>; Leo Chyi <Leo.Chyi@sonoma-county.org>; Eric Gage <Eric.Gage@sonoma-county.org>; Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>

Subject: Forestville Concerns

Sonoma County Representatives,

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

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

As for our current peace officer situation, it's important to recognize we only have two officers covering between Jenner and the Forestville area. If there should be an accident to an individual, or God, for bid a more significant crisis, the time it takes to get into or out of the area will equate to precious time being lost getting help,

particularly if officers (fire department and/or sheriffs) may be all the way in Jenner at the moment of the crisis. Currently, Forestville fire department is considered a volunteer fire department and it has been merged with several others, which is more described by Becky. So if there is a crisis of that nature on River Road, there's no promise about how long it will take for help to arrive.

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

Imagine we forward in time and you approve the housing being proposed. Forestville and Guerneville flood. Becky listed the floods that were the highest however, we have many, many more floods than that. The areas that you guys are proposing, the low-income housing he located is either in the flood area or located where they would be trapped in or out of Forestville by the flooded streets.

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

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

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

Where will they go? Forestville was not built to be anything other than a simple town on a road with one lane each direction. The amount of parking that will need to be accommodated is far more than what the area can accommodate.

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

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

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

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

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

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

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

Thank you for considering what I've had to say. Both as somebody who cares

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

Synde Acks-Stewart
8801 Marianna Drive
Forestville, CA 95436
(707)887-7556

Letter from Becky:

Dear Sonoma County,

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

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

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

Total population allowed under current designation: 167

Total population under proposed designation: 1,652

The current population of Forestville, as defined by the boundaries of the Grammar School is 6,771. The addition of 1652 residents would be a population increase of nearly 25%. Forestville would have the greatest number of proposed new occupancies/population in the County with the exception of the city of Santa Rosa which is much better equipped for such a drastic influx vs the small community of Forestville who still have the same sized roads they did when I grew up there back in

1971. There is not the infrastructure nor the services in place to accommodate this kind of growth and it is not right to put such a burden on one community in contrast with what is being put on others. The difference of 10 vs 25 percent is not insignificant, it isn't small and unlike the EIR states -- it would be dominant vs "could be dominant". There is simply no way to believe it would not be dominant given the unit #'s proposed vs what the landscape actually is. Unless the proposed developments are single story ranch like homes, there is no "could" about it. See table 4.1-6 in section 4.1-51 for further comparisons.

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

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

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

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

Where is the study for the safety of it's citizens just trying to get through the day without a horrible accident when there's an extra thousand or so cars and pedestrians

jaywalking, risking their lives, with such a large increase of traffic on such a small stretch of travel. I am gravely concerned about the implications. These are urban services as much as sewer and water are per: page xviii yet there is no study about this as far as I'm able to tell.

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

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

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

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

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

urban/suburban areas with things around them? In implementing the proposal as it is, we are also pushing the people that need it the most into situations where they have to drive further when gas prices are among the highest levels the last few years.

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

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

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

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

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

Please set out to find parcels that can meet the counties needs that the State has put your feet to the fire for and find territories that fall in the "Less than Significant", "Less

than Significant with Mitigation" or "No Impact" vs the very many "Significant and Unavoidable". Not an easy task but detrimental otherwise.

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

Respectfully,
Becky Boyle
Forestville, California

--

Synde Acks, Psy. D.

License Psy27309

435 Petaluma Blvd, Suite 136,

Sebastopol, CA 95472

(707)387-0245

Pronouns: She, Her

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From: [Janice Stenger](#)
To: [Lynda Hopkins](#)
Cc: [PermitSonoma-Housing](#)
Subject: Housing Element
Date: Monday, February 6, 2023 4:13:36 PM

I cannot get this to go to Erik...it keeps bouncing back. Could you possibly forward it???

When I was a kid, there were about 20000 people in Santa Rosa proper, murders were almost unknown, housing was super affordable, growth was slow and easy to digest, traffic?.farmers would sometimes drive tractors down 4th street. So some of my questions are:

In a 1/2 mile road, we are expected to take in about 500 people and as a result the people already here will bear the brunt? Will the quality of our life be the same?. Will redwoods be slaughtered? Can my kids ride their horse down the road? Can my renters 8 year old ride her bike? Will deer and all the little animals still use the paths they've used for centuries and sleep in my apple orchard.? Isn't it true that if any state or federal money is involved, these cannot be held for local people ONLY, or returning people that were born here and couldn't continue here because lack of available housing (in their price range?) So in reality, we could be building new housing for people from every state in the country and every county in the state? Is that true? People are fooled again to think it is okay because all of them will get a new condo or a tiny house or a trailer.

When they built Fife Commons (in the flood plain) we knew lots of young Guerneville adults that probably qualified for an apartment, but it wasn't a case of choosing from only Guerneville or perhaps Guerneville and Monte Rio low income

citizens; it was come one, come all and get on the very long list. One extraordinary wonderful local disabled kid who has led a heroic life, tried but no; there was no carve out for the people who have lived here forever and are known to us. So will these hundreds of dwellings you envision be for our town's families?

Guerneville was always the cheapest place to live and the Sonoma County Social Services pointed people over here for decades because of that. No year-round jobs here. We contemplate the exact reason the housing prices jumped and I only guess it's the second homes that stand empty, the lack of bare land inventory, the California population going from 13 million to 40 something million. Is it California's job to provide homes for everyone that wants to live here? And where in the Constitution is this promised?

There's much conversations lately about poor people who live in a food desert...but isn't that what the West County here has become with only one food market from Hacienda to the coast? Also isn't it true that developers can get a "pass" and build higher cost housing? Or even put in a trailer park?.

This EIR violates many of the objectives of the General Plan, is it now defunct?

Also assumes it knows better than the Cal Fire, Lafco, Water Agency and a multitude of apparatchiks that have busily fenced us all in for years. Wouldn't you say that if Sacramento makes the rules with out our input, that we are in the same place as the 13 colonies that fought with the British because of taxation without true representation?

Janice Stenger



  **Santa Rosa**

his to him?

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From: [Eric Gage](#)
To: [PermitSonoma-Housing](#)
Subject: Karyn Pulley - Property FOR-2 , Mirabel Rd.
Date: Monday, February 6, 2023 9:03:29 AM

Sincerely,

Eric Gage

Planner IIIFW:

From: kdpmick <kdpmick@aol.com>
Sent: Tuesday, January 31, 2023 11:14 PM
To: Eric Gage <Eric.Gage@sonoma-county.org>
Cc: bassman.pulley@gmail.com
Subject: Property FOR-2 , Mirabel Rd.

Good morning

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

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

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

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

Sincerely

Karyn Pulley

Sent from my Verizon, Samsung Galaxy smartphone

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From: [Ken Billheimer](#)
To: [PermitSonoma-Housing](#)
Subject: Proposed Housing on Sunset Avenue, Guerneville
Date: Monday, February 6, 2023 10:24:10 AM

RE: Proposed Housing on Sunset Avenue, Guerneville 6 February 2023

I live at 14182 Woodland Drive, Guerneville. This is the house which is just below the turn on Sunset Drive for the proposed development of 30 units of housing for 78 people.

I understand the need for affordable, high-density, low-income housing. I am socially conscious and not a "not in my back yard person." However, I vehemently oppose development of housing up the hill from Woodland Drive. It is an impractical location in an area with a one lane road in both directions of approach. In attempts to negotiate the turn directly above my house, it requires a sharp right turn and then often backing up in order to make the turn. It's not a safe turn under any circumstance. It would not be unlikely for a car to lose control and come down the hill into my house in an attempt to negotiate that turn.

An approach to that same turn by going North at the top of the hill onto Woodland would bring traffic in front on my house. It is not safe from this direction either. The road is too narrow. The bottom of my stairs go directly into the street and it's a blind spot. If a person does not stop and look into the street (as children and grandchildren often don't), it is an accident waiting to happen which could result in injury or even death. People speed on that street regularly. Someone is going to get hit by a car. There is no possible way to widen Woodland at that point without being in my living room.

During the last fires, we evacuated two times. This evacuation was mandatory, and we complied. In the event of evacuation from this neighborhood, there are two possibilities: Woodland to Armstrong Woods Road and Morningside Drive down to Highway 116. Morningside Drive to Highway 116 is a dangerous and narrow one lane road. It is NOT possible for two cars to pass. One must back up. To evacuate using this road is completely impractical. Conservatively, I would think 78 new people would add 50 cars to the neighborhood.

It makes more sense to build affordable housing in an area of Sonoma County where there are jobs not tied to a seasonal tourist economy. It just doesn't make sense to build housing where there are no jobs. I don't mind my tax dollars being spent on affordable housing; however, it should be built in an area where there are jobs and infrastructure to support it. If it is in Guerneville, it needs to be built in an area that people can access public transit or even practically be able to walk to the store. It is impractical to think someone with health issues could walk down and back up Woodland from the proposed location to go shopping. The road is steep and a challenge even for someone who is physically fit.

I request that all the parties considering this location for building new housing give some consideration to the practicality of the location.

Respectfully,

Kenneth Billheimer

Kenneth Billheimer, Au.D
Audiologist, Consultant
Somewhat Retired
Inquiries Welcomed

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From: [Maggie Mayo](#)
To: [PermitSonoma-Housing](#)
Subject: Draft EIR Comments: Housing Element Update
Date: Monday, February 6, 2023 8:18:54 AM

Dear Mr. Gage,

We are at 20553 Birch Rd, which is next to the SON-1 through SON-4 properties that are subject to the Housing Element. We only recently learned of the Housing Element by way of the December 28, 2022 notice of availability of the Draft EIR. I had hoped to attend Thursday's hearing but unfortunately was not able to.

I have a few questions/comments about the proposal. If easier to discuss over the phone, my number is 415-722-5274.

- We have a well that we share with our neighbor, and I believe others in the area are on well water too. Has there been any analysis on the impact of this proposed construction and future use of the land on existing wells in the area?
- Based on my review of the documents, it sounds like the proposal works as follows: parcels labeled SON-1 through SON-4 in the draft EIR are currently RR and the proposal is to change the zoning to R2, which the proposal contends under Government Code section 65913.5 would allow up to 10 dwelling units to be built on each parcel, and then the proposal contends that number would be doubled to twice what is provided for under Government Code section 65913.5 to 20 dwelling units per parcel under Sonoma's "Rental Housing Opportunity Area Program." Is that correct? If so, how do SON-1 through SON-4 qualify under Government Code section 65913.5? Is it in a "transit-rich area" or an "urban infill site"? And how does the Sonoma "Rental Housing Opportunity Area Program" to double the allotment provided for under that Government Code when the express language of the statute provides for zoning a parcel for "up to" 10 units of residential density?
- Are there requirements to maintain a certain amount of green/open space? If so, what are those requirements?
- Will there be limitations on building height?

Thank you for your time.

Best,

Maggie Mayo
415-722-5274

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From: [Eric Gage](#)
To: [PermitSonoma-Housing](#)
Subject: Michael Gomez comment
Date: Monday, February 6, 2023 10:45:53 AM

From: Michael

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

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

Subject: Sonoma county housing element, Eric Gage

My name is Michael Gomez; my house is located on 188 Academy lane in Boyes Hot Springs. I am writing to you in order to express my opposition to the proposed zoning changes for my property (agu1) and my neighbor (agu2) both of these properties have existing development constraints. The newest burden imposed on my property occurred last year (2022) when Sonoma sewer and water installed a sewer easement across my property, this easement is 15ft wide and is located north to south across the full width of the property . I have been informed by Sonoma sewer and water that no trees or landscaping are to be on this easement or in the vicinity of the easement This in effect renders part of my land a landscape barren sewer roadway! Now Permit Sonoma plans to zone for 20 units per acre, there by ending my single- family home use, this I view as a first step toward the taking of my property. There are additional constraints on both Agu1 andAgu2, that being both properties are bordered by Sonoma creek to the west and Lily creek to the east. The presence of these creeks requires a 50ft riparian set back from each creek further, reducing the use of the property. Because of these facts I believe the proposed new base zoning of R2 is not a good fit in this area. The Boyes Springs area is already receiving a great deal of new housing, these two properties should not be part of an enormous increase in use. The proposed zoning change is not a good fit for the land, not a good fit for the surrounding neighborhood and not for the environment. I am concerned this zoning change targets my property for development and will bring unwanted pressure on me to give up this house! Thank you for this opportunity to state my concerns. Respectfully, Michael Gomez

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From: [Patricia Kremer](#)
To: linda.hopkins@sonoma-county.org
Cc: [PermitSonoma-Housing](#)
Subject: Draft EIR Comments: Housing Elements Update
Date: Monday, February 6, 2023 8:49:31 AM

Dear Linda,

RE: Proposed rezoning for affordable dense housing: GUE 2, GUE 3, and GUE 4.

The community surrounding Laughlin Road and Cutten Drive strongly opposes this rezoning. Especially the loop around Cutten Drive (GUE 3). This is a one-lane road and would severely negatively impact our community: traffic, water, sewer, our beautiful redwoods, and emergency egress for residents.

Every resident of Cutten Drive has purchased property to be in a R1 zoning area. Surely there must be a better place to build affordable dense housing, with better access, such as on River Road?

Please keep me posted on any developments.

Patricia Kremer
16445 Cutten Drive
Guerneville

Thank you,

Patricia Kremer

Hospitality & Special Event Professional

"Delightful Experiences Await..."

Phone: (707) 477-2546

<https://www.linkedin.com/in/patricia-kremer-5a12a21b/>

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From: [Rick Harrington](#)
To: [Lynda Hopkins](#)
Cc: [PermitSonoma-Housing](#); info@sweetwatersprings.com
Subject: 14156 Sunset Ave, Guerneville
Date: Monday, February 6, 2023 5:41:28 PM

EXTERNAL

Dear Supervisor Hopkins,

I am informed by a neighbor that a plan is in process to develop a thirty-unit housing development at 14156 Sunset Ave, uphill from my home on Woodland Dr. This is the property owned by Sweetwater Springs Water District and is currently used as water storage for central Guerneville. I don't know how far along this development is in process. I was unable to find any activity listed on the PRMD website. But this is a terrible proposal for many reasons. The engineering to build such structures is unimaginable and would in all likelihood compromise the stability of the entire hill. It sits atop a hill that is only accessed by one-lane roads, all of which are in decrepit condition, and which would have to be completely rebuilt after being run over by all the construction equipment required to build such an enormous project. In the event of a major fire, it would present a most dangerous challenge to evacuate. The additional traffic through the neighborhood would turn this quiet little neighborhood of unique single-family homes into a nearly-urban zone. Finally, my greatest concern is that this home, which my wife and I worked hard for many years to be able to purchase in order to enjoy our retirement in would in all likelihood suffer a catastrophic decline in value.

As I stated, I don't know how far along this process has gotten to, but I implore you to put a stop to it. It is not only a bad deal for me, but it is also hazardous and potentially destructive to the neighborhood. If it is indeed to be subsidized housing, it would be another very expensive boondoggle for the County. Thank you for your attention to this matter.

Rick Harrington

14151 Woodland Dr

Guerneville, CA 95446-9582

707-869-1808

--

Ego sum quia sumus

I will remember that what has brought us up from savagery is a loyalty to truth, and truth cannot emerge unless it is subjected to the utmost scrutiny -- will you not agree that a society which has lost sight of that, cannot survive? - Learned Hand, jurist (27 Jan 1872-1961)

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From: [Stacie Gradney](#)
To: [PermitSonoma-Housing](#)
Date: Monday, February 6, 2023 2:57:45 PM
Attachments: [image0.jpeg](#)
[image1.jpeg](#)
[image2.jpeg](#)
[image3.jpeg](#)
[image4.jpeg](#)

PermitSonoma-Housing@sonoma-county.org

Here are some screenshots from discussion in Next Door App.
Comments are growing.

This about zoning forestville for developers to build housing for a town that is NOT fit for over populating.

I think you need to start getting the community involved. Every person in forestville needs to know what you are trying to do. You already took our high school.



Sent from my iPhone

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From: [Eric Gage](#)
To: [PermitSonoma-Housing](#)
Subject: Tim Patriarca and James Wang - Public Comment
Date: Monday, February 6, 2023 9:15:44 AM

Sincerely,

Eric Gage

Planner III

From: Tasha Levitt <Tasha.Levitt@sonoma-county.org> **On Behalf Of** PlanningAgency
Sent: Thursday, February 02, 2023 8:48 AM
To: Eric Gage <Eric.Gage@sonoma-county.org>
Subject: FW: Public Comment on Sonoma County Housing Element Update, GRA-4

From: Tim Patriarca <tim.patriarca@gmail.com>
Sent: Thursday, February 2, 2023 8:29 AM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Cc: James Wang <james.howard.wang@gmail.com>
Subject: Re: Public Comment on Sonoma County Housing Element Update, GRA-4

To Permit Sonoma,

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

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

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

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

Regarding the rural aspects of the area, the properties surrounding this parcel are open and natural. Three of the four sides of the site share a border with large parcels

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

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

Thank you for your time and consideration.

Sincerely,

Tim Patriarca and James Wang

On Thu, Feb 2, 2023 at 8:28 AM Tim Patriarca <tim.patriarca@gmail.com> wrote:

To Permit Sonoma,

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

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

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

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

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

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

Thank you for your time and consideration.

Sincerely, Tim Patriarca and James Wang

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From: [Becky Boyle](#)
To: [PermitSonoma-Housing](#); [Eric Gage](#); [Planner](#)
Subject: Fwd: Sonoma County Planning Commission & Board of Zoning Adjustments Meeting Information Update
Date: Tuesday, February 7, 2023 10:25:45 AM

Hi,
I don't understand why the letter I sent you for the draft EIR was not included in Item 2. Have you really only received 3 letters about this?
I tried calling but that was challenging, thought I'd pop off this email, might try to swing by later in case that's easier.
Thanks,
Becky Boyle

Begin forwarded message:

From: "Sonoma County, CA" <casonoma@public.govdelivery.com>
Subject: Sonoma County Planning Commission & Board of Zoning Adjustments Meeting Information Update
Date: February 7, 2023 at 9:29:33 AM PST
To: becky.boyle@gmail.com
Reply-To: casonoma@public.govdelivery.com

Sonoma County Permit and Resource Management Department



You are subscribed to Planning Commission & Board of Zoning Adjustments Meeting Information for Sonoma County, CA. This information has recently been updated, and is now available:

February 2, 2023 Planning Commission Actions, Video and Comments:

- [Actions](#)
- [Video](#)
- [Item 1 Additional Comments](#)
- [Item 2 Additional Comments](#)



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**Sonoma County Permit and Resource
Management Department**
www.PermitSonoma.org

This email was sent to becky.boyle@gmail.com using GovDelivery Communications Cloud on behalf of: Sonoma County, California
· 575 Administration Drive · Santa Rosa, CA 95403



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From: [Dan O'Leary](#)
To: [PermitSonoma-Housing](#)
Subject: Opposing the Rezoning of properties listed in the DEIR
Date: Tuesday, February 7, 2023 4:58:33 PM

To Whom It May Concern,

As a homeowner located in the area in question, please let this email certify my opposition to the proposed DEIR: **GUE 2** 16450 Laughlin Road, **GUE 3** 16500 Cutten Drive and **GUE 4** 16050 Laughlin Road, located off Armstrong Woods Road, Scenic Corridor in Guerneville, CA. Among many of my concerns are the following:

- The fire risk is only getting worse. Evacuating our neighborhood now is already challenging at best. The thought of adding an additional 200+ plus homes built would be catastrophic.
- This is also a factor with the flooding of Armstrong Woods Road if we all must evacuate. Armstrong Woods Road is already heavily traveled in the summer particularly with tourists traveling to the forest, hikes, etc.
- Laughlin Road is very narrow in some spots, allowing for only one car to pass.
- Laughlin Road dead ends, which makes the egress/ingress problem of evacuation even more difficult.
- The present condition of the sewer system in the area currently has its own set of problems dealing with the current level of homeowners.

While I am sympathetic to the need for affordable housing, this is simply not a good place to do it. Our homes and livelihood are already compromised every year dealing with fire and flood threats. Please do not allow this massive project to threaten not only the beauty of the area, but quite simply our safety.

Sincerely,

Dan O'Leary

14735 Carrier Lane

Guerneville, CA 95446

415-889-0043

doleary11@hotmail.com

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From: [Eric Gage](#)
To: [PermitSonoma-Housing](#)
Subject: FW: For todays housing meeting
Date: Tuesday, February 7, 2023 8:19:28 AM

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

From: Kelly <killy_jyc@yahoo.com>
Sent: Thursday, February 2, 2023 11:36 AM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Cc: Omar Percich <percichomar@gmail.com>
Subject: For todays housing meeting

EXTERNAL

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

Good afternoon, my name is Kelly Joyce and I am a resident of Forestville. My family moved from Windsor three years ago to Conor court which is located off Highway 116 and across the street from the proposed development on packinghouse Road. I have sent several emails over the years to both Caltrans and county officials pertaining to the extreme safety concerns I have for this location as my daughter is not able to even cross the street to go 20 feet to school in the morning safely. When we drive her to school in the morning, it typically takes five minutes just to turn left to go straight across the street.

Additionally, Highway 116, right in front of the proposed Packing House Road development, floods, multiple times a year completely cutting off access in both directions. Does California need more housing? Yes. However; It is highly concerning that the carts being put before the horse by proposing a 37% increase in Forestville's population with obviously minimal thought/planning put into the feasibility given current infrastructure. How does the county move forward with rezoning proposals without even having a plan for the required infrastructure changes? Our town is not setup to accommodate thousands more people and at the same time be able to safely evacuate in the event of a natural disaster. People that actually live here understand how far off this proposal is to the current reality of our country existing infrastructure.

Thank you,

Kelly Joyce

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From: [Kon Zaharoff](#)
To: [PermitSonoma-Housing](#)
Subject: Attn: Eric Gage (FOR-2) Housing Update
Date: Tuesday, February 7, 2023 11:59:51 AM

Eric,

The owners of FOR-2 posted an e-mail comment after the recent Zoom meeting. Please see below.

Question: has the County responded to this email from the owners?

Question: will the County be removing FOR-2 from further consideration?

From:
Nick Pulley
To:
PermitSonoma-Housing
Subject:
FOR-2 rezoning response
Date:
Thursday, February 02, 2023 11:42:33 AM
EXTERNAL

Eric,

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

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

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

Let us be clear in no uncertain terms:

WE ARE NOT SELLING THE ORCHARD

. We plan on continuing to restore and expand the agricultural and environmental

function of the land, with hopes of selling food to local stores and individuals in the near future, and eventually retiring here. This property has been in the family for 5 generations and will continue to be so.

We also hope that this rezoning doesn't impede on our ability to use the land for agriculture.

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

Nick Pulley - Bassman.pulley@gmail.com

Kristen Krup - Klynnkrup@gmail.com

Karyn Pulley (off site, owner) - kdpmick@aol.com

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From: [Larry Martin](#)
To: [PermitSonoma-Housing](#)
Subject: Forestville growth plan
Date: Tuesday, February 7, 2023 5:24:20 PM

EXTERNAL

To who it may concern; before initiating discussions on growth in this unincorporated area, please consider local traffic, water and sewage concerns.

Forestville has the capacity to accept some growth, but the density that has been suggested is beyond the town's capacity to accept without adding capacity and fundamentally changing the character of our town.

Sprawling growth as has been suggested is expensive and inefficient. Please add needed housing closer to major transportation corridors, and large sewage treatment plants, not in far flung rural areas.

Regards;

Larry Martin
6710 Ellen Lane, Forestville
(707) 328-5341

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February 7, 2023

Marilyn and David Kinghorn
P.O. Box 949
Forestville, Ca. 95436

To Whom It May Concern:

We are writing in regards to the rezoning that is planned in Forestville. The rezoning has just recently come to our attention.

We have been told that everyone living within 300 feet of the areas to be rezoned received a notice of intention. We probably live 301 feet away so we were not notified. Everyone in the Forestville zip code should have received this information because everyone who lives in the area will be affected when and if development occurs.

We also realize that rezoning areas for affordable housing is State mandated. What we don't understand is why this seems to have taken our Board of Supervisors by surprise, and now there seems to be a rush to get it done ASAP. We elected our supervisors to anticipate and be prepared for just such occurrences.

There is no question that there is a need for affordable housing. Growth is inevitable. However, knowing that growth is inevitable doesn't mean that our supervisors get to engage in a haphazard scatter shot to decide where that growth should be. The argument that Supervisor Hopkins makes that we should quickly rezone and worry about potential problems when the development takes place is not only ridiculous, but it's irresponsible.

We would like to direct your attention to Forestville site FOR 1, the Electro Vector site. It is a hazardous waste site. While the location seems ideal for growth it is a HAZARDOUS WASTE site. It should not be rezoned until it is safely cleaned up. That clean up, incidentally, has been put off for too long and needs to be dealt with. We have lived on Hughes Road for 39 years and the site has never been taken care of despite the fact that a school sits right under it.

FOR 4 is another potential rezoning site which is directly east from site FOR 1. To rezone an area for dense housing so close to a hazardous waste site is unthinkable and irresponsible. There are several other environmental concerns with regards to site For 4. At least one creek runs directly through the area and overflows its banks in heavy rain. The access to this property is nothing but a narrow, dirt driveway that runs off of Van Keppel on a steep curve. With the resulting increase in traffic, this would result in a dangerous situation for cars, bikes, and pedestrians.

Again, we think it is negligent and irresponsible to rezone and expect developers to take care of or even be concerned with the complex issues that face a growing community.

Possible problems and environmental issues need to be addressed prior to rezoning.

Some concerns:

- 1) Utility wires – underground
- 2) Water – more storage
- 3) Sewer – is there adequate capacity. Many residents have septic tanks
- 4) Roads – the obvious is that they are not designed for an increased population

A question: several years ago there was discussion about making a bypass around the town of Forestville. Is that being discussed along with the housing rezoning?

And a final question: Why is Forestville set to increase population by 25% rather than the 10% of other neighboring areas.

Final thoughts:

Along with increased housing there are quality of life concerns. We need some open space and parks. A neighbor has been working to develop a skatepark for the youth of our community.

Affordable housing should take into account those that are actually going to live in our area. With that in mind we feel that organizations like Habitat for Humanity needs to be a part of the conversation.

Our request of the Board of Supervisors is that you put some thought and planning into what you are trying to accomplish. Do not push through a set of haphazard rezoning sites because you have not done your homework and you have not involved the community in a responsible, meaningful way.

Sincerely,

Marilyn and David Kinghorn

From: [Neel Nath](#)
To: [PermitSonoma-Housing](#)
Subject: PermitSonoma-Housing@sonoma-county.org
Date: Wednesday, February 8, 2023 9:50:47 AM



Hello there,

Your website is not ranking well on Google.

We can help you in putting your website on the Google top page and getting more customers.

Let me know if you are interested, we would be happy to send you past work, pricing and proposals.

Thanks & Regards,
Neel Nath

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February 7, 2023

Permitsonoma-housing@sonoma-county.org
RE: Draft EIR comments: Housing Element Update

from: Stephanie Blumenthal, 3501 Ross Rd Sebastopol CA 95472 (P.O. Box 462
Graton CA 95444)

Following are my comments on the DEIR (3 pages).

1. GRA-2 (3400 Ross Road)

You are proposing, per page 2-24 of the DEIR, to change the zoning of GRA-2 from M1 (limited urban industrial) and F2 (flood pathway) to Workforce Housing, and further, to designate it for maximum "medium-density" housing of 24 units per acre(!). Nothing on this site has changed to justify this change. It has been used for limited urban industrial purposes since I moved here in 1987. While the site is not pretty, it serves its intended purpose and leaves the sensitive land it is on and surrounding land more or less intact. This "vacant land" has had friends or family members of the original owner, Tom Sullivan, living there as caretakers for years, including disabled people, hardworking truckers, and others, hence the provisional trailers. I believe this property is now part of a living trust. M1 zoning states that Development in the M1 zone is limited in scale by such factors as incompatible adjacent land uses and adverse environmental impacts.

The current F2 zoning for GRA-2 is because it does indeed lie within a floodway, and this is shown on your map of the site in the DEIR. F2 zoning states that no use shall be approved within the floodway that will significantly increase the flood hazard or significantly affect the carrying or storage capacity of the floodway. Further, it states that uses allowed within the base district with which this district is combined shall be permitted subject to the provisions of section 26-56-030, except that no new permanent structure nor structure intended for human occupancy shall be permitted within the floodway. Changing the M1, F2 zoning would be detrimental for additional reasons, to-wit:

GRA-2 is situated in a Riparian corridor, the Atascadero Watershed/marsh, which is home to a wide variety of water fowl, fish, reptiles and amphibians. Of these, coho salmon, steelhead trout, red legged frog and California freshwater shrimp are threatened or endangered species. There are also endangered plants in the area including the Pitkin Marsh Lily, which could be further endangered through development of this highly sensitive area and invasive plants. Light glare, paving, loss of trees and shrubs, and increased flooding from loss of soil will have an adverse effect on biotic habitat and bird life, and increase flooding, and when we are facing climate change, this just doesn't seem to be in our best interests.

The northernmost end of the GRA-2 site is also a major point of drainage from Ross Road to the Atascadero watershed.

Ingress and egress to GRA-2 involves crossing the Joe Rodota bike path, which could increase the risk of pedestrian/cyclist-vs.-auto accidents.

2. Sewer Hookup for all proposed Graton housing developments

The DEIR states that sites were selected based on the availability of public sewer.

-Graton has a small, minimally accessible treatment plant. Its treatment capacity is 140,000 gallons per day (gpd) per LAFCO and the Graton Community Services District (GCSD).

-In 2018 there were 632 equivalent single family dwellings (ESDs) connected to Graton sewer, which per GCSD were estimated to generate 70,000 gpd of wastewater for treatment (using the GCSD's estimate of 110 gpd). This did not include wastewater from 10 units plus their ADUs that were built in Graton around this time.

-Also around 2017/18, it was proposed that Occidental's sewage (273 ESDs) be trucked to Graton. It was estimated this would add about another 30,000 gpd of wastewater for treatment at the plant. The idea of trucking sewage and offloading it into a "hole" at a Graton sewage lift station alongside a bike path (also, ironically, located at 3400 Ross Road) was not viable, and since then, the county has spent \$156,000 for a feasibility study to install a pipeline to bring sewage from Occidental to Graton. Funding for this project (around \$6 mil, I think) from the State Revolving Fund is anticipated in 2024, with construction to begin in 2026-2028. This will bring the Graton plant's daily wastewater treatment up to about 100,000 gpd.

-In 2020, the GCSD appears to have entered into an "out-of-district" agreement with Manzana Products on Green Valley Road and connected them to the Graton sewer. Their wastewater is estimated to be 37,000 gpd, which with Graton and Occidental would bring the plant to just about its capacity of 140,000 gpd.

-In addition, the 2020 General Plan recommends 33 existing residents in Graton be annexed into the district. I don't know that any of these folks have been connected as yet.

This does not seem to leave plant capacity for 5 "medium-density" housing developments of 20-24 units per acre.

3. General comments on all proposed Graton sites

There is no grocery store in Graton; the nearest one is 3 miles away. We already have traffic issues with large trucks going to and from Traditional Medicinals, Manzana Products, and various wineries traversing our narrow rural roads. We have water issues with new vineyards going in frequently; ask the people whose wells have run dry and had to drill new wells.

In closing, someone suggested we offer constructive feedback rather than simply voicing opposition. So, I spent the last couple of months trying to find a place for an old friend with limited income who had to short-sale her home of many years. There was plenty of availability in Santa Rosa with the many, many new developments going in, but the problem is that developers are only mandated to offer a percentage of affordable units. For example, one apartment building with 120 units had plenty of availability but only 16 units in an "affordable" price range; the rest were rentable at the market rate of \$32-3700 per month. Also, some of the cheaper apartments were for farm workers only or required a monthly income 2.5 times the monthly rent, which is a helluva' lot for seniors and service industry employees. Perhaps the governor needs to come down harder on the developers and landlords who are making tons of money off this mega-housing push.

Thank you.

From: [Alicia Chazen](#)
To: [PermitSonoma-Housing](#)
Subject: Draft Housing Element EIR - Forestville
Date: Wednesday, February 8, 2023 1:59:12 PM

Eric,

I am a resident of Forestville and a member of the Forestville Planning Association. As you know, there has been a lot of conversation in the community regarding the possible re-zoning of 6 lots in Forestville and the potential impact of the re-zoning. I'd like to add my comments to be recorded and included in the staff/consultant report that is presented to the Planning Commission.

While it is clear that there is a desperate need for more and affordable housing in Forestville, Sonoma, and California as a whole, the proposed re-zoning of the 6 specific lots in Forestville is concerning. In my opinion, these are the most concerning issues:

- In an emergency, the evacuation corridors from Forestville are 116 and River Road, both of which are curvy, 2-lane roads. They would be crowded and potentially dangerous under current conditions. Adding up to 1,652 people would only add to that condition.
- The roads serving the proposed lots may not conform to Cal Fire and Fire Department requirements for access. I'm concerned that these two entities have not been consulted and asked for their analysis of the potential impact and non-conformity.
- It is not clear that our existing water and sewer infrastructures are adequate to support added development. I'd like to see the Water and Sewer district reports on this matter.
- It is my understanding that there have been requests in the past to expand the boundaries of Forestville, which were rejected due to there not being adequate infrastructure to support added housing units. This conflicts with the current proposal of adding up to 1,652 residents.

The 6 proposed lots in Forestville represent an outsized proportion of the number of potential units being proposed for the County as a whole. Considering our relative lack of infrastructure, why aren't Santa Rosa, Petaluma, Windsor and other larger, more developed communities taking more of the percentage?

My career is in residential construction, and I am a strong proponent of building more housing units in my community. I would like to see these units added in locations that do not have a negative health and safety impact on Forestville, and that are added in response to Forestville's identified needs and desires for community development.

Thank you,
Alicia Chazen

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From: [Amanda Shone](#)
To: [PermitSonoma-Housing](#)
Subject: Comments on Sonoma County Housing Element
Date: Wednesday, February 8, 2023 7:11:20 PM

To whom it may concern:

I am writing on behalf of myself and my spouse who reside in Glen Ellen and have concerns with the requests that are being reviewed to rezone parcels 054-250-057 and 054-250-084 (GE-1 and GE-2). The current owner who is making these requests does not currently keep his properties in good habitable conditions and has proven he is not invested in the community with his past and current actions. Please take this into consideration with your decision making. The small village of Glen Ellen will be drastically changing in the near future with the SDC and the infrastructure etc. really isn't there for this kind of downtown population.

Thank you for your consideration,
Amanda Shone and Caden Long

Amanda Shone

Sotheby's International Realty
793 Broadway, Sonoma 95476
DRE# 01977204
Phone: 707-338-8241
E-mail: amandashone@gmail.com

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From: [Angelica Jochim](#)
To: [PermitSonoma-Housing](#)
Subject: housing unit development in West County
Date: Wednesday, February 8, 2023 11:02:04 AM

To whom it may concern,

I am terribly concerned about the proposal to add 1,480 housing units to Forestville, as part of the 3,881 units proposed for unincorporated Sonoma county. Really?

I am all for workforce housing, yes, when it's thoughtfully planned and in keeping with the nature of the community. This plan though, is sloppy and badly thought out by people who do not know the area.

The number of housing units is far too many for a little town like Forestville, which has no infrastructure in place to accommodate them, and the locations are poorly chosen.

Please scale down this plan, and take the time to create a plan for new housing that is harmonious with the local environment.

Thank you,
Angelica

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From: [Eric Gage](#)
To: [PermitSonoma-Housing](#)
Subject: Robert Grandmaison: Objection to Proposed Housing Site GUE-1 for Rezoning Project
Date: Wednesday, February 8, 2023 12:11:22 PM

From: r.grandmaison@comcast.net <r.grandmaison@comcast.net>
Sent: Wednesday, February 08, 2023 12:10 PM
To: Eric Gage <Eric.Gage@sonoma-county.org>
Cc: 'Dylan Smith' <dylan.smith@goat.com>
Subject: Objection to Proposed Housing Site GUE-1 for Rezoning Project

Dear Mr. Gage,

I'm writing to you with concerns about the proposed site GUE-1 for the low-income affordable housing rezoning development that is being mandated by the State of California for development in unincorporated portions of our county. I believe the site is unsuitable for many reasons, including the following:

1. The site is currently being used heavily by the Sweetwater Springs Water District and has two large water tanks on the property, along with many accessory structures/buildings to provide water treatment and emergency power and fuel to power the pumps and related equipment for the facility. These two large tanks provide potable and fire-fighting water for all of Guerneville and placing many people on the same site would lessen the viable area for housing, as well as create the potential for vandalism or lack of immediate access to the water facility during times of maintenance and emergencies. My house is the nearest house to the current entrance to the site and I regularly see Sweetwater Springs employees in the small service trucks having to make 3-point turns on the narrow road into the facility many times throughout a work day. Having additional cars on the site could potentially serve as an obstacle for immediate access to the site, in particular during wildfire season. Security fencing around the facility deters vandalism currently- however, the lack of visibility provided by the topography and tree canopies provide even more.
2. The roads leading up to the site are all very narrow roads on hillsides, which would make widening them for two-way traffic impossibly expensive and difficult. Currently it's very common to encounter opposing traffic on Sunset Avenue and it requires one vehicle to stop, and back-up in reverse up the hill to allow the upward moving vehicle access to the site's driveway. Many of the roads in the neighborhood share this narrowness issue, often with houses within a few feet of the pavement, given their construction date prior to the creation of the Sonoma County building department.
3. None of the roads in the area have any sidewalk, curbs, or gutters or proper ADA-compliant curb cuts and approaches. The edges of the pavement area is also very uneven, often hidden by overgrowth of ivy and other vegetation or debris. Residents who walk the uneven pavement now (from continued repairs to the water and sewer systems) must negotiate their way on the asphalt on very uneven surfaces in some areas. We have witnessed people tripping and falling on the road from the condition. It is not a user-friendly road system for pedestrians, though it's heavily used by many for exercise, dog-walking, and the walk into town. This particularly true in the summer time during the peak of vacation rentals when

larger groups of people use the roads as a walkway. Putting the vehicles in motion for 78 people/30 units, with that type of pedestrian use is an invitation to conflict and injury.

4. Though it's a quick and fairly convenient location for a walk into town, the same is not true for the return trip. According to the lidar contours from the Sonoma Vegetation Map site, the contour elevation of the site at the water towers is at 252' and the elevation at the bottom of the hill, where Woodland Drive meets Armstrong Woods road, is at 62'. The roads of Palo Alto and Woodland drive rise quickly from Armstrong Woods Road at a near 11.84% grade (740' run and 88' rise), exceeding an ideal maximum slope of 1:12 used for ramped access for wheelchair users. The elevation at the bottom of the hill, at Woodland Drive is shown as 62' from that same lidar map. Even a person in reasonably good physical shape might have difficulty with the walk. That is, of course, complicated by negotiating the pavement with oncoming vehicles, and inclement weather when it occurs. It looks conveniently located to downtown Guerneville, for shopping or work or bus stops, on a flat map, but when considering the elevational difference between the site and town, it tells a very different story. The other access road, Palo Alto Drive, is even narrower and more curved and as steep as the Woodland approach.
5. Given the roadway grades and the narrowness of the roads, many delivery vehicles have a difficult time negotiating the neighborhood. Semi trucks cannot make deliveries to the neighborhood. Any large construction vehicles will have to be severely limited or off-loaded in town and materials moved to the site via smaller shuttle trucks. Even the local fire trucks and ambulances have difficulties getting around the neighborhood, in part because people park along these narrow roads, further blocking access. I've heard our local fire department vehicles blaring their horns for long times trying to capture the attention of local residents to move vehicles that prohibit the movement of their emergency vehicles on our roads. I fear that with 78 people, guest parking may well overflow into the neighborhood, further complicating the situation- with the clear evidence of this happening during big summer events when visitors to the area look for nearby parking spaces in our neighborhood, making parking for local residents in front of their own homes, sometimes impossible.

I am an architect (C22127) as well as a long-time faculty member at Santa Rosa Junior College. I have lived in Guerneville for over 33 years and support changes that better the lives of others. I believe in high-density housing projects and recognize the immediate need and importance for housing for everyone in the county, regardless of economic status, but in particular for those who need accommodations due to lack of income or due to physical limitation of abilities. I would welcome such housing IF this site was appropriate for the location, but given all the issues above, and other less significant ones (like the dissimilarity to the current housing in the neighborhood) I must object to the proposed project on the GUE-1 site on Sunset Avenue in Guerneville.

Respectfully,

Robert Grandmaison, Architect (C22127)

14160 Sunset Avenue

Guerneville, CA 95446

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Date:

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

Dear Mr. Gage,

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

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

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

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

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

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

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

Name: Caitlin Marigola

Address: 16320 Valley Ln Guerneville

Date: 2/8/2023

Signature: Caitlin Marigola

Date:

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

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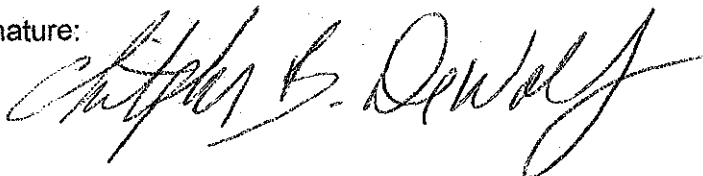
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Name: Christopher Dewolf

Address: 16320 Valley Ln

Date: 2/8/23

Signature:



Date:

2/13/23

Mr. Eric Gage

Permit Sonoma, Project Planner

2550 Ventura Ave.,

Santa Rosa, California 95403

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Name:

Anna Hayman

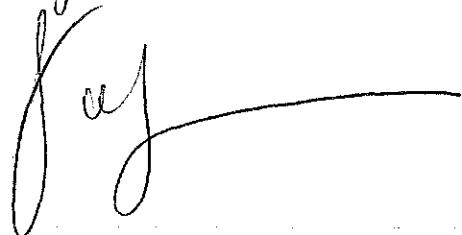
Address:

16447 Cutten Dr. Guerneville CA 95446

Date:

February 13 '23

Signature:



From: hermanjh@aol.com
To: [PermitSonoma-Housing](#)
Cc: hermanjh@aol.com
Subject: Guerneville Four Locations Submitting my Objections to Rezoning those Parcels!
Date: Wednesday, February 8, 2023 3:05:22 PM

EXTERNAL

Dear Permit Sonoma,

I am submitting my Objection of the the Rezoning of the properties listed in Sonoma County Draft Environmental Impact Report (DEIR) specifically, GUE -1 which is 14156 Sunset Ave., GUE-2 which is 16450 Laughlin Road, GUE-3, 16500 Cutten Court, and GUE-4 which is 16050 Laughlin road, and all in Guerneville. I have given my Objections on each parcel below. Thank you!

1. 14156 Sunset Ave., is located above the Guerneville Library, and off of Woodland Ave., in several areas only a single car access, as Woodland is a narrow county road way! As you approach the top of Woodland you take a right turn to Sunset Ave., which is a ridge top with about 12 house's currently in the neighborhood, and a little wider street and as you drive about two blocks there you hit a road way that is a dead end, where you come to the Subject property. Which consists of about 1.3 acres of land at the end of a mini country road. In order to exit the subject property you then go down Sunset Ave., to Morningside Drive, to Palo Alto, this road area is much of a single car access.

As I describe the ride going to the subject property, as I mentioned several times above the residents need to be very careful about going up and down this road. I feel the infrastructure, water, sewer, are major issues and even not possible, plus when we speak about evacuation from fire, would be a major problem, if there where more housing built in the neighborhood, the addition of more residents would be a major concerns. For the current location of this parcel, I would be totally be against this parcel being rezoned.

2. 16500 Cutten Court is a very light used road, plus currently has a single family dwelling on the land and sits on a level ridge top parcel with great views. To get to this site, You turn left off Armstrong Woods Road, on to Laughlin Road, a country road, where two cars passing each other can be a little tight, and then you drive up Cutten Drive, where some of the road, only has access for one car. As you get to the ridge top, there are about 18 homes in the neighborhood, and as you drive west on Cutten Drive, again is narrow in some parts, until you get to the subject property.

Based on the location, plus the infrastructure requirements, access, and the possible evacuation I find this property, to where it should not be re zoned.

3. 16050 Laughlin Road, is located right off Armstrong Woods Road, in fact it is the second property right off Armstrong. Please note that 16500 Cutten Court, access to that property is the same road, or Laughlin Road, where, currently this road is used for access, to enter the Guerneville Elementary School, which has 290 students and the school buses and parents bring there children to school already creates during the day heavy traffic. In addition Laughlin Road, is a artery of access, with about about 200 homes that already use Laughlin Road, plus the School parents, is a lot of traffic.

Now you consider rezoning Cutten and the subject property here with a possible 150 units, does not seem to Feasible. This subject property does consist of five acres and borders Fife Creek, which makes a good portion of this property in the 100 year flood zone. Plus on this parcel was to only have access off of Laughlin Road, would really cause and increase a traffic issue! If they only have one exit option?

I would be against any current rezoning of this parcel, yet I do feel you maybe could place some homes on this land but nothing then what is being considered. So Traffic, infrastructure, flood, as major issues, in addition I have seen that the current land takes much of the high water when there is possible flooding.

4. 16450 Laughlin Road, again to access this property, you are coming from Armstrong Woods Road, on to Laughlin Road, and driving about a 3/4 mile to subject property, which again consists some parts of getting to the subject property in areas of only one car passing those areas of the

road. Meaning that one car needs to wait as the other passes by. Again we are using a road to get to this property, and about 1/4 mile before arriving to this property is the second property being proposed and third is closer to Armstrong Woods road.

What is surprising, the rezoning the county is calling for is proposing some 200 plus units doubling the residents, in a neighborhood that its current residents are always careful on driving these roads.

I am also against the rezoning of this parcel for the reasons of infrastructure, flooding, traffic, and over populating the Armstrong Valley! The parcels, just do not pan out with the problems of the road, and even the possibility water and the connections of sewer.

I have lived in Guerneville, for 53 years and been a Real Estate Broker for 50 years. In that time have seen many changes and needs. Yet this proposal of rezoning, produce by PRMD is scary for the community and turly we do need affordable housing, but sorry to say the locations marked just will at this time not work, when you have them all on the North side of Guerneville, all having one car lanes.

In closing if you have any questions from me, feel free to call me at my cell at 707-953-1956 for further conversation as well.

Respectfully,

Herman J Hernandez

Hope this can help. Best, Herman

PS So sorry for the delay! Been overwhelmed with issues.

Herman J. Hernandez, CRB, SRES

Broker-Owner

Hernandez Realty Co.

P.O. Box 105

Guerneville, Calif. 95446

Office Phone 707-869-3865 ext. 11 www.russianriverhomes.com

CalBRE #00455770

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

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Name: Caitlin Manigold

Address: 16320 Valley Ln Guerneville

Date: 2/8/2023

Signature: Caitlin Manigold

Date:

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Permit Sonoma, Project Planner
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Name: Christopher Dewolf

Address: 16320 Valley Ln

Date: 2/8/23

Signature: 

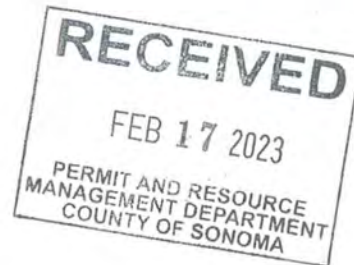
16320 Valley Ln
C.V. 95446

SAN FRANCISCO CA 940

15 FEB 2023 PM 3 L



Eric Gage
Permit Sonoma, Project Planner
2550 Ventura Ave,
Santa Rosa, CA



95409-282999



From: [Jonathan Teel](#)
To: [PermitSonoma-Housing](#)
Subject: OPPOSING the Proposed DEIR GUE 2, GUE 3 and GUE4 Site Projects
Date: Wednesday, February 8, 2023 7:56:58 AM
Attachments: [Outlook-vv41bk4a.jpg](#)

EXTERNAL

To Whom It May Concern,

As a homeowner located in the area in question, please let this email certify my opposition to the proposed DEIR: **GUE 2** 16450 Laughlin Road, **GUE 3** 16500 Cutten Drive and **GUE 4** 16050 Laughlin Road, located off Armstrong Woods Road, Scenic Corridor in Guerneville, CA. I am extremely concerned about the following:

- This is also a factor with the flooding of Armstrong Woods Road if we all must evacuate. Armstrong Woods Road is already heavily traveled in the summer particularly with tourists traveling to the forest, hikes, etc.
- Laughlin Road is very narrow in some spots, allowing for only one car to pass.
- Laughlin Road dead ends, which makes the egress/ingress problem of evacuation even more difficult.
- The fire risk is only getting worse. Evacuating our neighborhood now is already challenging at best. The thought of adding an additional 200+ plus homes built would be catastrophic.
- The present condition of the sewer system in the area currently has its own set of problems dealing with the current level of homeowners.

While I am sympathetic to the need for affordable housing, this is

simply not a good place to do it. Our homes and livelihood are already compromised every year dealing with fire and flood threats. Please do not allow this massive project to threaten not only the beauty of the area, but quite simply our safety.

Sincerely,

Jonathan Teel | Strategic Account Executive
Alteryx, Inc.
p: 415-335-1656
jteel@alteryx.com | www.alteryx.com



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From: [Eric Gage](#)
To: [PermitSonoma-Housing](#)
Subject: Karyn Pulley FOR-2, potential rezoning site
Date: Wednesday, February 8, 2023 10:29:59 AM

From: kdpmick@aol.com <kdpmick@aol.com>
Sent: Tuesday, February 07, 2023 10:17 PM
To: Eric Gage <Eric.Gage@sonoma-county.org>; dsnorthern@sbcglobal.net
Cc: bassman.pulley@gmail.com; klynnkrup@gmail.com
Subject: FOR-2, potential rezoning site

Good Morning,

Thank you for the opportunity to once again reach out to share my concerns regarding the proposed changes in property zoning for Sonoma County. I listened with intent, the zoom meeting held last week. I retreated from that meeting with mixed feelings, but felt that for the greater good, active listening and participation was done by those gathered and members present. This brings us forth, to this upcoming meeting, February 13th. Once again, it is imperative that I advocate for the land so wisely purchased and established by my Grandfather in 1911, from the original land owners of Forestville.

I must agree and ask like that of Mr. Carr, have committee members availed themselves by visiting the potential rezoning sites. What seems necessary to ask oneself and that of the committee, were the wisest sites selected, and based on criteria that might bring forth additional questions and concerns, prior to the Feb. 13th meeting. An example of question, in knowing that many of the sites do not have easy accessible water, sewer, roads, transportation, all of which would cost thousands, and yet within a few feet, yards, even a mile, there is viable land that would have easy access to those needed items. In examining the sites, were these questions asked as they pertained to each site.

I have read the lengthy report, and would like to share why I believe that the site I hold known as FOR-2 is not a desirable rezoning site.

Priority to all of the following reasons is the clear fact that I, as the owner of FOR-2, and subsequent generations to follow, have no interest in selling the land we own. As mentioned, we have owned this land since 1911, and while over time it has had great crop growth and production, low growth and production, and mediocre growth and production, what is constant is the fact that we have owned the land, worked the land, and it remains, a working Gravenstein apple orchard and vegetable farm. Currently, as previously stated in my first email, we are in the process of regenerating this land, a process begun in excess of five years ago.

Secondly, this land serves as water shed for the areas directly surrounding the proposed property. This is needed to maintain the existing permaculture, house wildlife, and maintain the ecosystem. The lack of respectfully interfacing with the permaculture, will increase and indeed incrementally damage the ecosystems and environment causing irreparable damage and significant effects to the ecosystem.

We have reason to believe and know, through the artifacts and mapping done, that our land at one time was home to several Native Americans who would travel along the coast as they passed from southern Sonoma County up the coast to Fort Bragg.

Fourth, the report mentions that if FOR 2 were to be rezoned, that due to the density factors, it would be a useful site only if mitigated use of appliances, plumbing, land use and landscaping, limited growth on each site, etc. were to be followed. Is this a wise use of land, and good land management? I don't believe so. How does the committee measure greenhouse gases, emission hazards, unavoidable aesthetic cultural resources, for an unknown date in the future. Further, if to be developed, how is that managed and by what agency?

Fifth, which is now becoming a long list of concerns and reasons why not to rezone my land, is where it is located....or more accurately, where it is not located. Currently, there is limited regional

transit, no SMART, etc. If allowed to be rezoned, and subsequently if the property were to be deemed needed, there would be increases in pollutants, significant changes in air quality, needs for increased infrastructure which would include water, sewer, garbage, police/sheriff, fire, road enhancements, traffic increases, and this is the short list. Impacts and indeed far-reaching unknown changes do not allow for informed or adequate decision making to be made.

Sixth, in studying the charts, analysis, more suggested outcomes, I have not been able to determine that there are any valuable gains to have my land rezoned. What I have learned through the studying of that data, is that it is apparent that FOR-2 is **not** a viable or useful piece of property to be rezoned. I fail to see positive outcomes. Why I would embrace the rezoning of my property is currently lacking, hence why I do not support this suggested rezone plan for FOR-2. Instead, the report continually uses the phrase significant impact. Does that translate to the unknown reality of what significant impact is, and would the county only stop growth once reached, which often and sadly means that significant impact was reached long before it is deemed time to stop development. In summary, please reconsider the potential rezoning of FOR-2, my land and that of my family. We again humbly ask, to remove our land from the list. Thank you again for your committee work and the opportunity to have this communication.

Sincerely,
Karyn Pulley

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From: [Leigh Hall](#)
To: [PermitSonoma-Housing](#)
Subject: Comment on Sonoma County Housing Element proposed rezoning of parcels #054-290-057 and #054-290-084 (GLE-1 and GLE-2)
Date: Wednesday, February 8, 2023 2:47:46 PM

I request that you remove these two parcels from rezoning considerations:

1. These parcels are in the middle of our small town, which cannot be considered an urban area or an area near an urban area.
2. Public transportation is very limited.
3. The BOS just approved an EIR for at least 620 homes about 1 mile from these parcels (at the Sonoma Developmental Center) and the property directly across the street from these sites has very recently been built out to house a number of new dwellings, both of which will result in considerably more traffic and need for more resources in our small town.

I urge you to remove these parcels from the proposed rezoning.

Thank you for your consideration.

Leigh Hall
Glen Ellen, CA

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From: [Michael Cuoio](#)
To: [PermitSonoma-Housing](#)
Subject: Comments on re-zoning of 6 lots in Forestville
Date: Wednesday, February 8, 2023 5:21:25 PM

Attention; Eric Gage

Dear Sir,

As a citizen of Forestville and former member and president of the Forestville Planning Association, I wish to offer the following comments regarding the District 5 Draft Housing Element EIR.

I welcome the opportunity to provide more affordable housing to our middle-income citizens. They -- and their welfare -- play an important role in our -- and indeed in most -- communities. I do not, however, endorse moving forward with these plans until there is a concurrent commitment, funding, and approved plans to upgrade all of the infrastructure that would be impacted by the addition of hundreds to thousands of Forestville residents. Specifically, I request that the County and State implement the existing and approved plans to install a bypass system on Highway 116 in Forestville, the associated round-about at the intersection of 116 and Mirabel road, and already promised Transportation and Public Works upgrades to downtown Forestville, including crosswalk systems and sidewalks.

I also can envision impacts to our schools, which should be addressed if, and as, you move forward with the project.

Of course, there are many details to which I am not familiar and cannot rationally comment, but I do wish to emphasize here the responsibility of the State and the County to fully address, plan and fund for the inevitably required upgrades to all our local infrastructure.

Very Respectfully,

Michael Cuoio

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From: [Wil Lyons](#) on behalf of [Planner](#)
To: [PermitSonoma-Housing](#)
Subject: FW: New housing project in Forestville
Date: Thursday, February 9, 2023 9:09:53 AM

From: Michael Korreng <mkorreng@comcast.net>
Sent: Wednesday, February 8, 2023 1:10 PM
To: PermitSonoma <PermitSonoma@sonoma-county.org>
Subject: New housing project in Forestville

Hi, I am a Sonoma Co resident living near Forestville. I do not have any issue with adding more housing in the area. I do have more than one request. In Forestville Hwy 116 already has a fair amount of traffic. If you live in the area, it can be challenging to cross the street at one of the two crosswalks that do not have lights. I would ask that some consideration is made to improve that for our safety. Hwy 116 and Mirabel road crossing should be improved. It can be dangerous when traveling west bound on Hwy 116 past Mirabel. Cars bolt out from Maribel onto Hwy 116 East bound all the time without waiting for Westbound traffic on Hwy 116 to clear. A light may be required once there is even more traffic. Pedestrians do not have sidewalks. At a minimum, sidewalks should be added from the proposed housing into downtown and into all public transportation locations. Designated parking should be added near the buss stop. People that use the buss will need more parking.

From Forestville,
Michael Korreng
707 953 6981

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From: [Rick Sanfilippo](#)
To: [PermitSonoma-Housing](#)
Cc: corsanfilippo67@gmail.com; [Lynda Hopkins](#); info@sweetwatersprings.com; steve@blackpawdog.com
Subject: Sunset Avenue, Guerneville 30 unit low income housing project
Date: Wednesday, February 8, 2023 10:21:21 AM
Importance: High

Eric – my wife and I live on Woodland Avenue at Sunset Avenue.

What I am learning is that there's the consideration of putting a 30-unit, low income, housing structure on Sunset Avenue. My concerns and thoughts- My concerns are the practicalities of the location itself. Did anyone actually drive to this site to see what is being considered? If not, I implore you to make the drive. I have a video that I can share taken from my cell phone from our small sedan. I'm lucky to keep the car on this one lane surface street without hitting an edge of the road. Now imagine with 30 units the number and size of vehicles that will be traveling up and down this hill. Imagine all the vehicles that must pull over to the side of the road, if they can find room!, to allow another car to go by. Congestion on a one lane road! This is what we deal with now on a daily basis without this structure! There is no way that, if this project passes, that all construction vehicles are going to make it up this steep hill to the project for how long? 2 – 3years? The construction vehicles will destroy our roads!

Weather, I'm sure has to be another consideration because of all the moisture, not only in the air but the ground as well from a ground stability standpoint. Why invest millions of dollars for this structure to be put on the side of a severely sloped hillside? We experience slides in the area all the time through the winter months.

We're going to lose our trees that have been there for 100 years? Not fair to the neighborhood.

My wife and I are extremely disappointed that we **received** absolutely **no correspondence from any government agency of this project!** Why is that? Is it because it's trying to be fast tracked and there's no kickback from the community? Is it because Guerneville is an unincorporated area, so we have less of a voice in the matter? As I understand it, Lynda Hopkins(supervisor to our area) has stated that her hands are tied. Why? She's our representative,

our mouthpiece and she needs to step forward and voice the concerns of the community of this particular site. Don't say "your hands are tied". There's always something that can be done and as our representative, she needs to step up and do what she was voted in to do. I have no qualms about meeting the necessary people at the site for a calm, practical conversation.

My thoughts- This is not a case of NIMBY(not in my backyard). There are so many other sites in the Guerneville area that could accommodate this type of structure.....IN THE FLATS!

The Feds, the State, the County, whomever, were provided this money. I'm sure some of my tax dollars. I understand that they have to spend it, but use it wisely. Let common sense prevail here. Don't spend money just to spend money as only the government can.

Thank you for your time in this important/personal matter.

Rick Sanfilippo

Rick Sanfilippo

Sanfilippo & Sons Insurance

P.O. Box 471

San Jose, Ca 95103

P - 408- 295-1195 X 235

License# 0540404

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State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

Bay Delta Region

2825 Cordelia Road, Suite 100

Fairfield, CA 94534

(707) 428-2002

www.wildlife.ca.gov

GAVIN NEWSOM, Governor

CHARLTON H. BONHAM, Director



February 8, 2023

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

Subject: Housing Element Update, Draft Program Environmental Impact Report,
SCH No. 2022060323, Sonoma County

Dear Mr. Gage:

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

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

CDFW ROLE

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

REGULATORY REQUIREMENTS

California Endangered Species Act

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

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

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

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

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

Lake and Streambed Alteration Agreement

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

Raptors and Other Nesting Birds

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

PROJECT DESCRIPTION SUMMARY

Proponent: Sonoma County

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

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

COMMENTS AND RECOMMENDATIONS

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

Mitigation Measure and Environmental Setting Shortcomings

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

And,

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

Comment 1: Section 4.4, page 30

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

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

BIO-2 Special-Status Plant Species Surveys

If the Project-Specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) determines that there is potential for ~~significant~~ impacts to federally or state-listed plants or ~~regional population level impacts to~~ species with a CRPR of 1B or 2B from Project development, a qualified biologist shall complete surveys for special-status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). **Surveys shall be conducted following CDFW's 2018 Protocol for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (<https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants>) and, as applicable, the Santa Rosa Plain Conservation Strategy Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain**, including, but not limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts, such as altering off-site hydrological conditions where these species may be present, or any formal updates of **these protocols**. The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species identified in the Project-specific biological analysis. All plant surveys shall be conducted by a qualified biologist during the blooming season prior to initial ground disturbance. **More than one year of surveys may be required to establish that plants are absent, and the above Santa Rosa Plain Conservation Strategy Appendix D requires a minimum of two years of surveys, which shall be implemented unless otherwise approved in writing by CDFW.** All special-status plant species identified on site

shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the County, and the CDFW and/or USFWS, as appropriate, for review and/or approval. **The Project shall obtain written approval of the survey reports from CDFW prior to the start of construction, unless otherwise approved in writing by CDFW. If any special-status plants are observed, the Project shall: 1) avoid all direct and indirect impacts to the special-status plants, and 2) prepare and implement an avoidance plan that is approved in writing by CDFW prior to Project start. If CESA listed plants are observed and impacts cannot be avoided, the Project shall obtain a CESA ITP from CDFW. For impacts to federal Endangered Species Act (ESA) listed plants, the Project shall obtain authorization from USFWS.**

Comment 2: Section 4.4, pages 30-31

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

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

BIO-4 Restoration and Monitoring, and Habitat Compensation

Development and/or restoration activities shall be conducted in accordance with a site-specific Habitat Restoration Plan. If federally or state-listed plants or non-listed special-status CRPR 1B and 2 plant populations cannot be avoided, and will be impacted by development, all impacts shall be mitigated by the applicant at a ratio not lower than ~~43~~:1 and to be determined by the County (in coordination with CDFW and USFWS as ~~and~~ if applicable) for each species as a component of habitat restoration, **unless otherwise approved in writing by CDFW. For impacts to state-listed plants, habitat compensation at a minimum 3:1 mitigation to impact ratio shall be provided, which may include either the purchase of credits at a CDFW-approved mitigation or conservation bank or purchasing appropriate habitat and conserving it in perpetuity through a conservation easement and management plan, which shall be prepared, funded, and implemented by the Project in perpetuity, unless otherwise approved in writing by CDFW.** A qualified biologist shall prepare and submit a restoration plan to the County **and CDFW** for review and approval. (Note: if a

federally and/or state-listed plant species will be impacted, the restoration plan shall be submitted to the USFWS and/or CDFW for review, and federal and/or state take authorization ~~may~~ **will be obtained from** ~~required by~~ these agencies). The restoration plan shall include, at a minimum, the following components [...]

Comment 3: Section 4.4, page 31

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

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

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

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

and/or USFWS it is determined that protocol habitat assessments/surveys are not required, the applicant shall complete and document this consultation and submit it to the County prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they understand the protocol requirements and shall hire a qualified biologist to conduct protocol surveys.

Comment 4: Section 4.4, pages 31-33

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

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

BIO-6 Endangered/Threatened Animal Species Avoidance and Minimization

The following measures shall be applied to aquatic and/or terrestrial animal species as determined by the Project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1 [...]

2. All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between ~~April 4~~ **June 15** and October ~~31~~ **15** to avoid impacts to sensitive aquatic species. Any work outside these dates would require Project-specific approval from the County and ~~may~~ **shall** be subject to regulatory agency approval [...]

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

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

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

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

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

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

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

Comment 5: Section 4.4, pages 33-34

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

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

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

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

Comment 6: Section 4.4, page 35

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

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

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

For projects that require **construction, grading, vegetation removal, or other project-related improvements**, construction activities shall occur outside of the nesting season (September 16 to January 31), and no mitigation activity is required. If construction activities must occur during the nesting season (February 1 to September 15), a qualified biologist shall conduct surveys for nesting birds ~~covered by the CGFC no more than~~ **within 74** days prior to ~~project activities~~ **vegetation removal and shall conduct additional surveys if there is a lapse of 7 days or more in construction activities**. The surveys shall include the entire disturbance area plus ~~at least a 200~~ **500**-foot buffer around the **project** site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of ~~50~~ **250** feet for non-raptor bird species and at least ~~150~~ **500** feet for raptor species, **unless determined otherwise by the qualified biologist. Buffer distances for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distances shall be specified to protect the bird's normal behavior thereby preventing nesting failure or abandonment. The buffer distance recommendation shall be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The qualified biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or**

young) until an appropriate buffer is established. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. The biologist shall submit a report of these pre-construction nesting bird surveys to the County to document compliance within 30 days of its completion.

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

Comment 7: Section 4.4, page 37

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

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

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

Impacts to sensitive natural communities (including riparian areas and waters of the state or waters of the U.S. under the jurisdiction of the CDFW, USFWS, RWQCB, or **U.S. Army Corps of Engineers (USACE)** (hereafter “agency” or “agencies”)) shall require that the Project: 1) submit an **LSA Notification to CDFW (for impacts to streams or lakes and associated riparian habitat) and comply with the Final LSA Agreement, and 2) obtain authorization from RWQCB and the USACE (for impacts to Waters of the U.S. or State including wetlands pursuant to the Clean Water Act). Impacts shall be mitigated as required by agency permits and at a minimum 3:1 mitigation to impact ratio** through the funding of the acquisition and in-perpetuity management of similar habitat, **in-kind credits purchased from a conservation or mitigation bank, or on-site or off-site habitat restoration based on area**

and linear distance for permanent impacts, unless otherwise approved in writing by the agencies. Temporary impacts shall be restored on-site. The applicant shall provide funding and management of off-site mitigation lands through purchase of credits from an existing, approved mitigation bank or land purchased by the County and placed into a conservation easement or other covenant restricting development (e.g., deed restriction). Internal mitigation lands (internal to the Rezoning Sites), or in lieu funding sufficient to acquire lands, shall provide habitat at a minimum 34:1 ratio for impacted lands, comparable to habitat to be impacted by individual Project activity. The applicant shall submit documentation of mitigation funds to the County. **Please be advised that CDFW may not accept in-lieu fees as an appropriate method to mitigate impacts to streams or lakes and associated riparian habitat [...]**

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

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

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

Replacement tree plantings shall consist of 5-gallon or greater saplings and locally-collected seeds, stakes, or other suitable nursery stock as appropriate, and shall be native species to the area adapted to the lighting, soil, and hydrological conditions at the replanting site. If acorns are used for oak tree replanting, each planting will include a minimum of three

acorns planted at an approximately two-inch depth to minimize predation risk. Large acorns shall be selected for plantings. Replacement oaks shall come from nursery stock grown from locally-sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they are planted.

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

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

ENVIROMENTAL DATA

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

FILING FEES

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

CONCLUSION

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

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

Eric Gage
Sonoma County
February 8, 2023
Page 14

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

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486
Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1: Draft Mitigation Monitoring and Reporting Program

ec: State Clearinghouse #2022060323

ATTACHMENT 1

Draft Mitigation and Monitoring Reporting Plan

Biological Resources (BIO)			
Mitigation Measure (MM)	Description	Timing	Responsible Party
MM-BIO-2	<p>Special-Status Plant Species Surveys</p> <p>If the Project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) determines that there is potential for significant impacts to federally or state-listed plants or regional population-level impacts to species with a CRPR of 1B or 2B from Project development, a qualified biologist shall complete surveys for special-status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). Surveys shall be conducted following CDFW's 2018 Protocol for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants) and, as applicable, the Santa Rosa Plain Conservation Strategy Appendix D: <i>Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain</i>, including but not limited to conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts, such as altering off-site hydrological conditions where these species may be present, or any formal updates of these protocols. The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species identified in the Project-specific biological analysis. All plant surveys shall be conducted by a qualified biologist during the blooming season prior to initial ground disturbance. More than one year of surveys may be required to establish that plants are absent,</p>	Prior to Ground Disturbance	Project Applicant

	<p>and the above Santa Rosa Plain Conservation Strategy Appendix D requires a minimum of two years of surveys, which shall be implemented unless otherwise approved in writing by CDFW. All special-status plant species identified on site shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the County, and the CDFW and/or USFWS, as appropriate, for review and/or approval. The Project shall obtain written approval of the survey reports from CDFW prior to the start of construction, unless otherwise approved in writing by CDFW. If any special-status plants are observed, the Project shall: 1) avoid all direct and indirect impacts to the special-status plants, and 2) prepare and implement an avoidance plan that is approved in writing by CDFW prior to Project start. If CESA listed plants are observed and impacts cannot be avoided, the Project shall obtain a CESA ITP from CDFW. For impacts to federal Endangered Species Act (ESA) listed plants the Project shall obtain authorization from USFWS.</p>		
MM-BIO-4	<p>Restoration and Monitoring, and Habitat Compensation</p> <p>Development and/or restoration activities shall be conducted in accordance with a site-specific Habitat Restoration Plan. If federally or state-listed plants or non-listed special-status CRPR 1B and 2 plant populations cannot be avoided, and will be impacted by development, all impacts shall be mitigated by the applicant at a ratio not lower than 43:1 and to be determined by the County (in coordination with CDFW and USFWS as and if applicable) for each species as a component of habitat restoration, unless otherwise approved in writing by CDFW. For impacts to state-listed plants, habitat compensation at a minimum 3:1 mitigation to impact ratio shall be provided, which may include either the purchase of</p>	Prior to Ground Disturbance	Project Applicant

	<p>credits at a CDFW-approved mitigation or conservation bank or purchasing appropriate habitat and conserving it in perpetuity through a conservation easement and management plan, which shall be prepared, funded, and implemented by the Project in perpetuity, unless otherwise approved in writing by CDFW.</p> <p>A qualified biologist shall prepare and submit a restoration plan to the County and CDFW for review and approval. (Note: if a federally and/or state-listed plant species will be impacted, the restoration plan shall be submitted to the USFWS and/or CDFW for review, and federal and/or state take authorization may will be obtained from required by these agencies.) The restoration plan shall include, at a minimum, the following components [...]</p> <p><i>Note to County, please add remaining mitigation measure from Draft EIR.</i></p>		
<p>MM-BIO-5</p>	<p>Endangered/Threatened Species Habitat Assessments and Protocol Surveys, CDFW and USFWS Authorization, and Habitat Compensation</p> <p>Specific habitat assessments and survey protocols are established for several federally- and state listed endangered or threatened species. If the results of the Project-specific biological analysis determine that suitable habitat may be present for any such species, protocol habitat assessments/surveys shall be completed in accordance with CDFW, NMFS, and/or USFWS protocols prior to issuance of any construction permits. If projects are located within the Santa Rosa Plain (SRP) Area, surveys shall be conducted for CTS in accordance with the Santa Rosa Plain Conservation Strategy (2005) with prior written approval from CDFW and USFWS. Due to numerous documented occurrences of CTS in the SRP in conjunction with the documented dispersal distances for the species of up to 1.3 miles, it has been established that CTS are present within many grassland and vernal pool habitats within the SRP rendering surveys unnecessary, and therefore any protocol CTS surveys shall be</p>	<p>Prior to Ground Disturbance</p>	<p>Project Applicant</p>

	<p>approved in writing by CDFW and USFWS prior to conducting the survey and habitat compensation for impacts to CTS habitat shall be provided by the Project pursuant to the SRP Conservation Strategy even if survey results are negative, unless otherwise approved in writing by CDFW and USFWS. If impacts to grassland or vernal pool habitat will occur, the Project shall consult with CDFW to determine if a CESA ITP for CTS is warranted. If CESA listed animal species such as CTS cannot be avoided, the Project shall obtain a CESA ITP from CDFW prior to Project construction. For impacts to ESA listed wildlife species such as CTS the Project shall obtain authorization from USFWS. While often consistent with the SRP Conservation Strategy, the CESA ITP habitat compensation requirements may differ from it based on a site-specific analysis. If through consultation with the CDFW, NMFS, and/or USFWS it is determined that protocol habitat assessments/surveys are not required, the applicant shall complete and document this consultation and submit it to the County prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they understand the protocol requirements and shall hire a qualified biologist to conduct protocol surveys.</p>		
<p>MM-BIO-6</p>	<p>Endangered/Threatened Animal Species Avoidance and Minimization</p> <p>The following measures shall be applied to aquatic and/or terrestrial animal species as determined by the Project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1 [...]</p> <p>2. All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 4 June 15 and October 31 15 to avoid impacts to sensitive aquatic species. Any work outside these dates would require project-specific approval from the County</p>	<p>Project Implementat ion</p>	<p>Project Applicant</p>

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

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

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

	<p>site-specific conditions and completed before Project construction unless otherwise approved in writing by CDFW. It shall also include placement of a conservation easement and preparation, implementation, and funding of a long-term management plan prior to Project construction.</p>		
<p>MM-BIO-10</p>	<p>Pre-Construction Surveys for Nesting Birds for Construction Occurring within Nesting Season</p> <p>For projects that require construction, grading, vegetation removal, or other project-related improvements, construction activities shall occur outside of the nesting season (September 16 to January 31), and no mitigation activity is required. If construction activities must occur during the nesting season (February 1 to September 15), a qualified biologist shall conduct surveys for nesting birds covered by the CGFC no more than within 744 days prior to project activities vegetation removal and shall conduct additional surveys if there is a lapse of 7 days or more in construction activities. The surveys shall include the entire disturbance area plus at least a 200 500-foot buffer around the project site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of 50 250 feet for non-raptor bird species and at least 150 500 feet for raptor species, unless determined otherwise by the qualified biologist. Buffer distances for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distances shall be specified to protect the bird's normal behavior thereby preventing nesting failure or abandonment. The buffer distance recommendation shall be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the</p>	<p>Prior to Tree Removal and Ground Disturbance</p>	<p>Project Applicant</p>

	<p>nest. The qualified biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer is established. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. The biologist shall submit a report of these preconstruction nesting bird surveys to the County to document compliance within 30 days of its completion.</p>		
<p>MM-BIO-14</p>	<p>Permitting and Restoration for Impacts to Sensitive Natural Communities, Waters, and Wetlands</p> <p>Impacts to sensitive natural communities (including riparian areas and waters of the state or waters of the U.S. under the jurisdiction of the CDFW, USFWS, RWQCB, or USACE (hereafter “agency” or “agencies”)) shall require that the Project: 1) submit an LSA Notification to CDFW (for impacts to streams or lakes and associated riparian habitat) and comply with the Final LSA Agreement, and 2) obtain authorization from RWQCB and the USACE (for impacts to Waters of the U.S. or State including wetlands pursuant to the Clean Water Act). Impacts shall be mitigated as required by agency permits and at a minimum 3:1 mitigation to impact ratio through the funding of the acquisition and in-perpetuity management of similar habitat, in-kind credits purchased from a conservation or mitigation bank, or on-site or off-site habitat restoration based on area and linear distance for permanent impacts, unless otherwise approved in writing by the agencies. Temporary impacts shall be restored on-site. The applicant shall provide funding and management of off-site</p>	<p>Prior to Tree Removal and Ground Disturbance</p>	<p>Project Applicant</p>

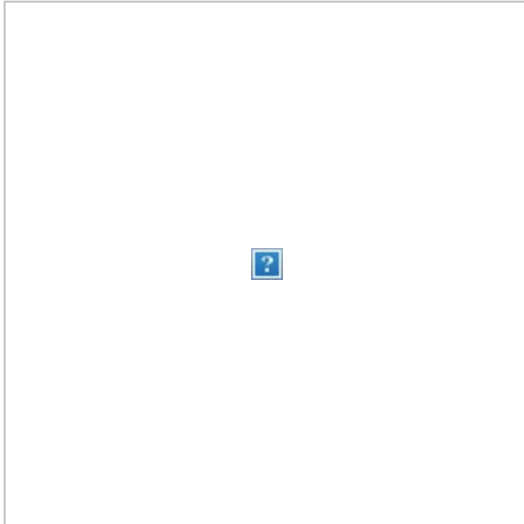
	<p>mitigation lands through purchase of credits from an existing, approved mitigation bank or land purchased by the County and placed into a conservation easement or other covenant restricting development (e.g., deed restriction). Internal mitigation lands (internal to the Rezoning Sites), or in lieu funding sufficient to acquire lands, shall provide habitat at a minimum 34:1 ratio for impacted lands, comparable to habitat to be impacted by individual Project activity. The applicant shall submit documentation of mitigation funds to the County. Please be advised that CDFW may not accept in-lieu fees as an appropriate method to mitigate impacts to streams or lakes and associated riparian habitat [...]</p> <p>Habitat restoration shall occur in the same calendar year as the impact on-site or as close to the site as possible within the same stream or watershed and may consist of restoration or enhancement of riparian habitat. If mitigation is not possible within the same stream or watershed, mitigation ratios may increase at the discretion of CDFW.</p> <p>To mitigate for the removal of trees, replacement trees shall be planted at the below minimum replacement to removal ratios:</p> <ul style="list-style-type: none"> • 1:1 for removal of non-native trees; • 1:1 for removal of native trees other than oak (<i>Quercus</i> sp.) up to 3 inches DBH (diameter at breast height); • 3:1 for removal of native trees other than oak 4 to 6 inches DBH; • 6:1 for removal of native trees other than oak greater than 6 inches DBH; • 4:1 for removal of oak trees up to 6 inches DBH; • 5:1 for removal of oak trees greater than 6 inches to 15 inches DBH; and • 10:1 for removal of oak trees greater than 15 inches in diameter 		
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	<p>Replacement tree plantings shall consist of 5-gallon or greater saplings and locally-collected seeds, stakes, or other suitable nursery stock as appropriate, and shall be native species to the area adapted to the lighting, soil, and hydrological conditions at the replanting site. If acorns are used for oak tree replanting, each planting will include a minimum of three acorns planted at an approximately two-inch depth to minimize predation risk. Large acorns shall be selected for plantings. Replacement oaks shall come from nursery stock grown from locally-sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they are planted.</p> <p>The Project shall monitor and maintain, as necessary, all plants for five years to ensure successful revegetation. Planted trees and other vegetation shall each have a minimum of 85 percent survival at the end of five years. If revegetation survival and/or cover requirements do not meet established goals as determined by CDFW, the Project is responsible for replacement planting, additional watering, weeding, invasive exotic eradication, or any other practice, to achieve these requirements. Replacement plants shall be monitored with the same survival and growth requirements for five years after planting.</p> <p><i>Note to County, please add remaining mitigation measure from Draft EIR.</i></p>		
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From: [Sonoma Valley Collaborative](#)
To: [PermitSonoma-Housing](#)
Subject: City of Sonoma Housing Element Adopts Nearly All of Sonoma Valley Collaborative's Asks
Date: Wednesday, February 8, 2023 12:08:59 PM

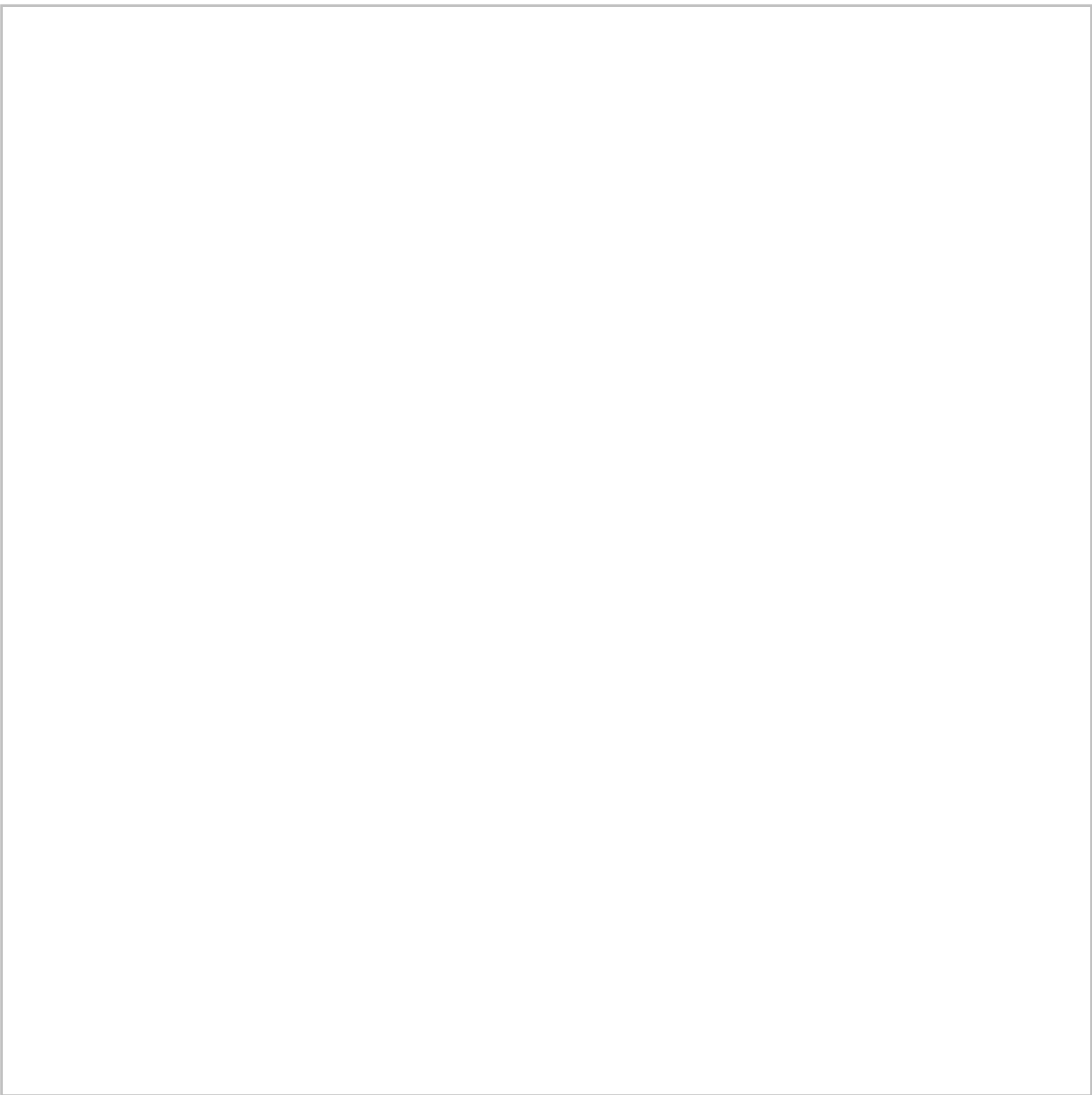
EXTERNAL

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City of Sonoma Housing Element Adopts Nearly All of Sonoma Valley Collaborative's Asks

For the first time, leaders across the entire community told the City of Sonoma they want and need more homes in the City that more people can afford.



Our advocacy with the united voice of the [Sonoma Valley Collaborative Council](#) and community members has been effective and inspiring. We are proud to announce that the [Housing Element](#) adopted by Sonoma’s City Council on January 31 is by far the most pro-housing plan ever in the City of Sonoma!

This Housing Element will govern how affordable homes are preserved and built in the City for the next 8 years.

Thank you to the many people—especially Sonoma Valley Collaborative’s members and community members who shared your housing stories—for uniting in support of Sonoma Valley Collaborative’s set of housing goals!



Teen Services members in a housing advocacy workshop, resulting in impactful, personal statements that moved County and City of Sonoma decision makers. Read them [here](#).

Sonoma Valley Collaborative advocated for 23 housing affordability policies, in many cases writing proposed language that the City adopted word-for-word in the Housing Element. All of these policies align with the consensus our members came to over several months at the outset of our work on housing affordability in Sonoma Valley: to work together across boundaries to increase, improve, and preserve housing that is affordable for people who live or work in the Valley, within already developed areas, to create diverse, safe, complete neighborhoods.

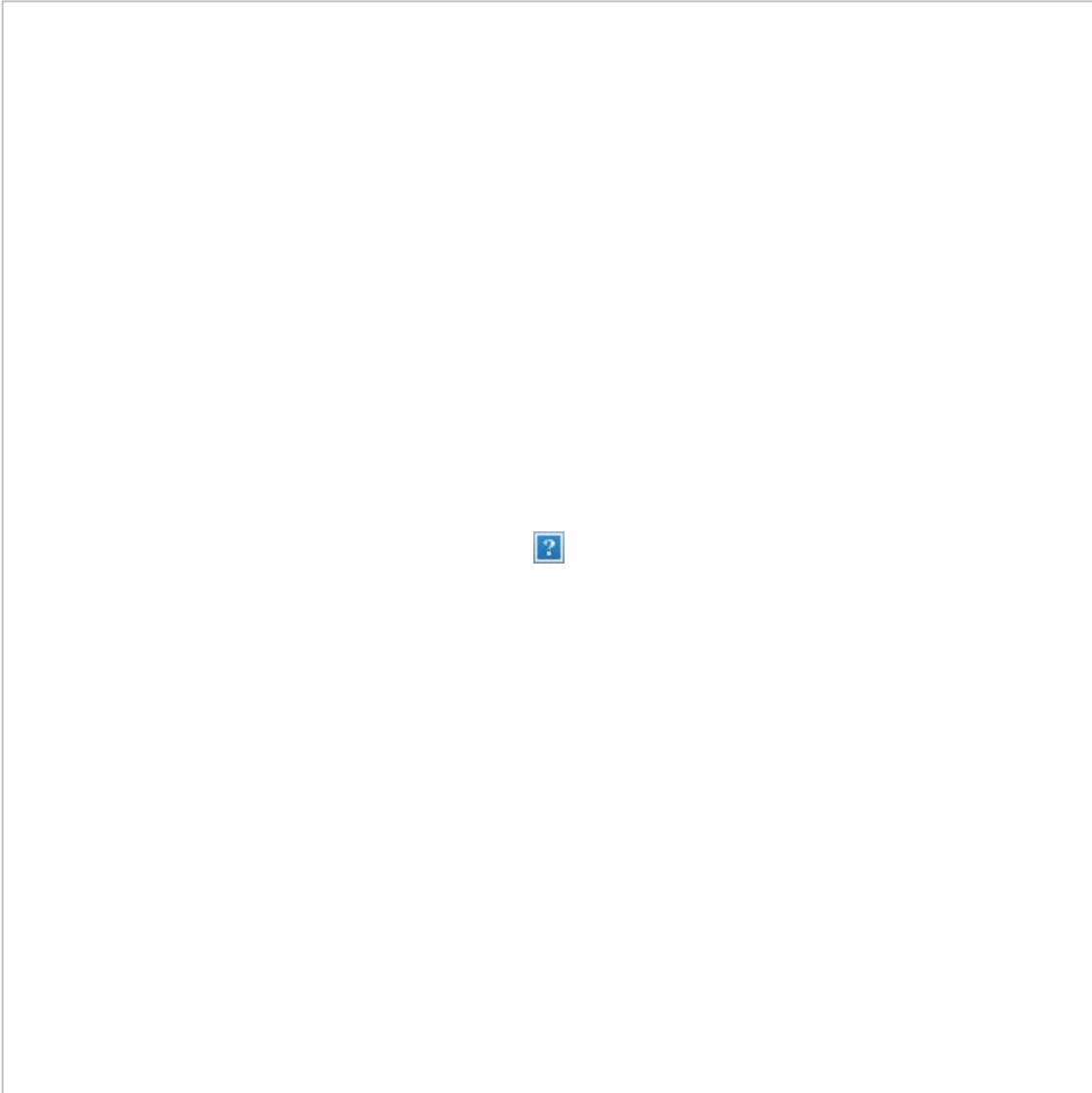
The 25+ community leaders on the Sonoma Valley Collaborative Council made this commitment understanding that housing is the most pressing cross-sector

issue in Sonoma Valley. They met monthly to create a housing platform that everyone could support. Then, Sonoma Valley Collaborative staff crafted policies and organized the advocacy that helped get them adopted. Of the 23 policy requests we made—designed to preserve existing affordable housing, protect tenants, protect open space from sprawl, and make the City of Sonoma more affordable—18 are now part of the City of Sonoma’s Housing Element.

These pro-housing commitments in the City’s Housing Element might not be there without Sonoma Valley Collaborative’s advocacy:

- Making Sonoma appeal to nonprofit housing developers like MidPen and Burbank who can build attractive, all-affordable projects like Alta Madrone and the cottages next to Vintage House
 - A promise to consider, during the upcoming General Plan update, increasing building heights and reducing setbacks along Sonoma’s main roads (W Napa and Broadway). The current limit is two stories!
 - More coordination with nonprofit housing developers, with specific outcomes like funding proposals and project development plans
- When affordable units are required as part of an otherwise market-rate development, now those units will be affordable in perpetuity.
- Protections for renters against arbitrary evictions and sudden rent hikes
- A registry of subsidized and low-cost homes and apartments to make sure they remain affordable
- Faster deadlines for many of the promised programs
- Acknowledgement that Sonoma’s housing history includes racial exclusion. This matters because housing law requires redressing discriminatory practices.
- A program for putting housing on underutilized commercial parcels like shopping centers.
- A feasibility study for a tax or other disincentive on empty homes
- All new construction will have doorways that wheelchairs can get through.

- A commitment to seek the state's Prohousing Designation, which would unlock state and federal funding for more and better homes



Aerial view of the City of Sonoma. Source unknown.

Some policies could bring more affordable housing to the City but still do not appear in the Housing Element. All of these policies are fair game for incorporating into the City's next General Plan:

- Reducing parking requirements. One parking space can add \$20,000 to a project's cost. The City gives precious land to cars that should be used for walkways, homes, trees, or transit.

We'll have to wait longer to see W. Napa St. and Broadway allow the taller, tighter mixed-use buildings that grace so many European towns.

- 65% of the City is still zoned for single-family homes. Luckily, state law allows these lots to have one attached Accessory Dwelling Unit (ADU, or granny unit) and one detached ADU. But small “plexes” of 5 or 12 units are still disallowed in most of the City. Allowing small plexes could allow more families and working people to Sonoma’s neighborhoods and spur more creative, compact housing designs.



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Sonoma Valley Collaborative is a forum of community leaders from a wide range of sectors across Sonoma Valley, finding solutions and taking action to address our community’s biggest challenges.

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Sonoma Valley Collaborative · PO Box 1486 · Eldridge, Ca 95431 · USA

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From: [Doug Thorogood](#)
To: [PermitSonoma-Housing](#)
Subject: 14156 Sunset Avenue, Guerneville
Date: Thursday, February 9, 2023 2:24:53 PM

To Whom It May Concern - I am writing to express my great hope that you will not allow the development of a 30 unit property on Sunset Avenue. I can not think of a worse site for this proposal in all of Sonoma County. That hill, with its very narrow and quiet streets would be ruined with the addition of 78 people up that narrow and winding road.

There are numerous locations in Sonoma which are designed to accommodate that amount of traffic. Please vote against this development on Sunset and find a better location. Thanks very much for your time and consideration.

Doug Thorogood
14119 Palo Alto, Guerneville

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From: [jeanne beanne](#)
To: [Lynda Hopkins](#); info@sweetwatersprings.com; [PermitSonoma-Housing](#)
Subject: Low income housing on Sunset Avenue
Date: Thursday, February 9, 2023 6:00:51 PM



I am writing about the proposed 30 units for 78 people at 14156 Sunset Avenue, Guerneville. This is a one lane road on a hill in a single family residential area.

I believe the low income housing is needed but I also believe this is an inappropriate place to build on such a scale. It would impact the roads and cause many

problems for the people who live on Morningside, Palo Alto, Sunset and Woodland Avenues. If this was only a few homes, like what is currently built here, it would

be doable but this scale is out of proportion of this area. Please find a better location to complete this project.

Thank you for your consideration,

Jeanne Reggio

Morningside Drive

Guerneville

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From: [Kenneth Koutz](#)
To: [PermitSonoma-Housing](#)
Subject: Draft Environmental Impact Report Publication (DEIR)
Date: Thursday, February 9, 2023 6:13:21 PM

The changes in zoning proposed for Laughlin Road and Cutten Court in Guerneville were clearly developed by someone with no knowledge of or concern for the area. There are numerous problems:

1. Most of these streets are two lanes—or less—wide with no shoulders or pedestrian walkways.
2. All three lack a second way to leave the area. One road, the northern extension of Valley, is a poorly maintained private road, “paved” in dirt or whatever reused pavement that was available. There are many potholes. The road is frequently blocked by delivery trucks or smaller vehicles in various states of disrepair. It cannot be considered an escape route.
3. The only road that has two full lanes is the beginning of Laughlin Road. Some parts of the remaining roads are one and one-half lanes, at best. None of these have pedestrian or bike lanes.
4. The corporation yard for the adjacent vineyard, served by Laughlin Road, gets large, multi-trailer trucks, leaving no choice for cars on the road but to pull on to the unimproved dirt frontage—or down into a culvert.
5. These three roads share a common deficiency: they originate at or require the use of the exit road from Guerneville School. Imagine the turmoil of a forced evacuation of the area. Not only will you have 100s of vehicles leaving the newly built dense housing, you will have parents trying to get to Guerneville School to pick up their children.
6. Even if you ignore the restrictions to entry and exit from the immediate area, they all empty onto Armstrong Woods Road, virtually a dead end road. Turning north from Laughlin Road, the road ends at the Park. On paper, there are two roads off of Armstrong: Sweetwater Springs, a terribly windy road subject to potholes and mudslides, frequently closed. The other is Rio Nido Road. This is barely one lane wide. Cars sometimes must try to back up, if another car is encountered.

If you turn south onto Armstrong you may be no better off. Armstrong can be backed up from the River Road intersection. In winter, Armstrong can flood, making passage impossible. Adding over 200 units, plus 200 or more vehicles, to already inadequate infrastructure is a recipe for trouble, even without the presence of the school. With the school, it is a recipe for disaster.

If denser housing is required in Guerneville, there are many locations along River Road that do not pose this myriad of problems: across from Safeway there are burned out stores; behind the gas station in the same location, there is a lot that used to house a motel; along the “strip” leading into town there is at least one—and maybe more—vacant lots; west of central Guerneville on the south side of River Road is the large lot proposed for a hotel or glamping (residential units would be a much better idea); across the River on CA116 on the south side is a little used lot that seems to be—sometimes—agricultural. These locations also provide ready access to shopping, transit and medical needs.

All things considered, the proposed DEIR is ridiculous, at best, and potentially disastrous.

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From: [Mark Ballard](#)
To: [PermitSonoma-Housing](#)
Subject: Forestville eir for 635 Housing Units
Date: Thursday, February 9, 2023 5:14:30 PM

I am a resident of this area. I think this is an excellent idea. West County is sorely in need of housing, especially affordable housing. The only issue I see is there may need to be an improvement in the traffic pattern, with that many additional dwellings and the increase in population. There may need to be a signal light at Covey and Front St. Although if the previously proposed forestville bypass it part of this improvement with the traffic circle any Mirabel Rd. and Front St. (hwy 116) a light may not be needed at Covey Rd.

Those are my thoughts.
Thank you,

Mark Ballard
8230 Spring Dr,
Forestville, CA 95436
7073219277

--

-Mark

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From: [MARY MOUNT](#)
To: [PermitSonoma-Housing](#)
Subject: Forestville housing proposal
Date: Thursday, February 9, 2023 12:32:51 PM

Absolutely Brilliant thoughts on high density low income housing in Forestville.
NOT.

The proposal to build on narrow dead end streets with no viable sewer or decent roads with ingress and egress.

REALLY SMART.

F. & F. Evacuations on Mirabel Road and Covey Road. You will be endangering lives by building more homes that tend to be evacuated.

DISASTROUS.

Placing low income housing should be in the INCORPORATED areas of our county; near stores, hospitals, culturally diverse schools and transportation.

INCLUSIVITY not EXCLUSIONARY.

Healdsburg, Santa Rosa, Sebastopol and Windsor have all of these accoutrements.

Guerneville, Forestville and Graton do not.

PLAIN and SIMPLE.

Keep your poop out of the lower Russian River.

We get enough of that when it floods.

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From: [Leo Chyi](#)
To: [MICHAEL OCONNOR](#); [PermitSonoma-Housing](#)
Cc: [district5](#)
Subject: Re: Proposed Forestville rezoning
Date: Thursday, February 9, 2023 9:24:04 AM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)

Resending due to typo in district5 address.

From: Leo Chyi <Leo.Chyi@sonoma-county.org>
Date: Thursday, February 9, 2023 at 9:21 AM
To: MICHAEL OCONNOR <docmike2@comcast.net>, PermitSonoma-Housing <PermitSonoma-Housing@sonoma-county.org>
Cc: distict5@sonoma-county.org <distict5@sonoma-county.org>
Subject: Re: Proposed Forestville rezoning

Dear Michael,

Thank you for writing in and submitting comments directly to Permit Sonoma, as well as copying us. At this time, I really think this is the most important way to give feedback. I wanted to confirm that Lynda is very aware of the Forestville sites and limitations, and I have heard her directly share concerns to the Housing Element team multiple times, including to Permit Sonoma Tennis Wick. She has driven those sites and understands those issues.

Since you're engaged on this issue, I did also want to let you know that the Lower Russian River Municipal Advisory Committee's Land Use Committee offered to take on the housing element concerns and agendized it for their meeting tonight at 6:00 PM. Planning Deputy Director Scott Orr from Permit Sonoma will be in attendance for that item, and it may be a chance to get details, get questions answered, and give feedback.

<https://sonoma-county.ca.gov/lower-russian-river-land-use-committee-meeting-february-9-2023>

There will be a report back at the main meeting the week following, so that will also be a way to get an update. It is at 5:30 PM on 2/16/23.

<https://sonoma-county.ca.gov/lower-russian-river-municipal-advisory-council-meeting-february-16-2023>

After the meeting, videos are available on Facebook and on the 5th District YouTube channel:

<https://www.youtube.com/@sonoma-county5thdistrict>

Our office is grateful for the thoughtful feedback that you and others in the community are providing the County. I know that people are being heard; the challenge is for the County to comply with our assignment by the State and region for zoning and identifying 3881 housing units in the unincorporated parts of the county. The County did appeal this number and was denied, but Lynda is continuing to push for better solutions.

Sincerely,

Leo

Leo Chyi

District Director to

Supervisor Lynda Hopkins

575 Administration Drive 100A

Santa Rosa, CA 95403

707.565.2241

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You can also double click on the county symbol to reach Lynda's webpage or click on the MAC logos below to be connected to our Municipal Advisory Councils (MAC)...



Aide: Jason Wilson

Field Representatives: Elise Weiland, Tracy Lyons, Debbie Ramirez

District5@Sonoma-county.org

From: MICHAEL OCONNOR <docmike2@comcast.net>

Date: Thursday, February 9, 2023 at 8:30 AM

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

Cc: Leo Chyi <Leo.Chyi@sonoma-county.org>, distict5@sonoma-county.org
<distict5@sonoma-county.org>

Subject: Proposed Forestville rezoning

Eric Gage: I am Michael T. O'Connor and live at 301 Conor Court, Forestville, CA 95436. I have lived in Forestville for almost 20 years. This correspondence is in reference to the proposed zoning changes for Forestville. We are a community of 3255 based on 2023 statistics (not the 6,000+ Stated in the EIA). The proposed 6 rezoning sites would have a population increase of 1652, a 50% increase for the entirety of Forestville. The increase is a significantly higher increase/impact with relation to the population within the boxed area. I live directly across from FOR-5 on Packinghouse Road, with FOR-3 directly behind FOR-5, both directly adjacent to Scenic Highway 116 with a high sensitivity designation. FOR-6 borders the waste water treatment facility. With regards to the current R-1 designation for FOR-3/5 and the M-1 for FOR-6. FOR-3 can have 3 units with 8 people. FOR-5 can have 6 units with 16 people, with a total for the two parcels of 9 units with 24 people. Your rezoning envisions FOR-3 is 33 units with 86 people; FOR-5 is 58 units with 151 people. Units for the two areas would go from 9 units to 91 units, a 10 fold increase. Similarly, 24 people would increase to 237 people, close to a 10 fold increase. FOR-6 is even more absurd. Allowable units and people is ZERO. Proposed is 120 units with 312 people living next to the sewer treatment facility. That would exhibit a high level of quality consideration by the county for the people living there. Several years ago FOR-5 was surveyed I believe for wetland/vernal pool existence. Numerous flags were placed. I have not been able to find official findings of that survey. Was FOR-3 and FOR-6 also surveyed at that time? If so, what were the results of those surveys, including endangered species. FOR-6 is very marshy for a large portion of the year. Infrastructure to support such and increase is virtually nonexistent and El Molino high school has been closed. The proposed multistory units are totally out of place and

should only be considered in an urban environment with proper infrastructure and not rural residential. Your proposals do not meet the land use policy set forth in ObjectiveLU-15.4, which states: Maintain the "rural village" character of Forestville through the development design standards that support small-scale development with substantial open space and native landscaping. Also refer to Policy LU-15b. The residents of Conor Court and the nearby neighbors live here for rural ambience. We do not want an area the area adjacent to our ranch style homes and a designated scenic highway to be urbanized in a totally inappropriate manner. Thank you for your consideration. M.T. O'Connor 707-326-1488

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From: [Patrick Waters](#)
To: [PermitSonoma-Housing](#)
Subject: Fwd: Proposed Development of 14156 Sunset Ave Guerneville
Date: Thursday, February 9, 2023 9:28:00 AM

Sonoma County Permits - I am writing to express my great hope that you will not allow the development of a 30 unit property on Sunset Avenue. I can not think of a worse site for this proposal in all of Sonoma County. That hill, with its very narrow and quiet streets would be ruined with the addition of 78 people up that narrow and winding road.

There are numerous locations in Guerneville and other areas in Sonoma which are designed to accommodate that amount of traffic. Please vote against this development on Sunset and find a better location. Thanks very much for your time and consideration.

Pat Waters
14119 Palo Alto, Guerneville

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From: [Eric Gage](#)
To: [PermitSonoma-Housing](#)
Subject: FW: COMMENTS FROM THE OWNER REGARDING THE PROPOSED REZONING OF FOR-4
Date: Thursday, February 9, 2023 3:29:23 PM

Sincerely,

Eric Gage

Planner III

From: Paul Paddock <paulpaddock@sbcglobal.net>

Sent: Thursday, February 09, 2023 3:22 PM

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

Subject: COMMENTS FROM THE OWNER REGARDING THE PROPOSED REZONING OF FOR-4

Dear Mr. Gage,

I own APN 083-073-010, referred to as Parcel FOR-4 in the EIR the County is doing for its Housing Element update of the General Plan.

During the Planning Commission's last meeting regarding the EIR, I indicated that the maximum density proposed for my property seemed clearly inappropriate. It would be inconsistent with surrounding parcel densities, and create the potential for significant traffic, and neighborhood changing impacts. Site specific challenges include access via a long, narrow easement, and possible issues regarding underlying soil conditions.

My neighbors have expressed serious concerns about the proposed density increase, and the type of housing proposed. They don't support it, and neither do I.

It is unfortunate, that my willingness to consider some increase in density, would trigger consideration of such a dramatic step-up in density. If I misunderstood the original outreach from the County, I apologize. With that said, I am sensitive to the County's need to demonstrate its commitment to increase housing opportunities throughout the County. I may be supportive of a density increase that would be more compatible with my immediate neighborhood, community, and site conditions.

As I recall, it was indicated that public comments would be accepted until February 13th.

I would be grateful, if you would enter this letter into the record.

If you, or any of the commissioners have questions about my parcel, or wish to discuss my position, please feel free to contact me.

Thank you,

Paul Paddock
707 450-5759

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From: [Rick Harrington](#)
To: [PermitSonoma-Housing](#)
Subject: Draft: EIR--Housing
Date: Thursday, February 9, 2023 4:48:50 PM

EXTERNAL

I am a homeowner/full-time resident at 14151 Woodland Dr and am writing to object to consideration of the parcel at 14156 Sunset Ave (directly uphill from my home) for development as multi-unit (as many as 30!) housing. I object because this parcel is already dedicated to its Best Use, i.e. water storage and treatment for all of central Guerneville. The hilltop itself is unsuitable for the scope of the proposal. It would require removal of many trees and extensive engineering to support such construction. Access to this property is only by three narrow one-lane steep winding roads, none of which are in any condition to support the traffic of construction vehicles, nor of the additional auto traffic if these units were built out and occupied. A development of this sort is entirely out of character of this quiet neighborhood of small lots and single-family residences. It would destroy the quality of life and severely diminish the property values of this neighborhood. I recommend killing this project before it goes any further.

Rick Harrington

14151 Woodland Dr

Guerneville, CA 95446-9582

707-869-1808

--

Ego sum quia sumus

I will remember that what has brought us up from savagery is a loyalty to truth, and truth cannot emerge unless it is subjected to the utmost scrutiny -- will you not agree that a society which has lost sight of that, cannot survive? - Learned Hand, jurist (27 Jan 1872-1961)

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From: [SANDY STRASSBERG](#)
To: [PermitSonoma](#)
Subject: Rezoning
Date: Thursday, February 9, 2023 5:04:02 PM

EXTERNAL

Dear Permit Sonoma,

I am writing in opposition to the proposed rezoning in Glen Ellen of the Marty Winters' property, parcel #'s 054-290-057 and 054-290-084.

We are a small town. A gem of a town facing huge changes with the development of SDC. This little town is not where increased housing should be. Please help us keep our town small.

After the corner across from these parcels was rezoned and built on, the streets are now lined with vehicles on both sides making it essentially a one lane road. There is not enough parking! There is not enough room on these little streets for more people and cars! Please put housing in urban areas!

Thank you,

Sandy Strassberg
13650 Gibson St.
Glen Ellen

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From: [Sharon Smith](#)
To: [PermitSonoma-Housing](#)
Cc: [David Wakely](#)
Subject: Permit Sonoma / Planning - FOR-1 FOR-2 FOR-3 FOR-4 FOR-5 FOR-6 - Alternative: fewer rezoning sites.
Date: Thursday, February 9, 2023 6:49:21 PM

Dear Sonoma County,

We want to add our voices to the concern for our Forestville. Others may be more detailed in their letters to you. My husband and I want to state that we are shocked at the huge amount of housing that is being considered for our little rural burg. We do know that housing is needed, but the amount that has been designated to Forestville is huge. It is frightening to think the build outs will grow our population by 25%. It is more than the other neighborhoods that are being considered and we worry about them too. As our neighbor Becky Boyle wrote "the document does not speak to what would be done with respect to urban renewal effects for the people displaced to enact these potential build-outs, displacing locals, loss of character, threat to local business and the introduction of community conflicts, pollution-related health conditions, around town parking needs and sanitization challenges." We couldn't agree more. As she also mentioned the county needs to plan widening roads, adding left turn lanes, round-a-bouts, traffic lights, street lights and crosswalks for public safety on roads that are used by commuters, visitors, pedestrians and gravel trucks all coming through town. We feel strongly that before building is decided upon, infrastructure needs massive improvement. Also this is a fire prone area. If anything there should be less housing in areas like this. How will evacuation routes be determined and how much harder will it be for people to get out if needed if there are so many more properties? Is there enough water? Lots of questions and considerations.

Please consider all the impact this will have and please narrow the approach to our area.

Thank you,

Sharon Smith and David Wakely

Sharon Smith
10821 Canyon Road
Forestville, CA 95436
415 378-8005
sharon@savorsmith.com

wrote "the

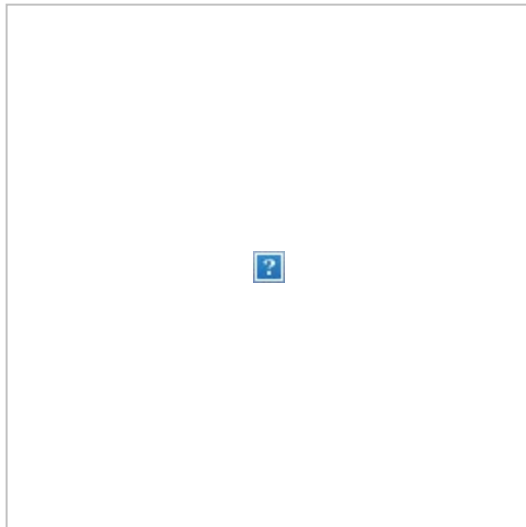
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From: [Sonoma Valley Collaborative](#)
To: [PermitSonoma-Housing](#)
Subject: Advocating For Affordable Housing | Abogar Por Vivienda Asequible
Date: Tuesday, February 14, 2023 12:42:27 PM

EXTERNAL

[View this email in your browser](#)



Advocating For Affordable Housing | Abogar Por Vivienda Asequible

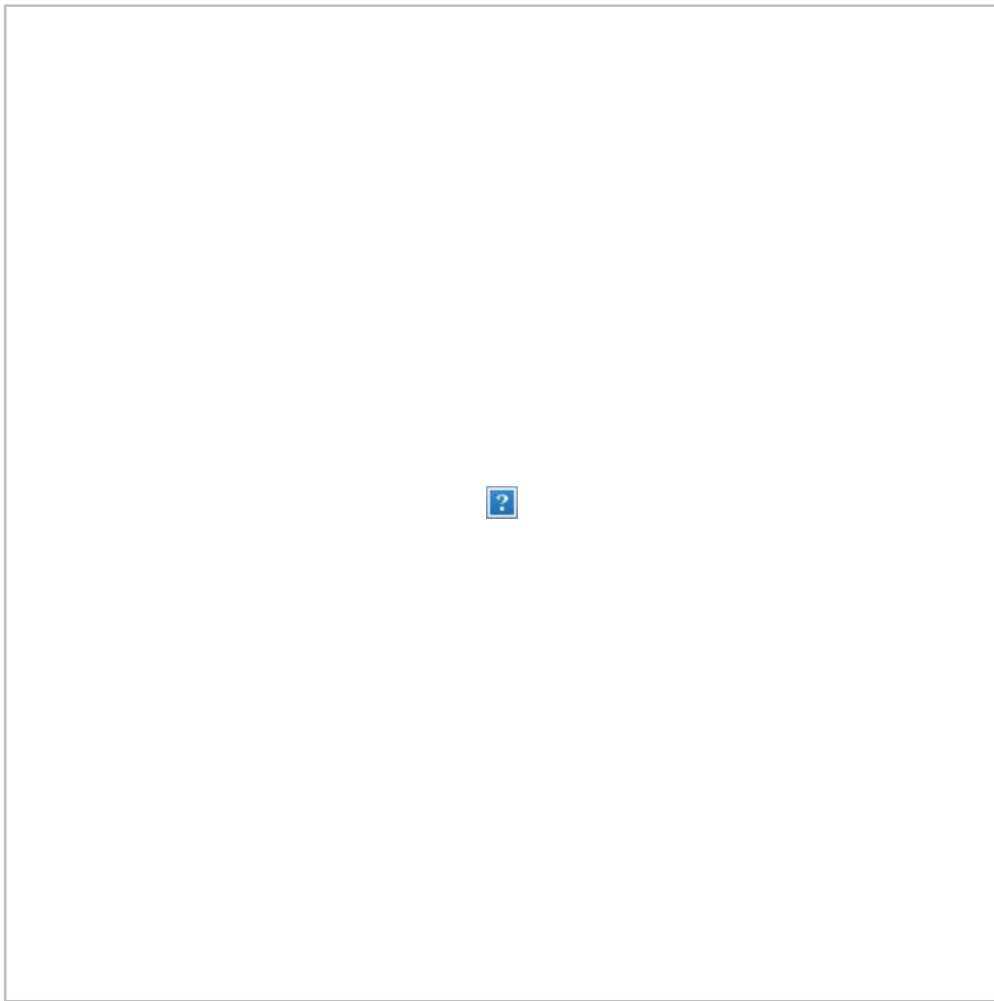
[Español abajo]

We are excited to be partnering with La Luz Center on our next Housing Advocacy Workshop!

Many people, including [Sonoma Valley Collaborative Council](#) members, local teens, and residents have [shared personal and challenging housing stories](#) to compel decision-makers to improve the County and City of Sonoma Housing Elements.

[Our advocacy](#) with the united voice of Sonoma Valley Collaborative's cross-sector leadership and community members has already been effective, with the City of Sonoma adopting its most pro-housing [Housing Element](#) ever on January 31.

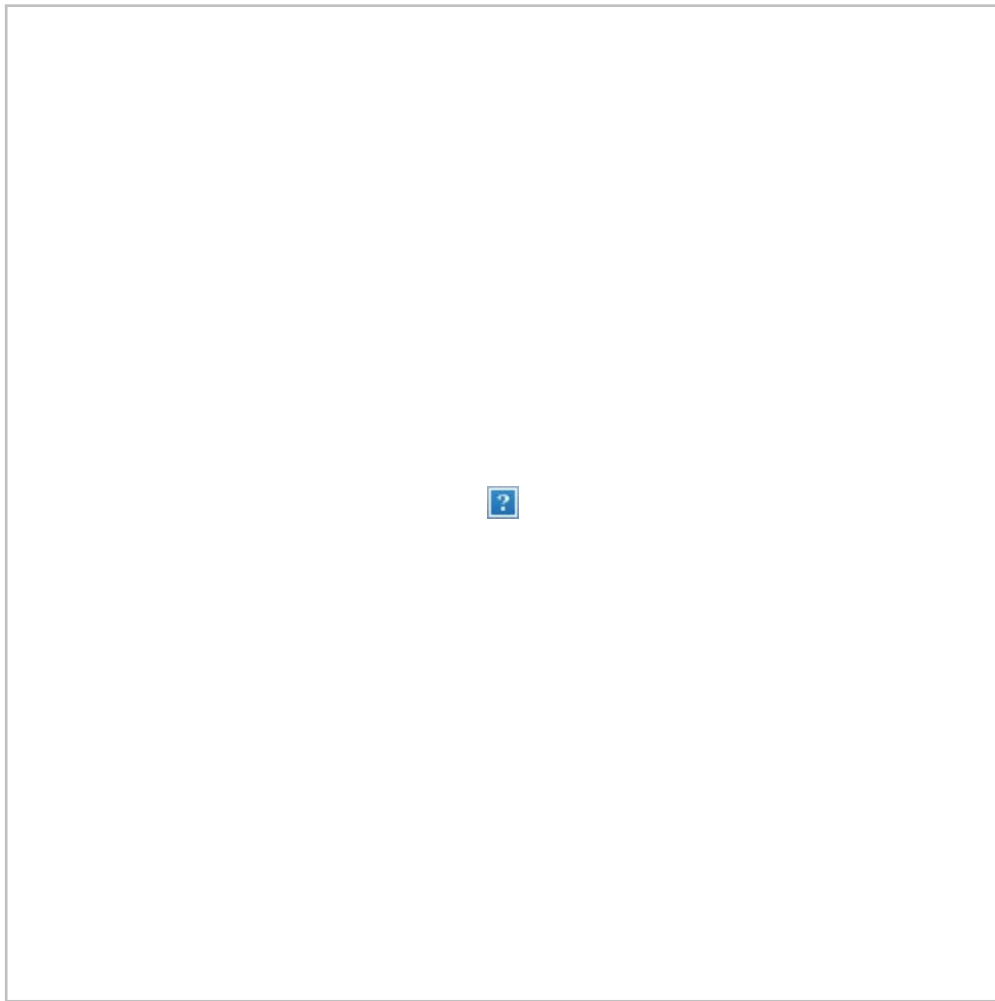
We now focus on improving Sonoma County's Housing Element, advocating for [Sonoma Valley Collaborative's housing platform](#).



Join us for a workshop that will deepen your understanding of local housing inequalities and help you develop a effective personal statement to advocate for change.

- Thursday, February 16 at 11:30 at La Luz Center
- You will be provided with a \$25 gift card for your time in the workshop.

Register at 707.938.5131 or nidia@laluzcenter.org



Únase a nosotros en un taller que profundizará su comprensión de las desigualdades de vivienda locales y los ayudará a desarrollar herramientas para abogar por el cambio.

- Jueves 16 de febrero a las 11:30 en el Centro La Luz
- Se le proporcionará una tarjeta de regalo de \$25 por su tiempo en el taller.

Regístrese: 707.938.5131, nidia@laluzcenter.org



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From: [Brad A Wallace](#)
To: [Eric Gage](#)
Cc: [PermitSonoma-Housing](#)
Subject: DEIR Rezoning GUE 2, 3 and 4.
Date: Friday, February 10, 2023 2:48:52 PM
Attachments: [Permit Sonoma Zoning Letter.rtf](#)

February 10, 2023

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

Dear Mr. Gage,

I oppose the rezoning of GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, listed in the Sonoma County Draft Environmental Impact Report (DEIR).

I moved to my current home at 16190 Laughlin Road in May of 2014 having moved here from Colorado. There were three things I required of my new house; that it be on a reasonably flat lot, that it has sun, and that it be in a quiet neighborhood. My Real Estate Agent assured me that this was a quiet neighborhood and with the current zoning it would stay that way. This is a "dog walking" neighborhood with narrow streets and no sidewalks. Laughlin Road has a place where a redwood tree is close to the road and the roots make it a one lane road. This neighborhood was zoned the way it was for good reason. The streets are very narrow up Cutten Ct and the 16450 Laughlin Road where the horse pasture is. You will destroy this neighborhood if 315 people are added that would drive by my house on Laughlin Road. It would add dumpsters that would have to be emptied by very large trash trucks that would require them driving on multiple days each week. The construction of the housing would require large truck traffic for years that would disrupt our peace.

The Russian River Sanitation District has a difficult time handling the sewage it currently gets, there is no way it could handle the increased sewage that 588 people would bring. I currently pay \$1,774.00 a year for my service or \$147.00 a month this has gone up each year I have lived here, I am sure it will go up this year also. I am retired and live alone, that is a very expensive sewer fee. Doesn't seem to be a good place to put in affordable housing. My fear is that if it has to be upgraded the current residents will be stuck with the charges and not the developers or the new residents. In other words, the current residents will pay for the destruction of our neighborhood. Not to mention the addition of new waterlines and power lines that would be adequate to serve that many new residents, like I said, the construction could last for years.

I hope all of the people that will be voting on this rezoning know that Armstrong Woods Road is the ONLY way to evacuate these properties and it floods very often, even before the Russian River. GUE 4- 16050 is obviously in a flood plain. To develop this property 105 units would have to be out of the flood plain, how are they going to do that without making other properties more likely to flood, including my house where flood waters have never reached the floor. Please do not make my house more likely to

flood. All three of these properties are now absorbent land, with the number of units that the new zoning would allow, the lots would have to be almost all covered and nonabsorbent so ground water would not be recharged and our properties would see an increase in runoff.

The property that is closest to services is the GUE 4- 16050 and that is 3/4 of a mile to Guerneville, the other properties are further and on narrow roads. This is not a good neighborhood to add affordable housing where a good part of the population might not have vehicles. There is no bus service in this neighborhood and these streets are too narrow to allow for them. So the residents would have to walk a mile to get transportation services, food, doctors etc.

I think that Sonoma County should think very hard about rezoning land against the wishes of the property owners. In the zoom meeting a property owner asked if he could add less units, first there was a yes then a no. I understand when a property owner wishes to rezone to add more units it is a big deal and is very difficult to do, the land was initially zoned that way for a reason. This is a very big deal and must not be rushed into because of the State. We need answers and there must be solid planning. It has been difficult for questions to be answered in this process, that scares me! I am retired and doing home improvements, I will put off some of my improvements to make sure I have enough money to enact litigation if this zoning gets passed.

Brad Wallace
16190 Laughlin Road
Guerneville, CA 95446
wallacebrada@gmail.com
707-604-7330

From: [Cassandra Shafer](#)
To: [PermitSonoma-Housing](#)
Cc: [Susan Gorin](#); [Pat Gilardi](#); [David Rabbitt](#); [Andrea Krout](#); [district4](#); [Jenny Chamberlain](#); [district5](#); leo.chul@sonoma-county.org
Subject: Draft EIR comment: Housing element Update
Date: Friday, February 10, 2023 1:32:07 PM

To: Eric Gage
PermitSonoma-Housing@sonoma-county.org
Re: Draft EIR comment: Housing element Update
cc: Board of Supervisors and staff

In response to the County's proposal to re-zone central Forestville, I agree that affordable housing is an urgent need; however, I have some concerns so I am sharing my comments. I live at 6115 Van Keppel Road.

Water, Sewer, Wastewater Treatment:

Increasing housing density in California when our state regularly faces droughts lasting years makes water a central concern for re-zoning. Not only is water a concern for all of California, it is of special concern in West County and Forestville. Can the Forestville Water District support this increase in density? Currently, sewer access is not available at my address or for any site further east on Van Keppel Rd. Who will pay for constructing sewer lines to Site FOR-4? Who will pay for expanding the waste-water treatment capacity for the additional 635 units proposed? Will water rates be increased so that current customers are underwriting this new development?

Access, Egress and Firestorms:

Sonoma County's recent history of firestorms are a central concern to re-zoning. Climate change forecasts that severe weather events will only become worse. My address received emergency alerts to evacuate during 2017, 2019 and 2020. There was stop-and-go stalled traffic on Hwy 116 for hours. Is it really desirable to increase housing density in West Sonoma County? If Sonoma County must increase affordable housing supply, doesn't it make more sense to increase housing density closer to the 101 corridor, where more emergency services already exist and emergency vehicle access would be easier, as would emergency evacuation?

Van Keppel Rd. has no outlet, but does have a number of dead-end roads branching off of it. The road itself is narrow and crumbling. It has 90-degree bends, which are blind. Neighbors already complain about speeding drivers who cut these corners, causing near collisions and killing pets. The first sharp bend off of Covey Rd is also a low dip that floods. How can the road itself support an increase from 5 residents to 185 residents on the FOR-4 site? Who will pay for it? How will it be engineered? Will taxes be increased so that current residents are underwriting improvements and services for this new development?

Public Transportation and Commuters

Another aspect of access is the poor public transportation to and from Forestville. Buses run

infrequently and bus lines do not serve enough areas of our county. Although it is true that more people started working from home during the pandemic, many people still commute to work by car. This year, two of my housemates moved into Santa Rosa into smaller, equally expensive housing because they could no longer afford the gas to go to work every day. Increasing housing density in Forestville rather than along the 101 corridor may end up increasing greenhouse gases, or else unfairly target certain categories of employees who work on site, thereby privileging remote workers.

Schools:

Increasing affordable housing in Forestville within walking distance of the elementary school and high school is a great plan. Increasing the population of families and school-age children would allow for the re-opening El Molino High School, which would be an effective use of existing facilities and re-vitalize our community. Is there any way to prioritize that families with children would receive first dibs on these new units? Or would such a priority violate Fair Housing law?

I have been teaching in Sonoma County for 20 years. This semester I am teaching in synchronous-online mode at SRJC via Zoom. Now that COVID concerns have eased off, I surveyed my students as to why they enrolled in this type of section, rather than an asynchronous, all-remote online class or an in-person class. Of the 3 answers students offered (work schedule, having young kids, and transportation issues), transportation was the most common reason by far. Nobody said they believed remote education was superior in quality. It seems they do want teachers, they do want classmates, they do want the structure of a regular meeting time, but they also like the convenience of not having to spend time or money driving. Housing within walking distance of schools is wonderful.

Economic and Social Equity:

I have lived in Forestville for 23 years. A single year after buying this house, its value had increased so much that our family couldn't have afforded it. And yet, our family's income has not kept pace with the insane explosion of the California housing market. My husband died young. We have been living close to the poverty line for 20 years. I have taken in boarders/housemates to keep a roof over my children's heads. I agree affordable housing is an urgent need. I worry that decision-makers believe that anyone who currently owns property in Sonoma County is affluent and can afford to pay ever more and more. My property tax bill still lists 2 charges for Palm Drive Hospital, but that entity no longer exists. Why do we still pay the tax? My property tax bill lists charges for Measure H, more and more buildings at Santa Rosa junior College. Enrollment has dropped so low at SRJC that many faculty have had our workload and incomes severely slashed. I am lucky to teach one class this semester. Many students learn online. Many JC staff work from home. Do elected officials believe that construction is always the right choice? Is it time to re-think the old maxim that building growth is always good and will solve our problems? Is there really the population to support this call for more building? Can we balance sustainability and planetary survival concerns with economic equity concerns?

Best Practices: Centralize population density

Overall, I believe Sonoma County should delay re-zoning and new construction due to water limitations, firestorm emergency concerns, transportation/air quality issues, and uncertain

population. Any efforts to increase affordable housing should focus on the 101 corridor rather than West County, also due to water limitations, fire emergency concerns, and transportation/air quality issues. My father earned a Masters in City Planning and worked as a county planner in San Diego and Imperial Counties. As a child, I learned about best practices in urban planning, which recommend centralizing population density. If the County proceeds with re-zoning Forestville and increasing density in a small rural residential town, choosing sites that already have sewer infrastructure and road access on more than one side would be better than the FOR-4 site at the end of Van Keppel Rd.

Respectfully,
Cassandra Shafer
6115 Van Keppel Rd., Forestville, CA

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From: [Cassandra Shafer](#)
To: [PermitSonoma-Housing](#)
Cc: leo.chyl@sonoma-county.org
Subject: Draft EIR comment: Housing element Update
Date: Tuesday, February 14, 2023 12:42:42 PM

To: Eric Gage
PermitSonoma-Housing@sonoma-county.org
Re: Draft EIR comment: Housing element Update
cc: Board of Supervisors and staff

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Respectfully,
Cassandra Shafer
6115 Van Keppel Rd., Forestville, CA

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From: [David Kristof](#)
To: [PermitSonoma-Housing](#)
Subject: Housing Unit Population Buildout Potential for Other Inventory Sites: SITE ELD-1
Date: Friday, February 10, 2023 2:40:32 PM

February 10, 2023

Attention: PermitSonoma-Housing@sonoma-county.org

Regarding: Table 2-5 “Housing Unit Population Buildout Potential for Other Inventory Sites” / SITE ELD-1

To Whom it May Concern,

We are writing this commentary on behalf of ourselves and adjacent neighbors that live on Brookview Drive and Oakwood Drive. It has come to our attention that an existing single family dwelling parcel at 15577 Brookview Drive (designated as **SITE ELD-1**) has been incorporated into the current Sonoma County “Housing Element Update/Draft Environmental Impact Report”.

Since little to nothing in the DEIR elaborates any specifics to this particular location, we would appreciate feedback on the calculus that determined this particular site’s inclusion in **Table 2-5 “Housing Unit Population Buildout Potential for Other Inventory Sites”**. Given the current vacuum of information, there is, to put it mildly, much consternation and outright concern over what is envisioned by the County in the near future.

On the surface, listing **ELD-1** to the County’s potential buildout inventory is pure folly. And, we suspect addition of this location was truly only incorporated into the report to meet the minimum buildout requirements mandated by the State. We further suspect that by paying lip-service to State requirements, such an undisciplined approach could come back to bite those who saw fit to throw a placeholder “bone” into the works. Enough on such finger-pointing though!

Please note, as the collective community, we do have legitimate concerns about the viability and use of this existing residential lot. Consider the following perplexities:

Lot width with regards to minimal set-backs (available structure footprints hampered by such restrictions):

- <!--[if !supportLists]-->a. <!--[endif]-->Set-back from Sonoma Creek (east perimeter)
- <!--[if !supportLists]-->b. <!--[endif]-->Set-back from Madrone Creek (south perimeter)
- <!--[if !supportLists]-->c. <!--[endif]-->Set-back from adjacent neighbors (north & west perimeters)
- <!--[if !supportLists]-->d. <!--[endif]-->Set-back from street.

Environmental impacts to Sonoma & Madrone Creeks, including:

- <!--[if !supportLists]-->a. <!--[endif]-->Impacts on existing Sonoma Creek stream-bank revetment (note that Sonoma Creek, along Brookview Dr., has had severe erosion mitigation over the last 60 years, with extensive repair work after high-water damages in 1965, 1997 & 2002).

<!--[if !supportLists]-->b. <!--[endif]-->Impacts caused by added storm drainage outflows (due to site hardening) and its negative effects on stream hydrology.

<!--[if !supportLists]-->c. <!--[endif]-->Impacts on creek corridor/waterborne plants & animals (verified freshwater shrimp in Sonoma Creek are a registered endangered species).

Off-street/On-street parking (the lot is in cul-de-sac with minimal street parking availability; added units = added vehicles = off-street parking & a driveway that eats into any potential building footprint).

An inordinate increase in traffic throughout the neighborhood, but especially in the cul-de-sac where 15577 Brookview Drive is located.

Historic neighborhood height limitations (several 2-story modifications have been permitted & built over the years, but the entire neighborhood is mostly long-established, single-story homes).

Neighborhood infrastructure's inadequacy to incorporate added demands at proposed site, including:

<!--[if !supportLists]-->a. <!--[endif]-->Added sewer connection (existing main sewer line is notorious for already backing up during high-rain events; the sewer line fails almost yearly with effluent flowing out of street man-holes and even backing up into toilets/bathtubs of homes in the cul-de-sac; the Sonoma Valley Sewage District has been fined multiple times for allowing high bacterial-count runoff to contaminate creek waters due to the inability of the existing sewer to handle any excessive flows).

<!--[if !supportLists]-->b. <!--[endif]-->Degenerative asphalt street pavement (street is in abysmal condition that cannot handle the stresses of additional traffic, prolonged abuse by heavy construction equipment and associated patchwork of road-cuts due to new infrastructure tie-ins).

Your return input would be most appreciated. Please advise.

Sincerely,

David & Barbara Kristof

15561 Brookview Drive

Sonoma, CA 95476

davidakristof@icloud.com

barbarakristof@icloud.com

(707) 996-8565 (home)

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MELODY CLARK
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E-MAIL: MELODYCLARK@COMCAST.NET

PermitSonoma-Housing@sonoma-county.org

Re: Draft EIR – Housing

Eric Gage, Planner

As a resident within two blocks of the proposed FOR-2 projects I have significant concerns about over-developing this location. I am also concerned about the disproportionate number of units that you have identified as potential locations for rezoning rural residential sites to accommodate high density housing, specifically in the west county areas of Graton, Forestville and Guerneville.

It appears that you have reduced our neighborhoods to “Inventory Sites” without regard to the neighborhoods and are proposing a backwards solution to the need for additional housing.

FOR-2 is a 13+ acre orchard encircled by 28 houses. The proposal of 238 units within this block of homes is unreasonable. How do you go from a site that currently permits 7 houses with private septic systems, to rezoning for 238 units in the middle of existing homes?

This is not an urban area. Our infrastructure is barely adequate for the existing homes in this area.

All of the homes west of Mirabel Road have individual septic systems. We have been told for many years that it is not feasible to expand the sewer system that exists east of Mirabel Road. It seems unlikely that you can wave a magic zoning wand and accommodate that many units into the existing system.

Mirabel Road is a major access road between Highway 116 and River Road. Those are the only two roads available for evacuation/access to Santa Rosa/Highway 101. The two-lane road is narrow, lacks turn lanes, lacks sidewalks, gutters, curbs, drainage or lighting. Ingress/egress into the proposed development will be dangerous. Making a left turn onto Giusti without the increased traffic is already a problem.

All traffic from the existing homes on Nolan Road and Giusti Road can only leave this area via Mirabel Road which is already inadequate for vacating the area.

The report is incorrect about a school on Mirabel Road. That location is a park maintained 100% by the community. There are no HOA dues, county or state entities that contribute to the Youth Park. Who is going to put in crosswalks and safety features from FOR-2 to cross the street to the park on the busy and dangerous road?

What about services. While the report does mention we have some services. they are very limited. It is 8-10 miles to the nearest full-service grocery stores in Sebastopol or Santa Rosa. I already worry about the distance to shopping and health services when I am older. Public transportation is limited and unreliable.

Roads, water, waste management, community services are typically planned first. This is a plan that feels rushed so that someone doesn't lose funds. This does not seem like a benefit to the existing neighborhood or potential new neighbors.

Over the past 30 years I have noticed that the people that move to Forestville find the location desirable because of the low-density housing. One example is similar size homes within the Speer Ranch subdevelopment on 6,000 to 15,000 square foot lots have had less market appeal than homes in Forestville that are not within a "tract" style development such as the homes on Nolan and Giusti Road. A better place for higher density housing would be closer to community services, shopping, transportation, employment areas. Where is the employment for the 700+ what would move here?

One last issue in this area that is very personal to me. The cellular service reception is horrible. Many of us have tried different carriers only to find that the each have dead zones. My husband died on River Road because he could not get emergency service in one of those dead zones. His phone log showed numerous attempts to make calls.

Bringing hundreds of new people into this area, when the services are already inadequate is practically criminal.

Additional services and housing are definitely needed but should be planned, and not a desperate act because of mandates and funds. It would be better to reduce the density in the AR and RR zones or allow lot splits for new homes to gradually accommodate additional units than building high density urban style homes in this area.

Thank you for listening to my concerns.

Sincerely,

Melody Clark

ATN: Eric Gage

From: Greg Carr

Subject: DRAFT EIR: HOUSING ELEMENT UPDATE

Thanks for the opportunity to comment on the above DEIR. Following are my comments:

In general, this is a thorough and professional effort to comply with CEQA. However, there are some changes that are necessary in order for certification.

1. Project Description. This section should be expanded in order to provide a more detailed description of the process that will be involved in the review of future development projects on the rezoned sites, including the type of public notice, the opportunities for public involvement, the required entitlements, the County's discretion to address issues not covered by mitigation measures, and the feasibility of imposing necessary and possibly costly infrastructure improvements.

2. Impact BIO-4. The conclusion that the project would not affect wildlife movement is based upon the fact that the rezoning sites are located within areas of existing development is questionable. Several sites are located along the outer edges of urban service areas that are relatively distant from existing development. It is likely that wildlife movement still occurs on or near these sites. GEY-1, and PEN-2, and 6 are examples. The FEIR should identify and address these potential impacts.

3. Impact LU-2: The DEIR is inadequate in its analyses of consistency with the County and City general plans.

-The DEIR fails to consider future project impacts on the applicable cities' plans and policies where rezoning sites are located within the cities' urban boundaries. The applicable city planning policies and land use designations, such as Petaluma's "Very Low Residential", Sonoma's "Gateway Commercial", and Santa Rosa's various designations, should be listed, described, and analyzed for consistency. The EIR should discuss the likelihood that any of these cities will extend utilities to sites within the UGBs when the proposed project is inconsistent with the applicable City General Plan.

-In addition, the DEIR fails to address consistency of the proposed rezonings with the countywide General Plan growth projections and potential buildout under the current Land Use Maps. The project is clearly inconsistent with this aspect of the General Plan and its policies and results in significant environmental impacts. The fact that the project is deemed consistent with Plan Bay Area 2040 is appropriate to identify, but is largely irrelevant to the discussion of consistency with the current General Plan and this impact.

Further, the DEIR fails to support its claims of consistency with several objectives and policies by stating that by virtue of being consistent with a majority of all policies means that it is consistent for purposes of this EIR. Affected objectives and policies include:

Objective LU-3.2 and Policy LU-3c limiting future growth to County Urban Service Areas;

Objective LU-4.1 requiring that infrastructure be available to serve projected development;

Objective LU-19.1 and Policy LU-19a and Objective LU-20.1 and Policy LU-20oo to avoid new urban uses within the respective Petaluma and Sonoma Urban Service Boundaries;

Objective CT-4.1 and Policies CT-4.2 and CT 4.3 requiring that a project meet certain traffic congestion levels of service.

The project is clearly inconsistent with these objectives and policies and the EIR should so state. Once the proper analysis is included, the EIR should then discuss the significance of these inconsistencies and recommend available measures that can be applied at a project level. For example, individual projects could be required to meet the above circulation policies.

4. Impact PH-1. The DEIR correctly points out that the project would result in population and housing that exceeds “established population and housing forecasts”, but then incorrectly concludes that this is not a significant impact because a housing need has been identified. That rationale is irrelevant to the fact that the project is inconsistent with the County General Plan since no change in housing policy has been adopted. Table 4.14-4 should be amended to include countywide Population, Housing, and Employment projections from the General Plan. The conclusion regarding significance should be based upon the difference between these countywide projections with and without the project. The statement that the project is consistent due to the proposed General Plan and Zoning amendments is incorrect and should be modified to state that these changes would only operate as mitigation measures for the inconsistency.

5. Impacts NOI-2 and NOI-4. The DEIR asserts that these two potential noise impacts would be mitigated by mitigation measures NOI-2, 3, and 4. However, it is likely that nighttime noise from blasting and/or pile driving will not be fully mitigated by the proposed measures due to proximity to other noise sensitive land uses in the near vicinity of some of the sites. The DEIR should add an additional mitigation measure that imposes a prohibition on nighttime blasting and pile driving when necessary.

6. Impact PS-3. Table 4.15-6 should be modified to include the actual current enrollment numbers for each of the elementary school districts so that the projected changes are put in context.

7. Impact TRA-1. While the DEIR is not required to determine the traffic congestion impacts using the Level of Service metric, this impact threshold asks whether or not there is a ‘conflict with a program, plan, ordinance, or policy addressing the circulation system...’. General Plan Objective CT-4.1 and Policies CT-4.2 and 4.3 require that projects meet certain levels of service to avoid significant congestion. This conflict should be described, either here or under Land Use Impact LU-2 above, and mitigation should be included. This mitigation should establish that future projects are required to meet these objectives and policies.

8. Section 5.1 Growth Inducement.

-Population Growth (Section 5.1.1). Similar to the above discussion under Land Use and Population and Housing Impacts, the DEIR does not provide an adequate analysis and rationale for the conclusion that the project would not be growth inducing. Without a proper analysis of the additional countywide growth that would result from the project compared to the countywide growth under the current General Plan, the impact is inconclusive. Use of Plan Bay Area or the RHNA for this analysis is inappropriate as the County General Plan has not adopted those plans.

-Removal of Obstacles to Growth (Section 5.1.3). The statement that all of the proposed rezoning sites are located in designated County Urban Service Areas is inaccurate. In fact, most of the sites are located within the Urban Growth Boundaries of Petaluma, Santa Rosa, and Sonoma, all of which are located outside of these urban service areas. Further, the statement that water and sewer extensions would not result in additional growth is also inaccurate as noted in the DEIR discussion of the need for significant extensions in some of the more outlying sites.

ATTENTION: Eric Gage, Planner in Charge

Sonoma County PRMD

2550 Ventura Ave.

Santa Rosa, CA

DRAFT EIR UPDATE: HOUSING ELEMENT UPDATE

The following comments and questions apply to ALL the sites proposed for the community of Forestville, CA.

- 1) Although affordable housing is necessary – it is critical that the implementation process follows the same existing rules and regulations (CEQA, etc) that previous building applications were required to follow. Government officials are voted into office, or appointed, by the taxpaying public, and are therefore bound to follow the same rules and laws that is expected of the public that they work for.
The current approach to locating this housing sets a dangerous precedent for the propagation of a dictatorship style of government, completely at odds with the democratic system intended by our Constitution.
- 2) State preemption limits the ability of communities to address critical local issues and uphold the values of those living in their communities. Local control gives communities the ability to adapt and have the tools they need to build stronger economies, promote innovation and move forward.

Questions:

- a. What gives the State of California and Sonoma County the right to ignore established CEQA planning laws, otherwise required to be followed by the voting public, to implement housing increases in rural communities with extremely limited services and without ability to handle more vehicle traffic ?
- b. How is this non-conformance to established CEQA evaluation processes and guidelines mitigated?
- c. How is it fair to the general public and developers, when they are required to follow CEQA, and the State or County can choose to ignore CEQA as they choose ?
- d. How will this dichotomy and double standard by the State and County be mitigated - to prevent future lawsuits?

- 3) In fairness to existing tax-paying communities, any increase in housing must be scaled to a reasonable and fair percentage of existing community populations, to prevent over-burdening a particular community with unsustainable impacts to their existing environment.

Questions:

- 1) Why is the percent increase in housing proposed for the Forestville community significantly out of proportion with the percentage increase amounts proposed in the other community sites discussed in the Draft EIR ?
 - 2) Who came up with the proportions, and what was the reasoning behind the currently proposed increase proportions ?
 - 3) Why are the unincorporated areas of Sebastopol, Windsor, Healdsburg, and Cloverdale not included in the distributions ?
- 4) Easy access to amenities, including food, medical, and other services, located mainly along major urban corridors, must be considered to avoid more automobile traffic, accidents, road rage incidents, pollution, and parking overload.

Questions:

- 1) Why aren't the proposed locations for housing increases located closer to the Hwy 101 main urban corridors, with easy access to services ? How is this non-conformance to the County's General Plan mitigated ?
- 2) How does the county propose that people in the (barely) affordable new housing travel to access services in the main urban corridors ?
- 3) Since people will need to travel, they will likely purchase used / affordable gas-burning vehicles to access the urban corridors from the currently proposed remote sites. How does the county plan to mitigate the increased pollution from auto traffic on the existing environment ? How is the additional traffic impact on existing roadways mitigated ?

Andy and Renee Tchirkine

8664 Marianna Drive

Forestville, CA 95436

PermitSonoma-Housing@sonoma-county.org

From: [Kris Nevius](#)
To: [PermitSonoma-Housing](#)
Subject: DEIR
Date: Friday, February 10, 2023 4:11:28 PM

We need more affordable housing, especially for the workers in the county. Graton is a small community and that is the reason many of us live here. Adding 443 new houses to the community will strain the roads, the sewer system (or will they all be on septic?) and potentially change the feel of the community. This proposal has the feeling of some people who decided how many new dwellings needed to happen and then just looked around for potential empty lots to put as many as possible. Please consider reducing the number of proposed houses for Graton and for the other communities in Sonoma County.

Kris Nevius

Graton

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Planning Commission

RE: Re-zoning Change to GUE-4 (16050 Laughlin)

Dear Planning Commission,

Our home sits at 14759 Marys Ln Guerneville which is adjacent to the proposed zoning change GUE-4. We have owned our home since 1997. Our primary concern is the affect this zoning change and subsequent development will have on the future flooding in our neighborhood and specifically to our cherished home.

Why would up-zoning a property in an active flood zone on such a large scale be considered without any studies or flood mitigation for the surrounding neighborhood? I've reviewed the DEIR and do not see any reference to these studies.

During our ownership, we have had water surround (abut) our structure on two occasions. In addition, many other years we have had water on our parcel. Water rushes down Marys Ln. We have always been very concerned that additional development in our neighborhood would very likely put as at more risk of flooding inside our home and especially without a plan for the runoff from 100 additional homes on a lot that has historically aided in overflow (see attached photos).

It is very distressing to our family that nearly 100 homes could be built adjacent to us on the other side of Fife Creek with no consideration to the impact on the neighbors flood risk. The parcel at 16050 Laughlin Rd has ALWAYS provided a natural aid in overflow from Fife Creek, allowing for additional runoff and water storage. It's reasonable to conclude that a project of this scope will severely impact the surrounding homes. **Please require the DEIR to include any flood mitigation studies.**

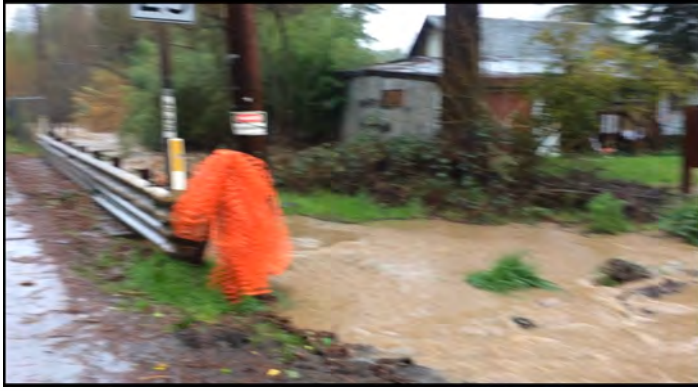
See attached video of water rushing into 16050 Laughlin during a heavy rain event just adjacent to Marys Ln. I've also included photos of various flood events in the neighborhood.

Please take our concerns into consideration and feel free to reach out to discuss. Also, please remove this property from consideration until flood mitigation plans can be provided to prevent our homes from additional inundation due to a project of this scale.

Thank you,

Paige MacDonell

Cc: Lynda Hopkins



Water from Fife Creek making way to overflow into 16050 Laughlin



Driveway into 16050 Laughlin just adjacent to previous photo



Armstrong Woods Rd at intersection of Laughlin



Intersection Laughlin & Marys Ln - water threatening to enter 14777 Marys Ln home



Water in garage of 14756 Marys Ln & threatening to enter home



Water rushing down Marys Ln & into school



From my porch 14759 Marys Ln right before evacuating

WHY CONSIDER 100+ MORE HOMES JUST ADJACENT TO THESE PROPERTIES WITHOUT ADDITIONAL FLOODING CONSIDERATIONS

From: [Lorin McClendon](#)
To: [PermitSonoma-Housing](#)
Subject: New Dwelling Units Proposed for Forestville
Date: Friday, February 10, 2023 11:27:49 AM

We are opposed to the 635 new dwelling units proposed for Forestville because of the dramatic increase in population, the limited transportation, our schools are not equipped to handle this influx and we agree with all of the reasons our District 5 Supervisor, Lynda Hopkins has stated for opposing this project. We need more affordable housing in our cities which have the infrastructure to support it.

Lorin & Rebecca McClendon
308 Conor Court
Forestville
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From: [Mark Dutina](#)
To: [PermitSonoma-Housing](#)
Subject: Forestville #2 Nolan Road
Date: Friday, February 10, 2023 9:11:02 AM

Thank you for listening to our concerns. I purchased 6824 Nolan Road in March of 2022. My property backs up directly to FOR#2. I am definitely not against the development of low and medium income housing. Here are my concerns for the development of this property. 1. Will crossing lights be placed to safely cross Mirabel and Giusti to get to Youth Park and El Molino H.S.? 2. What precautions will be made to protect those of us who back up to this parcel? I am mostly concerned about dust due to health reasons and the noise pollution it will create. 3. Will there be added police protection due to the increased number of people? Currently we are a small community that watch out for each other but with the added people there is no way that we will feel safe. 4. Will stop lights be added at River road and 116 due to the increased traffic? Currently it is already very dangerous to turn off of Nolan onto Mirabelle with the speed at which people drive here. 5. With this large of an increase in the number of people living here where will they work? Where will they shop? Where will they get medical services? The only services near here are to drive to Sebastopol or to Santa Rosa. Is it your intention to create another whole commuting area? 6. Where will the added number of people park? We have no street parking, no street lights, no sidewalks. Will this be safe? 7. Are you really willing to destroy another healthy ecosystem? Many birds and mammals live and nest here. Where will they go? Where will the thousands of moles,voles and rats go? To our houses? Will you be helping us with this problem? 8. Will the current owners of the property be forced to sell? Having spoken with them they have no intention of this being anything other than an agricultural property. 9. According to the DEIR report there are many environmental tasks to overcome before this property could be developed. Are you taking this into full consideration? 10. Living here in forestville our water and sewage systems are already fragile. What are the plans for this? Do you plan to use septic for this whole project? It seems impossible. In conclusion, I love living here, I have become very active in volunteering to help in any way in this community. If this project goes through I will be forced to move. Not only would this be a very negative life-changing experience it would also be extremely costly for my wife and I. We bought our home recently at the high market. Will the county be reimbursing us for the loss when we sell our property? I have many more questions and concerns, but please consider the ones I have listed and remove the development of FOR#2 from your list. Mark Dutina 6824 Nolan road. Phone # 650-544-3208

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From: [MIKE/BETTY BOJANOWSKI](#)
To: [PermitSonoma-Housing](#)
Subject: Fwd: Permitsonoma-housing@sonoma-county.org
Date: Friday, February 10, 2023 8:07:34 PM
Attachments: [CCF02102023.pdf](#)

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

From: MIKE/BETTY BOJANOWSKI <bbojanowsk@comcast.net>
To: "Permitsonsonoma-housing@sonoma-county.org" <Permitsonsonoma-housing@sonoma-county.org>
Date: 02/10/2023 10:35 AM
Subject: Permitsonsonoma-housing@sonoma-county.org

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

From: MIKE/BETTY BOJANOWSKI <bbojanowsk@comcast.net>
To: "Permitsonsonoma-housing@sonoma-county.org" <Permitsonsonoma-housing@sonoma-county.org>
Date: 02/10/2023 8:27 AM
Subject: DEIR response

Sonoma County Planning Commission Feb 10, 2023

This submittal is in regards to the Draft Environmental Impact Report for the Sonoma County Area countywide housing element update.

For the following reasons, and in no particular order, I submit and strongly feel the parcel designated as **LAR-9** in the **Draft Environmental Impact Report for the Sonoma County Area countywide housing update**, should be excluded ! This parcel is 5200 Fulton Rd Santa Rosa, Ca in the Larkfield area and designated a flood zone

1. This property not only flooded in 1995 and 2005 but was under mandatory evacuation in the 2017 Fire in the Larkfield area. It is in a flood zone. **FEMA** flood map included with this submission.
2. The Mark West Creek setback, alone, would wipe out nearly the entire property from development either on the driveway or the private easement north of the driveway.
3. This property exits off Fulton Rd , to the east, onto a

25'wide, approx. 800' long dead in, with no turn around, on this private driveway easement. No parking is allowed on the easement driveway for emergency vehicle access . All parking, including guest parking, **MUST** be provided onsite of each parcel. Parking is NOT ALLOWED ON FULTON RD. Fulton Rd, during the morning and evening commute times, has a tremendous amount of traffic blocking this aforementioned driveway/intersection making ingress and egress onto this private driveway extremely difficult. This private driveway currently serves a population of 34. The proposed addition of a population of 66 would have a **significant impact** on this intersection!

Thank you

Mike Bojanowsk

PO Box 756

Healdsburg, Ca 95448

bbojanowsk@comcast.net

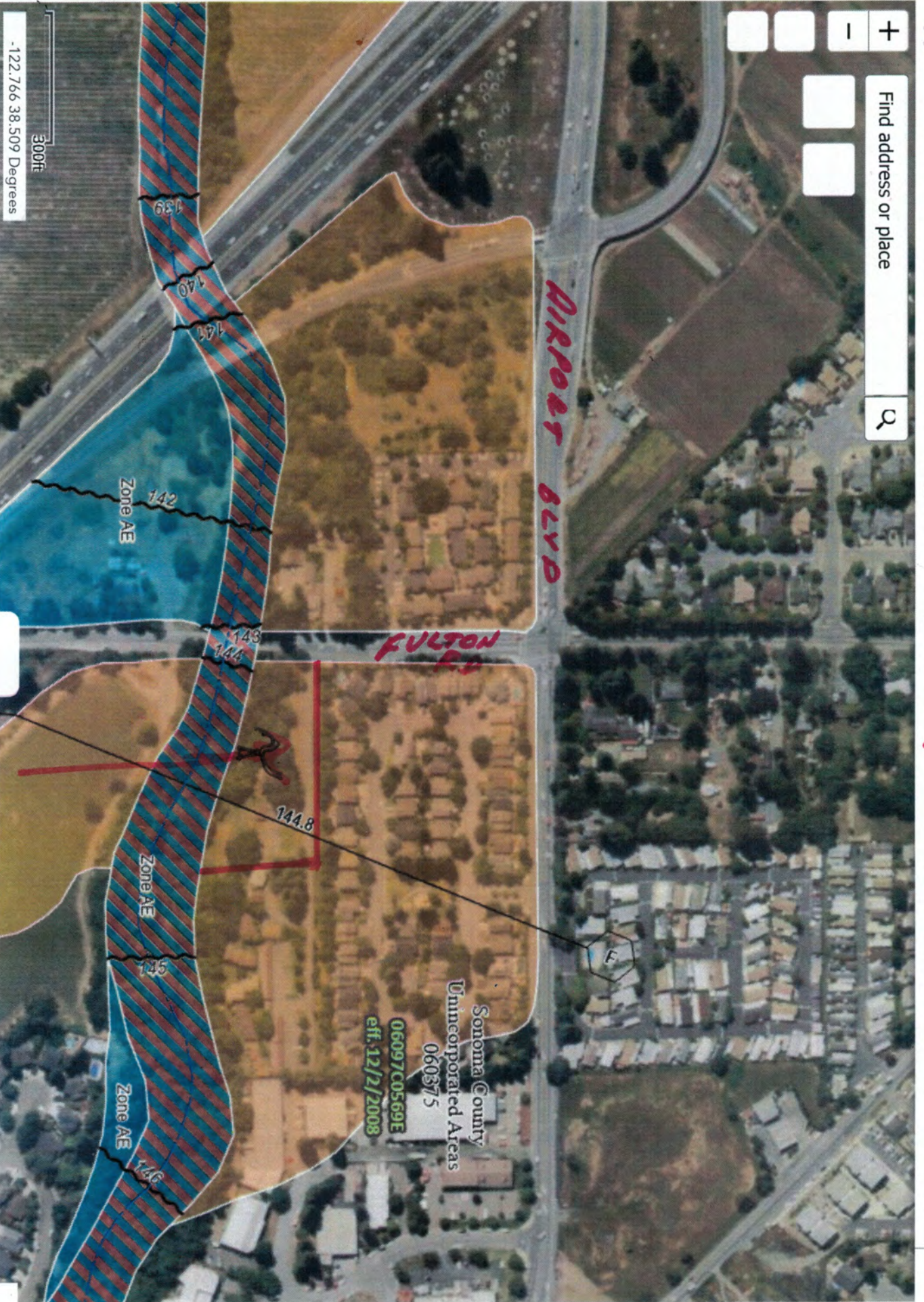
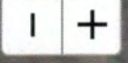
Office 707 433 5243 Cell 707 292 1690

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SUBJECT SITE

February 10, 2023

Att: Eric Gage

Re: Draft EIR Comments: Housing Element Update

Dear Eric and ladies and gentlemen,

I thank you, the Planning Commission, and all involved for receiving and reviewing our public comments. I thank LRRMC Lower Russian River Municipal Advisory Council and Land Use Committee for their recent Feb 9th zoom meeting and giving our community a chance to respond with questions and concerns regarding the DEIR's Housing Proposal.

I live in Forestville and appreciate this focus on low income housing yet, I see this proposal as not addressing the current needs of our small Forestville community. This proposal, with a possible increase in population of 1,484 for Forestville, would create a very challenging impact on this village town and change the character while not addressing needed improvements on the current infrastructure.. Decreasing the proposed density identified in this EIR for Forestville while finding alternatives to provide low housing here in our community is not an easy task but one that I support and encourage. A balance of low income housing with thoughtful consideration for what is here now while preserving its beauty and peacefulness is what I would like to see.

This DEIR proposal needs to address Forestville's current infrastructure needs. Adding such a huge increase with housing and people to this village town would intensify the problems we presently experience. Lack of sidewalks such as is the case on busy roads like Covey and Mirabel already prevents travel by walkers and bikers. Providing children, elders, handicapped and people of all ages in our community with safe sidewalks and streets is very important and would create less pollution from cars for transportation and is needed with current climate changes.

I am concerned about the increase in vehicles that would need to exit out of town using our two main arteries, River Road and Highway 116, during fire evacuations. This is unfortunately something that must be considered. I remember our first evacuation alert in 2016 and warnings we have had during most of the years that have followed. Evacuating twice made me experience the limits of the number of vehicles those two main exits can offer us all. Safely leaving our properties and homes during emergencies could be dangerously compromised with more residents and heavier traffic than we have experienced in the past years and it needs to be addressed

In Site 5 and Site 6 the proposed density increase could lead to many more cars needing to exit onto Highway 116 from Packing House Rd. for jobs and connections with local towns with larger stores, hospitals and amenities that our small town does not offer. I would describe Highway 116 as having narrow width lanes and am concerned about an increase in traffic from the proposed increase in population in that area. Infrastructure safety improvements for elderly and people with special needs may be needed at these sites and all the other sites. Other costly improvements may be necessary as well. The highest proposed density increase is with the FOR-2 Nolan Rd site which could necessitate major sewer pipe changes to be able to serve such a population increase. I see an unreasonable amount

of stress that this all would add to this peaceful town with the very high population increases proposed by this DEIR.

I appreciate your consideration of my comments.

Thank you,

Nancy Dempster
6730 1st St.
Forestville CA 95436

From: [Robert Davis](#)
To: [PermitSonoma-Housing](#)
Cc: [Robert Davis](#)
Subject: Forestville Rezoning for Housing
Date: Friday, February 10, 2023 11:30:14 AM

To Whom It May Concern:

I'll keep this short and to the point. After reading the DEIR, looking at the maps provided as well as Google Earth, I have to wonder why you would contemplate adding 571 housing units, with a population increase potential of 1,484 people, to a small unincorporated community like Forestville.

I don't believe our water or sewer system can handle that large of an increase. The current infrastructure (roads and services) do not support this large of an increase either. What may look good on paper, in reality, doesn't make sense when you take a closer look at it.

One other note. I found at least two errors in the Aesthetics section of the DEIR.

1. "On Mirabel Road, a school is directly across the street from FOR-2." That is not correct. The Forestville Youth Park is on Mirabel. The school is on Covey.
2. "FOR-4 is situated east of FOR-1 in an area accessible only by unpaved roads off Van Keppel Road." What is being referred to as an unpaved road off of Van Keppel is actually a private driveway.

I will not support this rezoning in its current form.

Thank you for your attention to this matter.

Sincerely,
Robert Davis
6255 Van Keppel Rd.
707-328-2493

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Dear Eric:

I have lived on Watson Rd for 8 years. I moved here to live in a rural setting with a slower paced lifestyle that provides a connection to community. The proposed re-zoning of Cutten and Laughlin Roads not only threatens to change the neighborhood to look and feel like a suburb, but ignores the current resident's wellbeing and worse, puts them and any new residents in danger. I am 100% against the proposed rezoning for several reasons:

- This neighborhood cannot handle the increased number of people and cars. Both Cutten and Laughlin are narrow, small roads that are basically a single line with one way in and one way out. Adding nearly 600 people (a 1700% increase from the current zoning) who on average will make over 1000 trips per day will cause immense congestion into and out of the neighborhood on a regular basis. Add the increased traffic during resort season and the situation becomes untenable. The traffic lights in Guerneville already cannot handle the traffic during resort season when the number of people in town is increased. In addition, the traffic situation would have a negative impact on the businesses in town as getting to these would be much more difficult.
- The re-zoning is putting the lives of the residents at risk. If there is a mandated evacuation due to a spreading wildfire (which there have been several), there is only one way out on both Cutten and Laughlin. Laughlin is lined with large trees and if a tree were to fall, people could easily be trapped. In addition, due to the traffic issues, residents may be forced to flee on foot. Adding this amount of people to such a small residential area accessed by small country roads is incredibly irresponsible.
- In a flood there is only one major road to get out of the neighborhood, Armstrong Woods, which is only 2 lanes. Fife Creek runs along Armstrong Woods and often floods, making Armstrong Woods impassable. Adding nearly 600 people to this area would increase the risk of danger to all should there be an evacuation due to flooding. In 2019, the Russian River flooded and left Guerneville an island, with no way in or out. Adding 18% more people to Guerneville primarily in this one area will stretch emergency services such that all residents will be at greater risk of danger.
- Emergency services are already limited in Guerneville with a very small number of police officers patrolling an immensely large area. Is there a proposal to proportionally increase police and fire personnel if another 588 persons are added to the neighborhood?
- The existing infrastructure cannot service more residents. The sewage system is antiquated and can barely handle the number of residents currently in the neighborhood. The entire sewer and water infrastructure north of Main Street would most likely need to be evaluated, removed and redone. In addition, the area is prone to electrical black outs for no apparent reason as well as due to storms. Will the power grid be updated as needed?

Cutten and Laughlin Roads are not suitable locations for the large number of affordable housing units proposed. Adding 588 people would be completely irresponsible from a health and safety perspective. I hope that the Planning Department and County Council listen to those who are affected most, the residents of this area who live and pay property taxes in Sonoma County.

Sincerely,

Anita Das
16711 Watson Rd.
Guerneville, CA 95446

Dear Eric,

As a 7 year resident of Watson Road, I am 100% against the proposed re-zoning of Laughlin Road and surrounding areas due to several factors listed below.

Climate change issues:

- a) Increasing CA Wildfires. This tiny neighborhood would quickly morph into a massive traffic jam, literally endangering the lives of the residents if a mandated evacuation due to a quickly spreading wildfire were to take place. Laughlin is lined with massive redwood trees and in some places there is only room for one car to pass. Laughlin is a narrow dead end - there is only one way in, which happens to be the same way out. To propose adding almost 18% more people to the town of Guerneville - and almost all of them on the tiny street of Laughlin - is a complete and total safety hazard. People who become trapped due to traffic issues could literally burn to death since there is only one narrow way out, and if a tree were to fall, hundreds of residents would be forced to flee on foot. So adding this amount of people to this incredibly small residential area would be completely irresponsible from a safety perspective.
- b) Increased flooding issues. There is only one major road to get out of town, Armstrong Woods Road, and it is only two lanes; one lane northbound (into the mountains - no escape) and one lane south (to 116 and River Road). Fife Creek runs alongside Armstrong Woods Road and during the rainy season, oftentimes floods, rendering the two lane highway virtually impossible to use. Adding almost 600 people to this area would greatly increase the risk of danger due to 100 year storms that are now happening every 25 years or so. In March of 2019, the Russian River flooded to the point that the vineyard adjacent to the proposed location was underwater. I live several blocks north of the proposed location and the water level came within 7" of my backdoor threshold (photo evidence to follow at your request).

Sewage Issues:

The existing sewage system is antiquated and can barely keep up with the number of residents we currently have. The entire sewage infrastructure north of Main Street would most likely need to be evaluated, removed and redone.

Traffic issues:

Guerneville is about to get a downtown renovation, making the sidewalks larger and sections of the road area more narrow. Both 116 and River Road are major thoroughfares that bring traffic into the town of Guerneville. The amount of daily traffic by 588 new residents would make getting in and getting out almost impossible. Additionally, there would be a negative impact on the businesses in town, since getting to those businesses (& resorts) would be much more difficult.

Laughlin Road is simply not an acceptable location for the addition of affordable housing units. Adding this amount of people would be completely irresponsible from a health & safety perspective. To be clear, I am in no way against adding affordable housing. It simply must be added in a location that will not literally threaten the lives (and/or infrastructure) of the residents who currently live and pay taxes here.

Sincerely,

Tre Gibbs
16713 Watson Road
Guerneville CA 95446

From: [ADELE.turk](#)
To: [PermitSonoma-Housing](#)
Subject: Draft EIR - Housing FOR-2
Date: Tuesday, February 21, 2023 1:06:39 PM

I live in Forestville on Guisti Road. I believe that is not a good area to put 283 houses. There is no road access, side walks, sewer connection, street lights. There is no hospital in 10 miles or grocery store or street lights. The traffic is very heavy on Mirabel road, highway 116 and river road. Many heavy equipment trucks from the Rock Quarry and many cars coming up and down highway 116.

Putting 1652 population in an area where there are no jobs available is not a good idea.

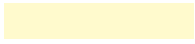
The solution I think is moving this proposal close to a bigger town with adequate facility.

Adele Turk

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From: [Anna Narbutovskih](#)
To: [PermitSonoma-Housing](#)
Subject: Proposed Housing Development in Guerneville
Date: Saturday, February 11, 2023 3:50:57 PM



Permit Sonoma:

I'm writing to protest the proposed multi-family housing development in Guerneville located at 14156 Sunset Avenue which is property owned by Sweetwater Springs Water District. That location is on a narrow one lane road where it's absolutely impossible for two cars to pass. The car driving downhill has to back up several hundred feet around curves to the top of the hill without falling off the downhill side. Adding 30 units for 78 people will lead to many unhappy accidents.

Ten percent of the single family homes on this hill are Short Term Vacation Rentals (STVR). By my count that's 14 homes that could be rented to working families. Simply eliminating the despised STVR permits will account for half of the proposed units and add stability to the neighborhood.

We are clearcutting our forests for lumber to build houses and blasting our mountains for the limestone and shale to make concrete. We are destroying our environment and biodiversity to build new housing, releasing massive carbon and pollution in the process adding to climate change. Instead we should be repurposing existing buildings and building materials. Before building anything new, take an inventory of what we already have that can be repurposed and refurbished.

Please consider the environment and future generations before proceeding with this unwanted and unnecessary proposal.

Thank you,
Anna Narbutovskih
narbutovskih@comcast.net
14288 Woodland Drive
Guerneville, CA 95446

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From: [Becky Boyle](#)
To: [PermitSonoma-Housing](#)
Subject: question, seeking clarification re: FOR-4
Date: Saturday, February 11, 2023 11:21:07 PM
Attachments: [Screen Shot 2023-02-11 at 11.06.37 PM.png](#)
[Screen Shot 2023-02-11 at 10.57.25 PM.png](#)

Hi,

My goodness, FOR-4 is an odd beast. The DEIR lists it as APN #083-073-010 and an address of 6090 Van Keppel Rd. However, your Zoning and Parcel Report for parcel APN: 083-073-010 lists that address as 6325 Van Keppel Rd. Can you please shed any light on this for us? Enclosing pic. I'm kind of assuming the 6325 Van Keppel address listed as associated is because you have to go through that address to get to this one but I am trying to confirm the APN # is accurate because there really does not seem to be a 6090 Van Keppel to be found aside from this rectangular lot and it does (based on overhead gps) appear to fit the description of being bordered by houses on one side, the school on the other, a few houses on the other side and AG on the other.... Seeking confirmation as things are kind of wonky re: lining up. Thanks.

Also, I'm wondering what the squiggly line going from bottom left to top right is. Is that a creek?

Thanks,
Becky Boyle



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From: [Becky Boyle](#)
To: [PermitSonoma-Housing](#)
Cc: [Eric Gage](#); [Susan Gorin](#); [Pat Gilardi](#); [David Rabbitt](#); [Andrea Krout](#); [district4](#); [district3](#); [district5](#)
Subject: Re: DEIR - Housing Element Update - FOR-4 parcel
Date: Saturday, February 11, 2023 6:13:34 PM
Attachments: [Screen Shot 2023-02-11 at 6.03.33 PM.png](#)

Hi,
So sorry, meant to include this also.
Thank you,
Becky



On Feb 11, 2023, at 6:09 PM, Becky Boyle <becky.boyle@gmail.com> wrote:

Dear Sonoma County,

After walking around and talking to people in the surrounding neighborhood of FOR-4. There's a lot of confusion out there. The address of 6090 Van Keppel does not actually exist in terms of signage on Van Keppel, leaving many residents unsure as to where this plot of land is that the county is considering for re-zone. There's currently (per your DEIR) 2 houses on these 2 acres and the proposal reflects Occupancies of 71. From 5 people, to 185. Let me say that again, from 5 people to One Hundred and Eighty Five people. This is a rectangular 2 acre lot with no direct access to Van Keppel. There is a PRIVATE pebble rock/dirt driveway going that direction. There is a lot between FOR-4 and Van Keppel.

Van Keppel (in the stretch between Covey and the first hard left the road takes leading up to this private driveway) is only 16'10" in width. The pebble rock/dirt driveway's width is only 9'6". This is inadequate access for the scope of your proposed project especially when taking into consideration all residents only have Van Keppel as a one way in and out road. There are no shoulders. There are no turn outs. It's road meets grassy/mud ditch/property fence driving.

Enclosing some photos for clarity. I sincerely question that a parcel with no access to the street (an only one way in and out street) could be viable especially given a maximum road width of 16'10" (private driveway width 9'6") when the average construction truck is 102" (aka: 8'5") and lacking access to the lot. How will residents survive, how will the streets that are already suffering from erosion and cracking survive. How will people flee in the event of an all too common evacuation emergency. Those roads are not built to handle the weight load nor the flow that is being proposed. This should not be rezoned. This parcel needs to be excluded from any rezoning.

Sincerely,
Becky Boyle
10825 Canyon Rd.

Forestville, CA

<IMG_4786.jpeg>

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<Screen Shot 2023-02-11 at 5.57.47 PM.png>

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From: [Becky Boyle](#)
To: [PermitSonoma-Housing](#)
Cc: [Eric Gage](#); [Susan Gorin](#); [Pat Gilardi](#); [David Rabbitt](#); [Andrea Krout](#); [district4](#); [district3](#); [district5](#)
Subject: DEIR - Housing Element Update - FOR-6 parcel
Date: Saturday, February 11, 2023 7:56:13 PM

Dear Sonoma County,

I have concerns for the potential residents (health) and the county's pocketbooks (potential lawsuits) with respect to potential building of low, moderate and any housing for that matter that backs into the property facilitating a sewage treatment plant. GI and Sinus disorders in particular are a risk to people in close enough proximity especially as pollutants go airborne. It is worth noting in addition to a safe distance between sewage treatment plant to residents, the allotment for potential future needs changes the treatment plant will have over time. Especially in light of all the many proposals on the table, how is the current plant equipped to handle all the additional toilet flushes from 1,600 people? How many households are currently feeding into that system? Most of us are on septic. Few are on sewer. How will the potential future needs grow and what physical land footprint should be maintained to maintain the plant's needs?

I have concerns about the health and welfare of these potential residents as well as having concerns for the county in terms of optics of having designated low income housing right on top of a sewage treatment plant. What does that say about the very people we're supposed to be helping? I don't love this at all. Quite the contrary.

Respectfully,
Becky Boyle
Forestville, CA

In the scope of 'accidents happen' I am reminded of an event in Contra Costa County in October of 2022: <https://www.sfchronicle.com/bayarea/article/Toxic-levels-of-hydrogen-sulfide-detected-near-17495401.php>

"Public health officials in Contra Costa warned people who live near the Crockett wastewater treatment plant that harmful levels of hydrogen sulfide were emanating from the facility on Friday, causing putrid smell to waft through the air, and potentially causing headaches or nausea. Residents recently began complaining about rotten egg odors that appear linked to an "ongoing operational issue" at the plant on 1801 Dowrelia Road, county health staff said in a notice Friday afternoon. It said that Bay Area Air Quality Management District monitors had found dangerous levels of hydrogen sulfide in the surrounding air. Although a foul smell alone doesn't indicate a public health concern, air monitors detected the chemical at high enough concentrations to cause symptoms, ranging from headaches and stomach aches to sore eyes. The risk of illness increases when people are exposed for longer periods of time, the notice said. It warned residents near the plant to close windows and doors or consider leaving the area, noting that the gas tends to be more concentrated in the afternoon, as temperatures rise. Health officials also recommended carbon air filters and said

anyone with severe symptoms should seek medical treatment. Masks do not provide an effective barrier against hydrogen sulfide, the notice advised."

Additionally, I came across this little blurb from the CDC. It is geared toward employees but does not specify what "around" means in "if you work around treated (class B) biosolids) so it stands to reason as toxins go airborne and into the ground as well, that humans "around" are also at increased risk of materials that can cause disease.

<https://www.cdc.gov/niosh/nioshtic-2/20039436.html>

"During any part of treatment, transport, or application of sewage sludge, you can be exposed to materials that can cause disease. This is true even if you work around treated (class B) biosolids."

...and..

<https://pubmed.ncbi.nlm.nih.gov/30522052/>

Can sewage bacteria be airborne?

Abstract. **Wastewater treatment plants (WWTPs) are major sources of airborne**

bacteria, which could pose health risks to WWTP workers and surrounding residents. In this study, air samples were collected from various treatment facilities of a typical WWTP.

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Feb 1, 2019

From: [Cheryl A Franzini](#)
To: [PermitSonoma](#)
Subject: Remove the two Glen Ellen Parcels from rezoning consideration
Date: Saturday, February 11, 2023 5:22:41 PM

EXTERNAL

Attention: Eric Gage -

This is in reference to Sonoma County Housing Element proposed rezoning of parcels # 054-290-057 and # 054-290-084 (GE-1 and GE-2).

Our downtown Glen Ellen area is 2 - 3 blocks long. Densifying this area is not consistent with the general plan policies regarding Glen Ellen nor is it consistent with the Glen Ellen Development Guidelines. Glen Ellen is not an urban area and is outside the urban growth boundary. There are currently 5 dwelling units on the property now. If rezoning occurs it will increase density on the properties to 16 to 22 units, bringing more cars and people into the area. Also they plan on removing trees which would change the character of our downtown area.

In addition the EIR does not consider the cumulative proposed projects in our area i.e. the development of a minimum of 620 homes proposed for the Sonoma Developmental Center site, or the recent development on the north side of Carquinez in Glen Ellen, or the newly proposed building of 660 units and a hotel across from Hanna Boys Center.

Please remove these two parcels from the rezoning list and help keep the character and charm of our town intact. Thank you for your consideration.

Cheryl Franzini-Pegan & Herb Pegan

(We are long time residents of Glen Ellen and we live in our home year round)

Sent from my iPad

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From: [Francisco Saiz](#)
To: [PermitSonoma-Housing](#); [district5](#); [Leo Chyi](#)
Subject: Housing Element Update
Date: Saturday, February 11, 2023 3:27:06 PM



Mr. Eric Gage
2550 Ventura Ave
Santa Rosa, CA 95403

The need of affordable housing complexes in and around Forestville is always a challenge for Sonoma County to address whether it's Santa Rosa, Sonoma, Windsor or Healdsburg. 'Forestville' presents itself as the "Good Life" setting in a small town setting in a rural country site. I have examined the Housing Site Inventory that satisfies RHNA (Regional Housing Need Allocation) for the Forestville community.

Yes, I am amazed that a possible 635 new dwelling units are being proposed for Forestville that could add 1500+ people into the community with no infrastructure present to handle the population boom.

I presently live in Forestville. I enjoy the small rural community marked with narrow roads and tree lined passageways to modest homes in the area. The homes are all single story structures on small parcels or parcels with acreage. The light pollution is minimal here with no glaring pockets of light that eat away the night. We all pay property taxes to have the "Good Life" in Forestville.

I want to address the Forestville Inventory Sites FOR-1 and FOR-4 identified by Sonoma County Housing Element Update on page 2-14. Both of these sites will bordered Forestville Academy Elementary School. How can school security be maintained for this elementary school with a high density apartment complex so near? Will large metal fences be the barrier that separates the elementary school from apartment complexes? How will the toxins on FOR-1 be handled during construction phase to ensure that the young and old around the site are safe? Where will the access to FOR-1 be created?

FOR-4 site is accessed by a small one lane gravel road that is flooded by any heavy January rains. The entry way to FOR-4 via Van Keppel Road off from Covey Road is a narrow road where all have to stop occasionally to allow a vehicle to proceed safely. This narrow lane to FOR-4 has always had to deal with excess rainwater drainage. This area represents a natural bog and a rainwater catch basin for runoff.

I feel that the Housing Element Update has failed to fully study or provide measures to prevent significant environmental and human harms that will result from the increased dwelling units for Forestville. Allowing this dwelling sprawl to go forward violates decades of open space protection, town-centered growth and sprawl prevention. Forestville has enjoyed its open space.

This many apartment style units will present severe challenges with transit, infrastructures and community services. Traffic alone will be severely impacted if all proposed units are built.

Forestville will be forever change but not for the good of the community. I desire Forestville to be a community where all contribute to the community good. I want to see people paying property taxes that will allow future sensible growth. I do not want to see Forestville become a place for the needy, for the downtrodden or at risk population. Yes, there is a need for low income housing state wide but no hand outs are needed here. Nor do we need apartment complexes higher than two stories here with limited parking. We need sensible growth.

Frank and Norma Saiz 707.710.5966c
7070 Winter Orchard Lane

Forestville, CA 95436

Richard Halgren/Julie Clark
7102 Winter Orchard Lane
Forestville, CA 95436

Gino and Karen Franceschi
7134 Winter Orchard Lane
Forestville, CA. 95436

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Alice Horowitz
P.O. Box 1045
Glen Ellen, CA 9542
oneallicat@gmail.com

Feb. 11, 2023

DELIVERED VIA EMAIL

Please distribute copies of this letter to all concerned County staff & Decision Makers.

RE: Comments on Sonoma County Housing Element Draft EIR, specifically regarding Glen Ellen parcels, # 054-290-057 and # 054-290-084 (GLE-1 and GLE-2)

Dear PRMD Staff:

I am writing to voice my concerns about the Draft EIR for the Sonoma County Housing Element, specifically regarding the two properties referenced above owned by Mr. Marty Winters and located on the corner of Carquinez and Arnold Drive in the heart of downtown Glen Ellen. These parcels were identified as potential sites for upzoning during the “Rezoning Sites for Housing Project” and were included in the Draft EIR. During the Draft EIR public comment period, many people submitted comments with valid concerns regarding the inappropriateness of substantially upzoning these parcels, which are outside of the urban growth boundary in the tiny village of Glen Ellen at an unsignalized intersection.

As a 29-year-resident of downtown Glen Ellen, I have no objection to Mr. Winters improving his properties (they certainly are in great need of improvement)! However, the rezone sites represent a large part of the downtown core (all two blocks of it!) and will dramatically change the core by tripling the existing number of housing units allowed. The Workforce Housing (WH) zone district REQUIRES a minimum number of units (16), so the property owner will have no choice but to overdevelop the property. The proposal is **clearly inconsistent with the intent of**

the Glen Ellen policies established in the General Plan and Glen Ellen Development and Design Guidelines.

Furthermore, the DEIR cumulative impact analysis does not consider two huge projects in close proximity to the proposed rezoning sites in Glen Ellen and Sonoma Valley – the adopted SDC Specific Plan and the Hanna Center housing, hotel, and commercial development a few miles down Arnold Drive. How can it be that these two large-scale developments were apparently NOT considered in the cumulative impact analysis for transportation, land use policy consistency, GHG, visual resources, public services (water, wastewater), or wildfire evacuation and emergency response? How on earth is Arnold Dr. supposed to accommodate so much increased traffic on a daily basis, not to mention during an emergency evacuation?

Please consider:

1. Removing the two Glen Ellen parcels from the rezoning list due to significant impacts identified in the EIR; and/or
2. Assigning an alternative zone district that reduces the number of allowed units on the site and does not require a minimum number of units, as required by the WH zone.

In closing, with the large scale SDC development, it is clear that Glen Ellen and the surrounding semi-rural area (without adequate infrastructure or transit) will be taking on more than its fair share of housing and should not be required to accommodate even more housing that will contribute to the significant and unmitigatable traffic impacts identified for the SDC Specific Plan.

Respectfully,



Alice Horowitz

From: [Deb Votek](#)
To: [PermitSonoma-Housing](#)
Subject: Sonoma County Housing Element proposed rezoning of parcels # 054-290-057 and # 054-290-084 (GE-1 and GE-2).
Date: Saturday, February 11, 2023 10:08:03 AM

EXTERNAL

We respectfully request that you remove proposed rezoning of parcels # 054-290-057 and # 054-290-084 (GE-1 and GE-2). Currently five dwellings exist. Changing the zoning to allow between 16 and up to 22 dwellings violates both the General plan policies regarding Glen Ellen and the Glen Ellen Development Guidelines.

I have been a resident of Glen Ellen for 40 years appreciating the rural character of the town to raise a family. Glen Ellen values our trees and our proximity to Jack London State Park. Glen Ellen is not located near an urban growth area. It is the small, (only two blocks) country feel of our town that invites tourists to enjoy nature and supports the restaurants and inns that provide jobs to residents who live here. Do not destroy our town by approving high density housing that the residents of Glen Ellen reject!

Sincerely,
Joseph & Deborah Votek

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From: [Kate Farrell](#)
To: [PermitSonoma-Housing](#)
Subject: Comments on Sonoma County Housing Element proposed rezoning of parcels # 054-290-057 and # 054-290-084 (GE-1 and GE-2).
Date: Saturday, February 11, 2023 11:59:58 AM

Dear Sir or Madam,

I am writing in regard to the rezoning proposal for two Glen Ellen parcels that are under consideration.

As a county resident who travels up through the Glen Ellen corridor on a frequent basis, and who also lived through the chaos of the recent fires that affected the corridor, it is obvious that increasing housing density in the area is an unsafe and irresponsible idea. Increasing population density in this area puts residents at risk and make efficient evacuation near impossible.

Additionally, the infrastructure to support an increased population density does not exist. Schools, services such as police and fire, existing roads and access to water are already strained to their limits.

Nor does the proposal consider the the cumulative projects in the area, i.e. the development of a minimum of 620 homes proposed for the Sonoma Developmental Center site or the recent development on the north side of Carquinez, or the newly proposed building of 660 units and a hotel across from Hanna Boys Center.

I urge you to deny these proposals for Glen Ellen,

Thank you,

Kate Farrell

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From: [larry loebig](#)
To: [PermitSonoma-Housing](#)
Subject: EIR FOR 2 - sidewalks and infrastructure
Date: Saturday, February 11, 2023 11:45:04 AM

EXTERNAL

The EIR for FOR 2 sites the development of being walking distance to town and services. There are no maintained sidewalks - and very few services available. How will people walking to town with no maintained sidewalks be mitigated and what extra infrastructure will the county need to develop especially for ADA people?

How will the added residents affect The current public transportation system?

Thanks

Larry Loebig
6610 Jim Court
Forestville CA 95436

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From: [larry loebig](#)
To: [PermitSonoma-Housing](#)
Subject: EIR FOR2 Sewer and Water
Date: Saturday, February 11, 2023 11:32:57 AM

EXTERNAL

What impact on the sewer and water in Forestville for the proposed development at FOR2?

How will the adverse effects of added water usage and sewage usage be mitigated?

Thanks

Larry Loebig
6610 Jim Court
Forestville CA 95436

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From: [larry loebig](#)
To: [PermitSonoma-Housing](#)
Subject: Fwd: EIR FOR2 -7. Question re Electrical Infrastructure
Date: Saturday, February 11, 2023 11:58:31 AM

Begin forwarded message:

From: larry loebig <larryloebig@gmail.com>
Subject: EIR FOR2 -7. Question re Electrical Infrastructure
Date: February 11, 2023 at 11:55:58 AM PST
To: PlanningAgency@sonoma-county.org

We have a limited electrical delivery infrastructure in Forestville.

How will the development of sites FOR 2-7 affect the electrical grid infrastructure? How will the capacity be upgraded and be made safer? How will the increase in electrical demand effect the the grid in terms of fire hazard? How will this be mitigated?

Thanks

Larry Loebig
6610 Jim Court
Forestville CA 95436

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From: [larry loebig](#)
To: [PermitSonoma-Housing](#)
Subject: question regarding EIR FOR 2 - 7 and supply of gasoline
Date: Saturday, February 11, 2023 11:39:53 AM

EXTERNAL

How will adding 1600 new residents effect the consumers need for Gasoline? This is a rural area and most people need automobiles to access services.

The Zoning department has just voted to ban any expansion or new construction for commercial gas stations in Sonoma County.

How will the current service station which gets very crowded - serve an additional 1600 new residents?

Thanks

Larry Loebig
6610 Jim Court
Forestville CA 95436

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From: [larry loebig](#)
To: [PermitSonoma-Housing](#)
Subject: Comments regarding EIR and FOR2 and traffic
Date: Saturday, February 11, 2023 11:29:39 AM

EXTERNAL

What impact on the flow traffic will the proposed development at FOR 2 have on the summer traffic or during a fire evacuation? How will this be mitigated?

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From: [Nina Rosen](#)
To: [PermitSonoma-Housing](#)
Subject: Development
Date: Saturday, February 11, 2023 1:47:05 PM

EXTERNAL

Hello-

I live around the corner from your proposed development- please don't do this. A terrible location for it. We don't want or need it.

Respectfully,

A long time Forestville resident,

Nina Rosen

Sent from my iPhone

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From: [rod.oney](#)
To: [PermitSonoma-Housing](#)
Subject: HOUSING ELEMENT UPDATE
Date: Saturday, February 11, 2023 12:05:26 PM

I am happy to voice my total support for AFFORDABLE HOUSING COMPLEXES around downtown Forestville. I have been a resident since 2001 and recently there has been an explosion of AIRBNB type vacation rentals that reduce the ability of Sonoma County families to obtain housing and as such turn these units over to the rich who purchase these homes for wealthy vacationers. Are we more supportive of those visitors to our county than we are to residents who live here 365 days a year? I have vacation rental properties on BOTH sides of my home now and must face the possibilities of loud parties on a nightly basis.

As a middle class resident who struggles to keep up with the rising cost of living in California in general and the San Francisco Bay Area specifically, I support the addition of this housing in Forestville!

Sincerely,

RODNEY E. O'NEAL
8170 PARK AVE
FORESTVILLE, CA 95436

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From: [Rory Pool](#)
To: [PermitSonoma-Housing](#); [Susan Gorin](#)
Subject: Sonoma County Housing Element Comment
Date: Saturday, February 11, 2023 10:45:37 AM

February 11, 2023

From: Rory Pool

13588 Railroad Avenue

Glen Ellen, CA 95442

roryjpool@gmail.com

Re: Comments on Sonoma County Draft Housing Element - Up-zoning downtown Glen Ellen parcels, #054-290 and #054-290-084

To: PRMD

I have lived on Railroad Avenue which is in close proximity to this proposed rezoning since 1975. I have watched as the Carquinez Avenue area has changed from semi-rural to now crowded and bustling because of increased density. To merge onto Arnold Drive from the bottom of Carquinez Avenue is already difficult. To impact this very area with even more parking and traffic is to create urban congestion that negatively affects all.

As an arborist, I object to the removal of so many mature trees to allow this project.

We just had a new, dense housing complex constructed on the north side of Carquinez, and the soon-to-be-developed SDC (Sonoma Developmental Center) housing will pour thousands of cars through this intersection regularly.

Please pump the brakes on the urbanization of my beloved town!

Thank you,

Rory Pool

Glen Ellen

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From: [Stacie Gradney](#)
To: [PermitSonoma-Housing](#)
Subject: West housing
Date: Saturday, February 11, 2023 2:23:49 PM

EXTERNAL

I think your housing development needs to be more realistic. There is so much west county cannot fulfill or offer low income housing, apartments, hud housing... whatever you think it is.

Our rural roads ... the water .. our school. I say school because Analy is the only high school. Can Sebastopol handle that?

Can our elementary schools handle more population in our small towns?? I think not.

Have you considered Windsor by the airport? You can zone away over there. Yea it's by an airport but it's affordable right?

I am sad to hear my friend on van keppel is worried about their view of apple orchards would potentially be apartments It makes me angry. Are you even from here? A local?

Look elsewhere

Develop where developing has already taken over. Chain stores and all. We love and support our mom and pop shops and enjoy our small rural town

Please hear the people

Listen to the people

Save west county


Save forestville

Sent from my iPhone

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From: [Tammy Melton](#)
To: [PermitSonoma-Housing](#)
Subject: NO
Date: Saturday, February 11, 2023 1:22:29 PM


We don't want Low-income Housing in Forestville
Sent from [Mail](#) for Windows

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From: [Vikki Miller](#)
To: [PermitSonoma-Housing](#)
Subject: Hello Eric. Housing Element
Date: Saturday, February 11, 2023 10:31:40 AM

Hello Eric,

It was nice to put a face to your name and thank you so much for attending the recent meeting on Thursday evening regarding The Housing Element!

I very much understand there is a real need to build low income housing in the county including in unincorporated areas and have hopes people will come forward with more appropriate locations. I also understand it is an uphill battle and I applaud your efforts and commitment to get it right.

I have lived on Mirabel Road in Forestville for a decade. There are a number of pressing issues that already continue to go unaddressed here in our small community. I was surprised to read the proposed increase to the population of Forestville is, by far, the highest of any of the proposed sites and would include well over 1600 new residents to our small community. Krista raised a point in the meeting and I too am interested and am asking how Forestville locations were selected as they would have the most impact to our population? Our residents here would be, by far, impacted more than any other location. I also want to speak to some of the resources already lacking in our small community such as water, sewage, accessibility to transportation, lack of sidewalks, poor road quality, insufficient access to police and shopping, traffic congestion. Mirabel Road, like so many others in the Russian River area already presents a real danger. Many roads, including Mirabel Road are in poor condition largely from lack of maintenance and exacerbated by recent storms and constant traffic. On Mirabel Road the conditions are already quite dangerous due to degraded road surface which poses an ongoing threat to bicyclists and pedestrians including our school aged children.

I help moderate a site called Next Door and another ongoing concerns voiced by local residents in Forestville is the drug and alcohol abuse plaguing our neighborhoods.

Of paramount concern for our residents is to have a safe and expedient evacuation plan in the event of a natural disaster. Having experienced this firsthand on several occasions, our ability to safely evacuate during an emergency is a concern of many, if not all, of my neighbors.

Eric, Forestville, as well as some of the other proposed locations, clearly lacks adequate infrastructure to move forward with the planned proposal. The issues I spoke of above, in my humble opinion, should all be addressed prior to the inception of any endeavor of that magnitude, especially here in Forestville due to our already inadequate infrastructure and safety concerns.

It is my understand that residents of a housing project, such as the one proposed in Forestville on Mirabel Road and the 116, would do much better in a more urban setting primarily due to lacking infrastructure and proximity to services.

In closing, I want to thank you for taking time to read this. I am aware many of the concerns have already been noted. I want to voice my concerns as well and wish I had more suggestions for more appropriate locations in this area.

I wish you the best in helping to resolve this in an equitable manner, one that would work for all of us. You can reach me via email or my landline if you have any questions.

My phone number is 707 887-1068.

Best to you,

Vikki Miller

Forestville, CA

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From: [Alanna Spencer](#)
To: [PermitSonoma-Housing](#)
Subject: Please reconsider the low income housing development in Foorestville
Date: Sunday, February 12, 2023 9:50:59 AM

Please reconsider the low income housing development in Forestville. I resources including adequate water, sewage, accessibility to transportation, poor road quality, insufficient access to police and shopping, traffic congestion as well as any potential dangers. Many roads in the Russian River area are in poor condition from lack of maintenance, recent storms, and constant traffic. On Mirabel Road, for example, the conditions are already quite dangerous due to the degraded road surface which poses a threat to bicyclists and pedestrians. Our ability to safely evacuate during an emergency is also of paramount concern.

Alanna Spencer
Resident of Forestville, CA

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From: [Ann Dexheimer](#)
To: [PermitSonoma-Housing; district5; Leo Chyi](#)
Subject: Draft EIR comments: Housing element update
Date: Sunday, February 12, 2023 4:17:59 PM

To Whom It May Concern;

My husband and I found and bought our home in Forestville in 2010, moving here after two years of intense research of housing in Sonoma County for the ideal place for us. We chose Forestville because of its rural charms, getting an unexpected bonus with our friendly neighborhood and town.

I am writing to address the concerns I have with the rezoning of the six lots in Forestville. I tried my best to slog through the 600 page Draft EIR but after several hours, I got no further than page 235, which makes me wonder how many of the county residents who will be impacted by these proposed rezoning changes will have the patience to go even further!

Several concerns bubble to the top.

1. **The focus on unincorporated areas.** It seems to me that there is a huge infrastructure need in all the areas listed in the DEIR that would be more easily met in the urban areas of our county. Additionally, is there a reason that Sebastopol and Windsor were left off the list? Could it be possible that the sites were selected from areas where less pushback would be expected (fewer residents, lower income levels)? It makes no sense.

In my rural neighborhood that is adjacent to FOR-5 and FOR-6 there is a sharp road curve, an increasing number of speeding cars, and no sidewalks. Because I have a disability, profound bilateral hearing loss, I do not walk Packinghouse Road to get downtown or to the West County Trail; I drive to where there is adequate parking and safety for me from the worsening traffic on Packinghouse. The infrastructure for additional housing in my neighborhood does not exist; I cannot imagine how this will be put in place with adding over four hundred and fifty residents to such a small area.

2. **Transportation.** Public transportation is extremely limited in Forestville, which would force individuals to turn to cars to get to work, school, or shopping. This would greatly increase traffic on the Forestville section of 116, a State Scenic Highway.

3. **Limited shopping and services.** Forestville does not have a large grocery store, which forces residents to drive 6 or more miles to the nearest supermarket. Additionally, if these new dwellings are multiple stories, how will that impact our fire department in terms of equipment? If there is another evacuation due to fires or floods, how will this evacuation work with such limited roads and the additional numbers of residents?

4. **Forestville no longer has a high school.** This is another situation where families would have to turn to driving on 116 to take their children to Sebastopol for

school.

5. Forestville provides few employment opportunities. Folks will have to drive out of the local area in order to reach their place of work.

The report is large in scope and I realize that there are many State requirements for the information needed to find sites for additional housing in our county. However, though I am familiar only with the sites that are near our home, I noticed several errors in just the small portion I read. For example, the pictures on page 128 of FOR 5 and FOR 6 (two sites near our home) seem to be incorrect. The pictures were taken from Google Earth so I assume that the people who were hired to compile this report did not actually go to these sites. The impact of rezoning will have a huge impact on almost any area that is selected. These errors make it difficult for me to trust that the information in the report is accurate.

I hope that the Planning Commission and the Board of Supervisors will take my comments into consideration when they meet to discuss the rezoning of the lots in Forestville. Please let me know if you have any questions.

Best regards,

Ann Dexheimer
(Frank Hochman, spouse)
310 Conor Ct.
Forestville, CA
925-922-1229

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From: [Arlene&Geo Irizary](#)
To: [PermitSonoma](#)
Subject: Housing Element: FOR-1, Electro Vector, 6555 Covey Road, Forestville
Date: Sunday, February 12, 2023 11:12:16 AM

EXTERNAL

Dear County Planners;

As a long-time non-profit housing advocate/worker, I support the development of housing for extremely low-income, low-income, medium-income people in Sonoma County. I am shocked by the proposed increase of more than 1500 new residents to Forestville on top of our existing population of about 6,000 people. I do NOT support the proposed housing development, FOR-1, Electro-Vector, 6555 Covey Road, Forestville.

While the Electro-Vector site is close to the downtown & to Forestville School, the site's historic uses are well-documented; old-timers report deaths from cancer of many workers at that site due to toxic exposures. What will it cost to do all of the required assessments/remediation of any toxic or hazardous conditions on this site before development even begins? How will those costs be funded?

Please remove FOR-1, Electro Vector, 6555 Covey Road, Forestville from the Housing Element proposals.

Thank you,
Arlene Irizary
8582 Trenton Road, Forestville, CA 95436
(707) 887-7451 or (707) 304-4216

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From: [Arlene&Geo Irizary](#)
To: [PermitSonoma-Housing](#)
Subject: Housing Element: FOR-4
Date: Sunday, February 12, 2023 8:49:59 AM

EXTERNAL

I support the development of housing for extremely low-income, low-income & moderate income people in Sonoma County. As a long-time resident of Forestville, I do not support the proposed site for 180 new residents, FOR-4, 6090 Van Keppel Road, Forestville for a number of reasons. First, the only current access to this site is a narrow 16' wide road & a private 9'6" drive-way; the property is one-way in/one-way out so is at huge-risk during any type of emergency (wildfire, earthquake, etc.) and will be nearly impossible for larger construction vehicles to access. What costs will be required re widened/improved road access? What infrastructure, if any, exists now for water/sewer hook-ups? What are the costs associated with all of these needed infrastructure improvements? What about increased electric & natural gas access?

Please remove FOR-4, 6090 Van Keppel Road, Forestville from your Housing Element proposals.

Thank you,
Arlene Irizary
8582 Trenton Road, Forestville, CA 95436
(707) 887-7451 or (707) 304-4216

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From: [Brice Dunwoodie](#)
To: [PermitSonoma-Housing](#)
Cc: [Lynda Hopkins](#); [district5](#)
Subject: 6th Cycle Housing Element Update Project - Concerns & Questions
Date: Sunday, February 12, 2023 10:27:05 PM

Greetings,

I would like to raise several concerns about the 6th Cycle Housing Element Update project. But before I articulate my concerns and questions I want to state that I fully support expanding housing and affordable housing in a manner proportional to the current population and in a manner that aligns new housing and the corresponding population growth with existing infrastructure and economic robustness.

The first concern is the distribution of new housing units across the county by ABAG.

As a function of population, 6th cycle Housing Element project is increasing housing statewide by about 9% (1,341,827 new 6th cycle units * 2.86 avg. household size = 3,837,625 more housed population. This is 9.7% of California's 2020 census population.).

The ABAG mandate for Sonoma County is about an 8.4% population increase, using the same approach. The mandate for Santa Rosa is 7.5%. And strangely, the mandate for Unincorporated Sonoma is also about 7.5%. The rural areas of Sonoma are being loaded at the same level as Santa Rosa – this defies common sense and defies basic urban planning best practices

As Lynda Hopkins noted in her February 1, 2023 newsletter, this load on West County is an “outrageous 654% increase over the last planning cycle.”

I understand that Sonoma county is told what to do by the Association of Bay Area Governments (ABAG). But I think it’s the county’s responsibility to appeal these numbers and/or challenge them legally in Sacramento, if the appeals process does not yield satisfaction.

I am aware that Sonoma county has tried (unsuccessfully) to appeal the current allocations, but I want to ask -- given the extremely bizarre current allocations -- why further challenges have not been pursued? Is there no additional recourse available?

My second concern is how Sonoma leaders have distributed the new housing units across Unincorporated Sonoma. As I understand, these are local Sonoma county decisions, not ABAG decisions.

Consider these numbers:

- * California is supposed to create housing for about 9% more people
- * Sonoma county’s target is housing for about 8.4% more people
- * For Unincorporated Sonoma it’s 7.5% more people
- * For Santa Rosa it’s also about 7.5% more people

These percentages all look similar. But in Unincorporated Sonoma and especially West County – where local leaders make decisions – the numbers are quite different:

- * The Guerneville expansion is about 40% more people (616 new units; 403% of the CA average by population)
- * The Graton expansion is about 70% more people (443 new units; 403% of the CA average by population)
- * The Forestville expansion is about 110% more people (1,484 new units; 723% of the CA average by population)

These growth numbers are absurd. None of these towns could possibly expand at these levels without huge infrastructure projects and robust urban planning processes. And then there's the question of urban planning best practices -- overloading rural areas with scant infrastructure and a pattern of natural disasters makes no sense either.

Please explain how the new housing unit allocations were decided upon for these towns and exactly who or what committee was responsible for approving these decisions.

My third concern is related to the selection of sites. I'm sure many residents of Sonoma are providing feedback on the site selections and questioning the wisdom and/or legality of some of these decisions. I won't go into the site level details except in one case. But I would like to have a few general questions answered:

1. How exactly were the Guerneville sites selected?
2. Who approved these sites and what criteria did this person or committee use to approve a site?
3. Some, if not all, of the Guerneville sites are privately owned. Does Sonoma county acquire prior approval from the site owners before approving a site for inclusion in the Housing Element plan?
4. I have personally seen a letter from Sweetwater Springs Water District objecting to the inclusion of site GUE-1 / Parcel # 070-070-040 in the plan. Why is this site still included in the current plan if the owner of the site objects to its inclusion? And will Sonoma county be removing this site from the current plan?

Thank you for your consideration and I look forward to your detailed responses to my questions.

Kind regards,
Brice Dunwoodie

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From: [Celeste Johansson](#)
To: [PermitSonoma-Housing](#)
Subject: Forestville development
Date: Sunday, February 12, 2023 7:01:11 AM

EXTERNAL

Good morning, I wanted to submit my comment regarding the proposed development of 3500 medium density housing units in the county. I am a resident of Forestville, which is the proposed location of some of the units. Forestville is a small commuter town in the Russian river. Our existing community doesn't have much in the way of public transportation or road infrastructure and traffic congestion on our narrower roads already pose hazard to existing town residents during emergency evacuation periods, both for fire and flood.

The county's proposal would disproportionately raise the percentage of residents in Forestville as compared to other towns in the county without making any provision for increasing our fire or medical resources or infrastructure to accommodate those new families, nor is there space to add enough new stores or restaurants to account for such a large population growth to our town, even if ample resources for that kind of development were being provided. Which they are not, under this proposal.

The second largest concern is the toxicity of the proposed sites for the housing development. These sites had previously been rejected by other developers as being too expensive to clean in order to be able to build. Is the county planning to follow those same standards and clean the toxic soil before building houses, or are exemptions being issued to be able to get the projects done, which would mean potentially harmful materials will be allowed to remain at the sites for these new low income residents? We need to make sure that all housing in our town is safe, but no discussion of remediation is involved with this proposal.

I ask that the county address these concerns.

Sincerely,
Celeste Johansson.

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From: [Gay Knight](#)
To: [PermitSonoma-Housing](#)
Subject: Re. Comments against Sonoma County Housing Element proposed rezoning of parcels #054-290-057 and #054-290-084 (GE-1 and GE-2)
Date: Sunday, February 12, 2023 3:13:55 PM

EXTERNAL

I am strongly and respectfully requesting that Sonoma County remove the two Glen Ellen parcels, # 054-290-057 and # 054-290-084, from rezoning consideration.

The proposed rezoning of our rural, unincorporated Glen Ellen community (which has a downtown area consisting of approximately two blocks) to a “high density” classification is completely inappropriate. It would result in the removal of the 5 dwelling units and trees currently on the targeted “rezoning area”. Instead, a minimum of 16 units and a maximum of 22 units would be built. This would be extremely out of proportion and destructive to our small community!

A high density area implies an urban area populated by high-rise buildings with many units, located near job centers and served by dependable public transit. None of these are true of Glen Ellen. There is a clear reason that Glen Ellen has been classified as an unincorporated area, and an incomprehensible change to the classification at this time is definitely not warranted. It would be destructive to our small, connected community.

Please remove the two Glen Ellen parcels from rezoning consideration.

Sincerely,

Grace Knight
Glen Ellen resident

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From: [jeanne beanne](#)
To: [PermitSonoma-Housing](#)
Subject: Permit Sonoma ATTN. Eric Gage
Date: Sunday, February 12, 2023 10:19:31 AM

Dear Mr. Gage,

I oppose the 16-22 unit development on Arnold Drive on parcels numbers 054-290-057 and 054-290-084. There is now not enough parking for the few businesses that already exist. Now cars are forced to park up the hills in our neighborhoods. It is a very small town and would change the character and charm of it. There is already plans to put 620 units in Sonoma Developmental Center which is in the middle of Glen Ellen. There is also a proposal of 660 units and hotel across from Hanna Boys Center.

This density without adequate transportation or near urban growth area or employment does not meet with the general plan policies of Glen Ellen. Please do not rezone our neighborhood and change the charming character of our small town.

Sincerely,

Jeanne Reggio
Glen Ellen resident since 1990

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From: [Joshua Peterson](#)
To: [PermitSonoma-Housing](#)
Subject: Fwd: 14156 Sunset Ave. rezoning
Date: Sunday, February 12, 2023 12:42:58 PM

Distinguished servants of the people, I hope this email finds you all well.

I am writing to express my opposition to any rezoning of the parcel at address 14156 Sunset Ave. in Guerneville (aka GUE-1). The simple fact is that the infrastructure of this neighborhood cannot support the proposed development of a 30-unit structure. The entire area consists of one-lane roads. Adding some 60 more vehicles would make driving in and out difficult, and walking more dangerous than it already is.

The proposed parcel is full of trees. We don't need another Stumptown. Especially considering the recent landslide from this hill, removing a large number of trees could be quite hazardous.

Additional concerns that have yet to be addressed include water, power and sewage. Our energy grid is already strained. During recent storms, power was lost in the neighborhood for over five days.

No one is opposed to "affordable housing" (although I question why all housing isn't "affordable") units being built in the county, but the block of land on Sunset Ave. is not the right place for it. There are several underutilized blocks of land currently owned by the county in the downtown area that would be more appropriate.

The entire proposal smacks of poor (or nonexistent) planning and an absence of common sense. Sonoma County can do better, and its voters demand that it do so.

Cheers~

~Joshua Peterson

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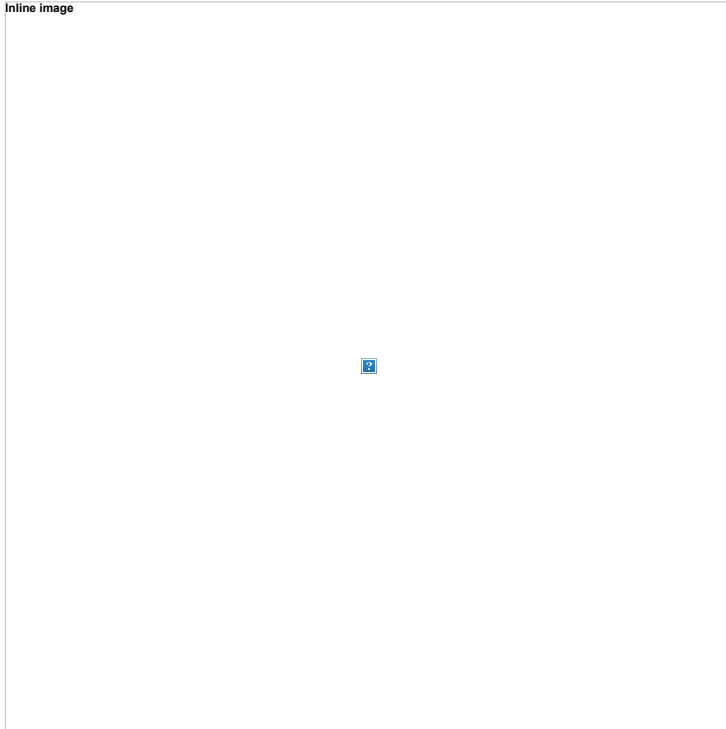
From: [Kelly Joyce](#)
To: [Permi@Sonoma-Housing](#), [Leo Chyi](#), [Susan Gorin](#), [Pat Gilardi@sonoma-county.org](#), [David Rabbitt](#), [Andrea Krout](#), [district4](#), [Jenny Chamberlain](#)
Cc: [Kelly Joyce](#), [Omar](#)
Subject: Comments Housing Element Update DEIR
Date: Sunday, February 12, 2023 8:06:40 PM
Attachments: [1636200635-1636200635.jpg](#)
[IMG_9714.jpeg](#)
[IMG_9701.jpeg](#)
[IMG_9713.jpeg](#)

Dear Planning Commission and Board of Supervisors,

The proposed re-zoning of the lots off Highway 116/Packinghouse Road in Forestville (FOR-3, FOR-5, FOR-6) are in an extremely dangerous area for pedestrians and bicyclist. It borders a 2-lane highway without any sidewalks, bike lanes or crosswalks. It floods multiple times per year, is next to both a sewer and water plant, off a designated scenic highway, difficult to access by the fire department, would damage community character, affect existing nesting and foraging of wildlife, and obstruct views of current residents in an affluent neighborhood across the street on Conor Court.

The proposal for unincorporated Sonoma County is adding 3.2% of population overall but Forestville is being tasked to increase population by 43.6% when it has little to no infrastructure for its current residents. It is proportionally way out line when compared to some of the other towns such as Petaluma, Santa Rosa, and Sonoma where people have better access to everyday items also employment. I would also like to note that there are frequent power outages as the town is remote and having a high density residential area would be a challenge when we have outages that could be days due to trees falling or challenging landscape.

Inline image



Sewer & Water- Setback required.

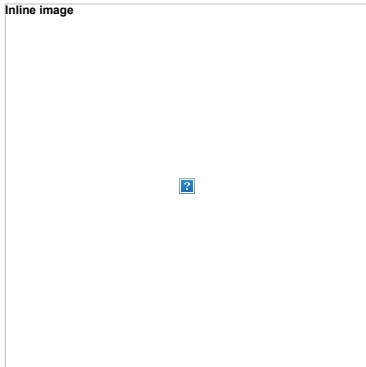
Scenic Corridor--High sight sensitivity. There are currently million dollar homes across the street on Conor Court that have a view of these lots and the ridgeline of trees behind them.

Fire- These lots are next to a high fire zone. Packing House Road is a narrow road. Existing residents find it very difficult to turn onto HWY 116 with existing traffic conditions. In the event of a natural disaster both Packinghouse Road and HWY 116 would become a parking lot not allowing residence to evacuate. Sites are adjacent to high fire zones. I disagree with page 550 stating that emergency response would not be impacted. We can hardly get my daughter across Hwy 116 in the morning for school by car let alone try to leave all at once in the event of a fire.

Community Character: Currently zoned to protect community character and because of prime location, should be a property that can be used to benefit the entire community--not new residences. The children of Forestville have nothing to do, nowhere to go. This would be a perfect location for the requested skate park, a dog park, and community garden.

Lighting: Installation of commercial lighting would negatively affect existing residences who moved to the country to enjoy the nights sky. Photo below shows view of the proposed lots from the residential neighborhood on Conor Court.

Inline image



Site impacts:

- Page 163 4.1 55 Marked High, Moderate and High, no mitigation measures available or 3 and 5 regarding scenic.
- Page 165 AES-3 5, 3, 6 would adversely affect public views, and community aesthetic character--even with mitigation impacts would be significant and unavoidable.

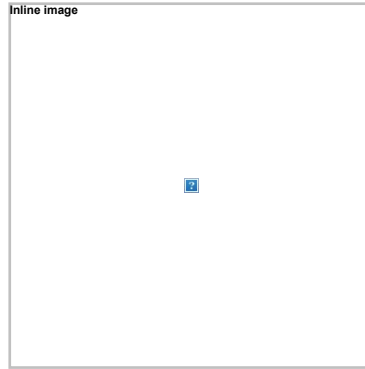
Wildlife corridor: Lots are a safe space from surrounding development to nest and forage, vernal pools are present. I have seen bob cats, deer, owls nesting, fox, coyote and many bird species.

Traffic: Would significantly increase traffic in the event of an emergency making it very difficult to evacuate.

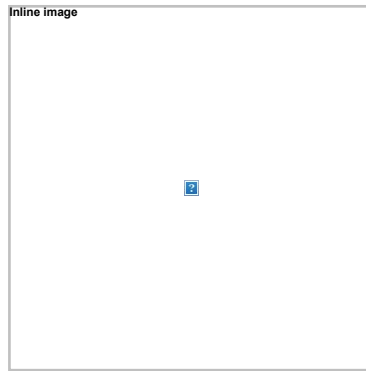
DISAGREE: Page 368 Haz 4--development of these lots would require a police department and new infrastructure for safety of pedestrians.

DISAGREE: Page 550, It WOULD impact emergency response and evacuation plans significantly!

Pedestrian Safety- No sidewalks or bike lanes along HWY 116 or crosswalks to get to elementary school up the street. Proposed lots located on right side of photo.



Flooding- This location floods annually, closing down at least one sometimes two lanes of 116. You can see the cone and flooding sign on the ground.



Thank you,

Omar Percich & Kelly Joyce-Percich
305 Conor Court, Forestville

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From: [Kenneth Smith](#)
To: [PermitSonoma-Housing](#)
Subject: Forestville proposed zoning changes
Date: Sunday, February 12, 2023 8:50:19 AM

Permit Sonoma Housing:

I fear that the high density zoning proposed for the Forestville downtown area could lead to many deaths as this high population of people try to escape a wind-driven fire on our two-lane Highway 116 or the two-lane River Road. However I do support a much lower density zoning for low and very low density housing for our community.

I am a resident of Forestville living at 6636 1st Street.

Ken Smith

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From: hughesroad@yahoo.com
To: [PermitSonoma-Housing](#); [Susan Gorin](#); [Pat Gilardi](#)
Subject: Multi Housing Units in Forestville
Date: Sunday, February 12, 2023 4:29:48 PM


Hello Mr. Gage and Others,

Please receive my opposition to the planned developments proposed for Forestville. I can understand the need for affordable housing within Sonoma County however, this rural community is not fit for several of these planned multi-occupant dwelling's because the Hwy 116 traffic, the lack of services and the unsuitable pedestrian facilities.

Multi housing units are more suited for the urban areas of the county in my opinion. Thank you for your consideration.

Louis Hughes
5950 Hughes Rd,
Forestville

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From: [Lucy Hardcastle](#)
To: [PermitSonoma-Housing](#)
Subject: Issues around rezoning Forestville with punishing numbers of units
Date: Sunday, February 12, 2023 8:36:59 PM

EXTERNAL

Date: February 12, 2023
From: Lucy Hardcastle
President of the Forestville Planning Association (FPA) Board of Directors

To: Eric Gage

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

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

We recognize three things:

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

We'd like you to recognize three things:

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

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

Obstacles to this ambitious plan concern lack of sufficient infrastructure such as roads and the ability to have swift egress when evacuations are called. Highway 116 may sound like a Highway due to its name, but it remains a two-lane country road,

busy with lumbering quarry trucks competing with parents dropping their kids off at school in the middle of town. Adding large or very large apartment complexes along these roads is a sure-fire way to destroy our town's capacity to adapt. Businesses needing to take advantage of the tourist trade for survival would be devastated if and when traffic and parking became a nightmare.

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

FOR-1 Electro Vector Site

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

For- 2 Between Nolan Road and Gusti

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

For-3, 5 and 6

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

For- 4

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

For-7

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

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

inviting affordable housing advocates to come and teach us what could work well for our community.

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

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From: [Mary Anne](#)
To: [Lynda Hopkins](#)
Cc: [PermitSonoma-Housing](#)
Subject: DraftEIR comments: Housing Element Update
Date: Sunday, February 12, 2023 9:06:12 AM

EXTERNAL

I, MaryAnne Gustafson, have lived in the Armstrong Valley for over 43 years at —16410 Melody Lane, Guerneville.

This area is unique in its beauty, lack of accessibility and likelihood of flood, earthquake and fire. It is NOT a place for 588 more residents!

Whoever chose these 3 areas hasn't looked into lack of expensive infrastructure needed, the adverse impact on this neighborhood's tranquility and inconsistency with the goals of the County General Plan, Bay Area 2050 and Housing Element Policy.

There are much better locations available if you look at downtown, or the LOK site. Please don't ruin this lovely family residential, non-dense area for future enjoyment.

Finally correct lack of notification and short response time for us who live here and want to protect this area.

MafryAnne Gustafson
Sent from my iPad

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From: [renee tchirkine](#)
To: [PermitSonoma-Housing](#)
Subject: housing element update
Date: Sunday, February 12, 2023 7:32:52 PM

2/12/2023

planner in charge

dear eric gage;

i am writing in regards to the proposed rezoning of unincorporated areas mandated by the state. i am speaking of forestville - particularly parcel FOR-2. 283 units in this residential neighborhood is inappropriate as well as dangerous. the major road (mirabel) is busy with gravel trucks speeding up and down this two lane road. the bottem of this road has our towns only small market and cars are backing out of the parking stalls into traffic all day long. **since there is no room for sidewalks on either side of the lower mirabel road stretch - how will the county provide sidewalks and areas to cross this potential freeway once development is in place?**

there is no high school, no major markets, care units, police force, or freeway access for at least 10 miles away. the carbon footprint that will be created with this re zoning proposal is appalling to even suggest straining our outer river area with this medium density housing location. **i am asking why arent more of the major density units planned along the 101 corridor?** that is where more major services are available, transit opportunities, as well as appropriate flat, wide open spaces with safer road layouts, easier sewer attainability and police and medical available.

if FOR-2 is rezoned for medium density living - how will the construction process be handled? from june - august we have a huge, mismanaged amount of steelhead beach visitors illegally parking up and down the street from this area. they walk down the middle of mirabel to the river - with no sense of traffic whizzing by them. **near collisions happen thru out the summer months, how will the county protect these tourist on the narrow 2 lane, no sidewalks or crosswalks to russian river less than a mile away?**

lastly, my largest concern is the disproportionate population increase proposed by the county to rezone our town by 635 medium density units. forestville is a population of 4000 residents - this proposal will increase our town by an additional 1652 new residents (conservatively counting)! this is unfair, irresponsible and unsafe influx to the tiny town. **why is the rezoning numbers here in forestville so lopsided compared to all the other area being considered?** i am not opposed to affordable housing - sonoma county needs it desperately! i am asking you to provide development opportunities to house 10% of our population, 200 units (400 people). this is possible if FOR-3, FOR-5, FOR-6 are the ONLY areas slated for medium density. they are owned by the county, walkable to main street, an easy access to hwy 116 and small enough percentage for responsible town growth. we need

affordable housing and this option would be providing our share.

i realize there are some hard decisions ahead. please listen, review and consider our concerns. 3500 units mandated by the state is just a series of numbers for the board - but its our magical west county that is at stake. balancing progress and a delicate ecosystem isnt easy but i trust the sonoma county planning department and our board of supervisors will make the correct responsible choices.

sincerely,

renee tchirkine

8664 marianna drive

forestville, ca 95436

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From: r.grandmaison@comcast.net
To: [PermitSonoma-Housing](#)
Subject: DEIR Objection to GUE-1 Site for 30 Units
Date: Sunday, February 12, 2023 8:47:18 PM

February 12, 2023

Dear Mr. Eric Gage,

I am a local Guerneville resident of over 34 years, who lives across Sunset Avenue from the GUE-1 site. My house is the closest house on Sunset, nearest to the driveway entrance to the site. I am writing in objection to the proposed housing project on the GUE-1 site. I would request that this letter, after having attended a recent Zoom meeting for the public on February 9th, supplement any emails you may have from me that were sent before that meeting.

I am a licensed architect (C22127). I also an educator at Santa Rosa Junior College. I know all too well the urgent need in our community for affordable housing for low-income families and individuals. I'm delighted that SRJC will soon be opening a 350 resident student housing unit at the Santa Rosa campus. I know the constraints on housing, given the wildfires and lack of density in much of our housing communities. However, as an architect, I also know that there are many critical issues regarding the use of the GUE-1 site that simply appear not to have been taken into consideration when putting this property on the list of possible housing sites. I welcome the opportunity to bring some of the urgent ones to light in this email. Before that, I would like to bring to someone's attention an obvious error in the Draft EIR.

There is an obvious error in the photograph showing what purports to be the GUE-1 site in Guerneville. That photo, taken from Google Earth Streetview, is from a location just outside the Sonoma Landworks landscape supply yard on River Road and does not depict the GUE-1 site on Sunset Avenue. Were a photo from the site actually be shown, it would be clear that much of the site is currently occupied by two large water tanks and all the accessory buildings, water treatment equipment, as well as the emergency generator and fuel storage to run that generator in the event of the inevitable power outages we have on this heavily wooded hillside. These water tanks provide potable and fire-fighting water for all of the town of Guerneville- and yet the current, critically needed purpose of the site, seems to have been omitted in the site review within the Draft EIR. The photograph "Figure 4.1-4 Site GUE-1 from River Road, Looking West Past Construction Stockpile" does not contain any portion of the GUE-1 site nor any of the tree canopy on the property, even in the background elements in the photograph, and misrepresents the site.

I've reached out to Sweetwater Springs Water District and they have expressed to me that they have, on several occasions, asked for the site to be removed from the list of viable housing sites as they intend to expand the critical water treatment and storage capacity of the site in the future. Given that the entire town of Guerneville depends on those tanks and water treatment facilities for potable and fire-fighting water sources, it seems like a critical site to preserve- especially in light of the many wildfires we've faced recently. That critical current and future need for water would seem to be reason enough to remove the property from the rezoning list and I am still dismayed that no mention of it appears in any real way within the Draft EIR.

Part of the spirit of providing affordable housing for low-income residents is to allow them to take advantage of public transportation and access to such facilities becomes essential for transportation

to work places that may not be in their town. However, though this site looks close to the local town square with a bus shelter, it is anything but a leisurely walk to it. The elevation at the bottom of Woodland, along Armstrong Woods Road is around 62' above sea level. The elevation of the site, at the location of the existing water tanks, is about 252' above sea level. The horizontal distance is just over 2016 feet from the start of Woodland, along Morningside, up Sunset and then the last leg of the journey up the site driveway. That is an elevational difference of 190 feet, or the height of a 19 story building. In many locations the street slope exceeds a rise to run ratio of 1:8 for lengthy portions of the walk. Even bicyclists typically abandon trying to pedal up the hills and end up walking their bikes up the hill. Moving down the hill is easily accomplished from an exertion standpoint, though fraught with trip hazards, but working back up the hillside will not be an easy matter for many people. I suspect that will mean many of the locals may use their vehicles to drive downtown, to allow them to drive up the hill at the end of their bus commute after a day of work. I also suspect that many of those proposed residents would also likely drive to the local stores, such as Safeway, to shop after their first attempt at carrying heavy groceries up the equivalent of 19 flights of stairs, as the current local residents mostly do. It will be quite impossible to achieve walking surfaces that meet ADA compliance in spirit even were sidewalks, gutters, and curb transitions be a possibility in the final design. Residents on the hillside already use vehicles to shop in town due to the steep hillside climb when returning. I do not see why future residents would do otherwise and locating housing in such an elevationally challenging location, even with the close proximity to town, would defeat the "walkability" purpose for such a housing project. Those residents who use local transit or work downtown would likely often drive even such a short distance and would not only create more traffic on the narrow hillside roads, but would also eliminate much needed parking spaces in the heart of downtown Guerneville.

The roadways in the area are very narrow in some locations. The pavement along Sunset, just before the entrance to the site, is as narrow as 9'-6" in some areas, with very few widths of pavement reaching anything even near 15'. Steep hillsides are adjacent to such areas on both the upslope and downslope sides of the roads and would require extensive retaining walls to allow for wider streets and sidewalks. Frequently, as in the case of the intersection of Sunset and Morningside, the narrow roadways are often bordered by existing houses or garages which are only a couple of feet from the paved surface. Widening the roadways to allow for two-way traffic and sidewalks would require demolition of existing residences and structures as well as necessitate extensive soil mitigation measures and extensive retaining wall systems that would be out of character with the neighborhood.

When driving on Sunset, Morningside, Palo Alto, and Woodland, it often becomes necessary for downhill moving vehicles to reverse up the hill to allow for oncoming uphill moving vehicles to pass. This means the driver backing up must also negotiate narrow curved roads until an intersection of a wider area allows for pulling off of the pavement onto a shoulder. It's not uncommon to regularly encounter Sweetwater Springs service vehicles on Sunset, requiring that reverse backup procedure, just before the driveway entrance to the GUE-1 site on Sunset. One of your own committee members attending the February 9th meeting stated that he had to do so for two different vehicles when he drove to visit the site.

Emergency vehicles often have a difficult time navigating through this neighborhood due to the narrow roadways being compounded by people parking at their homes alongside the roads. I'm quite certain the local fire department can attest to having to blare their vehicle horns on many occasions to alert local residents who are blocking their forward movement with parked vehicles.

Delaying the quick response of emergency vehicles can be a life-threatening situation. And, with up to 78 more people on this hillside, the need for emergency vehicles and personnel would certainly be increased.

Larger delivery trucks often cannot navigate the neighborhood and semi-trucks with trailers typically refuse deliveries to the area. I have had to make arrangements with delivery companies to meet them downtown to receive items because of this issue. A large truck and trailer which may try to make the delivery will most certainly obstruct traffic movement for access or egress from the hillside by other vehicles. This will be a problem for congestion in the future should drivers not be aware of the roadway conditions before proceeding up the hill, but could also be detrimental to emergency vehicle access and egress from the hillside in the event of mandatory evacuations.

Due to the somewhat brittle nature of redwood limbs, it's not uncommon to have power and data transmission problems in the area during storms or wind events. On January 4th of this year, during a weather event, the entire area of Guerneville was without power for a couple of days. My house and 135 homes on this hillside neighborhood were without power for 5 days. A tree from the uphill side of the roadway took down the power lines directly in front of my house and left all of us without power for those five days. Putting another 30 homes in an area that suffers from this potential problem isn't a good strategy for people heavily dependent on reliable power grids and communication lines. Those downed limbs and branches also cause road blockages and general difficulty for people trying to traverse the already constrained roads.

I hope for the above reasons, and the reasonable voices of other neighbors who object to this proposed location, presents a clear and obvious common sense objection to the location of such a project on the GUE-1 site.

I have enjoyed being a resident of Guerneville. Though it has some issues with vacationer traffic in the tourist season and issues with wildfires and flooding, it's still a wonderful place with much charm, natural beauty, and character. I welcome new residents and hope that suitable sites, where residents can use their vehicles, local transit, bikes, or walking to take full advantage of the shopping, beaches, library, churches, parks, and all that Guerneville has to offer, can be found without having to create more problems than they solve. I'm certain the GUE-1 site will not provide more solutions than problems and I therefore object to it.

Sincerely,

Robert Grandmaison
14160 Sunset Avenue
Guerneville, CA 95446

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From: [Roger Peters](#)
To: [PermitSonoma-Housing](#)
Subject: Comment on Housing Element DEIR
Date: Sunday, February 12, 2023 8:31:27 PM

EXTERNAL

Permit Sonoma,

Please include in the record the following comments and questions on the Draft Environmental Impact Report (DEIR) for the Housing Element currently under review.

1. Cumulative Impacts--general. The DEIR at pg 107 of 601 (using download page references) seems to take the position that since this is a broad planning document it is either not necessary, or not possible due to the generalize nature of the document (and thus too speculative) to actually try to assess the cumulative impacts of the housing projects identified. Given that specific sites were identified (e.g., SON 1-3 and Pet 1-4) it would be possible to assess the cumulative impact of surrounding and affected projects that are known, pending or reasonably foreseeable. The DEIR should indicate why it was not possible to take a conventional approach to assessing the cumulative impacts as applied to the specific sites identified. If this programmatic document is not going to be used for tiering or overriding the need for subsequent detailed project review of the sites identified, the DEIR should state that clearly. If it is going to be used for that purpose what is the reason they were not analyzed in detail for foreseeable, known and pending projects?

2. Cumulative Impacts/Year 2040 impacts--specific. For both VMT and intersection LOS the DEIR appears to rely on the July 2020 version of the SCTA travel demand model. (see DEIR appendices p 245 of 545 and 251 of 454). The SCTA travel demand model has not been made available for review, but is incorporated by reference in studies and in the text. Why does the DEIR not have a discussion of the July 2020 and any more recent model runs? At a minimum the list of approved, known or reasonably likely projects that correspond to the areas of the identified projects should be disclosed. So, for example, for the SON projects that bisect Verano Ave the DEIR should disclose whether the SDC and Hanna Boys projects are assumed to be operational in year 2040 and the impacts.

Are the adopted SDC Specific Plan project elements reflected in the SCTA project list for its July 2020 TDM? Is the Hanna Boys Project in the SCTA project list used for this DEIR analysis purposes, either 2040 base or for cumulative impacts? Hanna is listed as a "pipeline" project. See 12/30/22 Apprentices to HCD Review draft dated 12/30/22 at Tables 11 and 12 (pg 347 and 348 of 400). SDC is not mentioned. What assumptions were used for SDC and Hanna development in the DEIR?

3. Transportation and Traffic--why was a segment LOS analysis (vs intersection analysis) not done on the Son 1-3 Verano projects relative to the impacts of SDC and Hanna on Arnold Drive?

4. Population and Housing --Were the SDC and the Hanna Boys Center projects factored in as pipeline projects for purposes of the discussion of population and housing? If not, explain why not?

5. Wastewater Capacity to Serve for SON 1-3 and cumulative capacity--Was there a capacity to serve analysis requested from the SVCS for its 8th street east treatment plant for the cumulative combination of the development of SDC, Hanna Boys Center and Son 1-3 and for year 2040 purposes? If not, why was that not requested? Is there presently adequate capacity at that treatment plant for those combined projects for 2040?

6. PET 1-4 Transportation and Traffic Assessment/VMT #1--Did the DEIR assess any change in the immediate area VMT based on the elimination on the Bodega Market site proposed for housing development? If not, why not?

7. PET1-4 Transportation and Traffic Assessment #2--The DEIR has an intersection LOS for the Bodega Ave-Paula Road "intersection." Why was no intersection analysis done for the Bodega Ave and Cleveland Lane intersection? It seems as likely or more likely that traffic will flow out from and in to the PET 1-2 sites to Petaluma via Cleveland Lane than from Paula Lane. If that was not considered, why was that not considered?

Thank you for considering these questions and comments.

Roger Peters
515 Hoff Road
Kenwood, Ca.

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From: [Ron Redmon](#)
To: [PermitSonoma-Housing](#)
Subject: The proposed apartment complex on Sunset Avenue in Guerneville
Date: Sunday, February 12, 2023 10:27:24 PM

Thank you for taking time to hear from me and the other citizens. I only recently found out about this proposal since I am living in Santa Rosa, displaced by a fire that burned my home in Guerneville, so I was unable to attend the meeting last week.

First let me say how much I appreciate efforts to provide affordable housing in Sonoma County. I see this as a move toward a healthier economy for our county and a more compassionate environment in which to live. Having served as an alternate on the Municipal Advisory Council I have become very familiar with the efforts of the county to address our severe housing crisis.

I am a 40 year veteran Registered Nurse with a subspecialty in Community Health, spending my entire career here in the Lower Russian River. During that time I have been an advocate for the homeless citizens in our community, and have provided a music participation experience every week since 2012 at the Empowerment Center until interrupted by the COVID pandemic. I also have provided food, supplies, and jobs for homeless friends during that time. I have also rented a unit attached to my house during nearly all of my 48 years here, and always to renters on assistance. It's from this perspective that I share my views about the proposed apartment complex.

Building an apartment complex at the proposed site is ill-conceived, mainly due to safety concerns as a result of overcrowding. I can't imagine anyone who has actually been to the site and observed the auto and pedestrian traffic on Woodland during a busy weekend would vote to approve this. All three roads that feed the hill are at least in some places a single lane wide, and have blind curves. The population of the hill has in my estimation nearly tripled since I moved here in 1976. Most of the growth has been from "summer cabins" being converted to year-around residences. Then the foot traffic has increased even more, since there is now a significant number of homes converted back to vacation rentals in the neighborhood now. When a house is used as a vacation rental, its occupancy is far higher than when the houses were used by a single family for their vacations. Since the tourists are not used to narrow roads and no sidewalks, they walk in groups of up to ten even around the blind curves. Adding housing for 78 people would probably DOUBLE auto and pedestrian traffic AGAIN!

An even bigger safety concern is what would happen in the event of a fire or earthquake. The narrow roads are very difficult for fire engines to navigate. My house on Sunset Ave. burned this past May. I'm in a fortunate location since the road branches out to Morningside right at my property, so three engines could get close enough to fight the fire. Farther up Sunset where the apartments are proposed, there is only this ONE ROAD and it is ONE-LANE. The fire department would probably want a dozen engines to fight a fire in a 35 unit apartment complex. It would be a catastrophe, especially when combined with 78 people trying to evacuate. PLEASE VISUALIZE THIS. The residents of this proposed complex would be put at significant risk, as well as those of us who already live there.

I know with most proposals there are those who simply say "not in my backyard". That's not where I'm coming from. I am concerned for both my current neighbors and those who would live in the apartment complex should it be built. There are far safer options; ones that are more like the Fife Creek Apartments and the new ones being built behind the Safeway. If you want some volunteer help to explore options please let me know. I would be happy to help and I have a lot of community-minded neighbors who would help as well.

Please support safer alternatives.

With my sincere thanks, Ron Redmon

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From: sachikow@mindspring.com
To: [PermitSonoma-Housing](#)
Cc: [Susan Gorin](#)
Subject: Fw: Comment on Sonoma Housing Element rezoning Glen Ellen
Date: Sunday, February 12, 2023 6:00:05 PM

February 12, 2023

Re: Comments on Sonoma County Housing element proposed rezoning of parcels, specifically regarding Glen Ellen parcels #054-290-057 & #054-290-084 (GE-1 & GE-2)

To: PRMD Staff

Glen Ellen is a historical small town. Tourists come here to see the old historical area. There are historical buildings on the 2 parcels and it would be sad to destroy this history. People come here to visit Jack London and appreciate the older style. This town has a country character and is not urban.

The vegetation and trees are old and a part of the way our town feels. To rezone and do this project, the trees would be removed and the plants. It would change the beautiful view and be bad for our planet.

I love this place and have lived here almost 50 years.

Please take these two Glen Ellen parcels off the rezoning list.

Thank you,

Sachiko Williams

Glen Ellen

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From: [Sally Olson](#)
To: [PermitSonoma-Housing](#)
Subject: Housing
Date: Sunday, February 12, 2023 1:44:16 PM

The housing proposal for Nolan Road is not well thought out and would be a disaster. It is way too big and right in the back yards of existing residents. Adequate sewage and water is a big concern. Traffic would be a nightmare, and if there were an emergency requiring evacuation, such as a fire, there would be even more congestion. These housing proposals seem to be targeting the small town of Forestville. Please reconsider the housing at this location.

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From: [Soichiro Takahashi](#)
To: [PermitSonoma-Housing](#)
Cc: Maureen.taber@ymail.com; [Susan Gorin](#); [David Rabbitt](#); [Andrea Krout](#); [district4](#); [Jenny Chamberlain](#); [district5](#); [Leo Chyi](#)
Subject: Draft EIR comment: Housing Element Update
Date: Sunday, February 12, 2023 1:56:53 PM

EXTERNAL

Dear Eric Gage and Board of Supervisors:

My family and I are opposed to the proposal to build large housing complexes around the downtown area of Forestville.

Regardless of housing affordability, the increase in population does not suit our community. We are a very small town that values being small and intimate.

We do not desire a local police station, traffic lights, more larger roads, markets, a hospital etc. These things would be needed to support such growth in population size.

And like I said, we appreciate most of all our communities small size and intimacy we share with our current neighbors.

It would be a much better idea, and best use of money, to concentrate such housing structures in the Santa Rosa downtown area where employment is readily available and people can easily get to work even without a vehicle. The real cost of living is not only housing fees, so it is naive to think that simply more affordable housing will equal a good life for those who move here. If you actually care about people, you know Forestville is not the suitable location for such plans.

Please seek locations that already have the proper services and employment available for the people who will be living in the proposed housing complexes. The small town of Forestville is not that location and will never be.

Sincerely,

Soichiro Takahashi
8416 Spring Drive
Forestville, CA 95436

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From: [Laura Hanson](#)
To: [PermitSonoma-Housing](#)
Subject: Proposed Units in Forestville
Date: Sunday, February 12, 2023 12:21:48 PM

EXTERNAL

Mr Gage,

We are very concerned, and oppose the proposed rezoning of several sites in Forestville. Forestville is a small city not only in population but in infrastructure. The majority of our roads are one to two narrow lanes, without sidewalks. The majority of our houses are small and built on small lots with hillsides for backyards. We have limited nearby resources. Adding 1600 people to our community would stretch those resources to the max. Traffic would be hugely impacted, as would our water, and garbage. The construction of these huge buildings would not only fit in with our community, but would be disruptive to traffic flow for many years. We see so many new apartment complexes being built all over Santa Rosa, is there really a need for this kind of housing in rural Forestville ? People move to Forestville to avoid all the urban growth, live out in the redwoods. Large apartment complexes are not what we would like to see in Forestville.

Respectfully

The Hansons
8150 Park Ave
Forestville

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From: [Vesta Copestakes](#)
To: [PermitSonoma-Housing](#)
Subject: HOUSING ELEMENT DEIR comment - Forestville
Date: Sunday, February 12, 2023 11:04:03 PM

HOUSING ELEMENT DEIR comment - Forestville

February 11, 2023

COMMENTS submitted by:

Vesta Copestakes, 9455 Argonne Way, Forestville, CA 95436
707-887-0253 - landline, 707-889-0069 - mobile, vesta@sonic.net - email

Like other Russian River resort communities, Forestville has a history of being affordable for young families because our hills are populated with former summer cabins becoming year-round homes. Many of these cabins have been purchased for Vacation Rentals so are being removed from potential affordable housing. This has contributed to lower student populations at our Forestville School campuses and therefore the consolidation of El Molino High School into Analy High School. ***We welcome more families!***

Our area, and specifically Forestville, has been Blue Collar for generations. **Workforce Housing** is encouraged and welcome by most residents who want our Blue Collar designation to remain into the future. We NEED affordable housing, specifically family-owned housing - rather than rental housing. Many years ago Burbank Housing established the Meadowlark development on Pajaro Lane that has become an asset to our town. Unincorporated communities rely upon committed residents to maintain our home. Renters move on, homeowners stay and invest their time and energy in our community and schools.

Of the parcels submitted to Forestville for our review for potential affordable housing, four stand out as **POSITIVE assets: FOR-1, FOR-3, FOR-5, FOR-6**

FOR-2 and FOR-4 do NOT look like a good fit for affordable housing units. Inadequate road access, sidewalks, crosswalks, and emergency evacuation challenges face both FOR-2 and FOR-4. Infrastructure to make these parcels function well in our community would be excessively expensive. The density proposed for these sites is unrealistic and would damage the character of these neighborhoods. Other residents are commenting on these two sites so I will leave details of why we oppose them to others.

FOR-7 is just a horrible place to suggest people to live next to the gas station and

carwash, but at least it's downtown with existing infrastructure. The added traffic to the intersection of Mirabe/116 might force the county to take another look at the roundabout design from many years ago. Add intersection improvement cost to FOR-2 and FOR-7.

FOR-1, FOR-3, FOR-5, FOR-6

FOR-1 is included in Alternatives 1 & 2 but has been removed from consideration in Alternative 3, BUT it is a PRIME LOCATION for Senior and Family Housing. Since Electro Vector closed this plant, the building has become increasingly dangerous and an eyesore in our community. Placed next to the elementary school and right downtown, it has the potential to give residents an affordable place to live where they can walk to school, downtown businesses, our public parks, and churches. Most of the infrastructure needed for this property is nearby and/or in process and therefore more affordable.

Mitigating the environmental hazards of this former power supply manufacturing facility is its greatest challenge. Other communities have established housing on similarly challenged properties by covering the impacted earth with concrete parking - some have added housing above parking as a way of separating residences from any contamination. No matter what method is used for mitigating hazards on this property, development of this land would be welcomed as a major asset to our schools and vast improvement of our downtown.

FOR-3, FOR-5, FOR-6 are in close proximity to each other and have access into downtown via Forestville Street as well as Hwy 116. Two of these properties are county-owned and are being considered as the location for an Emergency Services Center. Being close to our elementary school and downtown is an asset for families and seniors. Again, infrastructure is nearby.

Our community is trying to incorporate a skatepark near downtown (<https://www.forestvilleskatespot.com/>) and it has been suggested that this property is a prime location for that park. If there needs to be a separator to keep housing a designated distance from the sewage treatment plant, we are suggesting that our skatepark and Emergency Services Center be that separator. There are grants available for our skatepark if we have a location, so we are anxious for this to happen. Family housing close to our school and skatepark would be a welcome addition to our town.

Forestville needs affordable housing

As the Planning Commission moves forward with this process, please consider that Forestville needs affordable housing for young families and low-wage workers who serve our rock quarries and hospitality industry that dominates the Russian River. Our schools need more students in order to continue to serve families. This could be a win/win for us.

What is important to us is WHERE that housing is constructed. By keeping housing focussed near our downtown where Sonoma County Public Infrastructure has plans in the works for sidewalks between Mirabel Road and Covey Road along Front Street/Hwy 116, most of the infrastructure needed to support this new housing is either established or in-process. This infrastructure improvement is already funded so should help keep developing properties in our downtown more affordable than in outlying parcels that require new infrastructure.

Please consider these suggestions as you make plans for the future of Forestville.

THANK YOU,

Vesta Copestakes, *resident since 1990*

Vesta Copestakes
9455 Argonne Way, Forestville, CA 95436
vesta@sonic.net
707-887-0253 landline
707-889-0069 cell

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From: [Vikki Miller](#)
To: [PermitSonoma-Housing](#)
Subject: Attn Eric Gage
Date: Sunday, February 12, 2023 6:06:19 AM

Hello Eric,

I submitted the previous email/letter to you prematurely and apologize for some of my uninformed comments/questions as I had not read through the DEIR and came into the process late. I now realize many of the locations were chosen because landowners submitted them back in 2019 as possible housing sites.

Additionally, It is my understanding the sewer and water system, despite the issues some residents in Forestville continue to experience has purportedly been adequately addressed.

The DEIR is lengthy and complex and a lot to get through. My focus is to go through the specific properties to be more specific and submit informed comments and suggestions about the best possible location.

Thanks for bearing with me Eric. One last email to follow.

Best to you,
Vikki Miller

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February 12, 2023

To: Eric Gage
Permit Sonoma

From: William McAfee
16427 Melody Lane
Guerneville, Ca. 95446

RE: Proposed Zoning change and development plans for the six properties listed below:

GUE-1 14156 Sunset Avenue 070-070-040 Guerneville
GUE-2 16450 Laughlin Road 069-270-002 Guerneville
GUE-3 16500 Cutten Court 069-280-043 Guerneville
GUE-4 16050 Laughlin Road 069-230-007 Guerneville
GUE-5 16451 River Road 071-180-014 Guerneville
GUE-6 17081 CA-116 071-200-003 Guerneville

The choice of these properties for the proposed use represents an example of the worst possible choices that I can imagine.

In the case of GUE 1-4, these sites are located on narrow roads that would require significant widening. This, along with other infrastructure upgrades would cause significant disruption to the residents of the neighborhoods. Additionally, the cost of these upgrades would be staggering. Besides road widening, there would be an increased demand for water which is crucial during a drought cycle. Sewage treatment capacity may also need to be increased.

These neighborhoods feature Redwood and other trees which would have to be removed which along with the increased population of the additional housing would ruin the character and ambiance of these peaceful rural communities.

The property on which I reside borders GUE 1 and 4. Twice in the last 4 years, our neighborhood has been forced to evacuate because of wildfires. During those evacuations, the flow of traffic on River Road and HWY 116 slowed to a crawl. We could conceivably be trapped in our homes because of increased population on Cutten and Laughlin rds. In the winter, the Russian River could flood causing more people to be unable to travel to where they need to go.

I wholeheartedly and without reservation oppose the use of GUE 1-6 for the proposed changes in the DEIR.

Sincerely,
William McAfee

From: [Aron Dornstreich](#)
To: [PermitSonoma-Housing](#); [Susan Gorin](#); [David Rabbitt](#); [district4](#); [district5](#)
Subject: Re: Forestville Housing Element Update: Protest Against Rezoning
Date: Monday, February 13, 2023 3:28:11 PM

Dear Mr. Gage, Supervisors Gorin, Rabbitt, Gore, and Hopkins:

I was born and raised in Forestville and went through Kindergarten-12th grade in our beloved town. We own family homes and have re-invested into a another home to move my father-in-law into and an investment property that we rent to a lovely family.

We are sickened by the proposal to fast-track the rezoning of Forestville in order to develop multiple apartment complexes in our small town! I write in STRONG protest to Sonoma County Planning Commission's proposed plan. Forestville unquestionably cannot withstand an influx of 1600+ new residents (and their vehicles) and it is frightening for all of us who call Forestville home to imagine the detrimental impact on our town.

We understand there is a state mandate to build affordable housing and want to know why is the county targeting unincorporated areas? And why on such an unreasonable scale?

Forestville has been my family's chosen home for fifty years because it was affordable, quiet, beautiful, and a safe. There also was space. Land surrounds our homes and we cherish that space. We have sacrificed many of the suburban or urban conveniences to enjoy this space and lower density community. If we wanted the convenience that surrounds higher density living perhaps we would have chosen to relocate to Windsor or Santa Rosa. Both wonderful locations but they are different choices than Forestville!

A town the size of Forestville is not equipped with the infrastructure to withstand such rapid population growth.

Specifically, in relation to **6250 Forestville Street**, I am writing to ask

- How will sewer and water be provided for?
- How will our modest, two-lane roads account for the increase in traffic?
- How will the State support the schools so that they can teach all of the new school-age children?
- How will law enforcement manage the commensurate increase in crime that inevitably comes with a new population?
- When the town has to evacuate for fire or flooding, how will our narrow roads manage the evacuation in a safe manner?

Affordable housing is a State-Wide issue but pushing multiple high-density units into a very small town is not the answer! The health and safety of every current resident of Forestville is at stake. None of the SEVEN proposed complexes can be allowed to move forward as they are extreme in size and numerosity. The construction of such units will, without doubt, **destroy Forestville.**

We are disappointed with the incongruent nature of these plans into such a small hamlet that historically has not supported any similar projects. We invite you to consider the development of our County more thoughtfully!

Sincerely,

Aaron Dornstreich
aedornstreich@gmail.com

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From: [Aron Dornstreich](#)
To: [PermitSonoma-Housing](#); [Susan Gorin](#); [David Rabbitt](#); [district4](#); [district5](#)
Subject: Forestville Housing Element Update: Protest Against Rezoning
Date: Monday, February 13, 2023 3:21:51 PM



Dear Mr. Gage, Supervisors Gorin, Rabbitt, Gore, and Hopkins:

I was born and raised in Forestville and went through Kindergarten-12th grade in our beloved town. We own family homes and have re-invested into a another home to move my father-in-law into and an investment property that we rent to a lovely family

We are sickened by the proposal to fast-track the rezoning of Forestville in order to develop multiple apartment complexes in our small town! I write in STRONG protest to Sonoma County Planning Commission's proposed plan. Forestville unquestionably cannot withstand an influx of 1600+ new residents (and their vehicles) and it is frightening for all of us who call Forestville home to imagine the detrimental impact on our town.

We understand there is a state mandate to build affordable housing and want to know why is the county targeting unincorporated areas? And why on such an unreasonable scale?

Forestville has been my family's chosen home for fifty years because it was affordable, quiet, beautiful, and a safe. There also was space. Land surrounds our homes and we cherish that space. We have sacrificed many of the suburban or urban conveniences to enjoy this space and lower density community. If we wanted the convenience that surrounds higher density living perhaps we would have chosen to relocate to Windsor or Santa Rosa. Both wonderful locations but they are different choices than Forestville!

A town the size of Forestville is not equipped with the infrastructure to withstand such rapid population growth.

Specifically, in relation to **6555 Covey Road**, I am writing to ask:

- How will sewer and water be provided for?
- How will our modest, two-lane roads account for the increase in traffic?
- How will the State support the schools so that they can teach all of the new school-age children?
- How will law enforcement manage the commensurate increase in crime that inevitably comes with a new population?
- When the town has to evacuate for fire or flooding, how will our narrow roads manage the evacuation in a safe manner?

The health and safety of every current resident of Forestville is at stake. None of the SEVEN proposed complexes can be allowed to move forward as they are extreme in size and numerosity. The construction of such units will, without doubt, **destroy Forestville.**

Affordable housing is a State-Wide issue but pushing multiple high-density units into a very small town is not the answer!

We are disappointed with the incongruent nature of these plans into such a small hamlet that historically has not supported any similar projects. We invite you to consider the development of our County more thoughtfully!

Sincerely,

Aaron Dornstreich
aedornstreich@gmail.com

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From: [Aaron Mason](#)
To: [PermitSonoma-Housing](#)
Subject: Housing Element Update / EIR Comment (Forestville)
Date: Monday, February 13, 2023 3:58:45 PM

Hi Eric,

My name is Aaron Mason and I'm a homeowner in Forestville, near some of the parcels being considered for re-zoning. If you don't want to read my whole email, I support allowing medium density housing to be built on all proposed Forestville sites except for FOR-4.

I have a long history with the town. I went to high school at El Molino, and own a house with a small vineyard next to my father, who also lives in downtown Forestville. My wife and two kids love the community we've built. I'm a nurse and I've lived in NY, Honolulu, and years abroad, and I believe there's something special about the town. I'm also a big proponent of adding housing to Forestville. I think that adding more families within walking distance to downtown will help build our community, and our tax base. I also believe in the value of walkable towns and cities. Forestville has been planning an update to the sidewalks and bike lanes throughout downtown, and stretching down both Covey and Mirabel roads, which would be a huge improvement. Having families living within walking distance of schools, public transportation and basic shops helps a place feel alive and connected. That's what I want for myself, the current residents of the town, and for new families we'd be welcoming in. I love some of the recent developments in downtown Graton, and hope for similar things in Forestville.

As such, I think it's a great idea to allow medium density housing on most of the proposed sites. Specifically:

- FOR-3, FOR-5, and FOR-6: These sites seem like a wonderful addition to the town. An easy walk to downtown, transit and schools.
- FOR-1: This would also be an amazing addition to downtown. The old Electro-Vector building has been sitting unused on such a wonderful site, between downtown and the elementary and high schools, that would be a lovely place to live. I would hope that connections to this site would be included in the proposed sidewalk and bike lane updates the town is considering. Seeing new homes instead of a crumbling factory would help justify the town slogan of "The Good Life"
- FOR-2: This is a little farther from downtown, but it's proximity to the youth park, high school, and the proposed sidewalk and bike lane improvements make this a solid site for development.
- FOR-7: Again very close to downtown, this seems like an excellent place for new families. I don't know why it's separated from the others, or why it's considered "Other Inventory", but it seems like a very convenient place to live.

However,

- FOR-4: This is the only parcel I have concerns with. In the interest of full disclosure, it's the closest to my home, but that has very little to do with my concerns. Of all the sites in Forestville, this one alone seems out of place. The parcel is surrounded by single family homes and sits at the end of a tiny dirt driveway. All of the others sit along established roads with an easy walk to downtown. I don't believe there's any plan to develop roads, sidewalks and other infrastructure to support the 71 units that would be permitted, and that much increased foot traffic would not be safe with the current state of Van Keppel Rd, and the small dirt driveway. Ultimately, building this parcel out would not help to build up the heart of downtown Forestville as a charming, walkable community.

Thanks again for hearing my thoughts and concerns. I imagine there are a lot of competing opinions out there but I appreciate you taking the time to listen to mine.

Cheers,
Aaron Mason
5971 Green Lane, Forestville CA

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From: [Amber Gray](#)
To: [PermitSonoma-Housing](#)
Subject: Housing Element DEIR for Forestville
Date: Monday, February 13, 2023 4:36:35 PM

Hello,

We are very concerned about the Housing Element DEIR for Forestville. Suggesting that a town of this size increase its population by 10-50% (depending on which numbers you use and how many sites might actually be developed) is very dangerous for many reasons related to all the suggested sites.

- Our infrastructure just isn't ready for that amount of growth.
- We have very few sidewalks, and the ones we have are in very poor shape. Improvements have been promised repeatedly but not delivered, so we have no hope that this will happen any time soon.
- Our sewer systems already have problems.
- Public transportation in this area is almost non-existent.
- There is very little work in this town, so people moving here would most likely be driving out of town to go to work, and with two-lane roads, that number of people would cause significant traffic problems on our small streets.
- Elementary-age kids would have to be driven to school since walking along these roads is not safe for little ones, and with no high school here, parents of teens would have to drive their kids to/from Sebastopol every day.
- There is already limited parking in downtown Forestville; where are all these new people going to park if they go downtown?

We are not anti-growth but based on the characteristics of this town it seems that a reasonable expectation of growth over the timeline proposed in the DEIR would not exceed 10%.

Please do not destroy this town by blowing it up this way.

Thank you,
Amber and Todd Gray
978 Esther Drive
Forestville, CA 95436

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From: [Aram Sarkissian](#)
To: [PermitSonoma-Housing](#)
Subject: Fw: Housing Element Update-Forestville FOR-2
Date: Monday, February 13, 2023 3:57:25 PM

Dear Permit Sonoma,

Regarding the proposed rezoning of Forestville to include up to **1652** new residents, I'd like to first point out that as of the 2020 census the population of Forestville is **3788** people. Which means you are proposing increasing the size of our town by **50%**. An increase like this would seriously impact traffic, safety, and overall quality of life for our community.

Forestville simply does not have the infrastructure for growth like this, and there are communities with open space much closer to the 101 and public transportation, like Fulton. We have limited access to public transportation which is located on streets without sidewalks, an elementary school that is at capacity, no high school, few sidewalks, no access to medical and social services, limited sewer and water capacity and no police force.

Regarding the rezoning of FOR-2 on Nolan

1. Mirabel Rd. is a very busy and important 45 MPH thoroughfare, how do you propose to facilitate a safe flow of traffic for up to 736 additional cars entering the flow of traffic onto Mirabel Rd? Onto Hwy 116? Onto River Rd?
2. Mirabel Rd only has a sidewalk on one side of the street heading towards downtown. How do you propose to keep the many pedestrians and children from this high density housing safe? On their way to Speers Market? On their way to the River?
3. There is limited and infrequent public transportation in Forestville. Many of the residents, in the proposed high-density housing will surely rely on public transportation which is only accessible down a very busy Mirabel Rd. with no sidewalk and dangerous ditches on either side. What will you do to ensure the safety of the pedestrians and children on their way to the bus stop?
4. What will you do to improve public transportation from Forestville to Santa Rosa and throughout the Russian River?
5. What will you do to improve the local Elementary School, ensuring there are enough teachers to accommodate the influx of children?
6. Our local Sewer and Water system would need to be upgraded to handle the extra residents, what will you do to upgrade and improve our local Sewer and Water system? How is Forestville water district supposed to accommodate 283 extra homes?
7. Forestville doesn't have a police station, or much of a Sheriff's presence, how will you ensure that we receive the extra policing required for an additional 736 residents?
8. How do propose to improve appropriate access to medical and social services for these high density housing residents.

It's a wildly inappropriate proposal for any of the small communities in unincorporated Sonoma County to increase their population by 50% and Forestville seems to be bearing the brunt of the current effort to rezone for affordable housing in Sonoma County. I look forward to a sane and thoughtful process before you decide to rezone such a large swath of Forestville.

Thank you,
Aram Sarkissian
8004 Savio Ln.

Forestville, CA. 95436

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February 13, 2023

To Whom It May Concern:

We are Mary Neuberger and Arch Zellick of 6015 Hughes Rd. in Forestville and are longtime residents. Just recently (12 days ago) we heard about the rezoning plan being pursued by the County. This discovery came by way of a post on the Forestville Next-door website with a summary of the Housing Plan, a link to the Draft Environmental Impact Report (DEIR) and the Planning Commission of Sonoma County. After reviewing the DEIR and attending a Zoom meeting of the Planning Commission on February 2nd we have many concerns regarding the plan for Forestville. One major concern regards the lack of notification to the public. We were informed at the zoom meeting that everyone living within 300 hundred feet of an identified project site had been contacted by mail. We fit that criterion along with many of our neighbors, yet none of us received a notification. We find this to be a violation of the County's responsibility to notify its citizens of such sweeping actions. Referenced below are additional concerns regarding the impact on Forestville as a community and members of our Van Keppel neighborhood, which borders Zone FOR-4.

Forestville as a Community

Six sites have been identified in Forestville for potential rezoning (see Figure 2-6 pg. 89 DEIR). According to Table 2-4 the maximum number of new units in Forestville is 635. New residents would number approximately 1,487 at 2.6 people per unit, cars at 1.5 per unit is 745. Forestville has a population of approximately 6,000 and an addition of 1,487 people represents a 25% increase. No other community in West County is above 10%. Only Santa Rosa has a higher percentage increase in population and that city has far more infrastructure in place to accommodate the increase. Forestville is barely equipped to accommodate the population we have now.

Our concerns listed below do not just affect current residents, but will impact our new residents as well.

- 1) There are only two ways to enter and leave Forestville - River Road and Highway 116. Since moving here, we have been evacuated several times and each time it has been a slow, scary and arduous process. We were fortunate to have been given an early warning and enough time to get out safely. However, as we all know (Tubbs Fire, Paradise...), we may not always have that luxury. Without significant changes to the existing infrastructure, the proposed increase in population density and vehicles puts us all at risk.
- 2) Other than Highway 116, Covey and Mirabel, most of our roads are small with no sidewalks and are not pedestrian friendly. Our Main roads have no stop lights and can

barely handle the traffic we have now. Again, without extensive infrastructure improvements, the safety of current and new members of our community will be compromised.

- 3) Forestville has no police department and is serviced by the Sonoma County Sheriffs department. We have one small fire station and another station several miles away in Graton. We have no medical facilities. In essence we have minimum public services for a community our size and certainly not enough to service 1,487 additional residents.
- 4) Local public transportation consists of one bus line that go through town. Though reliable, the service is minimal. No where near what is required to meet the needs of new residents who may wish to take public transit.
- 5) The downtown area has one gas station, one pharmacy, one small store (Speers), two restaurants, one taqueria, a laundry mat, a hardware store, a bank, a coffee shop, a liquor store and NO HIGH SCHOOL. The closest supermarket is in Sebastopol, a 15-20 minute drive and, since the closure of El Molino, the traffic on 116 to Sebastopol in the morning and afternoon has increased dramatically.
- 6) If units are constructed in our 6 zones at the maximum density per acre the buildings would have to be 2 or 3 story apartment complexes. There are currently only a couple of 2 story buildings in town and all of them are downtown. To place such structures in our residential neighborhoods would be completely out of step with the character of our community.
- 7) I don't see an analysis as to capacity of our sewer and water infrastructure to handle the needs of a maximum build out of our six zones.

Van Keppel Neighborhood (Zone FOR-4)

One of the sites, designated FOR-4, 6090 Van Keppel Rd., is a privately owned 3 acre parcel between Van Keppel Rd. and the soccer field at Forestville School. It is accessed via a gravel driveway easement. The medium density, medium to low-income development would increase the number of units in FOR-4 from approximately 90 to 161 (78%), and increase the neighborhood population from approximately 234 to 418 (79%). At 1.5 cars per unit it is an addition of 90 vehicles (50% more traffic). Considering that the whole of the proposed population is 25% over current numbers, this puts a huge and undue burden on this particular site. Not to mention the fact that Van Keppel is not a through road. One way in, one way out!

Concerns

- 1) With only one way to evacuate the neighborhood in case of fire, the increase of 79% in population and 50% in vehicle traffic is a huge concern. As it stands now, a rushed evacuation with the current population is quite problematic. With the proposed increases in cars and residents, it could be deadly.
- 2) Most homes in our neighborhood are on septic and public water. Do we have the capacity to supply water and sewer to the new units? How would these utilities be brought to the property? It appears that Van Keppel is the only road for access to the FOR-4 property, will the road be expanded? Is the sewer that currently serves some residents on Van Keppel be of sufficient size to accommodate an additional 69 units?
- 3) Zone 4 is bordered by residential properties to the East, West and North with Zone 1 to the Southwest of us. The Zone 1 property is the site of the abandoned Electro-Vector Plant. It is a registered toxic waste site. The regulatory oversight agency for the cleanup of this site is the North Coast Regional Water Quality Control Board. When contacted, we were informed by the agency that the site was still an active case and that they have, "been working hard trying to move this project towards cleanup and eventual closure" since 2008. The elementary school, whose property abuts Zone 1, has test wells around it to monitor the leaching of toxic waste from the site. Zone 4 is not far from Zone 1 and could be negatively impacted by the toxic waste in Zone 1. I saw no ground water contamination review in the EIR. Has that been reviewed?
- 4) There are two schools just to the south of FOR-4. The proximity of ongoing construction to the elementary school subjects the students to noise and airborne construction particulates during the buildout period.
- 5) The only entrance to the property is by an unimproved gravel driveway. This driveway exits Van Keppel at Van Keppel's lowest point as it traverses the neighborhood. There is a creek that drains approximately ½ of the Van Keppel neighborhood and it's exit point is the intersection of Van Keppel and the unpaved road. This area of Van Keppel floods on consistent basis during heavy rains. Without extensive drainage work the development of the FOR-4 would only exacerbate the flooding issue.
- 6) For the nine properties on the Northern and Eastern boundaries of the property, construction of multi-level apartment complexes would be like building a 30 foot wall at our property lines. Our neighbors to the north as the hill slopes upwards would also be affected by the height of such buildings. This type of structure is completely out of

character for our neighborhood and would diminish our right to quiet enjoyment of our property.

We appreciate you taking the time to review our input. We are fully aware of the need for affordable housing in our County. We have adult children, nieces and nephews who are unable to find affordable housing in Sonoma, so are supportive of the cause. But the current plan for Forestville is not the best way to proceed for our community, our neighborhood and for the new residents envisioned in this plan. Stated in the DEIR, zones can be added or deleted by the Board of Supervisors. We respectfully request that zone FOR-4 be removed from consideration for rezoning and the remaining zoning plans for Forestville be amended to better reflect the character of our town, the needs of our current residents, and those of future members of the community.

Respectfully,

Arch Zellick and Mary Neuberger

6015 Hughes Rd.
Forestville Ca. 95436
707-820-1476

From: [audrey kung](#)
To: [PermitSonoma-Housing](#)
Subject: Objection to new housing at 14156 Sunset Ave in Guerneville
Date: Monday, February 13, 2023 4:17:48 PM

Hi there,

I am writing to express my objection to the proposal of 30 new housing units at 14156 Sunset Ave in Guerneville and hope you do not move forward with the permit for the following concerns:

1. Traffic safety of the roads in our neighborhood
2. Lack of water utilities

Traffic safety of the roads in our neighborhood

I'm sure you have all the measurements of Woodland Rd and Sunset Ave, which is the only entrance way to this location. With no side walks, there is barely enough room for a car and pedestrian on the street, let alone two way car traffic. I walk up and down Woodland Dr multiple times a day, and pretty much every time I walk it, I have to jump quickly off the street into bushes to avoid getting hit by a car coming around the blind curvy roads. While driving this road, we constantly have to pull over into the bushes as well and have had many near miss accidents. Adding 78 new residents at this location and increasing the road traffic is just an accident waiting to happen.

Lack of water utilities

With Guerneville being required to add hundreds of new units, it will require major new infrastructure changes for basic utilities like water, sewage and power. The location at 14156 Sunset Ave currently belongs to Sweetwater springs, the main water storage/fire protection of Guerneville. They sent a letter (attached) stating that they intend to use the land for future water storage and expansion. Seeing as there will definitely need to be expansion to support all of the new housing units elsewhere, it makes absolutely no sense to take land away from the water utilities company.

Thank you for your consideration,
Audrey Kung
14021 Woodland Dr, Guerneville

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From: [Barbara DeLonno](#)
To: [PermitSonoma-Housing](#)
Subject: Draft EIR comments: Housing element Update
Date: Monday, February 13, 2023 4:42:50 PM

Dear Mr Eric Gage,

I'm writing you because several days ago I heard about the proposal to rezone 59 areas in Sonoma County to allow more housing density to help achieve the mandated housing goals from the state.

I have comments in general and comments about where I live, in Forestville.

I am disturbed to see some of the new housing in Santa Rosa. For instance, the houses built off of Guerneville Road near Fulton. They are all attached, have no trees, no yard to speak of, and no privacy.

Community Character

I would like to see more affordable housing in Forestville, but not at the expense of the character of our community. It is frustrating that the only way that has been figured out to build "affordable housing" is to cram in twice as many dwellings as the place is zoned for. The county doesn't lose, the developers don't lose, but the community loses.

My husband and I moved here to Forestville with our three children in 1983. We were renting in Occidental and looking for a house. We came here for the affordable housing. It was cheap because it was a small modest house on a small lot. Our house is 967 square feet. The lot is 50' x 85.' Sometimes we were crowded while the kids were growing up, but we worked it out, saved a lot of money and had a nice life by being okay with a small house. We have a little yard, a deck and a little garden space. We have a Douglas fir tree, a fig tree, an apple tree and a cherry tree. What is nice about Forestville is that it's more out in the country than Santa Rosa or Sebastopol, yet it's not too far away. I want more families to have a chance at this good lifestyle. But the kind of housing this housing element proposal would create sounds like it would be the kind with no human habitat; for example no trees and outdoor space for the people. People don't move to Forestville to live in city style housing. There is no city here. The "urban" part of Forestville is about 3 blocks long! We have one gas station and one park. We don't have any stoplights. We don't have movie theaters or many stores. People move here to be closer to nature.

I wonder about the wisdom of trying to move so many people to Forestville. If full buildout were achieved it would raise our community population by 50%. In the rest of the county I have heard the increase is more like 10%. Why is Forestville slated for so much growth? And why so much growth that isn't really good for families? When you put in 20 units per acre, where do the kids play outside? Where can you plant a tree or some tomatoes? My house is on approx. 1/10 of an acre. It's a small lot. This proposal puts two "dwellings" on my lot. Forestville 2, on Nolan Road could get 283 dwellings! It is surrounded by houses with a good amount of land around them. I think the difference between the two would be aesthetically shocking. This would be a good

place to put a normal Forestville neighborhood. (10 units per acre)

Some people will want a place to live where they don't have to keep up a yard. But even if housing is built at greater density without personal outdoor space, I want there to be "human habitat" as part of the housing- some place to be outside, in a garden or a courtyard or on a deck. Our long range planning should take into account people's health and well-being.

Does this proposal really "Provide housing development opportunities throughout the urban areas of the Unincorporated County near jobs, transit, services, and schools?" Are there really many jobs near here? The 20 bus goes through Forestville 10x per day, but it takes 50 minutes to get to Coddington, (a 20 minute drive,) so I think most people who move here will be driving to work.

Water

We have been told year after year to conserve more water. People have saved about as much as they can save. How will there be enough water to support all of this new housing? Does the state mandate housing regardless of water shortage? Could the county make all of these dwellings with graywater systems to help with the water situation?

What about increasing the affordability of this housing by installing solar panels? This could bring the homeowner's costs down.

Thank you for your consideration,

Barbara Delonno
8175 Park Avenue
Forestville CA 95436
jarbarabean@comcast.net

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From: [William Avellar](#)
To: [PermitSonoma-Housing](#)
Cc: [district5](#)
Subject: Housing element Update
Date: Monday, February 13, 2023 4:10:17 PM

With regard to; Forestville Inventory Sites Figure 2-6 6898 Nolan Road AKA; FOR-2 previously known as Van Kepple's Property

In Forestville California, I remember a project that was all set to develop that area several years ago and it was not allowed because there was not enough sewer capacity to handle it.

If there was not capacity for that one area of development we certainly do not have capacity for areas : FOR-1, FOR -2, FOR-3, FOR-4, FOR-5, FOR-6, and FOR-7.

People who live here currently enjoy; small town living, beautiful scenery, knowing their neighbors, and very importantly a low crime rate.

All of these would be jeopardized by these projects.

Sincerely,

Bill Avellar

6856 Lois Lane

Forestville, CA 95436

Sent from [Mail](#) for Windows

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From: [Bob and Lucy Hardcastle](#)
To: [PermitSonoma-Housing](#)
Subject: Rezoning in Forestville
Date: Monday, February 13, 2023 3:17:17 PM

EXTERNAL

A 43.6% increase in a small towns population in order to allocate mandated housing units does not take into consideration the towns ability to support this growth. Our roads are challenged as is. A developer would need to put in a round about at Mirabel and 116 to avoid major traffic slowdowns. The town simply can't handle these numbers. Bob Hardcastle.

Sent from my iPhone

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From: [Bonnie](#)
To: [PermitSonoma-Housing](#)
Subject: Proposed Housing on Sunset Ave
Date: Monday, February 13, 2023 1:38:10 AM

EXTERNAL

We are writing to express our concern about the multi unit housing to be located on Sunset Ave. The narrow one lane roads would present dangerous traffic conditions.
Thank you for your consideration

Bonnie Smith
Gary Digman

Sent from my iPhone

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From: [Brenda Stivers](#)
To: [PermitSonoma-Housing](#)
Subject: opposition to the rezoning of properties
Date: Monday, February 13, 2023 7:07:45 PM

I'm a resident of Cutten Drive and want to voice my concern and strong opposition to the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2-16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

The response that the community and residents are hearing at meetings is not acceptable. We are being told that, for GUE 3 specifically, this property has been previously considered and because nothing happened then, then it's likely that nothing will happen now. I question why this property remains under consideration given all of the obvious issues surrounding it. I can think of at least 8 other viable sites in Guerneville that would be better fits for proposed affordable housing (near Safeway, Ferrell Gas site, large fields off of 116 are just a few examples). It is apparent that very little thought and time went into selecting the Guerneville properties. Perhaps in the future the planning committee can tap into the expertise of long-time residents of Guerneville to identify more viable sites.

There are many specific adverse effects noted in the DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning. Here are a few of my concerns, specifically related to GUE 3.

Infrastructure

Roads

GUE 2 and GUE 3 are accessible via one-lane roads that will need utility upgrades. The needed upgrades and road closures will severely impact the emergency egress for residents. Cutten Drive is a one-lane road that climbs up a ridge and is already dangerous for residents to navigate. There is a large Redwood on Laughlin that cannot be passed by 2-lane traffic. That redwood would need to be removed to widen the road to allow for needed traffic flow. Road work in these areas will need to be addressed before any construction can be considered, as heavy machinery can not safely make it into these areas without causing severe access issues and major disruption to residents.

Sidewalks & Bike Lanes

There are no sidewalks or bike lanes in our rural community. Increasing the foot traffic in these areas without sidewalks will result in many accidents and injuries. It is

already dangerous, especially for summer visitors, who do not understand the intricacies of navigating these roads with small amounts of traffic.

Water and Wastewater

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages. Additionally, the grade of GUE 3 will make it near impossible to add proper sewage to this area without significant development costs.

Health & Safety

The GUE 2,3 and 4 properties are within areas documented as high wildfire danger, flood plains, and earthquake-prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons. We have been evacuated for significant amounts of time in 2018, 2019 and 2020. Most recently, with the rain and wind, we were without power for over 7 days on Cutten Drive.

The nearest hospitals are at least 30 minutes away and our ambulance service is often overextended, especially dealing with the homeless community. Many low-income residents are elderly and it would be irresponsible to house them in an area that is so isolated from reliable emergency health services.

Additionally, Guerneville will need to increase the amount of law enforcement and emergency response given the significant increase in residents. I've seen little discussion or plans surrounding this issue.

Biological Resources

For GUE 3, future development facilitated by the project will impact special status species and their habitat during construction and/or operation. Development on this site would require the removal of redwoods and this meadow is a known habitat for California Quail, California Grey Foxes and Osprey.

GUE 3 is also adjacent to existing agricultural uses, and Mitigation Measure AG-1 would require an agricultural protection buffer for future development.

Visual Assessment

For GUE 3, Site Sensitivity should be high and not moderate and Visual Dominance should be considered Dominant. Old-growth redwoods and valley oak

habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high-density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed." There is no way to develop this property without removing a significant number of trees.

In the DEIR, "Figure 4.1-5 GUE-2 and GUE-3 Looking Westward from Cutten Avenue" is misleading and there should be additional photos of this property to fully show the immense beauty of this valley view - a pillar of the visual character of our community.

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

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

16430 Cutten drive
Guerneville
Brenda C Stivers
(Medicare agent)
Bus # 707-604-7111
stiversinsurance@
live.com

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From: [Bee Cee](#)
To: [PermitSonoma-Housing](#)
Subject: Draft EIR - housing
Date: Monday, February 13, 2023 4:34:18 PM

I live at 7446 Poplar Drive, Forestville, just around the corner from the proposed site FOR-2 at 6898 Nolan Road.

The total proposed increase in population for Forestville is significant: 39% -- greater than any other community in Sonoma. My concerns are that the infrastructure of this small, semi-rural community will need to be changed substantially to accommodate such an increase.

Additionally, my specific concerns about the 700+ increase in residents in FOR-2 are safety-related.

Every time I am about to pull out from Giusti Road or Nolan Road onto Mirabel Road, the main link between 116 and River Road, I have to be extremely watchful because all day long there are large gravel trucks speeding back and forth from the two quarries on 116 to various construction sites up North. This is, of course, in addition to the regular traffic. There are no traffic lights anywhere on Mirabel. And when pulling out from Nolan, there is a large hill to the North, blocking one's view of any fast-moving vehicles heading towards 116. An increase in population and accompanying traffic will result in accidents, unless significant mitigation takes place. And on these back roads (Giusti and Nolan), there are a number of residents who walk their dogs, jog, etc. and there are no sidewalks. Again, increased traffic will result in pedestrian accidents.

***** As a resident of Forestville I am very concerned about the impact of traffic safety that will result in this 39% population increase *****

I also have many questions about sewage, water drainage, fire safety, evacuations, etc. which I'm sure are being detailed by others.

No question that Sonoma County needs increased affordable housing. And no question that Forestville could accommodate some of that increase with modest enhancements of the infrastructure. But the current plan of radical population increase will not only impact the safety of our residents, but will forever change the nature of this community.

I urge you to reconsider both the size and location of these changes.

Thank you,
Burt Cohen
Forestville, CA

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From: [Anne Watson](#)
To: [PermitSonoma-Housing](#)
Subject: Comments on Sonoma County Housing Element proposed rezoning of parcels #054-290-057 and #054-290-084 (GE-1 and GE-2)
Date: Monday, February 13, 2023 11:05:06 AM

Our "downtown" here in Glen Ellen is about two blocks long, not near a job center, doesn't have adequate roads or public transportation, and does not fit the State's definition of an urban growth area. We believe, as former leaders in creating the development guidelines, that this rash proposal for rezoning to increase density was not well-thought out or properly considered for our small town in the long-term. It does not take in consideration the cumulative projects in our area. We oppose approving the environmental Impact report.

Charles and Anne Watson

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From: [Chris Romano](#)
To: [PermitSonoma-Housing](#)
Cc: [Stephen Marchi](#)
Subject: Sonoma County Housing Element
Date: Monday, February 13, 2023 4:41:08 PM

To whom it may concern,

It comes as a disappointment that so many of us have been kept in the dark about the Sonoma County Housing Element, which we have now learned is a regularly scheduled process every 8 years. None of this should have been sprung on us at the last minute, as it has. We feel pretty let down and blindsided that no meaningful community feedback or consultation has taken place.

We own our home and live full time on Sunset Avenue in Guerneville. We love living here and love our community. Like you, we are also supporters of more housing in the broader community. We also support higher density in the downtown district similar to most downtowns in Sonoma County where there are 3 or 4 stories above the street level with easy access to shops, transport and jobs.

We knew nothing about the fact that Sunset Avenue is being considered as a site for rezoning medium density housing until this week when seeing it by chance, buried in a post on Facebook. After speaking to a lot of people in our neighborhood it became clear that none of them knew anything about it either.

We do not support the draft 6th Cycle Sonoma County Housing Element, and wish to register our strong opposition to the inappropriate and disproportionate burden of new housing being proposed for Guerneville. We wish to also specifically note my objection to the inclusion of Sunset Avenue in the Housing Element.

Here are the reasons for our objection:

1.

Lack of meaningful community consultation.

No one in the immediate neighborhoods have been directly notified or properly consulted. We have also not been briefed on why the County thinks these are appropriate sites in Guerneville. There has been an enormous lead time to hold proper community meetings and share draft proposals and justifications with all affected communities. Instead, it

appears only a very small group of people who are involved with the MAC seem to have been part of this process locally. There is no doubt that members of the MAC are lovely, kind and good hearted volunteers, but they aren't properly equipped to represent the views of our community on this matter.

2.

Sweetwater Springs does not support this rezoning.

Sweetwater Springs, the owners of the Sunset Avenue land being proposed, have shared a letter with Permit Sonoma and our neighborhood noting they do not support the inclusion of their land in the Housing Element. A copy of this letter is attached for your reference. They note that their land is important to keep vacant for them to potentially expand their water supply for future generations. This is the main source of water for the town and provides essential fire fighting capacity. It beggars belief that they would not have been consulted when preparing this draft Housing Element.

3.

The proposal places an unreasonable and disproportionate load of new housing on the Guerneville area.

By adding 616 new units and potentially 1762 new residents, you'll be increasing the population of our town by as much as 37%. A disproportionate increase of population by this size and concentration in Guerneville would have an adverse impact on the very people we seek to assist by constructing low income and worker accommodation. There aren't enough jobs in Guerneville to sustain this increase, even in our peak summer tourist season. By contrast, the proposal to increase housing in Santa Rosa is one fifth of the burden on Guerneville on a per capita basis of population.

4.

Lack of appropriate road infrastructure.

Almost all of the sites proposed in Guerneville (with the exception of the site next to Safeway) are serviced by small one lane roads. The Sunset Avenue site is particularly bad as the road is steep, one lane and has a sharp hook turn in the upward direction making it difficult to access. It's precarious to drive along this street now if another car comes in the opposite direction. Adding this development, and the influx of cars it would bring in this location would be dangerous and irresponsible.

5.

Fire and evacuation risk.

As noted above, the Sunset Avenue site is serviced by a small goat track of a road. An increase in population and cars at this site would not be

safe and not only put the lives of people at this development at risk, but potentially many neighbors too. Our ability to evacuate via the small one lane roads servicing our neighborhood would be significantly hindered. The flood risk associated with Armstrong Woods Road is an additional concern that remains unaddressed by this proposal.

6.

Impact on local neighborhood.

The size of this development proposal for Guerneville and Sunset Avenue specifically is significantly out of character with the local neighborhood. There are no other medium density sites nearby - it is surrounded by single homes. The noise both during construction and as a result of nearly doubling the population of our neighborhood will have a significant negative impact. The site is so steep that families with children or pets would also not have yards for recreation. It's hard to imagine how parking will be able to be accommodated at this site either, meaning potentially 78 cars will be parked along the roadside further affecting fire, evacuation safety and local amenity.

Thank you for your consideration of our concerns. We are really hopeful that a more sensible Housing Element can be adopted by Sonoma County and we look forward to your response.

Sincerely

W. Chris Romano
415-637-9345

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From: [Christine Johansson](#)
To: [PermitSonoma-Housing](#)
Subject: Affordable housing plan for West County
Date: Monday, February 13, 2023 11:28:50 AM

My husband and I live in Guerneville and are very supportive of having housing that is affordable for workers. However, there are some major concerns we have about the proposed plan for our area.

1. The primary concern is the fact that our infrastructure does not support a lot of the larger projects. Many of our roads are essentially one lane roads (that are in terrible shape) that have to accommodate 2 lanes of traffic. Also, sewer and water systems are not adequate for the number of houses planned (and flooding is always a concern).
2. Safety is a huge issue. Our narrow, winding roads are in disrepair. Often one road is the only way in and out of an area. If a wildfire required an immediate evacuation, there is no way large numbers of people would be able to get out in time. We live in the Vacation Beach area and even when the summer bridge is up, we know that, in an emergency, if we tried to drive out of here we would die stuck in a line of traffic like the people in Paradise. Adding large numbers of people to areas that cannot safely handle the number of people they already have is dangerous and irresponsible.
3. Guerneville, Monte Rio and Rio Nido have a number of houses that used to be occupied by people who live and work in Sonoma County. This was one of the last affordable areas in the county which is why we were able to afford to buy here. Unfortunately, in the last few years there has been very uneven (or nonexistent) oversight of permitting for short term rentals. It is hard to reconcile this push to build more housing while at the same time watching family homes get taken off the market and turned into AirBnB's. We live in one of the many neighborhoods that has been completely hollowed out by this process. There are dozens of houses on my street that sit vacant half the year because they are short term vacation rentals. I understand that we need to accommodate tourists and some effort has been made to change the system that created this problem, but I would suggest that local government put a complete moratorium on all new short term rentals until we have achieved some of the goals of affordable housing for residents.
4. How much effort has gone into making it easier for people to add ADU's to their property? The permitting process is often a huge, expensive block to people who want to do this so I am wondering if this could be streamlined or incentives could be created to make this process less daunting? Also, septic/sewage issues can be a problem, but I think the county was looking into allowing composting toilets that use newer technology which would be a huge help.
5. Rather than building new, dense housing projects in remote parts of West County, how much research has been done to see if there are existing structures in town that could be renovated? I have lived in many small apartments that were single houses that had been divided into 2-3 living spaces. I can think of a number of empty lots and buildings in Guerneville that might be better suited for creating housing than some of the places that were proposed.

In short, we need to do something about affordable housing, but can we be a little more creative than building large housing projects in a couple locations? Many of us are in favor of doing something to help the problem, but what is being proposed is not tenable given the needs and limitations of our community. I am no fan of endless meetings, but allowing concerned people who live here and know the area a chance to voice their ideas and suggestions is needed before any further steps are taken.

Thank you.

Christine Johansson and Greg Kerlin

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From: [Cynthia Berman](#)
To: [PermitSonoma-Housing](#)
Subject: No New Buildings
Date: Monday, February 13, 2023 9:28:23 AM

EXTERNAL

This is NOT a smart or clever plan!! In fact, it is the polar opposite!!

Here in Guerneville and Forestville we not only DO NOT have the infrastructure to support this plan!! Flooding, fires, and roads abounds.

I can picture the mayhem as too many cars and panicked residents are trying to abide the evacuation order during fire season! No Way Out!!!! Armstrong Woods Rd and River Roads have been transformed into a giant parking lot....this chills me to the bone!!

NO NO NO!!!!!!!!!!

Cynthia Berman, Ph. D

Sent from my iPhone

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From: [Eric Gage](#)
To: [PermitSonoma-Housing](#)
Subject: FW: Draft EIR Comments: Housing Element Update Forestville
Date: Friday, February 17, 2023 12:07:20 PM

From: DAN NORTHERN <dsnorthern@sbcglobal.net>
Sent: Monday, February 13, 2023 3:11 PM
To: Greg Carr <Greg.Carr@sonoma-county.org>
Subject: Draft EIR Comments: Housing Element Update Forestville

To: Planning Commissioner Carr
RE: Draft EIR Comments: Housing Element Update
From: Dan and Sunoma Northern
Date: February 10, 2023

Dear Commissioner Carr,

My name is Dan Northern. My wife Sunoma and I live at 6925 Nolan Road in Forestville where we have been residents, with our family, for 30 years. This letter is in response to the Sonoma County Housing Element Update DEIR.

HCD Guidelines

The Sonoma County Housing Element Update - DEIR fails to sufficiently analyze to what extent individual parcels meet the HCD Guidelines for Low Income Housing.

Housing Element Site Inventory Guidebook Government Code Section 65583.2 - Page 9

HCD Best Practices for selecting sites to accommodate the lower income RHNA: When determining which sites are best suited to accommodate the RHNA for lower income households, the jurisdiction should consider factors such as:

1. Proximity to transit.
2. Access to high performing schools and jobs.
3. Access to amenities, such as parks and services.
4. Access to health care facilities and grocery stores.
5. Locational scoring criteria for Low-income Housing Tax Credit (TCAC) Program funding.
6. Proximity to available infrastructure and utilities. Site Inventory Guidebook Page 10 May 2020
7. Sites that do not require environmental mitigation.

8. Presence of development streamlining processes, environmental exemptions, and other development incentives.

Comment: HCD Site Selection Factors

Forestville currently has 2 SCTA bus routes that serve the community. They each drop off and pick up once per day. Although there are informal bus stops within a reasonable proximity to the proposed developments in Forestville, this can hardly be considered a robust transit system where stops occur every 15 minutes or so. Nor can it be considered a preferred method to travel to and from work, health care or other essential services in other portions of the County.

In regards to access to high performing schools. While “high performing” is not currently a rating system for schools in the State of California, I would assume the Forestville Union Elementary School District would meet this requirement. On the other hand Forestville recently lost its high school, El Molino, forcing students to travel to Sebastopol, Windsor or Santa Rosa to attend school.

While it is difficult to determine what a “high performing job” would actually be, we can evaluate jobs in general in Forestville. For the most part there are none and the few that do exist are mostly minimum wage service jobs. Forestville is not a job center, is not close to a job center and that is not likely to change for one simple reason. There is very little undeveloped commercial or business space left in the town of Forestville. Manufacturing companies, offices and retail locations need employees. These are all things that grow the local economy and help it to thrive. There are only three vacant commercial/industrial zoned lots in Forestville that are contiguous to or within a half mile of the downtown area, that are not already developed. Two of these sites are scheduled to be rezoned, to residential development, under the Housing Element Update, FOR-1 and FOR-6. One additional parcel is available on the south side of HWY116 across from Mirabel Road. This site is not in the Housing Element Update DEIR because it is already zoned for residential mixed use. It is my understanding that it will also be available for affordable housing at some point. If these sites are rezoned the ability to add jobs and essential services, health care, grocery stores, social services will be completely eliminated in the town of Forestville. There is simply no remaining space, unused lots or property, for commercial or business growth and the addition of jobs and services for a growing population. I understand the push by the State of California to convert vacant or unused commercial space or property to residential zoning in order meet its housing needs and it make sense. Forestville is not the place to impose this philosophy.

Forestville has two privately owned parks within ½ mile of the downtown area. These parks are maintained through private donation and fund raisers. Two separate 501c3's own these parks and neither receives public funds for the operation and maintenance and both struggle to find funding under increasing usage.

The only health care facility in Forestville is a dentist office. We have no medical, mental health or urgent care facilities. While the community needs these services where will we find the land to put them? Residents of Forestville travel to Sebastopol, Santa Rosa, Guerneville and beyond to access health related services.

Forestville has one grocery store which is 1.25 miles from the downtown area. It is not safely walkable or bikeable from any of the proposed sites, FOR-1 thru FOR-6. The County is planning to extend the Joe Rodota trail from downtown Forestville to Steelhead Beach. This path will make walking to the grocery store possible but the path will not be ADA compliant or accessible due to very steep grades.

At least some of the proposed sites in Forestville will require environment mitigation such as FOR-1 and FOR-2. FOR-1 has a ground water contamination issue. FOR-2 has a significant storm water runoff issue that effects blue line creeks, biologically diverse areas, flooding of low lying neighborhoods and the potential post development pollution of the Russian River.

Questions:

- The public transportation component of the DEIR does not provide a mitigation for the lack of adequate public transportation in Forestville. What mitigations measures should be included in the EIR that would bring the public transportation element up to practical or usable level for the community and who will pay for it? (HCD Best Practices – Factor 1)
- The DEIR should fully analyze the contamination issue on the FOR-1 site to determine if that sight might actually be useable for housing or Workforce Combining District development. There are “urban legends” about contamination levels at that site that may or may not be true. A combination of housing and commercial space on this site would be beneficial to the community and should be further investigated. What can be done to determine if this site can be mitigated so that it can be safe if developed? (HCD Best Practices – Factor 7)
- The FOR-6 Site is currently zoned industrial. Does it make sense to rezone one of the last parcels available in the town of Forestville for residential use when that site could help the community meet its needs for more jobs and businesses in the future? (HCD Best Practices – Factor 2 & 3, Jobs, Services)
- What additional mitigation measure can be included in the EIR to assure that the two privately owned parks in Forestville don’t fail due the overuse and degradation due to a lack of funding? (HCD Best Practices – Factor 3)

Forestville - Other Site Issues

Comment: Sites FOR-1 thru FOR-6

The DEIR did not sufficiently analyze even the basic issues that could impact the ability to successfully develop Forestville Sites 1-6.

FOR-1 – 6555 Covey Road – APN 083-073-017

- This site is known to have ground water contamination from a previous business. The contaminated water runoff has been tracked to the Forestville Union Elementary School District site. It has been monitored for since 2008 by PES Environmental. PES Environmental provides quarterly reports to the School District. Information relative to contamination at this site is readily available.

For-2 - 6898 Nolan Road – APN 083-120-062

There are several know significant issues with this site.

- Excessive storm water runoff affects blue line creeks, riparian corridors, biological sites, causes home flooding and creek bank erosion before reaching the Russian River unfiltered.
- Traffic safety issues relating to the entrance and exiting of the property from Mirabel Road.
- No crosswalks in the area allowing residents to safely cross Mirabel Road.
- Close proximity to High and Moderate Fire Severity Zones and State Responsibility Lands.
- The addition of over 700 residents and their effect on evacuation plans for the neighborhood.
- Sewer line capacity issues exist between the site and the main sewer line at First Street in downtown Forestville.
- The owner of the property has sent a letter to the County stating that the family has no intention of selling the property and plans to pass it down to future generations has not been sufficiently analyzed.
- The 3 entrance/exit sites are all separate parcels with separate APN's allowing the owner(s) to sell them off separately causing the property to be land locked.

FOR-4 – 6090 Van Keppel Road – APN 083-073-010

- This site is not located directly off Van Keppel Road. The site is land locked and accessed only thru an adjacent property, APN 083-070-009. The adjacent property is not owned by the owner of APN 083-073-010.

FOR-3 - 6220 Highway 116 N – APN 084-020-004 and FOR-5 - 6475 Packing House Road - APN 084-020-003

- The Forestville Skatespot, skateboard park, is planned for either site FOR-3 or FOR-5. In addition, the County is also planning to use a portion of one of these two sites for the storage of emergency disaster supplies. These two programed projects will impact the density of at least one of these sites.
- Both of these sites are within 300' of the Forestville Water District Sewer Treatment Plant. In order to avoid Environmental Justice issues surrounding the placement of low-income housing close to a sewer treatment plant the density on one or both of these projects may need to be reduced.

FOR-6 - 6250 Forestville Street - APN 084-020-011

- This site is currently zoned for industrial development and is one of the last vacant commercial/industrial properties that can be developed as such in the town of

Forestville. Removing rezoning commercial/industrial sites in Forestville will absolutely limit the community's ability to enhance services and create long term job opportunities.

- This site is adjacent to the Forestville Water District Sewer Treatment Plant. In order to avoid Environmental Justice issues surrounding the placement of low-income housing close to a sewer treatment plant the density of the project may need to be reduced.

We should not be dealing with significant and obvious issues that impact the ability build at the densities desired or to build at all on the parcels here if Forestville. In addition while other communities were represented on the Housing Advisory Committee the River, including Forestville, area was not. The unique character of our communities cannot be adequately assessed simply by viewing Sonoma County Active Map or Google Earth. You need local knowledge and local input.

I have heard the theory that if we build more housing units more business and jobs will follow. I challenge you to find a location in Forestville to build additional parks, business, commercial or industrial facilities especially after the Housing Element Update rezoning occurs.

Questions:

- The DEIR must further analyze the Forestville to develop appropriate mitigations measures, recommend reduce densities or consider the abandonment of projects.
- The DEIR should include a matrix that compares and rates each site against the HCD Guidelines above, essential features such as accessibility and their proximity to other known environmental, County Plans, Policies, Goals and Objectives as well as physical factors that might reduce, limit densities or eliminate the site from the rezoning list all together.
- If such a matrix was completed by the HAC it should be included in the EIR.

Forestville – Density Concerns

Comment: Densities

Most of the people we have talked to, in Forestville, are supportive of affordable and low income housing in our community. Their concerns revolve around the availability of services and jobs, infrastructure needs and the densities that are being proposed. If you live in Forestville you have no control over infrastructure, street and road maintenance, safe cross walks, street lighting, bike paths and sidewalks. We have been trying to work with the County to make safety improvements in these areas for years with little progress. One of our biggest hurdles is the fact that State Highway 116 runs right through the middle of our town and Cal Trans is slow and difficult to work with.

Housing Element Site Inventory Guidebook Government Code Section 65583.2 - Page 13

Step 2A: Does the parcel's zoning allow for "at least" the following densities?

- For an incorporated city within a nonmetropolitan county and for a nonmetropolitan county that has a metropolitan area: sites allowing at least 15 units per acre.
- For an unincorporated area in a nonmetropolitan county not included in the first bullet: sites allowing at least 10 units per acre.
- For a suburban jurisdiction: sites allowing at least 20 units per acre.
- For a jurisdiction in a metropolitan county: sites allowing at least 30 units per acre.

Housing Element Site Inventory Guidebook Government Code Section 65583.2 - Page 10

Step 7: Environmental Constraints

...However, local governments will find it beneficial to describe site specific environmental conditions when demonstrating site suitability and realistic buildout capacity of each site, as these types of impediments to building must be considered when determining how many residential units can be developed on the site.

It is hard to believe that the unincorporated area of Sonoma County is considered a suburban jurisdiction under the HCD Guidebook (20 units per acre above). It seems that the unincorporated area of Sonoma County fits the description of “unincorporated area in a nonmetropolitan county”. In any case the density of 20 units per acre in rural Sonoma County is excessive. It appears the only rationale for this density is to achieve the housing unit numbers required by HCD. Maximum Affordable Housing densities in the rural areas of Sonoma County should be reduced to a level that the environment, infrastructure, jobs and services can handle without breaking the community.

Question:

- Page 10, gives the County the ability to look at each site in order to determine the appropriate density, “realistic buildout capacity”. Site specific information should be incorporated into the EIR rather than taking the “one size fits all approach”.

FOR-7 – Mirabel Road/Hwy116

Comments:

This parcel is mentioned in several locations and maps but there does not appear to be any reference to rezoning the property. We know that it belongs to the Robinson Family who own the Rotten Robbie gas station next door and that they have plans to expand the station. This has led to confusion in the community.

Question:

- Should it be removed from the DEIR or information regarding rezoning it be included?

Development facilitated by the proposed project is intended to be dispersed throughout the County to create managed and planned levels of growth in specific areas. As discussed in Section 4.14, *Utilities and Service Systems*, the Rezoning Sites are near mostly developed areas supported by existing infrastructure that would be sufficient to serve the additional housing units. The project would not create or require the construction of new roads or major infrastructure, or directly or indirectly induce unplanned population growth.

This statement is completely false as it relates to the proposed rezoning, infrastructure needs and increased population in Forestville. The proposed rezoning in Forestville will increase the town's population between 25% and 50% depending on the boundaries used. The number of units proposed for Forestville is second only to the unincorporated area around the City of Santa Rosa. All 6 Forestville sites are within ½ mile of downtown, highly concentrated in a small community. The FOR-2 site is the largest proposed development in all of Sonoma County. The DEIR identifies the potential need for a round-a-bout at Mirabel/HWY 116. The FOR-2 site will require significant traffic mitigation infrastructure on Mirabel Road and adjacent side streets. FOR-3, 5 and 6 will require an entrance/exit to State Hwy116 and other significant traffic mitigation infrastructure. We are aware of a sewer pipeline issue that could require replacing 1000' of sewer line running under HWY 116 in order to serve the increase flow from FOR-2. These seem like significant infrastructure improvement.

Question:

- We don't know if Forestville is impacted more than other unincorporated communities but statistically it can certainly be proven. This is especially true when you consider the planned population growth per rezoning, 167 residents, vs the planned population post rezoning 1,652. The EIR should be updated to reflect that Forestville would be impacted by unplanned population growth.
- The EIR should be corrected to reflect what is contained elsewhere in the report and what is easily available from public records or just common sense.

Forestville Schools

DEIR Schools Page 4.15-15

Furthermore, based on the projected decline in enrollment across school districts serving the Rezoning Sites and the estimated 1,145 new school-aged children that would result from development associated with rezoning under implementation of the project, most of the school districts would be able to absorb new and incoming students because the increases in the student population are not greater than the anticipated decreases in enrollment (with the exception of Forestville Elementary and Geyserville Unified School Districts). Therefore, impacts to schools are considered less than significant without mitigation.

Question:

- This seems to leave a question of what the impacts to Forestville Elementary are and why the DEIR considers them less than significant after calling out ... with the exception of Forestville Elementary. There should be an explanation and possibly a mitigation following this statement in regards to Forestville Elementary.

Respectfully Submitted,

Dan and Sunoma Northern
6925 Nolan Road
Forestville, CA 95436
707-536-8991
dsnorthern@sbcglobal.net

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From: [Dane Riley](#)
To: [PermitSonoma-Housing](#)
Cc: [Lynda Hopkins](#)
Subject: Zoning Change to 6898 Nolan Road
Date: Monday, February 13, 2023 1:11:32 PM

To the Sonoma County Planning Commission:

This is in regard to the zoning change to the property surrounded by Giusti Road, Nolan Road, and Mirabel Road. The property being considered for a zoning change is not big enough to park enough cars at one per unit, let alone the two cars most units will have. Giusti Road and Nolan Road are not wide enough to allow parking on both sides of the street, and in some places on either side. This will result in problems for emergency access. This is a fire area, and parking on both sides of the street would not allow fire engines or ambulances to get through.

Forestville has very few jobs, so almost all workers would have to commute. The only public transportation is the bus, and the routes the bus takes results in very long times. Almost everyone would end up commuting by cars, resulting in lots of cars competing for very few spots.

Thank you for your consideration,

Dane Riley

7635 Giusti Rd, Forestville, CA 95436

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DANIEL M. BONTECOU

To whom it may concern,

Am writing to express my deep concerns about the proposed plan to construct 635 new dwelling units in the town of Forestville, CA. As a resident of this community, I believe that this project would have a profound and negative impact on the character, quality of life, and overall health of our town.

First and foremost I would like to express my concern about the proposed expansion leading to an increase of our population by 50%. This level of growth is totally unacceptable, as it will put a strain on our already limited resources including schools, infrastructure, and emergency services. Additionally, such a rapid expansion will have an impact on the town's character. One of the greatest aspects of our town is its "small town charm". With a downtown area of only 3 blocks long and no stop lights, we have very little traffic and the folks of Forestville like it that way. In fact, folks around here are shocked that our government is considering forcing this upon us. You won't find one resident who wants this expansion to occur. I would hope that this fact alone would be argument enough to stop this planned proposal. I believe it is paramount to have the residents of our town be heard regarding this subject and NOT by some random zoom meeting which was unknown by most.

One of my major concerns is the processing of sewage generated by these new dwelling units. With such a large increase in the town's population, it is crucial that proper sewage processing facilities are in place to avoid contamination of the Russian River, which is a source of the drinking water for many residents and also a critical habitat for various species of fish and wildlife. So, if there is a plan to build all of these units, where will this mystery sewage treatment plant be built? The problem is compounded by the fact that this proposal has homes being built in 6 different locations in town. How will the waste be handled?

Another concern is the availability of water. With 635 new dwelling units, the demand for water in the town will significantly increase. I would like to know where the additional water will come from to meet this increased demand. This new development will undoubtedly put a strain on our very limited water resources. How does our government plan to create a source of water where one does not exist?

February 13, 2023

Page 2

In conclusion, I strongly believe that the proposed development of 635 new dwelling units in Forestville would have a profound and negative impact on our community. I urge you to consider the concerns of the residents of Forestville and to reject this proposal.

Thank you for your time and consideration.

Sincerely,

Daniel Bontecou

From: [Dave Gebow](#)
To: [PermitSonoma-Housing](#)
Subject: Draft EIR - housing - Sunset Ave Parcel, Guerneville
Date: Monday, February 13, 2023 4:55:40 PM

EXTERNAL

Hello-

Just wanted chime in on the Draft EIR - Housing Element. I agree that we all need more affordable housing in Sonoma County. I just have some concerns about site GUE-1 or the 14156 Sunset Ave site.

There are certain characteristics of this unique neighborhood that may be odds with the goals of the project.

Density-

- The Highland Hill neighborhood is comprised of all single family houses.
- 30 units and 78 residents sounds awfully large. Maybe half that or even less might be appropriate for the site.
- It's a very quiet neighborhood. I cannot imagine a project of this density maintaining that.

Vehicular Accessibility-

- Woodland Ave, Sunset Ave and actually the entire Highland Hill area is composed of shoulder-less single lane roads that often require us to back up to allow access to oncoming vehicles. I cannot image adding possibly 50-80 or more cars to the neighborhood mix. It would be a nightmare.
- Many residents have an excessive number of vehicles and park illegally and carelessly even so much that the trash trucks have to blast their horns to get people to move their cars. There is a real concern for emergency vehicles being able to get through in these situations. And any evacuations would be challenging.

Pedestrian Accessibility-

- Woodland Ave, Sunset Ave and Palo Alto Rd that all lead to the site are insanely steep roads.
- Any physically challenged/disabled people would find the hike up undoable.

Look at the Burbank development Fife Creek Commons recently built here. That was a site that made sense. And in an appropriate location. Walkable. Accessible. Disabled-friendly. Plenty of parking and the roads to handle the extra cars.

Site GUE-1 is anything but.

Dave Gebow
14140 Buttner Rd
Guerneville, CA 95446

25 year resident of the Highland Hill neighborhood

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From: [D.gold](#)
To: [PermitSonoma-Housing](#)
Subject: Housing element update
Date: Monday, February 13, 2023 4:40:02 PM



Im writing about changing zoning laws in forestville to allow for several large high density house development. I have great concerns on several issues. Water being the first very important issue. Where is this coming from for all these new units. Second traffic mitigation. How would so many residents be able to traverse the smaller roads only creating unmanageable situation in town. 1 new restaurant in town on the 116 has already caused issues during peak times and a new brewery on the way. Is any of that taken into consideration?
Davin Goldstein
9625 CA-116, Forestville, CA 95436

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Comments on DEIR for Forestville re-zoning

1. FOR 4: Significant impact to Community Public Health (specifically fire safety). Significant impact to wetland and riparian habitats. Access to this property is via two lane Van Keppel Road and then a single lane dirt road easement over property 083-073-009. At the point that the single lane dirt road meets Van Keppel Road there is a year-round creek (which currently floods Van Keppel Road during heavy rains). Property 083-073-009 is bisected by this year-round creek and wetland habitats. The existing roadways, Van Keppel and the single lane dirt road already currently infringe on riparian corridor setbacks. Current condition of Van Keppel Road and the single lane dirt road cannot accommodate proper fire evacuation of the proposed 41- 71 units. Any major road work will need to mitigate the significant impact to the year-round creek and riparian corridor habitat.
Significant impact to Public Health if access to the property is via Travis Road. Travis Road is the main and only entry for the Forestville Elementary School. The increase of traffic by the proposed increase of 41- 71 units would be of significant safety concern to the school environment and child safety.
2. FOR 1: Significant public health concern. This property is currently listed by the state of California as contaminated with _____ RB Case Number **INSO901. [HTTPS://ENVIRONMENTAL.NETONLINE.COM](https://environmental.netonline.com)**

Any proposed housing on this site poses significant public health concern to any future residents.

The town of Forestville would be better served by a public parking lot at the location that would cap the contaminated site and provide safe parking for visitors to the downtown area. Additionally a large public parking lot could be used for any emergency services agencies to establish centralized emergency coordination centers during fire or flood events.

3. FOR1, FOR2, FOR3, FOR4, FOR5 FOR6: The county did not allow an expedited process to create a downtown open space park in Forestville on the main corridor of Hwy 116. It has taken 8 years and multiple publicly held local meetings to determine what would best serve the public good of Forestville. Why would intensive housing projects get a pass on meeting all CEQA requirements and full CEQA analysis plus no public hearing to get local input. There cannot be a double standard for accountability especially when the DEIR states that the proposed rezoning if these properties in Forestville could have significant impact on the community and natural environment with no possibility of mitigation.

Visual dominance: There is not a single multistory apartment building in the town of Forestville. Zoning that would create of multi-story apartment buildings would be a drastic and major alternation to the visual aspect of this small rural town and would conflict directly with the town of Forestville's location in a designated a scenic corridor. The existing DEIR states that every site listed for Forestville would be Dominate for site sensitivity rating. This is a significant impact that cannot be mitigated, and county cannot allow for expedited processing to bypass CEQA.

Public safety: There is currently an incomplete network of pedestrian sidewalks in the town of Forestville. The town simply cannot accommodate increased traffic of cars without installing a safe connective network of pedestrian safe corridors though out the entire town.

APPROPRIATE ALTERNATIVE IN REZONING: allow subdivisions with 1\4 acre lots with maximum two-story townhouse duplex units. No apartment buildings. This will still increase the number of people that can be housed in Forestville but will fit into the existing rural residential aesthetics of this small rural town.

From: [Dennis O'Rorke](#)
To: [PermitSonoma-Housing](#)
Cc: [Lloyd and Nhu Le Guccione](#)
Subject: RR HEP Official Comments
Date: Monday, February 13, 2023 11:39:30 AM

EXTERNAL

Decision makers,

Please, no more housing in flood prone areas.
No gentrification housing, period.

Thank you for your time and attention.

Dennis O'Rorke
95462

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From: [Dennis Sharp](#)
To: [PermitSonoma-Housing](#)
Subject: Housing Element update
Date: Monday, February 13, 2023 5:00:07 PM

Re 635 New dwelling units proposed for Forestville.

Proposing such a high percentage increase in the number of housing units in this community is a totally irresponsible proposal. This will put additional strain on schools and required services, and create downtown traffic problems.

Dennis Sharp
9452 Pajaro Lane
Forestville.

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From: [Diana Hindley](#)
To: [PermitSonoma-Housing](#)
Subject: Comments on Sonoma County Housing Element proposed rezoning of parcels # 054-290-057 and # 054-290-084 (GE-1 and GE-2)
Date: Monday, February 13, 2023 1:46:16 PM

EXTERNAL

To Whom It May Concern:

As a 38 year resident of Glen Ellen, I am writing to vehemently oppose the dense rezoning of downtown Glen Ellen, namely **parcels #054-290-057 and #054-290-084 (GE-1 and GE-2)**.

The urbanization of our tiny unincorporated village is unacceptable for these many valid reasons: traffic and safety (the neighboring intersection is already a dangerous crossing for pedestrians, and it is hazardous for cars to enter Arnold Drive from Carquinez St.); noise and pollution--both from construction and increased residents; the imprudent removal of 19 mature carbon sequestering trees (including a mature redwood) from the existing property; the loss of rural character in this small walkable community; the lack of local services, jobs, and adequate public transportation--to name a few--and significantly, this proposal is at odds with the General Plan policies and the Glen Ellen Development Guidelines.

It is ill-advised and will cause irreparable, long term damage.

I strongly urge that these parcels be removed from the county rezoning sites for dense housing.

Sincerely,
Diana Hindley

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From: don@donjackson.com
To: [PermitSonoma-Housing](#)
Subject: Housing element update DEIR
Date: Monday, February 13, 2023 2:56:10 PM

EXTERNAL

Mr. Eric Gage

I am writing to you today to voice my opposition to the proposed mandated housing units in Forestville, Guerneville and surrounding areas DEIR.

I am a 70 year-old, third-generation Sonoma County resident and for the past 33 years I have lived outside of Forestville (on the Guerneville side, off of River Road) and have several issues that I want to address.

- 1) I understand that the state and then ABAG mandated the increase of high-density housing in the bay area counties, including Sonoma County. I also understand that PermitSonoma fought back against the disproportionately high amount of units in Sonoma County rural areas but lost in court. Thanks for the efforts!
- 2) Uncontrolled growth that can harm its host and provides no required function is called cancer in a physical body. This proposal seems to be that for these small communities, and in the case of Forestville, will more than double the downtown population, dramatically changing the culture, personality and functioning of the town in a very negative way.
- 3) No notice! I just learned about these proposals by a friend letting me know, and I heard in a zoom meeting that notice was only required for residents that lived within 300 feet of the proposed development parcels. That would be fine for a unit or two, but this proposal IMPACTS THE ENTIRE COMMUNITY! And notice should have been sent to EVERYONE in the community. As an example, adding 660+ people to Guerneville, will dramatically impact the vehicle traffic on River Road, which can be terrible even now, k and I hate to think of what it would be during summer or times of emergency, such as the common fires and floods and access by medical, police or fire personnel.
- 4) 635 units and 1652 people in downtown Forestville will clog Hwy 116 and make traffic and travelling through town a mess. Where are these people going during the day for work? The YMT (Yearly Miles Travelled) will increase substantially as there is no significant work to be had in downtown Forestville, so this will create additional climate change /Co2 emissions in our small community. And if they all got electric vehicles, consider the peak electrical impact when they are home after work and need to charge their vehicles on the marginal electrical grid currently in place. There have been accidents on River Road, taking out a utility/power pole, causing power outages clear to the coast.
- 5) Where are the kids going to go to school?
- 6) What will be done to upgrade / enhance the local fire department, police (Sheriff), water and sewer systems? Waiting for unspecified grants to come through after the new building are built and occupied seems crazy. Put the infrastructure in BEFORE the units are built.
- 7) Disruption to the community during construction of these major projects. Building would probably be done during the summer for good weather, further adding to the load of tourist traffic and people load.
- 8) Forestville population as of 2023 is 3,255, which is 0.66% of Sonoma County's population of 490,000, so why should Forestville take on 1652 people. which is 51% or the current population! Outrageous! That same number of added people is only).33% of the

population of Santa Rosa, and insignificant amount for a city with significantly more resources and ability to absorb more people.

I appreciate your reading my input, encourage you to find a more viable solution and I look forward to your response.

Regards,

Don Jackson

Forestville, CA

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EIR Comments

Prepared and submitted by Tim and Kathy Dellinger Forestville, CA

February 13, 2023

We are residents of Forestville, CA. Our street address is 135 Nolan Ct. We have reviewed the 600+ page EIR report regarding the rezoning of specific parcels in Sonoma County addressing the state mandates for the addition of housing.

We understand that this is not the forum to criticize the State of CA "mandate". We will however take the liberty to state that we are opposed to it. We believe that rezoning and determination of the numbers and types of homes to be constructed should be the primary and sole responsibility of counties/districts/cities and their citizens. Mandates in terms of "numbers" in exchange for "funding" considerations, as we believe is the case here, should not be permitted. Our comments going forward will focus solely on the EIR Report

Reports like the one we have reviewed are certainly a necessary part of the rezoning process. This one does a better than reasonable job of addressing the what is being considered and provides reasonable alternates to what is required in the mandate. We will limit our comments to the report's analysis and suggested alternatives for Forestville, CA as we do not think it is appropriate for us to comment on areas beyond our own community.

Questions

1. It is not clear how the sites for the Project were chosen. We do not believe this is addressed in this report. **Who are the parties responsible for selecting the sites, and what was the methodology used in the process?** It appears from the information we could find referenced in this report, in particular Association of Bay Area Governments (ABAG) and Regional Housing Needs Allocation (RHNA) Plan, that this was accomplished by select committees which included elected officials. While we did see some representation of Sonoma County cities, we did not see representation for the unincorporated areas of Sonoma County, (which includes the town where we live...Forestville.) **What representation and input did the Forestville community and their District Supervisor have in this process?**
2. The EIR offers alternatives as required by CEQA. **Who will make the choice or selection of the best suited alternative? What input will citizens and their elected officials have?** we have read in the report, *"this Environmental Impact Report (EIR) identifies inventory sites included in the Housing Element; however, the County Board of Supervisors has the authority to remove sites from the Housing Element based on public comment or for other reasons, and the analysis is focused on sites that would be rezoned to allow for higher density housing"*. We have interpreted this as "the County of Sonoma has the final word regarding the selection and use of sites". **Is our interpretation of this statement a correct one?**

EIR Comments

Prepared and submitted by Tim and Kathy Dellinger Forestville, CA

February 13, 2023

3. Table 2-4 shows a housing buildout potential for FOR-2 and FOR-3 as follows:

TAKEN FROM Table 2-4 Housing Unit and Population Buildout Potential for Rezoning Sites

Rezoning Site	Total Allowable Dwelling Units Under Current Designation	Total Allowable Dwelling Units Under Proposed Designation	Change in Total Allowable Dwelling Units (Buildout Potential)	Total Population Under Current Designation ¹	Total Population Under Proposed Designation ¹	Change in Buildout Population Potential
FOR-2	7	283	276	18	736	718
FOR-3	3	33	30	8	86	78

In Alternative 3, FOR-2 and FOR-3 are omitted. Does that mean the Total Allowable Dwelling Units would remain at the current designation of 7 and 3 respectively?

Comments and Input

People choose to live in Forestville for many reasons. One reason that we believe is universal is that Forestville has and does provide a slower pace and peacefulness that comes with the population of a small village residing in low density housing. Our neighborhood is quiet day and night with the exception of occasional daytime noise from a nearby stone quarry and the trucks that transport those quarried materials on Mirabel Road and RT 116 to their destination. Mirabel Road connects the main traffic corridors of River Road and RT 116. RT 116 runs through the village center.

Rezoning that could potentially add 1,652 residents to the existing population of ~3,800 would result in major changes to the current way of life in Forestville, especially as nearly half of those residents would be added to a 14 acre "landlocked" site (FOR-2) located in a low-density residential neighborhood about .5 miles from the village center. This site is framed on 4 sides by Nolan Rd, Mirabel Rd and Giusti Rd. On the inside perimeter there are ~ 25 single family homes occupied by an estimated 100 residents. The majority of lot sizes for these existing homes are between .25 and .6 acres. Most of the structures are single story construction. It appears that most have septic systems and are not connected to the public sewage treatment system. The project proposes adding between 188 to 283 residences on FOR-2's 14-acre parcel. Three parking spaces for each residence and multiple ingress and egress points to the perimeter roads would be required. These conditions point to the construction of multi-story structures, towering above the current small single-story homes on the perimeter. While the report minimizes the impact of this esthetic change, we expect residents on the perimeter and passersby would strongly disagree. We oppose tall buildings in this space and believe it is reasonable to change the report to indicate this is a problem. We do not oppose adding housing that is similar to the current neighborhood standard, character and community feeling. Any addition must consider and address requirements for infrastructure improvement and safety.

Part of the road traffic on the perimeter road is foot traffic.... people walking, running, with pets and family (including) baby strollers. There are no sidewalks on either side of the perimeter roads. People in automobiles are likely to be confronted by both pedestrian traffic and vehicular traffic. The pedestrian

EIR Comments

Prepared and submitted by Tim and Kathy Dellinger Forestville, CA

February 13, 2023

traffic is literally on the perimeter roads. The absence of sidewalks is not mentioned in this report. We expect with a higher population density, there will be more of both types of traffic. We are not sure how sidewalks could be added. The perimeter roads are narrow allowing only adequate room for passing of opposing vehicular traffic.

During our twelve-year residence, we have never seen the perimeter roads used for parking vehicles other than for overflow parking during community picnics held in the "Forestville Youth Park" during the summer. This community park is on Mirabel Road directly across the street from this neighborhood and specifically the 14 acre FOR-2 site. We are assuming that this population of the FOR-2 site will include children. We wonder how they will safely cross this road which is heavily traveled by quarry trucks, grape gondolas, other commercial vehicles and automobile traffic.

Most people who live in Forestville do not work in Forestville. Data shows that the average one-way work commute time for people going to work is 24 minutes. At a speed of 35 MPH, that is ~15 miles. And while there is a small commercial sector in the village center, we venture that many of the employees commute similar distance from and back to their residence. Adding population to a place that does not have jobs to support it makes little sense to us.

The small commercial sector in the town center is comprised mostly of small retail and personal services businesses. Congestion due to lack of parking occurs at times but is currently tolerable. Contiguous sidewalks exist on one side of the street (RT 116) but not the other. Addition of a new and popular restaurant has increased the week end congestion. Another new restaurant is opening in a site vacated during the pandemic just across the street. There is one other vacant building on this same street site that we expect will be occupied in the coming year. The traffic through this commercial sector includes the people shopping or using the retail and personal services offered. We expect this to increase proportionally with population growth. The traffic also includes thru traffic from the towns of Sebastopol and Guerneville. We believe this was picked up in the Fehr and Peers transportation study, but we believe that its impact was underestimated. This traffic includes large truck traffic from the nearby quarry and from grape vineyards during the harvest season. Traffic signaling or road configuration that slows this traffic entering the commercial section does not exist even though it has been a topic of discussion for many years. This is a problem that needs correction with or without the added population.

In conclusion, we hope this provides valuable input to your process and final report.



Tim Dellinger 02/13/2023



Kathy Dellinger 02/13/2023

From: [Elizabeth Westerfield](#)
To: [PermitSonoma-Housing](#)
Subject: Housing element Update
Date: Monday, February 13, 2023 2:16:42 PM

EXTERNAL

My name is Elizabeth Westerfield and I live at 8275 Grape Ave, in Forestville. I am concerned regarding rezoning of sites FOR 1-6 in Forestville. Specifically, I have questions concerns about FOR 2 6898 Nolan R.

Traffic and safety:

*Mirabel Road is essentially the only thoroughfare from River Road to 116. How do you propose to facilitate a safe flow of traffic for up to 736 additional entering and exiting Mirabel Road? Onto Hwy 116? Onto River Road?

- Mirabel Rd has only one sidewalk on one side of the street heading towards downtown from the Youth Park. How do you propose to keep the many pedestrians safe while walking to and from this much higher density housing development?

- Forestville has very limited and infrequent public transportation. How will this public transportation meet the needs of people without cars? With no sidewalk and dangerous ditches on most of Mirabel Road, what will you do to ensure the safety of pedestrians and children on their way to the bus stop? On their way to the only grocery store, Speers Market? On their way to school?

Schools:

- What will you do to improve the local Elementary School, ensuring there are enough teachers and classrooms to accommodate the influx of children?
- What about the high school that is now closed? Is there a plan to bus students to Sebastopol?

Water and Sewer:

- Our local Sewer and Water system would need to be upgraded to handle the extra residents, what will you do to upgrade and improve our local Sewer and Water system? How is Forestville water district supposed to accommodate 283 extra homes?

Services:

- Forestville doesn't have a police station, or much of a Sheriff's presence, how will you ensure that we receive the extra policing required for an additional 736 residents?
- How do you propose to improve appropriate access to medical and social services for these residents?

These questions pertain to all of the proposed sites in Forestville!

The proposed rezoning of Forestville to include up to 1652 new residents. I'd like to point out that as of the 2020 census the population of Forestville is 3788 people. Which means you are proposing increasing the size of our town by 50%!

An increase like this would seriously impact traffic, safety, and overall quality of life for our community. Forestville simply does not have the infrastructure for this. We have limited access to public transportation which is located on streets without sidewalks, an elementary school that is at capacity, no high school, few sidewalks, no access to medical and social services, limited sewer and water capacity and no police force. It's a wildly inappropriate proposal for any of the small communities in unincorporated Sonoma County to increase their population by 50% and Forestville seems to be bearing the brunt of the current effort to rezone for affordable housing in Sonoma County.

Thank you,

Elizabeth Westerfield

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From: [Erin Jones](#)
To: [PermitSonoma-Housing](#)
Cc: [Audrey Kung](#)
Subject: Affordable Housing Program Open Comments
Date: Monday, February 13, 2023 4:54:49 PM

DEIR Review,

I support the addition of low working-income home developments to maintain the needed cross-economic diversity in our communities. However, as other residents in the Guerneville vicinity have shared, I have concerns for the proposed 30 units on the Sweetwater Springs property off Sunset Avenue.

An addition of 30 houses in this immediate area would stress the already poor infrastructure – resulting in a 40% increase over the approximate 90 homes that currently comprise Flamingo Hill. Specifically:

1. Roads are narrow ~ the largest entrances to this hillside area, Woodland Dr. and Palo Alto Dr. permit only a single car to pass, the other vehicle needs to back up into a driveway or to an acceptable passing spot off road. With the addition of more traffic, this area will become gridlocked. It's currently a nuisance during mornings and evenings and requires patience in the summers when tourists visit Highlands Resort. There are no sidewalks, and walking down or up requires great care as there are blind corners.
2. No quick exit ~ Woodland, Palo Alto, and Morningside (barely navigable as is) are the only access points to Flamingo Hill – in an emergency such as a local fire, it would be impossible to quickly exit the area and result in fatalities. The streets are carved into steep hills, so widening for safety would be a significant investment. These are one lane in and one lane out roads. If River road floods, all of these homes are cut-off from being able to evacuate the hill ~ all residents are effectively moated.
3. Tall redwood trees cover a significant portion of the hill and limbs/trees often fall on the powerlines. Last month's storm left all without power for 6 days – significantly longer than any other immediate areas.
4. Building on the Sweetwater Water supply site would displace the current water tank which currently supplies our current water supply – without a significant upgrade, I'm not certain how we would supply water in a fire event. If this isn't replaced, then the current water capacity is inadequate for an additional 30 homes.
5. In addition to electric and water utilities being strained, the propane network feeding many of our homes on the hill would require rework, expansion, or an expensive upgrade to electricity to heat many of our homes.

Please consider the above referenced, as well as other points my neighbors share in finding an appropriate location that would be less impactful to the Sweetwater springs location.

Thank you,
Erin E. Jones
14021 Woodland Dr.
Guerneville, CA

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From: [Eric Gage](#)
To: [PermitSonoma-Housing](#)
Subject: FW: Draft EIR Comments: Housing Element Update
Date: Friday, February 17, 2023 12:16:54 PM
Attachments: [letter to Susan Klassen.pdf](#)

Sincerely,

Eric Gage

Planner III

From: Gary Harris <sequoia@sonic.net>
Sent: Monday, February 13, 2023 2:38 PM
To: Eric Gage <Eric.Gage@sonoma-county.org>
Subject: Draft EIR Comments: Housing Element Update

Dear Mr. Gage,

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

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

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

We are also concerned about issues that don't seem to be understood or addressed.

An example of that is drainage of water during winter storms. Along Mirabel Rd. the drainage goes north and overflows during big rains. During this last rain storm a property was flooded on Mirabel Rd. close to Giusti Rd. from excessive runoff. Development of Site 2 would definitely exacerbate that problem. How will you mitigate that problem?

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

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

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

The issue of employment in the Forestville area is something that the Chamber knows something about. Unfortunately, there are few job opportunities in our area and the prospect of new jobs is limited because of lack of space for new businesses. That means that these new housing units will likely be occupied by working people who will be commuting to Santa Rosa and beyond. That means more traffic and the need for improved roads, traffic lights, crosswalks, etc. How will you mitigate that? Attached to this response is a copy of a letter written 6 years ago to Susan Klassen. It was signed by the Chamber president and a Chamber director along with our former fire chief. Some of the concerns expressed in that letter are the same concerns that we are expressing today. In this whole process, we in the Forestville area do not feel that we have been represented. So the bottom line is that we know our area very well and should be consulted and considered with much more respect.

Gary Harris

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March 5, 2017

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

Dear Ms. Klassen,

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

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

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

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

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

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

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

Sincerely,



Dan Northern
Forestville Fire Chief (RET)
dsnorthern@sbcglobal.net
707-887-0580

Wendi Gianni, President
Forestville Chamber of Commerce
Wendi_gianni@sbcglobal.net
707-887-2561



Hal Wood
Forestville Chamber of Commerce
wdhal@aol.com
707-887-2981



From: [Greg Guerrazzi](#)
To: [PermitSonoma-Housing](#)
Cc: [Susan Gorin](#)
Subject: Housing Element DEIR Comments
Date: Monday, February 13, 2023 1:06:13 PM

Dear Planning Staff & Supervisor Gorin,

My comments are regarding the two Glen Ellen parcels (# 054-290-057 and # 054-290-084, items 65 and 66 in Housing Appendix Table) proposed for rezoning in the Draft Housing Element. These parcels were part of the “Rezoning Sites for Housing Project” and were included in the Draft EIR for that rezoning effort. During that process, many people submitted comments with valid concerns regarding the inappropriateness of substantially upzoning these parcels, which are outside of the urban growth boundary in the tiny village of Glen Ellen at an unsignalized intersection.

Please consider the requests expressed here and in other community comments:

1. Remove the two Glen Ellen parcels from the rezoning list due to significant impacts identified in the EIR and other issues stated in this letter; and/or
2. Consider an alternative zone district that reduces the number of allowed units on the site and does not require a minimum number of units, as required by the WH zone.

Glen Ellen and Sonoma Valley have now been required to accommodate approximately 700 housing units and as many jobs, as part of the SDC Specific Plan (a few blocks from the Glen Ellen parcels proposed for rezoning). With the large scale SDC development, it is clear that this area has taken on more than its fair share of housing and should not be required to accommodate even more housing that will contribute to the significant traffic impacts identified for the SDC Specific Plan. It will also require removal of several heritage trees. Furthermore, the property owner has not stated any intention to develop the property at the proposed density, which would be completely out of scale for the site and surrounding neighborhood. Densifying this area that is not served by existing or planned transit, is not near a job center, and is not near or adjacent to an urban growth area makes no sense from a land use planning perspective and would be in conflict with climate change policies. Please do not do any further damage to this rural area by upzoning these parcels. Tripling the number of housing units on this site will only add to the significant impacts caused by implementation of the Specific Plan. Furthermore, the proposed rezoning is not consistent with General Plan policies regarding Glen Ellen nor is it consistent with the Glen Ellen Development Guidelines.

The proposal for the two subject Glen Ellen parcels involves **inappropriate and precedent-setting rezoning to a high-density zone district, which is out of scale and would result in significant adverse impacts on the small village of Glen Ellen.**

Due to the Workforce Housing zone minimum development requirements (16 units minimum), the subject Glen Ellen parcels would have to be cleared of all vegetation, including large trees, which would render the site an eyesore and incompatible with the community character. There is no feasible way to develop a project of this density without significantly impacting community aesthetic character or conflicting with the Glen Ellen Development and Design Guidelines. The mass, scale, and building coverage required to meet the density

requirements would not be flexible enough to be modified in such a way as to incorporate the siting and design features outlined in these mitigation measures. For this reason alone, an alternative lower density residential zone district should be considered.

The proposed rezoning of the subject Glen Ellen parcels is in conflict with Project Objective #6, which calls for new housing in urban areas near jobs, transit, and services.

I reside at 13480 Mound Avenue, a street with access to Arnold Drive from Carquinez Avenue, the location of the subject parcels. Traffic at the Arnold Drive and Carquinez intersection cannot support the dense housing proposed for the subject parcels. This is already a dangerous intersection with a cross walk and many people visiting the restaurants at this location. The DEIR does not adequately address the impact on traffic, emergency evacuation, disturbance of existing residents and the historic village of Glen Ellen that the densification of the subject parcels would create. In 2017 it took us an hour to evacuate Glen Ellen. With the SDC Development, Elnoka Development on Hwy 12 in east Santa Rosa, and the proposed Hanna development at Arnold Drive & Agua Caliente Road, evacuation traffic and emergency service vehicle access will be greatly impacted in this area due to the densification of the subject parcels. The DEIR must consider and thoroughly evaluate the cumulative impact of these development proposals, several of which are already approved. Arnold Drive, and Hwy 12, through this area simply cannot handle the level of traffic that will result from cumulative development.

The subject rezone parcels represent a large part of the downtown core (which is only two blocks long) and will dramatically change our village. It is disheartening to see a proposal that is **clearly inconsistent with the intent of the Glen Ellen policies established in the General Plan and Glen Ellen Development and Design Guidelines**. With the devastating loss of established neighborhoods during the 2017 fires, it is more important than ever to not overtax our rural infrastructure and resources. It is not understandable why the County would pursue rezoning this developed site considering valid concerns expressed by the community. Please do not do any further damage to this rural area by upzoning these parcels. Tripling or quadrupling the number of housing units on this site will only add to the significant impacts caused by implementation of the SDC Specific Plan.

Please preserve the rural nature, wildlife and historic village of Glen Ellen and remove these parcels from the Housing Element densification.

Thank you.

Best Regards,
Greg Guerrazzi
(707) 935-1111

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From: [Harriet Katz](#)
To: [PermitSonoma-Housing](#)
Subject: Housing!!!!
Date: Monday, February 13, 2023 12:30:21 PM

EXTERNAL

HELLO: PLEASE FORWARD TO APPROPRIATE COUNSEL MEMBERS

Building over 3000 new low income developments in Forestville is a travesty of humongous proportions for a small town such as ours, besides traffic congestion, and schooling, and more taxes to cover additional schools structures, and higher water usage in this area you are taking away the enjoyment of life in this small town. An appropriate number to absorb would be commensurate with your proposal for Guerneville in the lower range of 500-600 is probably more feasible to absorb with the current infrastructure and resources that are already in place. You will be placing an ALBATROSS in our midst with such a huge amount of new homes. I strongly urge you to stop using our small town FORESTVILLE as you "dumping ground" for this development. It should be more evenly and fairly distributed throughout the county and the incorporated areas as well.

I will be an active voter in the event you decide to neglect your duty to fairly distribute and clearly determine a more equitable proportionment.

Sincerely

Harriet Katz
8799 Marianna Dr
Forestville

Sent from my iPhone

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February 12, 2023

Eric Gage
County of Sonoma PRMD

Re: December 2022 Sonoma County Housing Element Draft DEIR and Housing Element document comments

Dear Mr. Eric Gage and Rincon Consultants, Inc:

I requested more time to prepare comments but did not receive a response so I am sending what I have now to meet the deadline on the Notice of Availability, which did not list a 5pm deadline. Below are my high level comments on the DEIR and proposed Housing Element. There are several areas that do not meet the state regulations.

Housing is important in our county, but making findings that Housing is more important than all of these significant and unavoidable impacts is going to be difficult. The County of Sonoma should be reducing significant and unavoidable impacts AND achieving the much needed housing goals which can be done if the correct housing locations are selected. Thoughtfully select appropriate locations for increased housing in order to reduce environmental impacts and develop near much needed services and appropriate infrastructure. These would include areas within the unincorporated Sonoma County lands within Urban Growth boundaries of the cities in Sonoma County, closer to the urban areas and available services, not 20-30 minutes outside any accessible services without transit to get to these services and without necessary infrastructure to develop these housing projects feasibly.

Title 7, Division 1, Chapter 3, Section 65580 of the Government Code states:

(e) The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors and community goals set forth in the general plan and to cooperate with other local governments and the state in addressing regional housing needs.

(f) Designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality's housing need for all income levels is essential to achieving the state's housing goals and the purposes of this article.

This DEIR does not adequately analyze economic, environmental, fiscal factors and community goals set forth in the General Plan for Sonoma County. Instead, this DEIR proposes to amend the General Plan to be consistent with the proposal without adequate analysis of the required areas. The proposal does not identify sites suitable, feasible for development since the analysis in many cases is deferred. Suitable and feasible means there are infrastructure and services in the proposed areas for housing which the sites in Forestville and Guerneville lack. Financial resources to make this happen are also not identified adequately as Section 65583 requires. Population and employment trends, Household characteristics are also required in this section of the code.

On ES-1, the project description claims that all sites are adjacent to or within Urban Growth boundaries or cities in Sonoma County but this is not true. Forestville and Guerneville and NOT adjacent to UGB for any city. The nearest UGB would be Santa Rosas which ends at River Rd just past Slusser Rd at Mark West Creek. This UGB is NOT adjacent to the proposed sites. ES-1 also does not describe the General Plan text amendments necessary to provide consistency throughout the GP. It only speaks of area plan amendments, but there are other GP texts that will also need to be amended to ensure consistency in the GP.

ES-2 states the project would implement existing General Plan Policies and Programs that require the County to identify urban sites near jobs, and transit which may appropriately accommodate additional housing. The Forestville and Guerneville sites do NOT have adequate jobs, or transit or schools as described in the Project Objectives. Rezoning these sites would be inconsistent with multiple existing General Plan policies as identified below and would actually encourage sprawl and loss of Ag land in direct conflict with the Project Objectives. More information below on these concerns.

Putting a disadvantaged population/community including low income residents, into rural areas without minimal services is just wrong. Creating more barriers to get to much needed services is the exact opposite of what HCD requires. The analysis in the DEIR does not adequately prove there are capacities for required services and jobs in the proposed locations.

Where's the analysis to show feasibility of these sites developing over the next 8 years? The following areas are lacking the analysis in the DEIR that the State Regulations require for all of the proposed Forestville, Graton, and Guerneville sites:

- Loss of industrial zoned land FOR #6: where is the replacement for loss of industrially zoned land? We already have a deficit in Forestville.
- Loss of State Farmland of Importance impacts on FORS #2: how is this being mitigated. The DEIR falsely states no impact on Ag which needs to be looked at again for the Forestville #2 site.
- Population Growth: this proposal is an Approximately 50% increase above current population using census data. This amount of increase without proper infrastructure will produce detrimental impacts to these areas.
- Lack of access to services in Forestville and Guerneville: No jobs or limited growth potential, no commercial area or industrial to expand the site and services, and no near future solutions to providing much needed services for high density housing. Instead, this proposal proposes to develop way outside of the urban core which puts pressure on communities that are not yet prepared for development.
- Biological Impacts: There is not adequate analysis for these impacts in the DEIR. Mitigations call for future study. At a minimum, an overall scan of the Natural Diversity database and the Santa Rosa Plain Conservation Strategy and a biologist high level review should be given to all proposed sites for rezone. If impacts may occur, the sites may be ruled out quickly. Why was high level analysis done for geology and soils but not biological impacts?
- Significant unavoidable impacts: Utilities (water, wastewater, sewer where are the studies to show this capacity? All sites should be analyzed for utility service and capacity now, not later. All of the sites in Forestville would require offsite improvements and thereby are not feasible for development within 8 years:

- Existing Pipe Sizing is not large enough (under 116 is 6 inch according to the Forestville Water District and is undersized to serve this large of an increase)
- Sewer-paper analysis only. An engineered analysis and study needs to be done now to determine feasibility of increased density and the impacts on the system.
- Stormwater capacity- this needs an engineered study now as well.
- Water capacity-paper analysis only-fire flow and system capacity should be studied now not later to ensure feasibility of increased density before rezoning takes place.
- Water Quality impacts need more attention and analysis.
- Drainage patterns cannot be assumed to be no impact at this stage.
- Traffic impacts and VMTs: intersection at 116 and Mirabel is LOS F-impacts of VMT are significant and unavoidable. This could be avoided by choosing a location closer to the urban cores of cities, rather than 25-25 minutes outside of them. This VMT impact is individual but also cumulative.
- Wildfire impacts: are significant and unavoidable in these areas and this is another reason to consider a different location.
- Public Services and Recreation and safety capacity: police/sheriff and Fire capacity for service delivery is not adequate for these new developments. Staffing capacity is 25-30% below currently and taking on a larger population will not ensure coverage and safety for the community. Why are public services analysis considered less than significant.
- Cable & electricity: – broadband is not available in these areas in Forestville and Guerneville. The cost to bring it to all sites would be beyond what any of the development would be required to contribute. What is the plan for access to internet and cable?
- Park and Recreation impacts: The County requirements 5 acres of park per 1K residents in unincorporated areas would require another 10 acres of parks in Forestville if these sites are approved. This addition of housing units will increase need for additional recreation areas without identifying them.
- Transit: bus lines are almost non-existent in Forestville and Guerneville. There is ONE bus that serves deep west county on Route 20. To get to Santa Rosa, you must first go all the way out to Monte Rio, back through Sebastopol, and then back into Santa Rosa. This is not a reliable, on-time bus route that is able to provide consistent stops. The existing bus schedule offers 8-10 stops per day depending on the day of the week and they are consistently late or sometimes do not show up. Where is the funding coming from to ensure this service is in place for the future development and additional consistent lines are provided? Access to services is required by HCD and these locations cannot provide that and the future developments cannot be fully burdened with providing that either.
- Streets and Infrastructure: Curb, gutter and sidewalks do not exist in Forestville and Guerneville near any of the sites. The investment in this infrastructure for all of these sites will be beyond the legal nexus for the individual projects to provide the link all the way to the transit and downtown area. How will this be funded to ensure installation? Walking along Mirabel Avenue or Armstrong Redwood Rd are dangerous recommendations.
- Scenic highway view Impacts: Several sites are on scenic highways (including Forestville #2) and would create significant unavoidable impacts without mitigation.
- GHG impacts: the greenhouse gases added by forcing this dense housing outside UGBs will obviously increase GHG impacts greatly. Why not look closer to UGB areas and those adjacent

to UGBs to reduce the Vehicle Miles Traveled and reduce GHG impacts? There are other options near Fulton Rd that are 10-15 minutes closer to services and that have more consistent transit offered

- Schools impact: The increase in density provides no tax revenue because they are apartments/multifamily, but increased students will result in loss of basic aid at the Elementary school level which results in more students, less teachers, and less funding for those students. On Pg 478 of the DEIR-the impact in Forestville and Geyserville are significant impacts period. You can't make an assumption overall there is no impact for the County overall, when 2 communities are impacted significantly. El Molino High school was just closed and 556 students were combined into Analy High school in Sebastopol which is now at its capacity for high school students. Please identify accurate analysis for impacts on schools in Forestville and Guerneville.
- Population growth estimates are off as they are based on county wide average per household, not low income increases/average in this county which is consistently higher than the average growth countywide. So in short, the estimates for growth of residents is flawed and much lower than the actuals for multifamily development.
- Flooding Impact: Laughlin in Guerneville is inappropriate site as well as it floods regularly and is within a 100 year flood zone.
- Hazardous Materials-FOR site #1 needs analysis. This site could impact the development and the development could impact the hazards onsite and remediation in process.

This Proposed Housing Element and DEIR are inconsistent with State Regulations that require consistency with the General Plan in the following areas:

-Current housing element policy:

HE-6f-Provide ghg quality and equitable public services in lower resource areas...this proposal is inconsistent with this policy by

He-2a-inconsistent-no available infrastructure

He-3G-not well served services by public transportation, schools, retail, etc

-General Plan polices for Forestville are inconsistent with this development proposal:

Into GP LU Element- Section 3.4 Russian River p81-forestville growth is an issue: rural character and public services, make commercial and industrial opportunities and preserve environmental qualities of the area

LU-15.3-commercial centers and local serving to keep with character of community-this proposal is inconsistent with that

LU-15.4-Maintain rural village through design of small scale development with substantial open space and native landscape.

Look at Wright Rd and Sebastopol Rd not rural areas without services necessary for dense development.

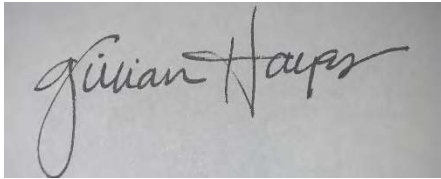
While I feel all Forestville and Guerneville sites are not appropriate for high density housing of this size and scale, at a minimum, you should consider DEIR option #3 with Fewer Rezoning Sites and remove all

of Forestville or at least remove FOR sites #1, #2 and #4 as they are completely inappropriate for high density housing giving the surrounding land uses and contamination onsite.

Thanks for your time considering these comments. I hope you are able to re-evaluate the locations for future housing over the next 8 year period that are realistic, closer to much needed services, jobs and schools.

Please reach out if you have any questions regarding my comments.

Thanks,

A rectangular image showing a handwritten signature in black ink on a light-colored background. The signature is written in a cursive style and reads "Gillian Hayes".

Gillian Hayes

CC: HCD

Date:

2/13/23

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

Dear Mr. Gage,

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

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

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

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

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

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

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

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

Name: Anna Hayman

Address: ~~16447~~ Cutten Dr. Guerneville CA 95446

Date: February 13 '23

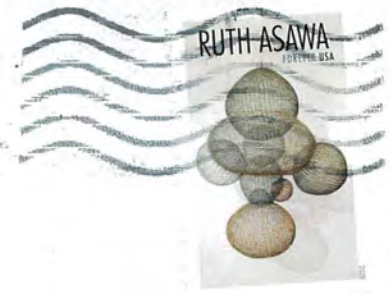
Signature:



16447 Cutten Drive
Guerneville, CA 95446

SAN FRANCISCO CA 940

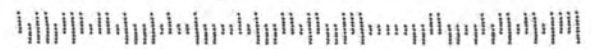
15 FEB 2023 PM 3 L



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

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FEB 17 2023
PERMIT AND RESOURCE
MANAGEMENT DEPARTMENT
COUNTY OF SONOMA

95403-282999



From: [Janice Stenger](#)
To: [PermitSonoma-Housing](#)
Subject: Timberland...
Date: Monday, February 13, 2023 3:47:13 PM

EXTERNAL

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

From: Janice Stenger <janicestenger@yahoo.com>
To: PermitSonoma-Housing@sonoma-county.org <permitsonoma-housing@sonoma-county.org>
Sent: Thursday, February 2, 2023 at 03:00:30 PM PST
Subject:

Impact AG-2. None of the None required No impact

Rezoning Sites are situated in areas zoned for timberland production (TPZ) and, therefore, development facilitated by the project would not conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production.

Development facilitated by the project would not result in the loss of forest land or conversion of forest land to non-forest use.

It may not be timberland but the carbon's gpt tp gp spmewjere!

Trees : There are at least 25 to 30 large redwood trees that sequester carbon and will for hundreds more years. They provide shelter and habitat for deer, bobcat, quail, foxes, skunks, raccoons, rabbits and uncountable migrating song birds..This year we've also had 100's of robins. The most in decades.

Also along our un-named man made stream that flows on to Livereau Creek on the Korbel vineyard (that shares a contiguous fence with us), which was in the days before intensive degrading of the Russian River a historical spawning creek of the river.

Livereau creek once was part of the "Big Bottom" where redwoods grew so thick you couldn't ride your horse through them.Or so said my grandfather.

Will the our redwood trees be cut down? and all of them along

Laughlin Road to facilitate sidewalks? And is that really "no impact" ? Guerneville natives won't think so.

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From: [Janice Stenger](#)
To: [PermitSonoma-Housing](#)
Subject: housing element
Date: Monday, February 13, 2023 3:14:49 PM

The errors in the EIR that influence Stenger property:

Lead Agency Contact Person

Eric Gage, Planner Planning Project Review County of Sonoma

2550 Ventura Avenue Santa Rosa, California 95403 (707) 565-1236

From Janice Stenger (It's mesmerizing, the more I read, the more I find.)

No picture of our house and our land appear in the DEIR...The picture that is labeled for us is actually a second picture of Gue1. Doesn't that disqualify us?

"GUE-2 and GUE-3 are on **UNDEVELOPED LANDS** says **the EIR** among single-family residences bordered by agricultural lands and wooded hillsides" (Figure 4.1-5). Nearby foothills are visible from the street through the undeveloped or sparsely developed adjacent lots. Site sensitivity is moderate and the zoning is LG/116 at both these sites; residential development and parked vehicles reduce the intactness of an otherwise vivid rural residential setting. The neighborhood has moderately high visual quality as residential development has unity in the varied architectural design and mature landscaping; the country lane style roadway has a degree of vividness that further contributes to the overall quality. Development in this area would likely be co-dominant with other residential" They don't mention the 2600 square foot house we built and where our children grew up or the darling two bedroom cottage we rent below market value. I don't believe anyone even came down Laughlin Road with their trusty camera. (By the

way, would you tear down my houses and barn and murder my redwoods?) Is that the plan? Guess the horses could go to the knackers.

I've lived in Guerneville all my life, my father was born here in 1908, my grandmother in 1880. Her mother walked across the plains in 1847, yes before the gold rush. My great great grandfather, born in 1799 owned much of what is now Austin Creek Reserve. His barn still stands there.

PS: I had to look this one up....do we have expansive soil? I know we have liquidification..I've seen the old map.

Expansive soil or clay is considered to be one of the more problematic **soils** and it causes damage to various civil engineering structures because of its swelling and shrinking potential when it comes into contact with water. **Expansive soils** behave differently from other normal **soils** due to their tendency to swell and shrink.

We have chickens and have always had horses for 45 years and had two goats at one time. We are considering a flock of sheep in order to feed our family because of rising meat prices. We've had sheep on family property for years and years but lions depredation has made it impossible there.

What do you define as impossible. So setback from AG MUST be 200 feet unless that's impossible then it could be 100 feet???

Wow. It will block the view and it will take quite a bit of the property out of development.

Gu4 is not my property but there are issues with that as it was turned down for 17 houses a few years ago because of the Fife Creek which is a spawning creek of the Russian River and has some other layer of protection granted to it during the last go-round. You will have to look it up and perhaps speak with Ms. Luna the former leader of the Stewards of the Redwoods and Coast. Although your maps mysteriously show a thinner riparian setback as it comes to Laughlin Rd. the creek floods quite widely on that property and in the 86 flood our big pickup couldn't navigate the Armstrong Road Laughlin Road intersection and we had to turn back when the water passed the top of our tires. There was also talk of contamination that originated at the County Yard that shares a fence line with Gu4 on the north side I'm fairly sure the setback from creeks is about 100 feet isn't it? We have to protect our precious spawning creeks.

Thank you for accepting my feedback. I'm sending this to Lynda too.

Sincerely, Janice Stenger

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From: [Jared McConnell](#)
To: [PermitSonoma-Housing](#)
Subject: No 1652 new units in Forestville
Date: Monday, February 13, 2023 6:57:42 PM

EXTERNAL

First of all I want you to know I 100% do not want these buildings built in our small city!
We do not have infrastructure here to support that many new residents!
There are not very many jobs to be had here in Forestville!
If people are low income, they might be looking for jobs why move them to a town where there are so few?
Bare Necessities are more expensive here in Forestville like gas and food at the only grocery store in town!
We do not have a good bus schedule for people to get to bigger cities where they may be working that is convenient to support their work schedules.
We would have to bus students all the way to Sebastopol what would cost taxpayers more money now that El Molino High School has been closed down!
The road in an out of Forceville sometimes flood in the winter and are not very good year round!
Why should we nearly double the towns population?
How much crime would this bring to our small town?
Who would pay for this?
How would this effect my home value?
Are you going to allow me to build an ADU or two on my third of an acre property?
I hope you read this, if you thank you & I also hope that you understand and realize that building these is a bad idea and I do not support it!
Jared McConnell- a Forestville resident.

Sent from my iPhone

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From: [Jim Smith](#)
To: [PermitSonoma-Housing; district5](#)
Cc: [Jim Smith](#)
Subject: Attn: Eric Gauge - Affordable Housing in Forestville
Date: Monday, February 13, 2023 12:24:37 PM

EXTERNAL

Hello Eric and Lynda,

We are writing to advise the Planning Commission of our concerns about the proposed Affordable Housing Plans for our community of Forestville. Our family has resided in Forestville since 1945 and has always been involved in community activities.

While we agree that affordable housing is needed in Forestville as well as every other community in Sonoma County we have concerns about the size of this overly ambitious plan.

From reading the proposal in the Press Democrat it seems that Forestville will be taking way more than their fair share of new housing units in the County.

We certainly feel that the three story "Human Warehouses" that Santa Rosa seems to be placing everywhere within their city limits would not be appropriate in Forestville. We do have some questions regardless of which parcels are finally decided on;

1. Can the the current utilities (water , sewer, power, roads, etc.) support these additional units without major upgrades?
2. Has the increased vehicle and foot traffic been taken into consideration?
3. What will it cost to purchase a low or modest income home?
4. Where are the pedestrian crosswalk lights for Highway 116 in downtown that have been promised for many years?
5. Why wasn't the old Crinella property (Hwy. 116 & Mirabel Road) included in the plan?

We feel that FOR-1 location (old Electro Vector Plant and possibly burned out Community Church?) would be the best location for new housing. A toxic cleanup may qualify for state/federal funding to help the community.

Locations FOR-3,5,6 would be a good location if the land is not needed for Forestville Sewer Plant pond expansion.

Location FOR-7 would be a great stand alone property for this proposal.

Location FOR-2 on Nolan Road is already zoned for housing but would not be good for such a high density plan without major infrastructure upgrades and cause a nightmare traffic problem on an already busy Mirabel Road.

Location FOR-4 on Van Kepple seems workable if it is the parcel shown on your map and not the one at the end of the road. It can possibly be combined with the FOR1 (Electro Vector site) and enter off Covey Road.

Sincerely,
Jim and Cathy Smith
6288 Anderson Road
Forestville, CA 95436

707-887-2988
jorcsmith@sbcglobal.net

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From: [ulla kiriakopolos](#)
To: [PermitSonoma-Housing](#)
Subject: Russian River Housing Element Project.
Date: Monday, February 13, 2023 4:59:09 PM

The proposed Housing Project for the quaint little town of Forestville is out of scope, the infrastructures needed for such large scale projects are not available, no adequate roads, sewer, utilities etc., etc.

As an example FOR-4, Van Keppel Rd is a narrow 2 lane road leading to a single way private driveway.

FOR-2 is a quiet residential area with mainly one story homes.

I am opposed to this housing project, it is way too big for our little town.

Sincerely,
John Kiriakopolos

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From: [Josh Beniston](#)
To: [PermitSonoma-Housing](#)
Cc: [district5](#)
Subject: Housing Element Update: Forestville Rezoning
Date: Monday, February 13, 2023 2:54:32 PM

Dear Eric Gage and Permit Sonoma Authorities,

I am writing to comment on the scope of the plans that are currently on the table with Permit Sonoma regarding rezoning of parcels in unincorporated Sonoma county to provide high density housing. I have some concerns with the plans that have been released, as well as the overall process. I am particularly concerned about proposed changes to parcels in the Forestville area. I own a home in Forestville and have lived in the area for several years. I would like to express the following questions and concerns and would appreciate a response on any of these items.

1. Why is Forestville providing such a large percentage of the overall number of housing units in unincorporated areas in this plan?

The proposed plan would grow Forestville's population by a significant percentage (more than 30%?). Forestville's infrastructure is not set up to accommodate that kind of increase in population. As it now, Forestville lacks sidewalks, traffic lights and other road safety measures, and has minimal access to public transit to other areas. We already have real public safety risks associated with our main roads. Further, very few social services and basic needs such as medical care or grocery stores are available in Forestville. Many of the other unincorporated areas of the county seem better suited to accommodate this kind of growth. Areas around Sonoma county airport, Larkfield, unincorporated Petaluma all come to my mind as areas with much better infrastructure and access to services for growing populations and high density housing. Those areas already have roads and infrastructure that can handle more dense populations, and have better access to services and public transportation.

In summary – I think the percentage of housing units being proposed for Forestville needs to be reduced, and that some of those units should be shifted to areas that have better capacity.

2. Will there be additional land use planning, impact studies, and upgrades in infrastructure to go along with the proposed increases in housing?

See above. We will absolutely need upgrades to the road corridors impacted in the proposed plans in Forestville. I'm concerned that adding this much housing will cause SAFETY and congestion issues related to additional cars and traffic. Homeowners in Forestville have invested heavily in the area and in the county and deserve a reasonable planning process to make sure their community is prepared for additional population. We do not deserve a process that our own supervisor has publicly described as "absolute garbage"-describing the state's mandates in this area. The Sonoma county government needs to act however it can to make sure that our communities are ready to accommodate the growth proposed in this plan.

3. How and Why were these specific parcels selected?

I am not opposed to adding higher density housing in the Forestville area and growing the population. I fully support the development of some of these areas. I think that Packing House Rd and the Electro Vector site are obvious choices for multi-unit housing complexes. I would like to see those sites prioritized. The current status of the Electro Vector site represents blight and public health risk. It should be properly remediated and utilized for development, rather than being listed as a site most likely to drop out of this plan because of the potential for additional expense.

I have major concerns with the proposal of a 71 unit housing complex off of Van Keppel Rd (FOR-4). 71 units is way too high a number given again the lacking infrastructure for walking and driving, and

the character of that neighborhood. There are not anywhere near 71 units currently in that neighborhood. It's too large a number and not appropriate. It represents a massive impact on the homeowners that surround that site. In my mind that proposal, and number of units, is totally inappropriate at that site given the infrastructure and neighborhood surrounding it.

Thank you for your consideration,

Joshua Beniston

6093 Van Keppel Rd

Forestville, CA 95436

707-540-4121

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From: [Judith Weller](#)
To: [PermitSonoma-Housing](#)
Subject: workforce housing Forestville
Date: Monday, February 13, 2023 4:54:55 PM

To whom it may concern,

I join with many others to express my understanding for the need for affordable, accessible housing in the Forestville area. However, I am opposed to this project for the following reasons including but not limited to,

Emergency evacuations: During the last two fire evacuations, it was bumper to bumper traffic on River Rd., Front St in Forestville, Hwy 116, Hwy 101 and Hwy 12. All routes we and hundreds of thousands of others used.

Parking and public services: During the summer vacation months, crowds come to enjoy the river. There are very limited to nonexistent services. Our local neighborhood streets are packed with illegally parked vehicles. Many of these folks use the bushes along the river and on our small neighborhood streets as toilets and leave heaps of garbage. Adding thousands of new residents their family and friends to the influx of the out of area folks just seems like a bad idea.

Emergency services: We have only one fire station in Forestville.

More often than not, our Sheriffs can't even respond to many of the calls they receive.

Local Grocery store: We have one market situated well away from the downtown Forestville area. It is NOT within walking distance of town. And the parking for this market requires negotiating the high-speed traffic on Mirabel rd.

Medial services: I'm not sure that we even have a clinic or doctor's office at this point.

Please scale this project way down or table it for the time being. Please don't put more pressure on our River communities than they currently have! The Forestville town and environs are not an appropriate location for this project.

Thank you for your consideration.

Judith Farina

11540 Sunnyside Ave. Forestville, CA 95436

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February 13, 2023

Permit Sonoma
Attn: Eric Gage
2550 Ventura Ave.
Santa Rosa, CA 95403
Permitsonoma-housing@sonoma-county.org

Re: Sonoma County Housing Element: Parcels GRA-3 and GRA-5

Dear Sonoma County Board of Commissioners,

As an unincorporated Sebastopol resident, I have been following the housing element proposal with a special interest in land parcels Graton-3 (3155 Frei Rd) (GRA-3) and Graton 5 (8525 Graton Rd) (GRA-5). With this letter I, along with my neighbors, respectfully request that you review the reasons as to why the proposal to rezone the lots and pursue site development should be reconsidered and not pursued due to the various significant and unavoidable impacts it would have. This type of development is not in the best interest of our community and will negatively impact the area and quality of life of residents.

Please know that I (and my neighbors) are hardworking contributing members of the community. We have purchased homes in the unincorporated area of Sebastopol (Graton utilities) with the expectation of living in a semi-secluded rural area, with a higher level of privacy, and safety whilst being situated away from the heart of the town. None of us would like our property values to decrease and we hesitate even to add to the “not in our backyard” rhetoric but it is important that concerns are raised and addressed by the Commission.

Parcels GRA-3 and GRA-5 are two of the few parcel sites on the entire Sonoma County proposed map that have several significant and unavoidable mitigating factors. The County should focus on developing sites that do not have such a grave impact on the community, infrastructure, etc.

The following factors to be considered:

- Disruption of Scenic Route 116 (AES-2)
 - a. The rural beauty along 116 is unparalleled. Many travel from afar to be lost in the large trees, country-esq vibe that we call home. Adding various new units adjacent to 116 on both GRA-3 and GRA-5, with an expectation of 100- 300 people would gravely diminish the scenic aspect that is to be protected. Not only homeowners but visitors would no longer be able to enjoy the visual beauty that has been kept for many years. With the proposed plan - neighbors and visiting persons would possibly see an array of structures which would not be consistent with the idea of not impeding on the scenic route plan.
 - b. Have you had the opportunity to speak with the wineries that would be directly

affected by the proposed development? Sonoma County thrives on the wine business. The three tasting rooms that would be directly affected are visited by many not only for their wine but the scenic environment they currently are set in. By adding homes on the parcels adjacent to 116, wine visitors will lose the Sonoma County feel they pay to experience and enjoy.

- Public Views blocked (AES-1)
 - a. The views from my backyard, neighbors and adjacent wine tasting rooms would be impacted. It is assumed that most of the trees would need to be removed. Therefore, our properties would no longer be shaded by the extremely mature trees. Our sights would be turned into numerous housing structures, windows and new residents would be able to look into existing backyards and directly into the homes themselves.

- Noise, Trash, Traffic
 - a. With both parcels being developed a significant increase of daily noise, trash and people would be created in such a small area. Additionally, the increase in people and cars would be a traffic issue in an intersection that is not constructed to handle that much in its current state. The location is not currently set up for the increased traffic and parking if development were to occur. Increased traffic and congestion can cause additional stress on local roads and make it difficult for residents to get around. Adding additional traffic to an already small land area with a limited number of traffic lanes raises concern if we are ever evacuated again for fires or flooding. The safety of your residents should be a high priority. How does the county ensure that current residents and potential future residents will not be plagued by unsafe conditions (extreme traffic, chaos) in an emergency situation?

 - b. A desired result from the creation of new housing is to provide residents with a safe mode of transportation to get to and from work or school, whether that be by car, bike, walking or public transportation. With the parcels current state, there are no sidewalks and its lack proper traffic accommodations for anyone, including the handicap to safely walk. What does the county propose to create a safe traffic area if it is to be developed?

- Water
 - a. All neighboring homes surrounding GRA-3 and GRA-5 are on wells. How would homeowners be ensured that our water supply would not be depleted with the proposed project? Will the units be connected to public utilities? (Per a recent conversation with a Sonoma County Board member we were advised housing units would need to be connected to public utilities. However, we would like confirmation).

- Sewer
 - a. My property and surrounding lots utilize Graton utilities. It is our understanding that Graton sewer is unable to accommodate this magnitude of sewer hookups for the proposed plan developments. How would the proposed projects obtain sewer? Again, we were recently advised that new developments would be connected to public utilities and septic would not be permitted. Please confirm this is accurate.

- Safety
 - a. For those homes that will share a fence line with GRA-5 we question the level of safety. For years, many of us have lived in a secluded area and enjoy being in an incredibly safe environment, with little crime. However, with the addition of 100-300 people, the likelihood of increased crime is high. How will your current residents be assured that they will continue to be in a safe community with the anticipated number of people potentially moving into the parcels directly behind our backyards?

- GRA-3 and GRA-5 are technically a Sebastopol address and situated in unincorporated Sebastopol, why have they been classified as Graton for the housing project?

Although the below is not a part of the DEIR, it is important that it be addressed in this letter.

We would like to know what the proposed building plans are or could be. We have heard that the owners of GRA-5 are in the business of establishing small home communities. Please see the link below. <https://www.twocrowshousing.com>

From their website, homes are not on permanent foundations and appear to be movable units with utility hook up capability. Spaces/stalls are rented out and have common bath houses. From research, their Guerneville site uses septic, and they have sex offenders possibly living on their sites.

If Sonoma County allows this type of community to be placed on these two parcels it goes against all that has been presented and should not be allowed.

Has the County thought about purchasing a large parcel of land for the projects? There are large areas of land for sale that we believe should be considered over the small lots proposed. Two are 1853 Cooper Rd or 7919 Occidental Rd in Sebastopol. The lot on Occidental Rd is closer to town for residents to obtain necessities and affects little to no current residencies. That lot could provide many homes for people if rezoned. By taking over fewer larger pieces of property for housing versus the numerous parcels proposed, less infrastructure would need to be changed/updated and less commotion per each site. A large parcel of land could be beautifully developed (with a community park, appropriate transportation accommodations and a unified housing design), to create a home those residents would feel proud to live in as well as maintaining the existing aesthetics.

We would greatly appreciate that parcels GRA-3 and GRA-5 be removed from the list and not be rezoned in the future. We have no problem with the parcels being in accordance with what it is already zoned for. Make them single residential homes (2- 3 homes with the possibility of each having an ADU) which can be purchased by families. This will add additional homes that are needed and keep the historical rural look of the highway design.

However, should Sonoma County or the State find the reasons brought forth not to be sufficient we ask that the county commit to invest in the below:

- Taller fencing around existing homes surrounding GRA-5; and
- Landscape to ensure the beauty of the area remains and assists in existing homeowners' sense of privacy (GRA-5 and GRA-3); and
- Any units built must be placed on permanent foundations. (I.e., no mobile home, RV, anything on wheels); and
- Ensure that public water and sewer be connected; and
- Ensure no bathhouses/common space bathrooms showers are allowed which would attract a transient population.

I strongly urge the County Commission to consider the long-term impacts of the housing development in small land areas and to reject any proposals that would result in the destruction of beauty of the area, overcrowding, and a decline in quality of life for residents. Your current community residents deserve better and I am confident that there are other ways to address our housing needs.

Thank you for your time and consideration.

K. Brooks
8543 Graton Rd.

From: [Kat Deaner](#)
To: [PermitSonoma-Housing](#)
Cc: [district5](#)
Subject: Housing Element Update: Forestville Rezoning-- FOR-4
Date: Monday, February 13, 2023 9:55:05 AM

Dear Eric Gage and Permit Sonoma Authorities,

I **adamantly oppose** several of the rezoning sites in Forestville, CA, specifically **FOR-4 (6090 Van Keppel Road)**. I understand there is a housing crisis in our county and we need to add additional affordable housing. However, the proposed increase of 1,650 residents (50% increase) in Forestville is absolutely **ridiculous and negligent!** There are already several safety issues with our current population including: lack of sidewalks, speeding cars, and no bike lanes. FOR-4 site is located in a neighborhood that will not be able to handle the proposed increase of 185 new residents. Van Keppel Road is already busy and unsafe at times for pedestrians and drivers. Additionally, a housing complex with 71 units does not fit the neighborhood. Way too dense!!

We need to be **mindful** in the growth of Forestville. *Where is the thoughtful, community driven strategic growth plan?* As a resident and tax payer, I would like to see a strategic plan which includes mixed use development and growth that makes sense with the culture and feel of the town. We need to make sure there are services available for an increase in population.

Sites FOR-1, FOR-3, FOR-5, and FOR-6 are on a main road, Hwy 116, and are more suitable for high density housing and mixed use. FOR-1 (6555 Covey Road- Elevtro Vector) is a great site for development. it needs to be cleaned up and remediated!! Pass this cost on to the developers who stand to profit the most off the development of the town.

Thank you for taking into consideration the voices of the residents!! It's imperative that we are **thoughtful** in development for safety, environmental and cultural reasons.

Sincerely,
Kat Deaner
6093 Van Keppel Road
Forestville, CA 95436

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From: [Kon Zaharoff](#)
To: [PermitSonoma-Housing](#)
Subject: Draft EIR Comments: Housing Element Update
Date: Monday, February 13, 2023 12:11:13 PM
Attachments: [image.png](#)
[image.png](#)
[Signatures.PDF](#)

Kon Zaharoff
6875 Nolan Rd
Forestville, CA 95436

- please see attachment for the signatures that accompany these written comments. I tried to drop off all these originals at your office this morning but the door was locked. Not a good idea to have a comment period end on a County holiday.

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

RE: Draft EIR Comments: Housing Element Update

From: The FOR-2 Neighborhood

Date: February 10, 2023

Dear Mr. Gage,

This letter is intended to specifically address the significant impacts and insufficient analyzation found in the Sonoma County Planning Update Draft EIR as it relates to the FOR-2 site, a 13.5 acre parcel located at 6898 Nolan Road in the town of Forestville beginning on Page 4.

As neighbors of the FOR-2 site, the 222 residents who signed this letter believe that before the HCD, Sonoma County Planning Commission and the Sonoma County

Board of Supervisors make any decisions on rezoning the parcels in Forestville they must first understand what the community of Forestville does and doesn't have to offer in the way of resources, services, transportation and infrastructure.

Forestville California 95436

Forestville is a small rural town in West Sonoma County about 11 miles and a 20 minute drive from Santa Rosa, the nearest job center. The population of Forestville is considered to be about 3300 people following the general boundaries of the Urban Service Area. The Sonoma County Land Use Element, Policy LU-15g, states that the boundary of Forestville is that of the Elementary School District or approximately 6700 people. If all 6 sites, designated for rezoning in the General Plan Housing Element Update, were built to capacity the population of Forestville would increase by 1652 people according to the Sonoma County Update DEIR. This is 25% to 50% increase in population depending on which boundary is used. The proposed cumulative dwelling units added to the town of Forestville is 635. This is the largest number of proposed units and population increase, for any community, in the unincorporated area of the County, with the exception of the unincorporated area around the City of Santa Rosa.

The main road thru Forestville is HWY116 which becomes Front Street for the 3 blocks where most businesses are located. Front Street/HWY 116 is a narrow two lane State Highway built around the turn of the century. All of the side streets in this area are residential.

There are few formal, private business maintained parking lots on Front Street/Hwy 116. Street parking consists of parallel parking on the south side and a combination of parallel and diagonal parking on the north side of the 3 block downtown area. Parking spaces are limited here and thus Downtown Park Open Space site is often used for overflow parking. The Downtown Park is located at the termination of the Joe Rodota Trail and is privately owned and maintained by a non-profit 501c3.

Sidewalks in the 3 block area of Front Street/HWY 116 are either nonexistent, non-contiguous or in extremely poor condition and dangerous. Limited sidewalks do exist from the intersection of Mirabel Road to the Forestville Youth Park. There are no other sidewalks in the neighborhoods that surround the downtown area. Walking the neighborhoods of Forestville requires walking on the narrow shoulders or in some cases in the middle of the road.

With the exception of the Joe Rodota Trail there are no bike lanes in the town of Forestville or surrounding neighborhoods.

Pedestrian or bicycle crossing Front Street/HWY 116, is facilitated by 2 uncontrolled crosswalks. One in the center of town and the other at Covey Road. The Forestville School District provides a crossing guard at the Covey Road intersection to facilitate the safe crossing of Front Street/Hwy 116 by school children. Crossing with or without a crosswalk or exiting a parallel parked car is dangerous on Front Street/HWY 116 due the road width, heavy traffic volume, including gravel trucks from the two local

quarry's, as well as most vehicles traveling faster than the posted speed limit.

There is one informal southbound bus stop in the downtown area. The bus stops in the Front Street/HWY 116 southbound traffic lane, to load and unload passengers. Sonoma County Transit provides bus service to Forestville. Bus Route 20, Russian River/Santa Rosa Route, makes one pickup and one drop off a day in downtown Forestville. Bus Route 26, Forestville/Sebastopol/Cotati/Rohnert Park Route, also makes one pickup and one drop off a day in downtown Forestville.

For all intents and purposes the commercial area of downtown Forestville is built out. There are two commercial/industrial parcels available for development within or contiguous to the downtown area. The first parcel, 3.4 acres zoned PC, is located at the intersection of south side of HWY 116 at the Mirabel Road intersection. The other parcel, located at 6555 Covey Road, is currently being considered in the Draft Housing Element for rezoning (FOR-1). Also known as Electro Vector, the parcel is 2.86 acres and zoned MP, AH. This site is subject to unknown groundwater contamination from a previous industrial business on this site. Mitigations have been underway for quite some time and this site should be fully evaluated before it is removed from the Housing Element Update rezoning inventory (Alternative-3). One additional site with Industrial zoning, although not contiguous with Front Street/HWY 116, does exist. This site is also being considered for rezoning under the Draft Housing Element Update and is currently zoned M1. Designated as FOR-6 in the plan, it is 4.94 acres.

Street lighting in Forestville is limited to the 3 blocks of the downtown area along Front Street/HWY 116. This allows the surrounding neighborhoods to very good Night Sky Viewing Areas with minimal light emissions.

New jobs in Forestville are few and far between. Those that do exist are generally minimum wage service industry jobs. This is largely due to the lack of sufficient commercial and/or industrial business. Forestville is a rural bedroom community.

Government Services in Forestville consist of:

- Sewer and Water - Forestville Water District
- Schools - Forestville Union Elementary School District K-8
- Fire and EMS - Sonoma County Fire District Forestville Station
- Police Services – Sonoma County Sheriff's Department
- Roads – Sonoma County Road Department

Notable business/retail services are limited in the downtown area of Forestville, off street parking is either non-existent or limited at all of these sites, very little future commercial growth is possible:

The following business can be found in Forestville:

A package store, pharmacy, hardware store, bakery, coffee shop, post office,

laundromat, real estate office, hair salon, gas station, bar, liquor store, dog groomer, antique store, winery, bicycle shop, auto repair shop and five eating establishments.

The following human services are available in Forestville:

A dentist office, a church, food bank, and a pharmacy.

There are no social services, medical facilities or broadband and very limited cell service within a ½ mile of downtown Forestville. The closest grocery store to downtown Forestville is 1.25 miles away.

The following Land Use and Housing statements, policies and objectives are relative to the discussion of all future development in the town of Forestville.

Reference: Sonoma County Land Use Element - Page Lu-81

Another issue in this area is growth and development in Forestville. Specific issues that need to be addressed include the amount of additional development that could be absorbed without changing the rural character or straining public services, how to make available commercial and industrial opportunities to provide local employment, and how to preserve the desirable environmental qualities of the area.

Objective LU-15.4

Maintain the “rural village” character of Forestville through design development standards that support small-scale development with substantial open space and native landscaping.

Reference: Sonoma County Land Use Element - Page Lu-82

Policy LU-15a: Policy LU-15a: Phase residential and commercial development within the Forestville Urban Service Boundary to allow the community facilities and services adequate time to absorb new growth, and to maintain the community character. For any project of 10 or more housing units, require a precise development plan or master plan that specifies the maximum number of new residential units to be built per year.

Policy LU-15b: Require design review for major subdivisions within the Forestville Urban Service Boundary. Design review approval shall assure that:

(1) Project scale and design is consistent with existing rural village character.

(6) The project includes pedestrian access connecting new homes in a nearby commercial area.

Reference: Sonoma County Draft Housing Element

Policy HE-2a: Enhance opportunities for affordable housing production on all appropriate sites with adequate infrastructure and proximity to services ...

Policy HE-3g: “Strive to focus affordable housing development in moderate and high resource areas well-served by public transportation, schools, retail, and other services. ...

Policy HE-5d: Strive to provide for senior housing needs. Focus senior housing projects in areas well-served by transit, accessible sidewalks, and amenities...

Policy HE-6f: Provide high quality and equitable public services, including public transportation, fire and police safety, crime prevention, parks, sidewalks, street lighting, and recreational facilities and programs in lower-resource areas through the use of place-based strategies and master plans.

Response to DEIR - FOR-2 - 6898 Nolan Road

FOR-2 Neighborhood

There are three main streets that directly surround FOR-2, Mirabel Rd, Nolan Rd and Giusti Rd. There are 5 additional streets that are accessed from either Giusti Road or Nolan Road and are also considered part of the FOR-2 Neighborhood; Nolan Ct., Niki Lane, Poplar Drive, Ohaire Lane and Chope Lane. There are approximately 85 homes and 180 residents living in this neighborhood.

FOR-2 is a 13.5 acre parcel. All 4 sides of the parcel abuts the backyards of well-established single family, single story homes along Nolan and Giusti Roads. The maximum proposed density on the FOR-2 site is 283 dwelling units and 736 new residents. The FOR-2 site is currently zoned for 7 homes.

The FOR-2 Neighborhood is a walking neighborhood and not just for its residents, people come from other areas just to walk here. There are no sidewalks or on street parking in the FOR-2 Neighborhood. The FOR-2 Neighborhood is an excellent place to view the night sky due to the lack of any streetlights in the area.

There are 3 designated existing entrances/exits to FOR-2. One on the East side of the property on Mirabel Road, one on the south side of the property on Nolan Road and one on the West side of the property also on Nolan Road.

FOR-2 is a heritage apple orchard established by the current owner’s family in 1911. The family has shared with the Neighborhood and the County, in person and in writing, they have no intentions of selling the property and wish to pass it down to future generations. See Attachment 1

Question:

- The County will require a minimum of 2 entrances/exits to the FOR-2 site if it is developed. The 3 lots that make up the entrance/exits to FOR-2 have their own unique APN’s (completely separate lots) and appear to be owned by the owner

of FOR-2. If the County rezones FOR-2 without the owner's permission, what stops the owner from selling one or more of the 3 entrance/exit lots thereby land locking the property?

Reference: Executive Summary

Alternative 3 (Fewer Rezoning Sites) – ES-3 Page 24

The Sonoma County Housing Element DEIR lists the FOR-2 site as one of the six rezoning sites that "have greater than average environmental constraints compared to the other Rezoning Sites. In particular, these sites would require off-site infrastructure water and sewer improvements to serve future development." The DEIR offers to remove these six sites, including FOR-2 as an alternative to the Plan. The following significant impacts are also associated with the FOR-2 site and not listed in the DEIR.

1. The parcel is considered by the California Department of Housing and Community Development (HCD) as being too large, over 10 acres, for an affordable housing development. (Page 6)
2. It is the largest project, 283 units/7736 residents, of all 59 sites proposed for rezoning in the unincorporated area of Sonoma County and it will increase the population size of the FOR-2 Neighborhood by 400%.
3. There are significant sewer pipeline size and capacity issues associated with the FOR-2 Site. (Pages 19-20)
4. School crossing traffic signal(s), traffic signal(s), left turn channelization, road widening and site distance and setback mitigations will be needed, on Mirabel Road, Giusti Road and Nolan Road as a result of this project. (Pages 14-19)
5. The FOR-2 site is approximately 100' from a Moderate Wildfire FHSZ and approximately 1000' from a High Wildfire FHSZ. (Pages 20-21)
6. Substantial water runoff from this project flows thru seasonal creeks and riparian corridors, causing flooding in the homes on Mirabel Road and the backyards of homes along Sunridge Lane and Trenton Road before flowing into the Russian River without any filtration or other mitigations. (Pages 12-13)
7. There is no broadband and limited cell coverage at the FOR-2 site.
8. The property owner has repeatedly assured the FOR-2 Neighborhood, verbally and in writing, that the Family has no intentions of selling the property and intend to pass it down to future generations. (Page 22 and Attachment #1)
9. California No Net Loss Laws discourage Jurisdictions from considering inadequate or unsuitable sites as adequate or available to achieve RHNA quotas.

Question:

- Given the above information, and further justifications to follow, would it be appropriate for the HCD, Sonoma County Planning Commission or the Sonoma

County Board of Supervisors to remove FOR-2 from the list of sites to be rezoned?

- If no please explain how the County of Sonoma plans to assume legal responsibility for traffic accidents, storm water runoff pollution, damage to biological resources, flooding and sewerage backups as a result of permitting this project without analyzing these issues and developing appropriate mitigations?

Reference: Project Description

Comment: HCD Requirements

The DEIR identifies FOR-2, 6898 Nolan Road, 13.5 acres, as one of the 59 urban sites in the unincorporated area of Sonoma County for by-right, medium-density housing.

The California HCD, Realistic Development Capacity, Analysis of Sites and Zoning – Size of Sites States:

To achieve financial feasibility, many assisted housing developments using state or federal resources are between 50 to 150 units. Parcels that are large may require very large projects, which may lead to an over concentration of affordable housing in one location, or may add cost to a project by requiring a developer to purchase more land than is needed, or render a project ineligible for funding. A parcel smaller than one half acre or **over 10 acres** is considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible. Please note, for purposes of this requirement, “site” means that portion of the parcel designated to accommodate lower income housing needs. The housing element must consider and address the impact of constraints associated with small or large lot development on the ability of a developer to produce housing affordable to lower income households. To demonstrate the feasibility of development on this type of site, the following analysis is required.

An analysis demonstrating that sites of equivalent size were successfully developed during the prior planning period with an equivalent number of lower income housing units as projected for the site.

Evidence that the site is adequate to accommodate lower income housing. Evidence could include developer interest, potential for lot consolidation for small sites or lot splits or subdivision for large sites...

A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.

Question:

- The site designated as FOR-2, APN 083-120-062, according to information provided in the DEIR, is 13.5 acres. According to the HCD any parcel over 10 acres is considered inadequate to accommodate housing affordable to lower income households. Has the County of Sonoma prepared sufficient documentation for the HCD to demonstrate the County's history of successfully developing sites of similar size, its potential for lot splits or subdivision or the existence of a proposal to develop the site in accordance with HCD requirements?

Reference: Sewer and Water

Comment: Urban Service Area Boundary

The Urban Service Area indicated on Figure 2-6 Forestville Inventory Sites – Page 2-14 would lead the reader to assume that both sewer and water are on site or adjacent to the FOR-2 site. This is not entirely true and the map is misleading. Existing domestic secondary water supply lines do run to the site and the surrounding streets of Nolan Road and Giusti Road. They are serviced by a water main on Mirabel Road. However, the existing sewer pipeline stops approximately 1100' south of the Mirabel Road entrance to the FOR-2 Site. Should the site be developed the existing sewer pipeline would have to be extended, from its current location, approximately 1100', to the existing right of way to the site off of Mirabel Road.

Question:

- It would be appropriate for the County of Sonoma to place a footnote on the map to clarify this situation?

Reference: Environmental Impact Analysis

Comments: Forestville, Page 4.1-18

FOR-2 is a large parcel west of Mirabel Road surrounded by single-family homes on large lots and zoned LG/116 but outside the SR designation. Views of the ridgelines and open spaces are not visible from the streets looking across the lot due to existing residential development, flat topography, and mature vegetation on all sides (Figure 4.1-14). On Giusti Road, residences are large, single-story, and designed in a vernacular suburban ranch style. They are situated close to the roadway and are landscaped in a varied but unified manner. On Mirabel Road, a school is directly across the street from FOR-2. The residential development on Mirabel Road features a less unified design than that on Giusti Road, with fewer trees and some intermittent fencing. Residential development on both sides of Nolan Road is like that on Giusti Road, but with less unified design and landscaping. Overall, the area around the site exhibits visual unity as the homes are large and consistently feature mature landscaping. While the unity is high, the level of vividness is lower because the

neighborhood does not offer expansive views or feature notable architecture. The site has moderate sensitivity and, depending on density and height, new development could be dominant.

Comments and Questions:

1. Any multi story, medium density development would be inconsistent with and pose a significant impact on the surrounding neighborhood where the majority of homes are single family/single story. In addition any construction over one story, would become the dominant feature in the neighborhood.
 - o The last sentence in the paragraph should be corrected to read: Any construction over one story will be a dominant feature in the neighborhood.
1. The report is incorrect in stating that there are no ridgelines or opens spaces viewable from the neighborhood. There are expansive views of Mount St. Helena, the Santa Rosa foothills and portions of Trenton Hill and other closer ridgelines are visible from the upper areas of Nolan Road and Giusti Roads surrounding the site.
 - o The EIR should be corrected to include the areas in which expansive views are available.
1. The site is not flat as stated above but has a slope of 2 to 9 (generally 3 to 5 percent) percent as stated else ware in this report.
 - o This statement should be corrected in accordance with the slope data provided elseward in the DEIR.
1. There are mature redwood trees on the property but they do not block views of the surrounding hillsides from all locations.
 - o This statement should be corrected.
1. The FOR-2 site is not directly across the street from a school. The Forestville Youth Park, a privately owned 501c3 park, is directly across Mirabel Road from FOR-2 and was mistaken for a school.
 - o This item should be corrected in the EIR.

Reference: Site Impacts and Recommended Mitigation Summary

The DEIR, Page 4.1-52 - The FOR-2 Site is listed with the following Impacts:

- Site Sensitivity – Moderate

- Project Potential Dominance – Dominant
- Potential Impact – Significant

Comment: Site Sensitivity Impact

The density of this project is 200% greater than the surrounding neighborhood. The vast majority of homes in the neighborhood are single story/single story on ½ acre lots. Any building 2 stories or taller, with a density of up to 20 units per acre, will become the Dominant feature in the neighborhood and the Site Sensitivity rating in the EIR should reflect that impact on the neighborhood.

Question:

- Based on the above information, the Site Sensitivity rating for FOR-2 should be changed from Moderate to Significant.

Reference: Aesthetics

Significance after Mitigation, Page 4.1-58

With implementation of Mitigation Measure AES-2, impacts from light and glare would be reduced to less than significant.

Comment: Significance after Mitigation

This statement is not sufficient and does not adequately represent or analyze the current night sky conditions in this area. The FOR-2 Neighborhood, Nolan Road, Giusti Road, Niki Lane, Poplar Drive and Nolan Court do not have street lights as does most of the Forestville area. This area is considered by its residents as a Night Sky Viewing Area with minimal light emissions and our visitors often comment on the beautiful night sky that we have. Any construction over a single story will impact the Night Sky Viewing in this area simply from uncontrolled and unmitigated light emitted second or third story units and a dramatic increase in night time vehicle traffic (headlights). Further analysis should be conducted to determine the effects of light emission in the FOR-2 Night Sky Viewing area.

Question:

- In accordance with General Plan Goal OSRC-4, Preserve and maintain views of the nighttime skies and visual character of urban, rural and natural areas, while allowing for nighttime lighting levels appropriate to the use and location. The EIR should acknowledge the significance and existence of night sky viewing areas and the impact of significantly altering those existing sights by developing FOR-2. The current analysis is insufficient. What additional mitigations are necessary to maintain the existing levels of Night Sky Viewing in the FOR-2 Neighborhood?

Reference Agriculture and Forestry Resources

Impact AG-1, Page 4.2-15: NONE OF THE REZONING SITES OCCUR ON LAND DESIGNATED AS PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE. THEREFORE, DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT CONVERT THESE TYPES OF LANDS TO NON-AGRICULTURAL USE.

All Rezoning Sites occur in County-designated Urban Service Areas, defined in the 2020 General Plan as geographical areas within the urban growth boundary of a city that are designated for urban development. Many of the identified parcels and their adjacent uses are currently zoned for rural residential or limited density, which in some cases means agricultural cultivation is currently underway; nonetheless, none of these lands are considered prime or important farmlands, as designated by the FMMP mapping program. The Rezoning Sites were selected out of dozens of possible sites in part specifically because rezoning them for higher density residential development would not convert productive, prime agricultural lands

The Sonoma County General Plan Goals:

Goal AR-3: Maintain the maximum amount of land in parcel sizes that a farmer would be willing to lease or buy for agricultural purposes.

Objective AR-3.1: Avoid the conversion of agricultural lands to residential or nonagricultural commercial uses.

Goal LU-9: Protect lands currently in agricultural production and lands with soils and other characteristics that make them potentially suitable for agricultural use. Retain large parcel sizes and avoid incompatible non-agricultural uses.

Objective LU-9.1: Avoid conversion of lands currently used for agricultural production to nonagricultural use.

It is a false statement to say that rezoning FOR-2 for higher density residential development would not convert productive, prime agricultural lands. The landowners have stated that this agriculturally important parcel has been used by the family since

1911. The California Department of Conservation's Interactive Map of Important Farmlands lists FOR-2 as Farmland of Local Importance. It was most likely excluded from the higher designations because it was not irrigated at some time during the four years prior to the mapping date of 2018. In fact, the property was listed as Prime Farmland up until 2004. The current owner wishes to rehabilitate the parcel into a more productive apple orchard.

Question:

- The above information requires the EIR to address the mitigation issues and impacts of rezoning FOR-2, a Farmland of Local Importance, to higher density residential housing.

Reference: Biological Study Area

Comment: Biological Study Boundaries, Page 4.4-5, Figure 4.4-4

The Biological Study Area – Forestville boundaries are not accurate in relation to the FOR-2 site, Figure 4.4-4 Biological Study Area - Page 4.4-5.

The majority of storm water runoff from FOR-2 that potentially affects biological resources flows north from the FOR-2 site and makes its way to the Russian River via unmaintained drainages ditches, seasonal creeks and riparian corridors to the Russian River. The effect to the biodiversity of these seasonal creeks, riparian corridors and the Russian River must be considered and investigated for Critical Habitat and Sensitive Communities.

Question:

- The Biological study area for FOR-2 should be expanded to include the ditches, seasonal creeks, riparian corridors from the site to the Russian River due to the increase runoff as a result of the development of FOR-2.

Reference: Biological Resources

Comment: Correction

The DEIR statement, Forestville - Page 4.4-13, does not mention that the FOR-2 site is connected to the Russian River via the storm water runoff from the site.

Question:

- This should be corrected so sufficient analyzation can occur and mitigation measures identified in the EIR.

Reference: Cultural Resources

Comment: Cultural Sites

The FOR-2 site is located within a half a mile of a known Native American cultural site where an ancient lake existed and Native American Community existed. Archaeological reviews are required on development projects in the area. Native American artifacts have been found on the FOR-2 Site and in the surrounding area.

Question:

- The EIR should state that this site is in proximity to a Native American cultural site and the possibility that artifacts and possibly human remains may be found on the site?

Reference: Hydrology and Water Quality

Comment: Storm Water Runoff

The FOR-2 site, is 13.5 acres with a slope of approximately 4.3% (52' in 1256') from the highest point on its western boundary (Nolan Road) to its lowest point at the intersection of Mirabel and Giusti Roads. Currently water runoff during heavy rainfall floods the crawl spaces and garages on the homes below the site and along Mirabel Road. One homeowner has installed a French drain to divert flows to the unmaintained drainage ditch on the west side of Mirabel Road. None of the current runoff is collected into storm drains. All runoff is uncontrolled and the vast majority flows along the west side of Mirabel Road downhill in a generally northerly direction. The water from the FOR-2 site is collected in a concrete open collector between 7522 and 7566 Mirabel Road. The water then flows west in an open seasonal ditch/creek until it meets a "blue line creek" and riparian corridor also known as Sunridge Creek. This blue line creek crosses Trenton Road and runs behind the homes between Sunridge Avenue and Trenton Road. During heavy rains this creek inundates Trenton Road and the backyards and first floors of homes along Trenton Road and Sunridge Avenue. This runoff then makes its way to the Russian River without filtration or settling ponds.

The effect to the biodiversity of these seasonal creeks, riparian corridors and the Russian River must be considered and investigated for Critical Habitat and Sensitive Communities. Significant hard surfaces, incapable of absorbing water, will be created thru development on the FOR-2 site. 15 acres of land generates 407,000 gallons of rainwater per one inch of rain. Forestville receives an average of 41 inches of rain per year, non-drought years. That accounts for over 16 million gallons of water flowing

from this site to the Russian River annually. Failure to identify the significant impacts and mitigation measures related to the storm water runoff from FOR-2 will impact biological resources and result in additional flooding of roadways and properties in the area

Question:

- The storm water runoff condition was not sufficiently analyzed in the DER to reflect the significant downstream effects of additional storm water runoff from the development of FOR-2. Further analysis and identification of mitigation measures must occur and be included in the EIR to avoid damage to the environment, biological resources and personal and public property.

Reference: Public Facilities and Services

Comment: Park Space and Funding

Page 4.15-8 - Policy PF-2c:

Use the following standards for determination of park needs: Twenty acres of regional parks per 1,000 residents countywide and five acres of local and community parks per 1,000 residents in unincorporated areas. A portion of State parklands may be included to meet the standard for regional parks.

Page 4.15-8 - Policy PF-2g:

Require dedication of land or in-lieu fees as a means of funding park and fire services and facilities.

Questions:

- There are no publically funded parks in Forestville. Please clarify if the full buildout in Forestville (1652 new residents) would require the addition of new public park space, how many acres and where it would be located, or if the existing two privately owned parks would qualify for the Policy PF-2c standard?
- The Forestville Youth Park is 7.93 acres and the Forestville Downtown Park is 4.26 acres and both are owned by non-profit organizations and available for public use. What population boundaries would be used to calculate population (PF-2c) and if in-lieu fees are obtained from the developer for parks do the existing privately owned parks receive that funding (PF-2g)?

Comment: Park Degradation

Impact PS-4, Page ES-38

The FOR-2 site is directly across Mirabel Road from the Forestville Youth Park. The

FOR-2 Neighborhood is concerned that the Forestville Youth Park would see a considerable increase in use that would lead to a physical deterioration of the facility.

Question:

- What mitigation measures are in place if existing parks, Forestville Youth Park and the Forestville Downtown Park suffer degradation due to overuse? Both parks are privately funded and exist solely on donations. The addition of over 1600 new residents within a half mile of downtown Forestville will have an impact on these existing parks. An additional section could be added to the DEIR that address privately owned Parks and how new development could support them?

Reference: Traffic and Parking

Comment: Traffic Study

According to the County of Sonoma Traffic Counts (arcgis) there are 6909 total trips per day on Mirabel Road, in both directions. The speed limit on Mirabel Road, in the area of FOR-2 is 45 mph although vehicles drive faster than the posted speed limit in this area. Due to speed limit and vehicle traffic volume, including large gravel truck traffic, Mirabel Road is likely a Major Collector when compared to other roadways defined in the DEIR Existing Street Network.

Question:

- DEIR, Existing Street Network – Page 4.16-1 thru 4.16-5 - Mirabel Road is not listed in the Existing Street Network. This should be corrected in the DEIR.

Comment: Mirabel Road/HWY 116 Intersection

At a conservative calculation of 5 trips per day per residence, including the existing FOR-2 Neighborhood and the proposed addition of 283 residences at FOR-2, the total trips per day coming and going from the FOR-2 Neighborhood would be approximately 4000, almost doubling the trips per day currently observed on Mirabel Road and significantly affecting the LOS rating of the Mirabel/HWY 116 intersection.

According to the DEIR:

Peak Hour Traffic at the Mirabel/Hwy 116 intersection is 1040. The cumulative total, including other River area rezoning projects is estimated to be 1782. This a 70% increase Peak Hour Traffic for that intersection.

According to the County of Sonoma Guidelines for Traffic Impact Studies-Page 4,

If the project is located in a study area where one or more intersections are currently

or projected to operate LOS E or Worse a Traffic Study is required.

Since the County has already determined that the intersection is failing, any development should be responsible for upgrades to the intersection due to increased Peak Hour Traffic. The last estimate available for a round-about at this intersection is 7.2 million dollars. The County has also considered a traffic signal at the intersection of River and Mirabel.

Questions:

- The DEIR is not clear whether traffic mitigations caused by the FOR-2 development, including the round-a-bout at Mirabel and HWY 116, as well as those on Mirabel Road and in the FOR-2 Neighborhood would be fully or partially the responsibility of the developer?
- The DEIR should require the need for a Traffic Study as a traffic mitigation requirement based on FOR-2's proximity to the Mirabel/HWY116 intersection due to the significant increase in trips per day that will be generated from the FOR-2 site and the substantial increase vehicle trips per day on Mirabel Road.

Comment: General Traffic Concerns

There are three existing access/right of ways to the FOR-2. One is directly off of Mirabel Road and two are off Nolan Road. Mirabel Road runs between River Road on the north end, a County Road, and HWY 116 on the south end, a State Highway.

There are two 4 way intersections between the northern border and the southern border of FOR-2. The intersection on the north side of FOR-2 is Giusti Road and Davis Road at Mirabel Road. The intersection on the south side of FOR-2 is Nolan Road and Speer Ranch Road at Mirabel Road. There are stop signs on Davis, Giusti, Nolan and Speer Ranch Road that control traffic entering Mirabel Road. Historically there have been serious accidents at the Giusti/Mirabel/Davis road intersections.

There are no are no turn lanes, at either of the four way intersection on Mirabel Road and traffic site distances are limited at both intersections. Site distances are also limited at the Mirabel entrance to FOR-2. The distance, along Mirabel Road between the two 4 way intersections, Giusti/Davis and Nolan/Speer Ranch, is about 1000'. The Mirabel Road entrance to FOR-2 lies roughly in the middle of the two intersections.

As residents of the FOR-2 Neighborhood we would like to share how difficult it can be to enter and exit Mirabel Road safely via either Giusti Road or Nolan Road. With the absence of turn lanes, the current speed limit, limited sight distances and high vehicle and gravel truck traffic, movements onto and off of Mirabel Road are currently dangerous. We anticipate entering FOR-2 from the designated right of way off of Mirabel Road will be equally dangerous.

In addition the County of Sonoma Guidelines for Traffic Impact Study Thresholds provide some references to possible mitigation measures that will be needed as the

result of the planned development of the FOR-2 site. (Thresholds, PG 10)

A project would have a significant traffic impact if it results in any of the following conditions:

1. On-site Roads and Frontage Improvements: Proposed on-site circulation and street frontage would not meet the County's minimum standards for roadway or driveway design, or potentially result in safety hazards, as determined by the County in consultation with a registered Traffic Engineer or Civil Engineer.
2. Vehicle Queues: Project causes or exacerbates 95th percentile turning movement queues exceeding available turn pocket capacity.
3. Signal Warrants: The addition of the project's vehicle or pedestrian traffic causes an intersection to meet or exceed Caltrans or CA-MUTCD signal warrant criteria.
4. Turn Lanes: The addition of project traffic causes an intersection to meet or exceed criteria for provision of a right or left turn lane on an intersection approach.
5. Sight Lines: The project constructs an unsignalized intersection (including driveways) and/or adds traffic to an existing unsignalized intersection approach that does not have adequate sight lines based upon Caltrans criteria for State highway intersections and AASHTO criteria for County roadway intersections.
6. County Intersection Operations: The County level of service standard for County intersection operations is to maintain a Level of Service D or better pursuant to General Plan Policy CT-4.2. The project would have a significant traffic impact if the project's traffic would cause an intersection currently operating at an acceptable level of service (LOS D or better) to operate at an unacceptable level (LOS E or worse). If the intersection currently operates or is projected to operate below the County standard, the project's impact is considered significant and cumulatively considerable if it causes the average delay to increase by five seconds or more. The delay will be determined by comparing intersection operations with and without the project's traffic for both the existing baseline and projected future conditions.
7. County Roadway Operations: The County level of service standard for County roadway operations is to maintain a Level of Service C pursuant to General Plan Policy CT-4.1; or, for specific roadway segments, the level of service standard adopted in the General Plan Figure CT-3. The project would have a significant traffic impact if the project's traffic would cause a road currently operating at an acceptable level of service (LOS C or better) to operate at an unacceptable level (LOS D or worse).

Sonoma County Standards for Traffic Impact Studies, Page 15

The project applicant shall retain a registered Traffic Engineer who is licensed to practice in the State of California. A TIS may be prepared by a registered Civil Engineer that has demonstrated appropriate expertise to the satisfaction of DTPW and is licensed to practice in the State of California. Said Engineer shall conduct objective qualitative and/or quantitative analysis, and submit a written traffic impact

study that includes each of the following areas that apply to the proposed project. Please note that when a concern is identified, the Engineer shall propose a solution and identify funding for the solution.

Vehicle Queues: Identify situations where either the addition of project traffic causes or exacerbates 95th percentile turning movement queues exceeding available turn pocket capacity.

Signal Warrants: Identify situations where the addition of project vehicles or pedestrian traffic will cause an intersection to meet or exceed Caltrans or CA-MUTCD signal warrant criteria.

Turn Lanes: Identify situations where the addition of project traffic at an intersection, including project driveways, causes an intersection to meet or exceed criteria for provision of a right or left-turn lane on an intersection approach.

Questions:

- The DEIR does not sufficiently analyze the effects of traffic mitigation measures relative to FOR-2 and their impacts the County's plans to extend the Joe Rodota Trail Bike Path along Mirabel Road between Hwy116 and Davis Road. How could traffic impact mitigations effect the plan construction of the Joe Rodota Trail in the area of FOR-2?
- The FOR-2 site adds 736 new residents and approximately 500 cars to the FOR-2 Neighborhood. In the EIR will traffic signal(s), turn lane(s), improved intersection setbacks, improved sight distances, and or controlled crosswalks be required mitigations, on Mirabel Road and the in the FOR-2 Neighborhood streets?
- Are there any potential mitigations that are likely to increase traffic on Giusti Road and Nolan Road at the other two entrances to FOR-2?

Comments: Crosswalks

The DEIR insufficiently analyzes the need for a controlled crosswalk at or near FOR-2 that will allow adults and children cross Mirabel Road to access the Youth Park, walk or bike to town, walk to school or access bus stops.

See Caltrans or CA-MUTCD Page 835 Section 4C.06 Warrant 5, School Crossing

Support: 01 The School Crossing signal warrant is intended for application where the fact that schoolchildren cross the major street is the principal reason to consider installing a traffic control signal. For the purposes of this warrant, the word "schoolchildren" includes elementary through high school students.

Standard: 02 The need for a traffic control signal shall be considered when an engineering study of the frequency and adequacy of gaps in the vehicular traffic stream as related to the number and size of groups of schoolchildren at an

established school crossing across the major street shows that the number of adequate gaps in the traffic stream during the period when the schoolchildren are using the crossing is less than the number of minutes in the same period (see Section 7A.03) and there are a minimum of 20 schoolchildren during the highest crossing hour.

Also See Permit Sonoma – Pedestrian Facilities

Policy 4.05 - Where discretionary projects in Urban Service Areas and unincorporated communities are found to create additional demand for pedestrian travel, require the project to directly provide or participate in the funding of pedestrian improvements such as sidewalks, gap closures, steps, safety improvements, and/or trails that will improve pedestrian access to destinations located within ½ mile of the project site.

Policy 4.08 - Provide high-visibility crosswalk marking at all intersections in Urban Service Areas, unincorporated communities, and wherever feasible countywide. Wherever possible, avoid mid-block pedestrian crossings, and where mid-block crossings are necessary, install signalization, refuge islands and signage warning vehicles to stop for pedestrians and watch for cyclists.

Question:

- The FOR-2 Neighborhood would like to know what mitigations should be added to the EIR to allow the 736 new residents of FOR-2, including school children to safely cross Mirabel Road to attend school, visit parks, bike, and walk or obtain services including public transportation?

Comments: Parking

There is a trend in the County to reduce parking spaces per developed unit in order to increase density and force occupants to use other forms of transportation (reduce VMTs). This option may work in urbanized areas with robust public transportation or within walking distances to essential services and work. Forestville is a rural community, there are few jobs available within walking distance of FOR-2. There is no industry, no available commercial land for future for development, minimal public transportation and no legal on street parking in the FOR-2 Neighborhood.

DEIR – Impact WFR-2, Page 4.19-26

Access to Rezoning Sites FOR-2, FOR-4, GRA-2, AGU-1, and AGU-2 currently does not meet County road standards of 20 feet in width or greater. Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways could be required. Those improvements would require a County encroachment permit if on a public right-of-way; however, widening County roads would not exacerbate fire risk.

Questions:

- The DEIR does not sufficiently analyze the lack of on street parking in the FOR-2 Neighborhood. Onsite parking should not be reduced for the FOR-2 development. How will the EIR mitigate the issue of assuring that there is sufficient parking on the FOR-2 site for a minimum 2 cars per unit due to the lack of robust public transportation?
- Residents of the FOR- Neighborhood are concerned about overflow traffic parking on our streets. What mitigations are included in the DEIR that will address this issue and who will enforce it?

Reference: Utilities and Service Systems

Comment: Sewer

The DEIR insufficiently analyzes the condition and size of the sewer pipeline serving FOR-2. The 8” sewer line that would service FOR-2 currently ends approximately 1000’ south of the access easement at the Mirabel Road entrance to the FOR-2 site. This 8” line runs from this termination location to the corner of Mirabel Road and Hwy 116. It then transitions to a 6” line, running under the north side of HWY 116 for approximately 1000’ to First Street, where it connects to the main line to the sewer treatment plant. This line is gravity flow and not pumped. The EIR does not sufficiently analyze whether the 1000’ of 6” sewer line has the capacity to handle the increased output from the FOR-2 project. A 6” sewer line carries one half the capacity of 8” sewer line. The FOR-2 Neighborhood is also aware that there have been problems with this 6” line clogging at or near 6661 Front Street/HWY 116 due to a low spot in the line. Failure to adequately estimate the capacity of the 6” sewer line with the increase demand associated with the addition of the FOR-2 development could result in the failure of the system or significant sewer spills at low points in the system.

The Sonoma County Water Agency – Design and Construction Standards for Sanitation Facility, Page 20

1. Minimum Pipe Sizes - The minimum pipe size for main sewers shall be eight (8) inches except as noted below. The minimum pipe size for side sewers shall be four (4) inches or the same size as the building drain plumbing stub whichever is greater.

Questions:

- Good planning for this project should include providing sewer access to the remainder of the FOR-2 Neighborhood which lies within or adjoining the

boundaries of the Sewer District, does the DEIR adequately address this planning outlook?

- The FOR-2 Neighborhood should be added to the flow calculation when determining capacity of the, 1000' long 6" sewer pipeline, on Front Street/HWY 116. Has the County of Sonoma contacted the Forestville Water District to advise them of this planning issue and to assure it is included in any pipeline capacity calculations?
- If it is found that there are capacity issues related to the reduce size of the sewer line between Mirabel Road and First Street this should be included with mitigations in the EIR.
- If sewer line does need replacing who will be responsible for replacing 1000' of sewer line under HWY 116 for a distance of 1000'?

Reference: Wildfire

Comment: Threshold, Page 4.19-24

Threshold:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact WFR-1 THE PROJECT INCLUDES REZONING SITES THAT ARE IN OR NEAR AN SRA OR VERY HIGH FHSZS, BUT DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT SUBSTANTIALLY IMPAIR AN ADOPTED EMERGENCY RESPONSE OR EVACUATION PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

During our recent wildfire evacuations traffic has backed up on Mirabel Road south bound from the intersection of Mirabel Road/HWY 116 to Davis Road, approximately ½ mile. There are only 3 exits from FOR-2. Two of the exits are onto Nolan Road which is the closest proximity, west facing and south facing, of a wildland fire burning in the SRA. Using these exits would hamper the existing residents ability evacuate as well as put the evacuees of FOR-2 closer to proximity of the oncoming fire.

Question:

- The DEIR does not adequately analyze or provide sufficient mitigation measures relative to how an evacuation would occur, from the FOR-2 Neighborhood, with nearly 900 residents attempting to exit onto Mirabel Road at the same time while also attempting to merge with other evacuees. This certainly doesn't seem like a Less than Significant situation? These are issues that must be addressed in the EIR and not left to be dealt with after the project has been completed.

Comment: Wildfire Threshold, page 4.19-26

Threshold:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

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

When it comes to public safety, SIGNIFICANT AND UNAVOIDABLE do not belong in the same sentence, ever! There are always mitigations including not going forward with a project. The EIR should evaluate wildfire risk and mitigation options considering the knowledge gleaned from the recent devastating fires in Sonoma County.

The drainages directly west of FOR-2 are in a Moderate FHZ but are identical to those below Giusti Road designated a High FHSZ. A fire moving uphill from Martinelli Road will not differentiate between these two FHSZ's. It will run its course up slope seeking drainages where rates of spread and intensity will increase. It is just as likely to arrive at Nolan Road as it is to arrive at Giusti Road. In this case a single ember could easily cross Nolan Road and ignite properties or landscaping in FOR-2. (Dan Northern, Forestville Fire Chief RET.)

Question:

- Given that Unavoidable is not an acceptable answer to a significant public

safety issue what other wildfire mitigations are appropriate for the FOR-2 site, including removing the site from the Housing Element Update List?

Comment: Fire Hazard Severity Zone

FOR-2 is located 100 feet from a Moderate Fire Hazard Severity Zone and 1000' from a High Fire Hazard Severity Zone. The site is across the street from State Responsibility land on the West side of the site. The EIR, Page 4.19-26 States:

Access to FOR-2 ... does not meet County road standards of 20 feet in width or greater. Prior to approval of development on- and off-site improvements to County and/or private roadways could be required. Those improvements would require a County encroachment permit if on a public right-of-way; however, widening County roads would not exacerbate fire risk.

Question:

- Who would fund the on and off site road improvements and traffic mitigation measures, to meet County and Cal Trans standards should the FOR-2 site be developed?

Comments: Removing FOR-2 from the Rezoning List

A copy of the owner's letter to the County asking that the FOR-2 site be removed from the rezoning list is attached. The family clearly states that they have no intention to sell the property and in fact have other plans for it. The family has owned the property since 1911 and it has become their legacy. It is a heritage property that they intend to pass down to future generations. Rezoning this property would be against their wishes and ruin their ability to use in a manner for which it is currently zoned.

Question:

- Is it in the County's best interest to continue to rezone a property, against the owners wishes, knowing full well that the owner has no intention of selling the property that has been in their family since 1911 and that they intend to keep it in the family for future generations?
- Is there a process or policy to remove a property from the Housing Element Update at the owners request or if the County is aware that they have no intention of selling the property?
- If so who will make this decision and when will it be made?

Respectfully Submitted by the FOR-2 Neighborhood,

Contacts:

Susan and Kon Zaharoff
6875 Nolan Road
Forestville, CA 95436
konzaharoff@comcast.net
707-800-2177

Sunoma and Dan Northern
6925 Nolan Road
Forestville, CA 95436
dsnorthern@sbcgloboas1.net
707-536-8991

Karen and Steve McDonald
6987 Nolan Road
Forestville, CA 95436
smcdonald205@comcast.net
707-495-7371

Attachment 1:



THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

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

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Print Name

Address:

DIANE GALIARDI

10675 CANYON RD.

Signature

Diane Galardi

Forestville CA. 95436

Print Name

Address:

Myron Thurman

10670 Canyon Rd

Signature

Myron Thurman

Forestville Ca 95436

Print Name

Address:

SCOTT STRONG

10829 CANYON RD FORESTVILLE CA

Signature

Scott Strong

Print Name

Address:

DON CARMAN

10641 CANTON ROAD, FORESTVILLE

Signature

Don Carman

Print Name

Address:

ANN CARMAN

10641 CANTON ROAD, FORESTVILLE

Signature

Ann Carman

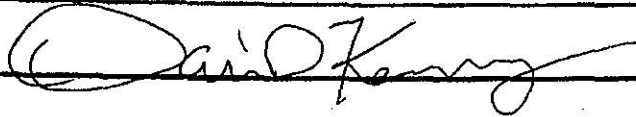
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Print Name

Address:

DANIEL KENNEY 11133 CANYON RD FORESTVILLE 95436

Signature

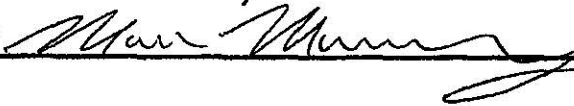


Print Name

Address:

MARK MURPHY 11133 Canyon Rd Forestville 95436

Signature

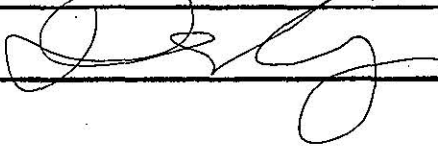


Print Name

Address:

DAVID WAKELEY 10821 CANYON RD. FORESTVILLE 95436

Signature



Print Name

Address:

SHARON SMITH 10821 Canyon Rd Forestville 95436

Signature



Print Name

Address:

Lorraine L. Bubb 10670 Canyon Road Forestville 95436

Signature



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Print Name

Address:

MARCO CALAVETTA

9489 ARGONNE WAY

Signature



Print Name

Address:

Edward Burtner

7024 Trenton Road

Signature



Forestville, CA

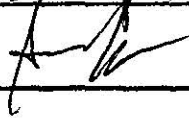
Print Name

Address:

Abraham Mansoor

6508 Mirabel Rd

Signature



Forestville CA 95436

Print Name

Address:

Rick Coyston

9315 CHAMPA DE ELIZABES

Signature



FORESTVILLE CA 95436

Print Name

Address:

CHRISTOPH VOSS

6972 GIOVANNETTI RD

Signature



FORESTVILLE CA 95436

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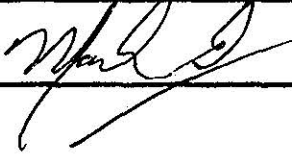
Print Name

MARK ARYA

Address:

6764 Ellen Ln.

Signature



Forestville CA

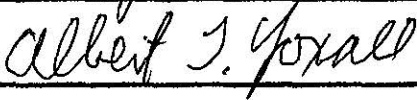
Print Name

Albert J. Yoxall

Address:

7383 Hidden Lake

Signature



Forestville CA 95436

Print Name

Christa Gallo

Address:

7397 hidden lake rd.

Signature



Forestville, 95436

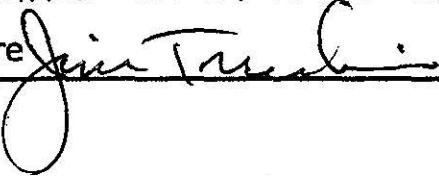
Print Name

JIM TRANCHINA

Address:

7404 HIDDEN LAKE RD

Signature



FORESTVILLE, CA

Print Name

MARY RAND

Address:

7404 Hidden Lake Road

Signature



Forestville, CA 95436

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Print Name

Address:

Bary Galvin 6650 Elkhorn Forestville

Signature

Bary Galvin

Print Name

Address:

MARY KAY GALVIN 6650 ELLEN LANE FORESTVILLE

Signature

Mary Kay Galvin

Print Name

Address:

LAURA MARTIN 6710 ELLEN LANE FORESTVILLE

Signature

Laura Martin

Print Name

Address:

Conie Brooks 6595 ELLEN LANE FORESTVILLE

Signature

Conie Brooks

Print Name

Address:

ANDREW V. SOUSA 6595 ELLEN LANE FORESTVILLE, CA 95736

Signature

Andrew V. Sousa

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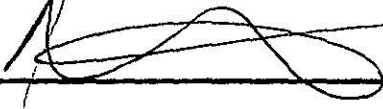
Print Name

Address:

DAN BONTZCOU

5720 PRIDE RD

Signature



FORESTVILLE, CA 95430

Print Name

Address:

PAUL PEARSON

7200 CORY RD

Signature



FORESTVILLE, CA

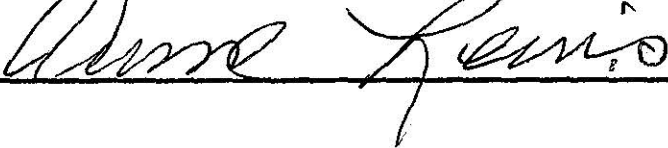
Print Name

Address:

Anne Lewis

P.O. Box 670 Forestville

Signature



Print Name

Address:

Ken McLEAN

8365 TEMPLEMAN Rd.

Signature



Print Name

Address:

RICHARD HICKMAN

8066 MARTINOLI RD

Signature



FORESTVILLE

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Print Name

Address:

Megan Doble

4450 Guerneville Rd 95401

Signature



Print Name

Address:

Mat + Edgus

5980 Anderson Rd 95436

Signature



Print Name

Address:

Cynthia Johnson

6088 Front St Forestville 95436

Signature



Print Name

Address:

ERIC J DOBLE

4450 GUERNEVILLE RD

Signature



Print Name

Address:

Spencer Henderson

7400 Maline Rd

Signature



Forestville CA 95436

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Print Name

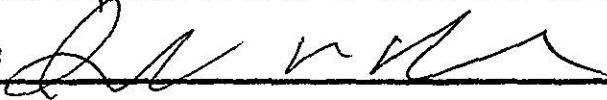
Address:

RANDOLPH W NELSON

11550 SUNNYSIDE AVE

FORESTVILLE CA 95434

Signature



8693 GREEN VALLEY RD.

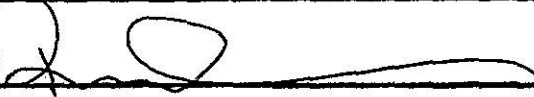
Print Name

Address:

RON ANDERSON

SIEGASTOWN, CA 95472

Signature



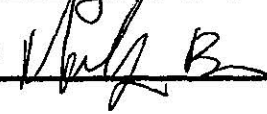
Print Name

Address:

MOLLY BROWN

4450 GUENEVERILLE RD

Signature



SANTA ROSA CA 95401

Print Name

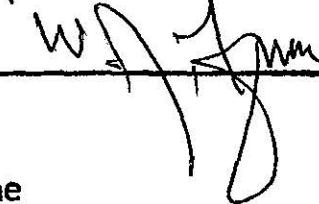
Address:

BILL FERGUSON

8383 HWY 116

FORESTVILLE CA

Signature



95436

Print Name

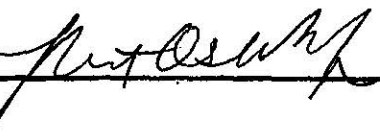
Address:

ROBERT O. BABA JR.

7444 PARKER AVE

GUENEVERILLE CT. 95446

Signature



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Print Name

Address:

JOEY BURTNER 7024 TRENTON RD 95436

Signature



Print Name

Address:

Claude Schroeder 8739 Manana 95438
Forestville, CA

Signature



Print Name

Address:

GERARDO D'ELIA 7429 BUCKLEY AV

Signature

 GUERRAZZINI, CA

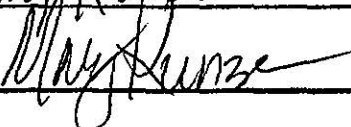
Print Name

Address:

Mary Kunze

7520 Niki Ln

Signature



Forestville

Not enough room for town needs.

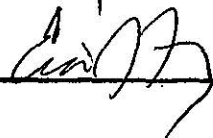
Print Name

Address:

Eric Fry

8330 1st Street, Forestville

Signature



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Print Name

Address:

ROBERT O. BABA III

6631 15th ST. FORESTVILLE, CA

Signature

Robert O. Baba III


Print Name

Address:

Christopher Smith

8645 Trenton Road, Forestville, CA 954

Signature



Print Name

Address:

ROBERT J Blacker

7423 Poplar Drive

Signature



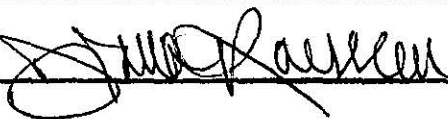
Print Name

Address:

DIANA ROUSSEAU

6830 Ellen Lane, Forestville

Signature



Print Name

Address:

JILL BABA

7444 PARKER, GUERNEVILLE

Signature



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Print Name Laura Almada Address: 5809 Vine Hill Rd

Signature Laura Almada Sebastopol

Print Name Marc McLeer Address: _____

Signature Marc McLeer

Print Name NATHAN Butta Address: 5660 Hwy. 116 N-

Signature Nathan Butta

Print Name Jumli Scrimick Address: 8501 Hwy 116

Signature Jumli Scrimick

Print Name ROGER BETTA Address: 6303 Hendricks Ln

Signature Roger Betta

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Print Name Address:
Diana L. Stuart 6815 Giusti Rd, Forestville
Signature Diana L. Stuart CA 95436

Print Name Address:
Carly Downs 6815 Giusti Rd.
Signature Carly Downs Forestville CA 95436

Print Name Address:
Johnathon Downs 6815 Giusti Rd Forestville CA
Signature [Signature] 95436

Print Name Address:
Barbara Wishard 7521 Niki Lane
Signature Barbara Wishard Forestville, CA 95436

Print Name Address:
CHRISTINE HUEMER 6740 Lavon Ct.
Signature Christine Huemer FORESTVILLE, CA 95436

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Print Name

Address:

Sally Olson

6537 Wayne Ct., Forestville, CA 95436

Signature




Print Name

Address:

Ken Harlan

6515 Wayne Ct

Signature



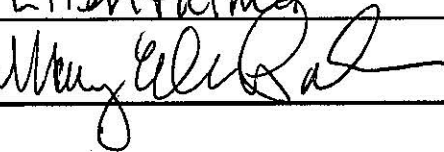
Print Name

Address:

Mary Ellen Palmer

8000 Speer Ranch Rd

Signature



Forestville, CA 95436

Print Name

Address:

Marshall John Palmer

8000 Speer Ranch Rd

Signature



Forestville, CA 95436

Print Name

Address:

Judy L. Lubas

6505 Wayne Ct.

Signature



Forestville, CA 9505

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Print Name Address: 6845 GIUSTI RD.
SANDRA FARKAS FORESTVILLE, CA 95436

Signature SANDRA FARKAS

Print Name Address:
Colleen O'Neill 8065 Speer Ranch Rd Forestville CA
95436

Signature Colleen O'Neill

Print Name Address:
Jennifer Alwood 6733 Lavon Ct Forestville, CA
95436

Signature 

Print Name Address:
Mike Alwood 6733 Lavon Ct Forestville, CA 95436

Signature Mike Alwood

Print Name Address: 6725 LAVON COURT
Forestville, CA 95436

Signature PEARL FROMALA
FROMALA

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Print Name

Address:

RONALD WININGAR

6907 ELLEN LANE FORESTVILLE CA

Signature

Ronald M. Winingar

Print Name

Address:

Amy Fogerson

6718 Laron Ct. Forestville

Signature

Amy Fogerson

C.L. Tree

Print Name

Address:

C.L. Tree

6610 JIM CT, FORESTVILLE

Signature

Print Name

Address:

LARRY LOEBIG

6610 Jim CT Forestville

Signature

Larry Loebig

Print Name

Address:

MARY CLARE CAWLEY

6632 Jim CT Forestville

Signature

Mary Clare Cawley

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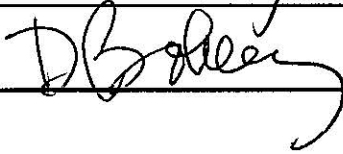
Print Name

Address:

Debra Bohling

4632 Jim Ct

Signature




Print Name

Address:

Ian Walsh

6644 Jim Ct

Signature



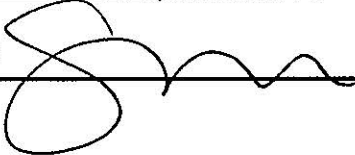
Print Name

Address:

Sarah Hoffmann

6644 Jim Court

Signature



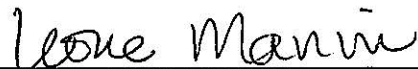
Print Name

Address:

Leone Manri

4506 Wayne Ct

Signature



Print Name

Address:

Mel Manni

6506 Wayne CT

Signature



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Print Name) Kent Wilson Address: 6536 Wayne Ct.
Forestville, CA 95436
Signature Kent Wil

Print Name Nancy Dempster Address: 6730 1st St
Forestville Ca, 95436
Signature Nancy Dempster

Print Name Vikki Miller Address: 7491 Mirabel Rd cottage 1 Forestville
95436
Signature Vikki Miller

Print Name Rebecca Boye Address: 10825 Canyon Rd Forestville
CA 95436
Signature [Signature]

Print Name Donna Winger Address: 6900 Ellen Lane Forestville, CA
95436
Signature Donna Winger

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Print Name

Address:

Richard Benyo

7050 Giustini Rd, Folsomville CA 95436

Signature

Print Name

Address:

Chris Mullins

8065 S Pours Ranch Rd Folsomville

Signature

Print Name

Address:

Allen Adams

8111 Speer Ranch

Signature

Print Name

Address:

Melody Adams

8111 Speer Ranch

Signature

Print Name

Address:

CHARLENE PETERSON 8123
SPEER RANCH RD

Signature

Charlene Peterson

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Print Name

Address:

Maria Birch 7446 Niki Lane

Signature

Maria Birch

Print Name

Address:

Richard Birch 7446 Niki Lane

Signature


Richard Birch

Print Name

Address:

Tami Barrick 7485 Niki Lane Forestville CA
95436

Signature



Print Name

Address: 6875 GIUSTI RA

Signature

Michael Bauman

Print Name

Address:

Carol Singleton 6000 Highway 116


Signature

Carol Singleton

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Print Name Rebecca Wessling Address: 6020 Hwy 116
Signature Rebecca Wessling Forestville, CA
95436

Print Name Karen Denise Langford Address: 5995 Hwy, 116
Signature Karen Denise Langford Forestville, CA 95436

Print Name Greg Gallemore Address: 8135 Speer Ranch Road
Signature  Forestville, CA 95436

Print Name Kristen Gallemore Address: 8135 Speer Ranch Rd Road
Signature KMGallemore Forestville, CA 95436

Print Name Frances Oliver Address: 8368 Trenton Rd.
Signature Frances Oliver Forestville CA 95436

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Print Name

Address:

Laurie Schefer 8147 Speer Ranch Rd. Forestville Ca 95436

Signature

Laurie B. Schefer

Print Name

Address:

Thomas Schefer 8147 Speer Ranch Rd Forestville Ca 95436

Signature

Thomas R. Schefer

Print Name

Address:

Christine Bell 8168 Speer Ranch Rd Forestville CA 95436

Signature

CA Bell

Print Name

Address:

Richard Phillips 8132 Speer Ranch Rd

Signature

Richard Phillips

Print Name

Address:

Jacqueline Keywood 8132 Speer Ranch Rd.

Signature

Jacqueline Keywood

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Print Name

Address:

SCOT COVINGTON

8031 SPEER RANCH ROAD

Signature



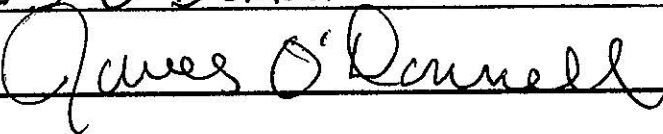
Print Name

Address:

JAMES O'DONNELL

8024 Speer Ranch Rd

Signature



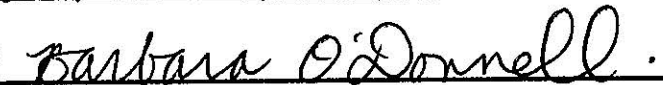
Print Name

Address:

Barbara O'Donnell

8024 Speer Ranch Rd

Signature



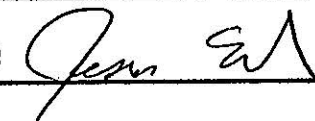
Print Name

Address:

Jessica Earl

8012 Speer Ranch

Signature



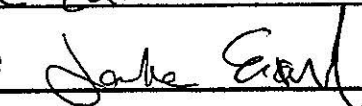
Print Name

Address:

Jake Earl

8012 Speer's Ranch

Signature



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Print Name

Address:

JAMES W. MCCLURE

7463 Poplar Dr.

Signature



FORESTVILLE, PA 95436

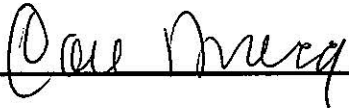
Print Name

Address:

Corinne Domecq

7455 Poplar Dr

Signature



Forestville, CA 95436

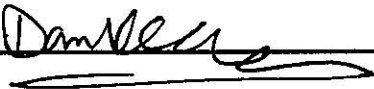
Print Name

Address:

Dan Kenner

7455 Poplar Dr

Signature



Forestville, CA 95436

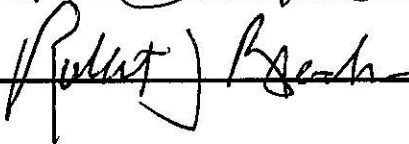
Print Name

Address:

ROBERT J. BLOCKER

7423 Poplar

Signature



FORESTVILLE CA

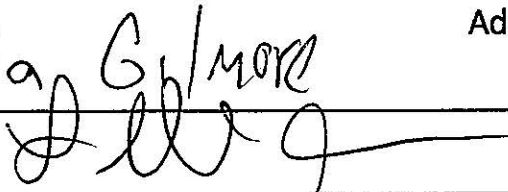
Print Name

Address:

Lisa Gilmore

7518 Mirabel Rd

Signature



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Print Name

Address:

Mona Behan

6867 Nolan Rd., Forestville 95436

Signature Mona A Behan

1/28/23

Print Name

Address:

ALAN CRISP

6867 NOLAN RD, FORESTVILLE 95436

Signature Alan Crisp

1/28/23

Print Name

Address:

Regan Crisp

6867 Nolan Rd. Forestville

Signature

Regan Crisp

95436

Print Name

Address:

TONY BRITTON

7420 POPLAR DRIVE, FORESTVILLE

Signature

Tony Britton

Print Name

Address:

ANDRÉ JACKSON

7480 POPLAR DR. FORESTVILLE, CA 95436

Signature

Andre Jackson

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

James Kay

7492 Poplar Dr

Signature

James Kay

Forestville CA 95436

Print Name

Address:

Molly Kay

7492 Poplar Drive

Signature

[Signature]

Forestville CA 95436

Print Name

Address:

Kevin Williams

7498 Poplar Drive

Signature

Kevin Williams

Forestville, CA 95436

Print Name

Address:

Ron Ruiz

7500 Poplar Drive

Signature

Ron Ruiz

Forestville, CA 95436

Print Name

Address:


Sandra McClure

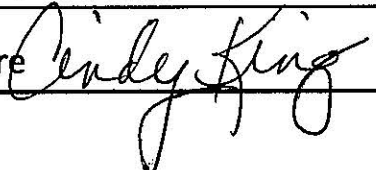
7463 Poplar Dr.

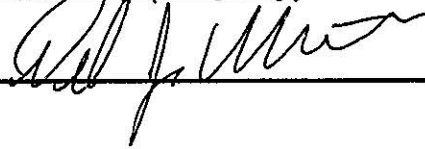
Signature

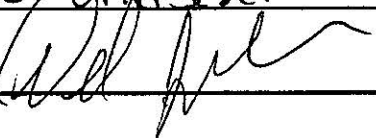
Sandra E McClure

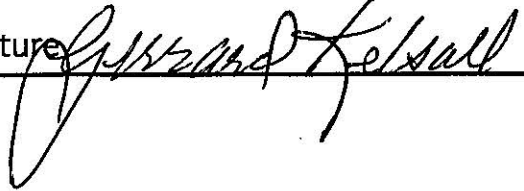
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Print Name RONALD FIELDS Address: 6512 WAYNE CT
Signature  Forestville CA

Print Name CINDY KING Address: 6512 WAYNE CT
Signature  Forestville CA

Print Name Debi Untereher Address: 6512 Wayne Ct.
Signature  Forestville, CA

Print Name Steve Untereher Address: 6512 Wayne Ct.
Signature  Forestville, CA

Print Name GERRARD KELSALL Address: 6548 WAYNE CT
Signature  FORESTVILLE, CA

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Print Name Address:
TERRY ANDREACCHI 7785 GIUSTI RD
Signature *Terry Andreacchi*

Print Name Address:
DANIEL A. LOWIE 7767 GIUSTI RD.
Signature *Daniel A. Lowie*

Print Name Address:
KURT GIUSTI 7750 GIUSTI RD
Signature *Kurt Giusti*

Print Name Address:
RICHARD BIRCH 7446 NIKI LN
Signature *Al R* FERBSTUUB

Print Name Address:
Ruth Wilson 6536 Wayne Ct. Forestville
Signature *Ruth Wilson*

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name Alice Shoffit Address: 6830 Giusti Rd
Signature Alice Shoffit

Print Name Mike Barats Address: 6996 Mirabel RD
Forestville Ca 95436
Signature Mike Barats

Print Name Janet Bauman Address: 7366 Mirabel Rd
Signature Janet Bauman Forestville, Ca 95436

Print Name Linda Barker Perkins Address: 6835 Giusti Rd Forestville
Signature L B Perkins

Print Name Michael D. Perkins Address: 6835 Giusti Rd Forestville
Signature [Signature]

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

DAN MOI'

Address:

6970 Giusti Rd.

Signature

Print Name

Alex Cruz

Address:

6875 Giusti Rd

Signature

Print Name

Heather Dale Best

Address:

6986 Mirabel Rd.

Signature

Print Name

Robert Best

Address:

6986 Mirabel Rd

Signature

Print Name

Andis Fece

Address:

7445 - Niki Forestville

Signature

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

John Franceschi

6874 Nolan Rd Forestville CA

Signature John Franceschi

Print Name

Address:

Thomasine A. Franceschi

6995 Giusti Rd. Forestville, CA.

Signature Thomasine A. Franceschi

Print Name

Address:

Lloyd Franceschi

6995 Giusti Rd Forestville CA.

Signature Lloyd Franceschi

Print Name

Address:

Cece Gannon

6955 Giusti Rd, Forestville CA

Signature Cece Gannon

707 887 7223

Print Name

Address:

C. Taylor Brown

6935 Giusti Rd.

Signature

[Signature]

Forestville, CA 95436

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

Steve McDonald 6985 Nolan Rd. 1/27/23

Signature

Steve McDonald

Print Name

Address:

Karen McDonald 6987 Nolan Rd. 1-27-23

Signature

K McDonald

Print Name

Address:

Elisa Baker 7423 POPLAR DR. 1/28/23

Signature

Elisa Baker

Print Name

Address:

ROGER STANCLIFF Forestville 129 NOLAN CT 1/28/23

Signature

Roger Stancliff

Print Name

Address:

Valerie Stancliff 129 Nolan Ct Forestville. 1/28/23

Signature

Valerie Stancliff

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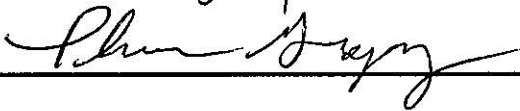
Print Name Chase Reece

Address: 7445 Niki Lane

Signature 


Print Name Thomas Gregory

Address: 7485 Niki Ln

Signature 

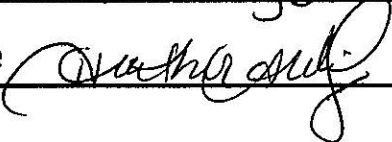
Print Name MARK ALDRIDGE

Address: 7484 NIKI LN

Signature 

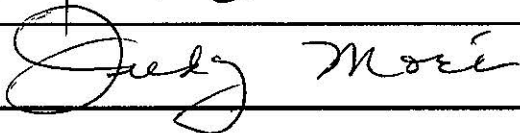
Print Name Heather Aldridge

Address: # 7484 Niki Ln.

Signature 

Print Name Judy Mori

Address: 7495 Niki Ln.

Signature 

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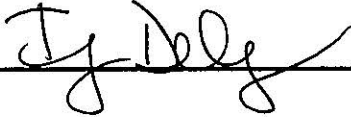
Print Name

TIMOTHY DELLINGER

Address:

135 NOLAN CT FORESTVILLE, CA

Signature



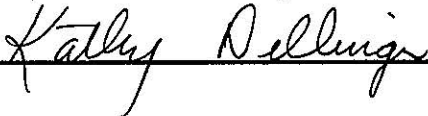
Print Name

Kathy Dellinger

Address:

135 Nolan Ct. Forestville, CA

Signature



Print Name

Helen Butt

Address:

122 Nolan Ct. Forestville Ca 95432

Signature



Print Name

Kirsten Franceschi

Address:

6874 Nolan Rd. Forestville, CA

Signature

Kirsten Franceschi

95436

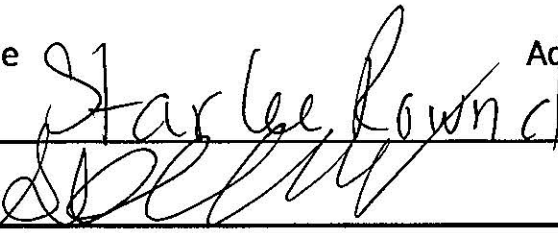
Print Name

Starlee Rownd

Address:

Nolan Rd. Forestville, CA

Signature



95436

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Print Name

Address:

1/28/2023

MARY K. DAUGHERTY

7107 GIUSTI RD.

Signature

Mary K. Daugherty

FORESVILLE, CA
95436

Print Name

Address:

EKaterina Bleeker

7600 Giusti Rd. Forestville, CA 95436

Signature



Print Name

Address:

Melody Clark

7680 Giusti Rd

Signature

Melody Clark

Print Name

Address:

Adele Turk

7680 Giusti Rd

Signature

Adele Turk

Print Name

Address:

Dana Riven

7635 Giusti Road

Signature

Dana Riven

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Print Name Robin Trimble Address: 6955 Nolan Rd.
Signature R. Trimble Forestville, CA
95436

Print Name Jim Kline Address: 6955 Nolan Rd
Signature Jim Kline Forestville, CA
95436

Print Name Mark Collischoun Address: 6955 Nolan RD Forestville, CA
Signature Mark Collis 95436

Print Name JON STURTEVANT Address: 6955 Nolan Rd. Forestville, CA
Signature Jon Sturtevant 95436

Print Name Sally Quady Address: 7635 Giusti Rd., Forestville CA
Signature Sally Quady 95436

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Print Name

Edward Mori

Address:

7495 R.K. Ln

Signature

[Handwritten Signature]

Print Name

Kara Northern

Address:

7682 Giusti Rd

Signature

[Handwritten Signature]

Print Name

GARRETT NORTHERN

Address:

7682 GIUSTI RD.

Signature

[Handwritten Signature]

Print Name

Sunoma Northern

Address:

6925 Nolan Rd

Signature

[Handwritten Signature] Forestville, CA

Print Name

DAN NORTHERN

Address:

6925 NOLAN RD

Signature

[Handwritten Signature] FORESTVILLE

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

Nick Comaich

6831 Nolan RD

Signature

Nick Comaich

Print Name

Address:

Amara Danzart

6829 Nolan RD

Signature

Amara Danzart

Print Name

Address:

Karl Hallstrom

6815 Nolan Rd

Signature

Karl Hallstrom

Print Name

Address:

Erin Hallstrom

10815 Nolan rd.

Signature

Erin Hallstrom

Print Name

Address:

Rhonda Provost

7050 Giusti ROAD

Signature

Rhonda Provost

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name Kan Zaharoff

Address: 6875 Nolan Rd
Forestville, CA

Signature 

1-27-2023

Print Name Susan Zaharoff

Address: 6875 Nolan Road 1-27-2023

Signature 

Forestville, CA 95436

Print Name Karen Krell

Address: 6860 Nolan Rd Forestville CA 95436

Signature 

1-27-2023

Print Name Florentino Garcia

Address: 6854 Nolan Rd Forestville CA 95436

Signature 

1-27-2023

Print Name Dewitt Blackman

Address: 6854 Nolan Rd Forestville CA 95436

Signature 

1-27-2023

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Print Name

Address:

Nancy L. Jones

6975 Giusti Rd, Forestville

Signature

Nancy L. Jones

1-27-2023

Print Name

Address:

Ken Jones

6975 Giusti Rd, Forestville

Signature

Ken Jones

1-27-2023

Print Name

Address:

DOLORES VOIGHT

8000 SPEER RANCH RD, FORESTVILLE

Signature

Dolores Voight

1-27-2023

Print Name

Address:

Douglas Mark Dutina

6884 Nolan Road Forestville

Signature

Mal Dutina

1-27-2023

Print Name

Address:

Dawn Dutina

6824 Nolan Rd. Forestville

Signature

Dawn Dutina

1-27-2023

CA

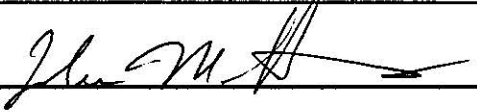
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Print Name

Address:

Johannes HENNEBERGUE 6844 Nolan Road, Forestville, CA 95436

Signature



1/27/23

Print Name

Address:

Ryan Hennebergue 6844 Nolan Rd. Forestville, CA 95436

Signature



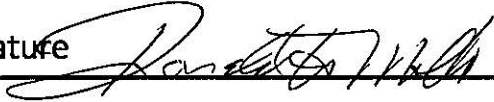
1/27/23

Print Name

Address:

Ron Mollo 6897 Nolan Rd Forestville 95436

Signature



1-27-23

Print Name

Address:

Barbara Schwoner 6815 Nolan Rd, Forestville, CA

Signature



1-27-23

Print Name

Address:

Michael Schwoner 6815 NOLAN R FORESTVILLE

Signature



1-27-23

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Print Name

Address:

Jeannette Smith

1780 Giusti Rd Forestville

Signature

Jeannette Smith

Print Name

Address:

Diane Nelson

6341 Van Keppel Rd.

Signature

Diane Nelson Forestville, CA

Print Name

Address:

Tim Nelson

6341 Van Keppel Rd

Signature

Tim Nelson Forestville, CA

Print Name

Address:

Debra Rypka

7096 O'Hare Lane

Signature

Debra Rypka

Forestville, CA 95436

Print Name

Address:


Dyana Foldvary


7381 Hidden Lake rd 95431


Signature


Dyana Foldvary


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Print Name Timothy Allen Address: 7581 Giusti Rd Forestville
Signature 

Print Name Leila Allen Address: 7581 Giusti Rd. Forestville
Signature 

Print Name GLENN Trowbridge Address: 7000 Nolan Rd
Signature 

Print Name CRAIG R. LEVITT Address: 7685 Giusti Rd. Forestville
Signature 

Print Name COLLEENE LOW Address: 7767 Giusti Rd. Forestville
Signature  95436

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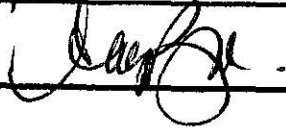
Print Name

Address:

Gary Beyrouhi

11140 Canyon Rd, Forestville, CA 95436

Signature



Print Name

Address:

Daryl Spritzer

11140 Canyon Rd Forestville, CA 95436

Signature



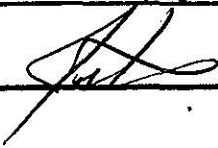
Print Name

Address:

Joel Woodbury

10905 Canyon rd

Signature



Print Name

Address:

Signature

Print Name

Address:

Signature

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Print Name

Address:

Margaret Katta

7430 Hidden Lake Rd.

Signature

Margaret L Katta

Print Name

Address:

Ellen Faryna

6400 Hidden Lake Rd.

Signature

Ellen Faryna

Print Name

Address:

Signature

Print Name

Address:

Signature

Print Name

Address:

Signature

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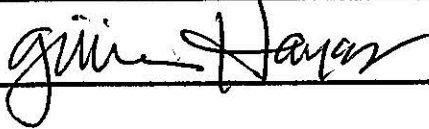
Print Name

Gillian Hayes

Address:

7385 Hidden Lake Rd
Forestville, CA 95436

Signature



Print Name

tyler Haen

Address:

7385 Hidden Lake Rd
Forestville, CA 95436

Signature



Print Name

Address:

Signature

Print Name

Address:

Signature

Print Name

Address:

Signature

February 13, 2023

Eric Gage
Permit Sonoma
2550 Ventura Ave.
Santa Rosa, CA 95403
Permitsonoma-housing@sonoma-county.org

Subject: Draft EIR Comments: Housing Element Update

Dear Mr. Gage,

My comments and concerns relate directly to FOR-2 APN, located in Forestville, and more generally to the Forestville sites proposed for increased housing. I am a 25-year resident of Forestville, own a home which backs on FOR-2, and am most familiar with this parcel and the vicinity in which it is located. My concerns include wildfire danger, impacts relative to climate change (GHG's), lack of water and sewers, egress and ingress, traffic, and the lack of local amenities.

I have reviewed a portions of the Draft Program EIR and was pleased that some of my concerns were addressed in the document. I do, however, want to emphasize that there are concerns that warrant consideration.

It appears that Alternative #3 (ref. ES-4 and Section 6—Alternatives) is in the best interest of the community, the county and the environment, as opposed to the Draft as written. Consider as it relates to FOR-2:

- The potential for and the actual significant adverse impacts that will result (ref. Table ES-1);
- The environmental constraints;
- Unknowns not yet explored for FOR-2 (e.g. water supply and wastewater generation impacts—page ES-42 - 43, and pages 6-13 - 6-16);
- There was no “Alternatives” discussion of “Alternative locations” (see below for further discussion and CEQA Guidelines Section 15126.6).
- “Based on the alternatives analysis provided ..., Alternative 3 would be the environmentally superior alternative (ref. page 6-18).”

There are other sites outside those discussed in the Draft PEIR that would seem less impactful from an environmental standpoint. They would be less costly from an infrastructure standpoint, would reduce the potential for wildfire impacts and other significant adverse impacts identified. It is important that although the County has a state mandate to fill, and is under a timeline to fulfill that mandate; the environmental impacts identified for the sites chosen must be considered and the resulting adverse impacts should outweigh the mandate requirement. It is imperative to identify housing sites, but it is also imperative that the county does its due diligence to identify housing that won't result in significant environmental damage, and put the residents and the community in a potentially harmful situation.

Based on the CEQA Guidelines Section 15126.6 (see below), it appears that “Alternative Locations” must be considered in the PEIR and evaluated given the significant adverse impacts that will result as described in the current document. How were the sites for analysis chosen? Was this a methodical endeavor? Are the sites chosen for this EIR the least impactful sites in the county? Are these the only feasible sites in all of

Sonoma County for rezoning? These questions are important when considering alternatives to the project as proposed.

It should be noted that in the last couple of weeks, landowners adjacent to FOR-2 were given a letter by the FOR-2 landowners that included: "Let us be clear in no uncertain terms: WE ARE NOT SELLING THE ORCHARD. We plan on continuing to restore and expand the agricultural and environmental function of the land, with hopes of selling food to local stores and individuals in the near future, and eventually retiring here. This property has been in the family for 5 generations and will continue to be so." They have verbalized this for the last few years to various neighbors. I have not attached the letter, as the FOR-2 landowners indicated they would also be submitting a letter to you. Given the landowner's desire, and the significant adverse effects identified relative to rezoning the parcel as described, it does not seem that realistically this parcel will be available for the 283 houses the rezoning Draft PEIR identifies, or would it result in a realistic number for the county to submit to the state.

Given the size of Sonoma County, it appears that there may be many sites in Sonoma County that would not result in significant adverse impacts, compared to the impacts described for some of the sites in this draft PEIR.

Pursuant to the CEQA Guidelines Section:

"15126.6. CONSIDERATION AND DISCUSSION OF ALTERNATIVES TO THE PROPOSED PROJECT.

- (a) Alternatives to the Proposed Project. **An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project** (my emphasis), which would feasibly attain most of the basic objectives of the project **but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives** (my emphasis). An EIR need not consider every conceivable alternative to a project. **Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation** (my emphasis). An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.
- (b) Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), **the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly** (my emphasis).
- (c) **Selection of a range of reasonable alternatives.** The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

(d) Evaluation of alternatives. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

Continuing, (f) defines Rule of reason, feasibility, and alternative locations

“(f) Rule of reason. The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project (my emphasis). Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

(1) Feasibility. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives. (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553; see Save Our Residential Environment v. City of West Hollywood (1992) 9 Cal.App.4th 1745, 1753, fn. 1).

(2) **Alternative locations** (my emphasis).

(A) **Key question. The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location** (my emphases). Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

(B) None feasible. **If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR** (my emphasis). For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location.

(C) Limited new analysis required. Where a previous document has sufficiently analyzed a range of reasonable alternative locations and environmental impacts for projects with the same basic purpose, the lead agency should review the previous document. The EIR may rely on the previous document to help it assess the feasibility of potential project alternatives to the extent the circumstances remain substantially the same as they relate to the alternative.

(3) An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. “

Based on the CEQA Guidelines listed above, it seems unreasonable to not have included “Alternative Locations” in the Draft PEIR. I submit that this must be addressed so that all who are reviewing the proposal have adequate information to make an informed decision, and sites are chosen for rezoning that lessen and/or remove significant adverse impacts.

FOR-2 is located in an “urban service area,” of an unincorporated area. The community of Forestville, in which it is located, is several miles from most of the amenities that people require, compared with most of the other parcels being considered under the EIR. There is a small grocery store, one dentist, a small medical clinic, and very little to no opportunity for permanent employment nearby.

FOR-2 would add approximately 783 people (there would be 1652 people added considering all Forestville sites), and it’s my understanding that other site(s) within the urban service area of Forestville have already been rezoned for additional houses (e.g. the property across from Rotten Robbie’s?). According to information obtained on “Google” the 2020 census showed ~3,800 people living in Forestville. This (granted over time) would result in a sharp rise in population; and would result in most of the population commuting several miles to jobs, the larger grocery stores, and medical appointments. This does not appear to be the best solution for addressing ghg’s, impact on the community itself, or the other needs of the population. Would public services (e.g. the Sheriff’s office staffing) be increased in the community?

As mentioned above, the increased population will add to environmental impacts by adding traffic congestion and CO2 to the air. In addition, it will increase impacts to the road surfaces. I appreciate that some mitigation was suggested (e.g. added bus lines and bike paths), however, it’s unclear whether this will be a requirement. Additionally, these means will not generally get people to their desired destination in a timely manner; and most people will continue to drive.

The increased density in housing (635 houses in Forestville, and an added population of 1,652 people—ref. Table 2-4, pages 2-25 – 2-26) will have a significant adverse impact on traffic on Mirabel Rd. and Front St., in particular. These roads are already heavily impacted, and at times congested by the heavy use of gravel trucks (traveling at 45 mph on Mirabel Rd.), along with the “normal” traffic traveling these roads.

Referencing 4.16 Transportation, I was unable to find any reference to Mirabel Rd. which would be an important artery for FOR-2. I was surprised that Mirabel Rd. and Front St. are not described as “Minor Collectors” of traffic (ref. page 14.16-4 – 14.16-5); or analyzed for significant impacts (unless I missed it). If development of FOR-2 occurs, Mirabel Rd. will be the road that those residents will “collect on”. Front St. will be a “collector” for the other FOR parcels, in addition to FOR-2.

These two-lane roads, which have little to no shoulder are dangerous to walk or ride bicycles on now. There are no sidewalks, bike paths, traffic lights or other measures to slow traffic, or accommodate pedestrians or bicycles particularly on Mirabel Rd., and Front St. is not much better. Mirabel Rd. has a stop sign where it intersects River Rd., and a stop sign where it intersects Front St./Hwy 116. The current conditions would not provide safe passage to the downtown area, to the Youth Park, Speers (our small local grocery store), or the river. In addition to the gravel truck traffic, vehicles have to back onto Front St. when they are leaving some of the businesses located there.

Forestville’s high school—El Molino—is no longer an option for the general high school public. As a result high school students are required to bus, or be driven to Sebastopol (or elsewhere) for school, and associated events. This adds to traffic concerns and congestion, and added ghg. With the added population, the situation will be exacerbated.

Referencing page 4.1-18: “On Mirabel Road, a school is directly across the street from FOR-2.” This is not accurate. The Forestville Youth Park is located across the street from FOR-2. School locations are: El Molino, located on Covey Rd., and The Forestville Elementary School and Academy located at 6321 Hwy 116.

The Draft PEIR indicates that transportation would result in significant and unavoidable impacts (ref. 4.16 and page 5-3). Nevertheless, it seems that Mirabel Rd. and Front St., given their current use and that proposed, would be important roads to discuss, analyze for significant adverse impacts, and mitigation measures; and disclosed for the purpose of thoughtful decision making.

Referencing pages 2-25 and 4.16.14. According to Table 2-4 the population buildout will be highest in FOR-2 compared to other parcels listed. Table 4.8-6 #4 indicates the project is consistent with reducing travel demand through focused growth. Although this may be true for some of the housing sites, it doesn’t appear to be true for FOR-2, in that travel demand to work, grocery stores, high school, etc. will be greater than if located closer to the amenities needed for a large number of people. As noted above, Forestville has very few amenities and working opportunities.

As indicated in the Draft PEIR, the FOR-2 parcel does not have sewer hook-ups. The homes that surround the parcel are on septic, as there is no sewer system available. Additionally, water availability is scarce. With the drought, and the prediction by some, that this will continue into the future, I question whether there will be water available to accommodate another 783 people (1652 for all of Forestville) even with the mitigation proposed in the Draft PEIR. How and where will additional water be obtained? Where will the sewage be transported? Will additional sewage ponds be required?

Referencing page 2-4, “...the County narrowed its list to 59 Potential Sites based on meeting these four basic requirements: ... 2. Site must be located within an established Urban Service Area where public sewer and water service is available”. As indicated in the DEIR: sewer is not available in FOR-2; and water availability and wastewater treatment are unknowns, and would require further study. It appears FOR-2 should have been eliminated from consideration in the DEIR, as were other sites. Why was it not?

Has FOR-2 been analyzed relative to hydrology, comparing the recharge that it currently provides (an area where water can absorb into the soil, and not have to be transported) to the area covered with houses, cement and asphalt? During large rain storms there is minor flooding along Mirabel Rd. as it descends towards the river, and flooding at the junction of Nolan and Mirabel and to a lesser extent at Giusti and Mirabel, particularly when drainage structures have not been cleaned. It appears a housing development has the potential to exacerbate the situation. Where will the drainage from the housing development be directed? Will it further impact potential for flooding?

Regarding wildlife, FOR-2 provides habitat for a number of species: deer, coyotes, bobcats, foxes, racoons, opossums, snakes, lizards, skinks, rats, mice, gophers, moles, and native bees, just to mention the obvious. It also provides roosting opportunities and hunting ground for owls, a variety of hawks—red shoulder hawks teach their young how to hunt in the orchard, sometimes a merlin in the winter, great blue herons, egrets, and a huge variety of other birds. Granted none of these species are “threatened” or “endangered”, however, putting housing in, at the density proposed, will reduce habitat for these species.

Impacts from wildfire are a major concern relative to the housing development being considered for FOR-2. Forestville is located in and/or adjacent to a wildland urban interface (WUI). With our changing climate and increased droughts, the danger of wildfires increases. This community has been evacuated twice in the last few years because of threat of fire. Substantially increasing the population will add to the difficulty of evacuation, particularly considering the 2-lane exit roads; and also increase the concern for a catastrophic outcome for those people who are unable to get out in time.

Referencing 4.19—Wildfire—page 4.19-1, includes a projection that extreme wildfire events are expected to increase in frequency by 20 percent by 2050 and 50 percent by the end of the century. The county recognizes that, “although high-density structure-to-structure loss can occur, structures in areas with low- to intermediate-density housing were most likely to burn, potentially due to intermingling with wildland vegetation or difficulty of firefighter access.” On page 4.19-2 (Table 4.19-1), FOR-2 is described as having 2-9% slopes on site with 0-75% slopes nearby. On page 4.19-4, vegetation is said to be less than Guerneville sites but more than Larkfield’s. On page 4.19-5, FOR-2 is shown to have a Very High FHSZ in less than one mile. Page 4.19-26 includes: “Development facilitated by the project would increase the potential buildout of the Rezoning Sites, concentrating this population growth in designated urban service areas of the Unincorporated County, where the risk of wildfire is generally less than in more rural areas where fuels are more abundant. However, as evidenced by recent wildfires in the County, urban areas, particularly those on the outer edges of urban development, are also susceptible to wildfires, despite the (sic) having less abundant typical wildfire fuels. Page 4.19.26 goes on to state, “Access to Potential Sites FOR-2, FOR 4...currently does not meet County road standards of 20 feet in width or greater. Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways could be required. Those improvements would require a County encroachment permit if on a public right-of-way; however, widening County roads would not exacerbate fire risk.” Why is it “could be required”? It seems the document should say “must be required”.

As it pertains to the statements made in the Draft PEIR, some of which I referenced above, it appears that in and near WUI’s housing density is “inherently” less. Putting high density housing in or near WUI’s, where drought and wildfires will only increase over time does not appear to be a good idea. It sets up a situation of potential disaster. I’m remembering the Tubbs fire. Fountain Grove was built in an area that actually had burned in the past. In 2017 the area burned again--this time with houses, and it appears the wind carried the added fuel from Fountain Grove across the freeway to Coffey Park. Although the orchard in FOR-2 may not be dense and contain a high fuel load now, even with the mitigations proposed to reduce fire in the proposed structures, the fuel overall will be increased, and increase a wildfire burning through. As stated on page 4.19-28, “However, it is not possible to prevent a significant risk of wildfires or fully protect people and structures from the risks of wildfires, despite implementation of mitigation. Thus, this impact would remain significant and unavoidable.” Considering the location of FOR-2, compared to many of the other proposed sites, it appears that there is an even greater significant risk relative to wildfire, and locating housing here only increases the risk for the community as a whole.

I wonder if there are studies that have been done which evaluate the best location for housing relative to climate change, drought and the danger of wildfires. It seems that these should be studied, and decisions made for the benefit of Sonoma county and the individuals and communities located in the county. I appreciate and agree with keeping open space between communities, however, when it comes to housing people in areas which would result in significant cumulative impacts as opposed to an area where impacts are minimal, I think it important to reconsider some areas currently “off-limits” to housing (e.g. areas near amenities, and areas where no significant adverse impacts would result).

Referencing page 4.8-22, it appears that the Cumulative Impacts focuses on GHG emissions generated by development of the project. I was unable to find (I could have missed) what impacts are projected once the housing development is in place and the people who occupy the 283 dwellings (FOR-2), or 635 dwellings (Forestville as a whole), are traveling on a daily basis.

Referencing page 5.2.1, “CEQA requires decision makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. The analysis contained in this EIR concludes that the proposed project would result in significant and unavoidable aesthetic, cultural resources, greenhouse gas emissions, hazards, transportation, utilities, and wildfire impacts. Although

development facilitated by the project would be required to implement mitigation measures, impacts would remain significant and unavoidable due to this irreversible loss.”

It is unclear how it is a greater good to continue on with a Draft PEIR that will result in significant adverse impacts for the people, the community and the county, as opposed to exploring areas of the county that will result in lesser impacts than the current proposal, with the consideration to rezoning those areas. Another indication that this document must address “Alternative Locations” as described under CEQA 15126.6

Given this is a Draft PEIR, the Impact Analysis speaks to the impacts of the housing sites in more general terms, and does not show the impacts relative to each parcel proposed for housing. There is a wide variety of parcels being considered in a variety of locations. Presumably, before some of the parcels are developed an additional EIR will be required. However, it is unclear how a zoning change can be decided when enough facts are still unavailable to determine whether the proposal is even feasible. How can you propose to change the zoning and allow up to 283 housing units on FOR-2, when there are still many environmental and feasibility unknowns?

As presented in the Draft PEIR and the Impact Analysis for Alternative #3, it clearly appears Alternative #3 is the superior environmental alternative, specifically as it relates to FOR-2, and is in the best interests of the community and Sonoma County. However, above and beyond this, other locations should be evaluated in the PEIR pursuant to the CEQA Guidelines Section 15126.6.

Thank you for considering my comments.

Sincerely,

Leslie Markham
6975 Nolan Rd.
Forestville, CA

From: [Lindsay Sullivan](#)
To: [PermitSonoma-Housing](#); [Lynda Hopkins](#); [district5](#)
Subject: Sonoma County Housing Element - Concerns
Date: Monday, February 13, 2023 4:16:10 PM

To whom it may concern,

I would like to express my concerns regarding the Sunset Avenue, Guerneville site selection for the Sonoma County Housing Element.

While I am a supporter of affordable housing, the selection of Sunset Ave as a site for 78 units is shocking because the neighborhood is already dense. The road is a narrow, one lane thoroughfare that is already tight to navigate through. It would be impossible to accommodate more parking and traffic. Sweetwater Springs has already requested this site be excluded from the selection process because the land may be needed for future water storage expansion. Increasing the neighborhood density will introduce fire safety and evacuation risks as well.

Beyond the Sunset Ave site, it seems inappropriate to include the unincorporated towns in the county's housing element project. These towns do not have the infrastructure to support such a large housing expansion, nor a large enough job pool for long term employment.

Thank you for your consideration.

--
Thanks,
Lindsay

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From: [Lisa Nahmanson](#)
To: [PermitSonoma-Housing](#)
Cc: [Lisa Nahmanson](#)
Subject: Forestville Housing Element: Comments to DEIR
Date: Monday, February 13, 2023 5:00:00 PM

February 13, 2023

Dear Commissioners:

I am writing to you today as a resident of Forestville, in unincorporated Sonoma County. I have lived in Forestville since February of 2011.

I am also a Forestville representative on the Lower Russian River MAC and on the Land Use Committee, so I have spent some time studying the DEIR and listening to Forestville residents during meetings and on social media (Facebook and Next Door).

Again, writing as a resident of Forestville, **the sheer number of housing units** proposed in the Housing Element plan for Forestville is absurd.

The Commission needs to eliminate many of the sites that have been chosen and dial back the impact of the Housing Element on the small town of Forestville.

My wife Sandra Steele and I have experienced fires first hand and also the impacts of floods on our town and surrounds. We have experienced first hand the dangers of dense housing in the wildland-urban interface (WUI) during evacuation periods.

We live on a one lane road portion of Giusti Road. We would be most closely impacted by the proposal of **6898 Nolan Road**. How would this parcel be developed, as it is internal, in the backyards of established homes and in an apple orchard. Would it be developed as a mini development with one ingress/egress off of the already impacted Mirabel Road? Would ingress/egress be from Nolan Road between 2 established homes? Would sewer and water lines be attached to an already impacted system? Fire lanes to fit current codes? Power infrastructure? It seems to be an unreasoned and irrational mess. Not to mention lighting, noise, dust, the typical building site mess. And eliminating a beautiful apple orchard.

When the fire in 2020 broke out we were hiking in Point Reyes. We immediately drove back to Forestville, secured our house and left again fortunate to have a safe situation with friends in Petaluma. And well before mandated evacuations. **How would our one lane road be impacted by a fire evacuation** adding multiple homes and residents trying to evacuate? **How would our small town lacking infrastructure be impacted?** How would the Lower Russian River be impacted? It is a frightening situation to ponder.

Our community lacks effective **broadband and mobile phone connections**. This type of infrastructure is also critical during fires and floods (not to mention during the day to day).

Furthermore, we lack **sidewalks, bike lanes and standard width roads** (such as our portion of Giusti Road, which is maintained by individual residents). We aren't set up like cities are to accommodate large scale growth. We don't even have enough **parking** spaces to handle

tourists in the summer and we don't have enough **trash and recycling and compost infrastructure which becomes a public health issue.**

We need to have further conversations to determine how to proceed with affordable housing while considering infrastructure impacts to current residents.

Thank you for allowing us to comment. I look forward to your response.

Sincerely,
Lisa Nahmanson (& Sandra Steele)
Residents since 2011
7799 Giusti Road
Forestville, CA 95436

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From: [lois](#)
To: [PermitSonoma-Housing](#)
Subject: Housing element DEIR
Date: Monday, February 13, 2023 11:20:26 AM

I am sure you have heard enough about how inappropriate the Laughlin Road, Sunset Ave. and Cutten Ave. sites are for high density housing

One lane roads, in some cases steep and winding, not walking distance to public transit and possibly school buses

Inadequate room for parking dozens of vehicles, changing the nature of rural neighborhoods, etc.

What I am suggesting is that we get together as communities to identify usable sites for high density housing, because it is obvious that we need it

Also, I believe at least some of this new housing should be affordable for low income people (not just middle income people like school teachers and nonprofit directors)

And some of it should be subsidized

I understand the county is between a rock and a hard place, and that is when you need to ask for help from our communities

Lois Pearlman

14290 Sunset Ave., Guerneville, CA, 9544707-494-9127

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From: [Lorna Catford](#)
To: [PermitSonoma-Housing](#)
Subject: Rezoning for Housing in Forestville
Date: Monday, February 13, 2023 4:05:38 PM

Hi,

I understand people need to live somewhere. To address the concern about “destroying the cottage atmosphere” of our small town, I think building more homes in the new area south of Hwy 116, East of the walking trail makes the most sense, because people bought into that area knowing that’s what it’s like.

Second, If you build on the lot behind the elementary school up Paul Paddock’s driveway, would traffic enter from Van Keppel (road width concerns), or off of 116 somehow? How would the increased traffic affect kids going to school?

If you build on the large area off Covey — can you sort of hide the buildings so they aren’t visible from the road? What would the increased traffic do regarding safety of kids walking to and from school?

Thanks,

Lorna

Dr. Lorna Catford

Emerita Psychology Faculty
Sonoma State University
lorna.catford@sonoma.edu
707-303-6787

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From: [Madeline Solomon](#)
To: [PermitSonoma-Housing](#)
Subject: Draft EIR comments: Housing Element Update
Date: Monday, February 13, 2023 3:31:07 PM

Dear Mr. Gage,

My name is Madeline Solomon. I reside at 6794 Clara Lane, Forestville CA 95436, a home on a 1 acre property that I purchased in 1990.

I apologize for getting upset on the phone with you last week. I did not think this Draft EIR process could be legal, in accordance with all applicable code and law, and in good faith due to the inadequacies of the report itself and the public review and comment period, in regards to Forestville 95436.

(1) I first received notice of the Draft EIR's existence, contents related to Forestville 95436, and Feb 13, 2023 closing date for public comment when I went for a walk by our downtown park last Thursday evening Feb 9, 2023. I saw a photocopied and highlighted sign, obviously a non-governmental announcement, posted on the bulletin board. One of our Forestville residents/neighbors then hand delivered the flyer to my front gate, and to the other houses in the Van Keppel-Hughes neighborhood.

When we spoke on the phone on Friday, you said that some people were that the notices had been sent to them late. No notices were ever sent to either me or my neighbors here. An internet search revealed that the six Forestville properties listed in the DRAFT EIR have appeared in previous Sonoma Permit documents since at least 2018, but this was the first that my neighbors and I heard of it last week.

drove to the Healdsburg library on Saturday to read the DRAFT EIR in their library, because no copy of the document was placed in the Sebastopol or Forestville libraries. Please remedy this immediately, so that copies of all Permit Sonoma documents that have public comment periods and are relevant to Forestville 95436 are placed in both the Forestville and Sebastopol libraries. Please see that if notices of public comment periods for relevant documents are sent out, then they are sent out to us in Forestville 95436.

I believe this is the minimum standard for a public comment period under CEQA and NEPA, and that Sonoma Permit failed to meet this requirement in regards to the Draft EIR Housing Element Update this year 2023 in Forestville 95436 and perhaps in other areas as well.

Therefore I believe that submitting the Draft EIR and verifying that the requirements for public notice and comment have been met, would constitute fraud.

Moving forward, I suggest notifying the state of CA of your failure to meet the minimum standard for submission of the Draft EIR, with regards to Forestville 95436, and see what you can work out. I do not recommend lying or committing fraud.

(2) Two of the addresses listed as potential sites in Forestville are not suitable for apartment/medium density housing, and should be removed from the list.

* Electro Vector 6555 Covey Rd is a contaminated site from past industrial activity. There is a report on the severity of the contamination in both dust and groundwater in the Dec 13, 2018 notes of the Forestville School District board meeting. By that time the contamination has spread from the Electro Vector site to the neighboring school as seen in groundwater monitoring wells. I received written notice of the groundwater contamination many years ago, perhaps 2008? The Electro Vector site cannot possibly be considered for housing.

The fact that the Environmental firm that Sonoma Permit hired for the Draft EIR did not find this contamination would require significant, costly and potentially dangerous mitigation before building housing shows that Sonoma Permit did not review the Draft EIR sufficiently before release, at least those parts of the report that relate to Forestville 95436.

* 6090 Van Keppel is not an address, in that it is not associated with a parcel identified with a parcel number in the Sonoma County Assessor parcel number database. My neighbors and I have been puzzled by the location of the property described by the 6090 Van Keppel address. I'll spare you the details of the different theories, but I think I've got it right! The parcel shown as FOR-4 on the map is the same as appeared in a Sonoma County document from 2018, where the parcel number was given as 083-073-010. In the Assessor's database, that parcel number is associated with a property address on Highway 116, near Forestville School.

The use of the 6090 Van Keppel address for this parcel suggests that the proposed 65 residences could be accessed from Van Keppel Rd. This would not be possible without millions of dollars of engineering work. It would never be safe unless Van Keppel Rd were substantively reconfigured and rebuilt around the intersection with Hughes Rd.

Also, the property that Permit Sonoma (but not Sonoma County Assessor) recognize as 6090 Van Keppel (based on parcel number look-up) is adjacent to and slightly upslope from the contaminated Forestville School, and very close to and slightly downslope (in my estimation) from the contaminated Electro-Vector site (FOR-1).

(3) The good news is that Forestville 95436 is a generally open hearted and good spirited community. We are concerned about the housing crisis too, and have some good ideas for increasing the stock of safe and affordable housing in Forestville 95436 in order to do our part in helping Sonoma County to fulfill the state mandate.

We hope that you and/or your representatives will come to town and invite us to Town Hall meetings and focus groups so that we can work together to make actionable plans to fulfill the CA state housing mandate.

Such plans and proposals must be based on sound and accurate information, should align with the principles outlined in the Sonoma County General Plan 2020, and should of course include an appropriate public notice and public comment period once Draft documents have been prepared.

I look forward to working with you and Permit Sonoma in the future to create a workable plan for developing more housing in Forestville 95436.

Thank you,

Madeline Solomon
MA, MSc
6794 Clara Lane
Forestville, CA 95436

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From: [Marci Mascorro](#)
To: [PermitSonoma-Housing](#)
Subject: Proposed Rezoning: Armstrong Valley
Date: Monday, February 13, 2023 12:02:52 PM

I am writing to protest the proposed rezoning and high density developments in Armstrong Valley.

In addition to the obvious problems that this type of increase in density entails, namely an infrastructure that is insufficient to support an increase of over 600 households. The existing sewer system is already challenged by the county's own evaluation; California water does not store, nor is able to provide via its existing infrastructure sufficient water for additional household in the density proposed.

The state of California, years ago, and importantly, prior to 2017, enacted legislation that requires local governments to force feed its communities additional housing or be held hostage for funding (sounds a little bit like a previous presidential administration MO). This mandated housing clearly does not take into consideration the changes we have seen and the public emergencies we have experienced due to climate change. Especially fire. Especially in Armstrong Valley with a single road out. There is no wisdom or value in adding over 600 housing units to Armstrong Valley. It's a preposterous proposal. Especially considering that that type of increase in density and the problems that come with it in terms of the aforementioned infrastructure challenges, fire, or flood evacuation routes, put the existing valley residences and the existing ecosystem at peril.

Armstrong Valley is also situated in an urban interface wildfire zone. How can "affordable housing" even be built with the high cost of all of the requirements brought on by this new code.

Unfortunately, the developers seem to hold the higher cards and their input in forcing this legislation is obvious. The developers have by far the most to gain, and they would benefit at the detriment of the existing community. I have heard the term "manufactured housing crisis". California housing is expensive in the majority of the state. There are also areas that are inexpensive and under populated. Further, Sonoma County in the past five years has experienced, according to the Press Democrat, a net loss of approximately 25,000 residence. The state of California has also experienced a net loss of residents. Yet, the cities of Windsor and Santa Rosa and Petaluma have added high density housing in core service and transportation zones, which is in accordance with their own zoning plans. No one even seems to know how many units have been added in the past five years.

I am neither for nor against additional housing in general. But I am certainly against the lack of transparency and basis in facts that have dominated the rezoning proposal and I am against the unreasonable and frankly unsustainable densities proposed for Armstrong Valley.

I have much more to say, I'm going to save that for Mike McGuire and Linda Hopkins. But please, put my name down as an opponent of the rezoning as proposed.

Thank you,

Marci Mascorro, a Laughlin Road resident

Marcimascorro@gmail.com

--

Marci

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From: [Mark Berry](#)
To: [PermitSonoma-Housing](#)
Subject: Draft EIR Comments
Date: Monday, February 13, 2023 1:44:36 PM

EXTERNAL

Hello,

Thank you for the opportunity to comment on the Draft EIR and proposed housing sites.

My comments are related to the proposed re-zoning sites located within Forestville, and more directly to site FOR 2.

I have great concerns about the proposed re-zoning of the identified parcels in the Forestville area. If all proposed parcels are re-zoned and built to proposed capacity, that would increase the total population of Forestville by 43% (based on 2020 population total). Such development would permanently alter the rural landscape and way of life for current residences – some of these families have lived here for multiple generations.

As a 20 year resident of Forestville, we own a property that is adjacent to the FOR 2 site.

This is a well established rural neighborhood with 50 year old single family homes that are built around the perimeter of the dry orchard parcel (FOR-2). Most homes are single story (there are a couple of 2 story homes), and all homes surrounding the proposed parcel are on septic systems.

I am especially opposed to re-zoning and building multiple housing units on the proposed parcel FOR-2.

The FOR-2 site is not compatible for the following reasons:

- There is no established infrastructure of water or sewer on this large sized parcel.
- Forestville water resources are already at maximum capacity and cannot support new multi-unit developments.
- This is a rural neighborhood without sidewalks. The proposed FOR-2 parcel borders Mirabel Road which has a 45 mph speed limit with heavy gravel truck traffic which is not safe for pedestrians & cyclists.
- Basic services are limited in this area and not within walking distance.
- There are many established natural trees on this parcel that would have to be removed for development.
- A multi-unit housing development of proposed scale on this site would be an eyesore, and forever change the pastoral setting that has been a part of this rural community for decades.

I agree that California in general is in need of more affordable / medium to low income housing, but should be done in a thoughtful and responsible way. Such developments in Sonoma county would be more successful and appropriate in developed communities with built-in infrastructures such as Santa Rosa, Rohnert Park, Windsor and Cotati.

Thank you for your consideration of my comments.

Sincerely,

Mark Berry
mark@akinsberry.com
7410 Poplar Drive

Forestville CA 95436

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From: [Mark Molofsky](#)
To: [PermitSonoma-Housing](#)
Subject: Comments Regarding Rezoning of Parcels #054-290-057 and #054-290-084
Date: Monday, February 13, 2023 12:53:36 PM

EXTERNAL

Attention Eric Gage:

Sir,

As a 45 year resident of Glen Ellen, retired builder, and concerned citizen for the future of our unique town and county, I implore you to remove the above referenced parcels from the rezoning consideration.

The scope, scale and proposed use and impact implications are far beyond what should be developed in downtown Glen Ellen. Despite possible legal loopholes that would allow such development, the proposal is at complete odds with the spirit of the village and the practicality of handling and integrating this use. Additionally, aesthetics and construction quality need be a major element in any future build on this site.

Again, please, please remove these parcels from the proposed rezoning. It is completely wrong.

Thank you,

Mark Molofsky

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From: mcbear35@comcast.net
To: mcbear35@comcast.net; [district5](#); [PlanningAgency](#); [PermitSonoma-Housing](#)
Subject: Questions and Comments on DEIR Unincorporated Sonoma County Housing Element
Date: Monday, February 13, 2023 3:20:31 PM



Permit Sonoma,

Thank you for the opportunity to make comments and ask questions regarding the DEIR. I am a resident of Forestville, and concerned about elements in this proposal.

The following questions pertain to FOR-1, FOR-2, FOR-3, FOR-4, FOR-5 and FOR-6.

1) Public sidewalks. With a potential significant increase in population base in Forestville how will people walk on streets or cross streets safely? Each of these sites have limited, broken and often nonexistent sidewalks. The FOR-2 site is a larger concern as Mirabel has a posted 45 MPH speed limit. There are no/limited sidewalks, and no crosswalks to cross Mirabel. How will people in general and specifically those with physical disabilities, children going to school negotiate our streets?

2) Traffic. This town has two streets that run through to and through it. The increase in population will certainly increase the traffic in Forestville and our ability to move safely and effectively into and out of town. I am concerned that an accident on either of these roads (or both) would put traffic at a standstill and would pose a huge concern during emergencies. Is there a plan that addresses how such a larger population might effectively evacuate this community? What are the impacts to the air by such a increase in traffic?

4) General infrastructure services: General services such as sewer, water and PG& E are already a concern in Forestville with out adding any additional population. What will be done to repair, and bring these services up to current standards while adding new population? This issue is somewhat addressed in your Powerpoint with a very disappointing result. Utilities and Service Systems: "the project would require the relocation or construction of new or expanded water and wastewater facilities" is identified as "Significant and Unavoidable" in your report. It goes on further to state: "The project would NOT have sufficient water supplies to serve the project development during normal, dry and multiple dry years" The question is how can we allow housing to be built for a greater population base that will potentially not have the ability to have water or sewer services? Why would a plan be approved where basic needs of its population (water, sewer) cannot be met and is considered a "Significant and Unavoidable" issue? What plan can be developed to insure that the population base can and will be provided basic services such as running water and healthy wastewater facilities? This is a very basic requirement and expectation for housing. Without a feasible plan to address something as basic as water and sewer, in the plan, the obvious solution is not to add additional population to this area until that simple expectation can be met.

4) Personal Services: There are no grocery stores in Forestville, and isn't that part of the expectations of such a large development? The population of Forestville now relies on grocery stores in Santa Rosa or Sebastopol, both of which are about 7+ miles from Forestville. When and where does this become part of this plan?

5) Emergencies: Our town has been evacuated a number of times due to Wildfires, so the threat of having this occur in the community again is real and can and should not be taken lightly. The ability for our town and its people to evacuate quickly and safely is horribly lacking in this plan and it needs to be addressed! This is a major concern of mine as well as others who live in wildfire risk areas. Even the language on your Powerpoint is alarming and appears to have no concern in the safety of the population as a whole. Per the Powerpoint, "This project would expose project occupants and structures to wildfire risks for sites located in or near SRAS or FHSZS as "Significant and Unavoidable". To me, this statement shows a complete indifference to health and welfare of our population and is unconscionable and irresponsible. Why is there a proposal where it blatantly states that there is real potential for loss of life in a wildfire area and why is this considered "Unavoidable" ? It is not "unavoidable" to intentionally place people in hazardous areas! There is an obvious and simple solution: Do not build a high density housing element in the area. The question really is why build in high fire danger areas in general and specifically where access to evacuate is so limited as it is in Forestville? I also have a very specific concerns with FOR--2 as I believe it is within 2 miles of an SRAS area. FOR-2 has a plan to house hundreds and hundreds of people. Why would like site even be permitted to build on?

I appreciate the opportunity to bring my concerns and questions to Permit Sonoma. I understand there is a legal requirement to add housing to the State and with that in mind, we should certainly need to participate in that requirement. However, why is the town of Forestville being impacted more significantly than any other town based on population? What's fair is fair, and it doesn't appear that this requirement is being handled in a fair and equitable manner. Are we in such a rush to approve a plan, and make the 'numbers' that we approve a plan that allows and acknowledges real safety and basic need issues? I believe that these are truly "Significant" issues, and I refuse to believe they are "Unavoidable".

I hope that we will not look at our current decision making in years to come and say, "Why did they ever build that here? What were they thinking? They knew better and look at the consequences". The project is referred to as a Housing Element, but please don't forget that these are peoples "homes", not simply houses. Community is where people and families live with a feeling of fellowship with others. At minimum we should have the basics of building housing that is safe and has running water and a functioning sewer. The impact for the current and future residents and families of this and every other "community" should have a well developed, healthy and safe place to call home. This current plan does not provide that, and it should.

Thank you,

Mary Clare Cawley
6632 Jim Court
Forestville, CA 95436
Mcbear35@comcast.net

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From: [Megan Cohen](#)
To: [PermitSonoma-Housing](#)
Subject: Attn: Eric Gage. Draft EIR - housing. Site FOR-2 at 6898 Nolan Road is not a suitable option.
Date: Monday, February 13, 2023 4:42:02 PM

Dear Eric Gage,

As a resident of Forestville, I believe the site at 6898 Nolan Road is not a suitable option.

Our community needs more affordable housing for working class citizens like me.

I am a Forestville resident on SNAP/EBT benefits and in the income bracket that would likely qualify for affordable housing.

But I strongly feel that the scope of the proposed development is not a suitable match for the suggested site.

I am a close neighbor to this site, living just a few minutes walk from the property. Based on my daily lived experience of this area for several years, I believe the Nolan site is not a suitable option for this housing project.

After reading the Draft Environmental Impact Report, here are my concerns.

* How will residents safely evacuate?

Due to the layout and condition of our roads (especially Mirabel Rd), evacuation from this neighborhood during natural disasters is already very difficult. How can it possibly be safe to have a massive population increase in this neighborhood, which is extremely vulnerable to flooding?

* How will our utilities grid meet the needs?

We already experience outages (planned and unplanned) due to an overtaxed power grid. I get notifications from PG&E and from my local officials asking me to change how and when I use water and power so that we can keep those key services going for current residents. In the proposal, I don't see an acceptable solution for strengthening our infrastructure to accommodate hundreds more folks under the same utilities grid that barely support us now.

* How will transportation be safe?

We already have a challenging mix of residential and industrial traffic here, with no walkability and very little public transit for those who are not drivers. In the proposal, I don't believe there is adequate consideration given to the impact of adding hundreds more people and their cars to the already packed thoroughfare of Mirabel with its degraded road surface, and to the narrow residential roads of Nolan and Giusti with their limited capacity.

Thank you for the opportunity to add my local perspective to this process. My main concern is

the safety of residents.

As we face natural disasters and daily life in this neighborhood I feel that a development of this size on this site would be dangerous not only for the new residents coming in, but for my own family.

I encourage the planning commission to reconsider the unsuitable site on Nolan Rd and to partner with local voices in seeking a new, more suitable site to meet our affordable housing goals.

Sincerely,

Megan Cohen
7446 Poplar Dr
Forestville, CA 96436
megan@megancohen.com

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Megan Cohen

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could provide public water and sewer to the new housing units¹, the area surrounding the proposed sites is a relatively small community with limited public transportation, roads that have already been looked at for improvement given the current traffic patterns, limited opportunity for rapid job growth in or near town, as well as local services such as grocery stores, restaurants, and pharmacies that would potentially prove insufficient to provide for the needs of such a large increase in population should these new housing units be built. The existing public transportation system should be carefully studied to determine its adequacy to reliably allow people to reach jobs in neighboring communities such as Santa Rosa or Sebastopol in a reasonable and reliable way². The impact of significantly increased car traffic in, around, and through downtown is of concern given that, for instance, there are currently no traffic lights of any kind in the town. Particular care should be taken to study the impact of increased traffic on the condition of modestly-sized roads including some with inadequate drainage and well known areas of concern from recent flooding. In addition, as noted the local services in or near town include only one small grocery store, a handful of local restaurants, a small coffee shop, a small bakery, a modestly sized pharmacy, and one children's park. The adequacy of these and other services should be studied for their ability or inability to adequately support the needs of an additional 1,652 people in 635 units.

The Proposed Development Would Negatively Impact the Community, Including in Ways Covered by The EIS

As a result of Forestville likely having insufficient services at present to support these newly proposed high density housing developments and the fact that the current EIS provides no clearly articulated requirements nor exact vision and support for other potentially required improvements to the town that may need to be developed alongside this housing, the proposal for the 7 Forestville sites will result in greater environmental impacts than shown here in this Draft EIS because the development would cause:

- Increased traffic, vehicle miles, and associated pollution (Impact AQ-1, Impact ENR-1, Impact GHG-1, and Impact TRA-1)
- More land disruption via parking that would need to be developed, as well as that required to address drainage and other potential water management and flooding mitigation efforts (AES-4 and Impacts BIO-1 –BIO 14)
- More land disruption because more general services would likely have to be developed (Impact PS-3 schools and PS-4 parks), etc.
- The development would also not result in the goal of connecting new low-income people with affordable housing that supports their employment and access to support and other services nearby.

¹ The FOR 1,2,4, and 6 sites still have to confirm suitable water service or waste water service per pg ES-43.

² The current Route 20 bus runs every hour to two hours to Santa Rosa via Sebastopol, so Sebastopol is reachable in ~25 min with those limits but the 20 min drive to Santa Rosa would become 1 hour+ depending on where one is headed

Conclusion and Recommendations

Thus, without greater study including the adequacy of existing services and physical infrastructure such as roads and overall drainage and flood management requirements and the associated environmental impacts with any improvements or expansions that may be required, we request that the County update Alternative 3 to remove the 7 Forestville sites from the proposed Housing Element Update and associated draft EIS. We would like to see the County instead support further investment in improving the existing services and access to housing in a more integrated and holistic manner, to support further investment in more organic increases in economic activity, and the addition of new housing units in conjunction with those areas of growth which will enable Forestville to expand and welcome new residents and families and in a more sustainable way that provides opportunity and support to all its residents.

Thank you for your time and engagement on this important topic, and we look forward to hearing your thoughts on our feedback. We appreciate all of the important service and work you do for our community.

Best,

Melissa Kemp

50 Marigold Ln
Forestville, CA 95436
607-351-7905

From: [citizenkane](#)
To: [PermitSonoma-Housing](#)
Subject: Draft EIR
Date: Monday, February 13, 2023 4:54:29 PM
Attachments: [Scan 143.jpeg](#)
[Scan 144.jpeg](#)

Thanks for the opportunity to be heard.

Michael Kane

6492 First Street

Forestville

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Draft EIR -Housing 2023

We, (Michael and Sherry Kane; 6492 First Street, Forestville) have lived for 38 years in the downtown area of Forestville. We have raised two children here. We recognize the need for additional housing for the lower-income residents of our county. We hope this hearing can come up with compromises that would be good for all.

A recent article in The Press Democrat (2/13/23) pointed out statistics that show the county is not growing at an x5 rate but rather with many people leaving the area and a population that's aging out we should plan accordingly.

Here are some of my questions and suggestions...

1. TRANSPORTATION

- With one road in and one out (for occasions when we have fires and floods), the roads are inadequate to handle the current population.
- What will be the solution to this problem
- For the proposed sites in the downtown area, there are not enough sidewalks, crosswalks, and streetlights.
- This housing is being designed for low-income families. The increase in non-electric vehicles will impact air quality. And we have one gas station in town. A study needs to be done to determine if that is adequate.
- The County Bus System had been an integral part of the workforce means for getting to and from work. Sadly, the schedules do not address those needs. I'd like this rectified for use not only for workers but for the senior population.

SEWER WATER GARBAGE

- The Forestville wastewater processing plant is adequate for the current population. With the addition of new housing, this facility will have to be re-engineered to handle the additional people.

3. COMMUNITY SERVICES

With the introduction of more people the need for Police and medical first responders goes up as well. Currently, there is one Fire/EMT unit in Forestville. And our police are the County Sheriffs. Low-income housing will increase the need for increased services. A bus system with a better schedule is just one way for people to be able to get doctors' appointments.

From: [Michael Nicholls](#)
To: [PermitSonoma-Housing](#)
Subject: Housing Element DEIR Comments
Date: Monday, February 13, 2023 12:53:24 PM

I am submitting my Objection of Rezoning properties listed in Sonoma County Draft Environmental Impact Report (DEIR) specifically, GUE -1 -14156 Sunset Ave., GUE-2 -16450 Laughlin Road, GUE-3, 16500 Cutten Court, and GUE-4 -16050 Laughlin road, all in Guerneville.

- None of the above properties are near public transportation corridors and all parcels lack vital infrastructure to support the addition of densely populated housing.
- Affordable workforce housing indeed is required along the Lower Russian River, however a proposed population increase of over 600 in Guerneville doesn't support that level of workforce in the local community, which leads to increased GHG and commutes to the 101 corridor and elsewhere for employment.

Unfortunately I'm not all that familiar with the Forestville parcels listed in the Housing Element DEIR, therefore do not feel qualified to comment on that community's needs.

It is my understanding the only city that was amiable to additional workforce housing was Cloverdale. Where was the buy-in from Healdsburg, Cotati, Rohnert Park, Windsor, and Petaluma; key county employment hubs, in identifying additional potential sites for workforce housing? Santa Rosa, the major employment hub of the county identified only 10 sites in Moorland and South Santa Rosa adjacent to Santa Rosa Av, which are not near major employment districts within the city.

- I am baffled county owned property at the County Governmental Center in Santa Rosa is not considered in the Housing Element for more densely populated high-rise workforce housing for County, Kaiser and other local employers. Was consideration given to converting underutilized parking structures near/within the Santa Rosa downtown area to multi-story parking, housing structures?

- Is there a valid reason the airport corridor (Brickway Blvd., Copperhill Pkwy., Skyline Blvd.) wasn't designated for workforce housing re-zoning? Many industries are located within that community, it is close to transportation corridors, has the important infrastructure necessary to support housing and is an ideal setting for growth and workforce, whether it be low rise, condominiums, rental units or live/work lofts.

Thank you for the opportunity to comment on the Housing Element DEIR

Sincerely,

Michael Nicholls
Cazadero CA

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From: [Mitchell Genser](#)
To: [PermitSonoma-Housing](#)
Cc: [Leo Chyi](#); [Susan Gorin](#); [Pat Gilardi](#); [David Rabbitt](#); [Andrea Krout](#); [district4](#); [Jenny Chamberlain](#); [district5](#)
Subject: Housing Element Update - Forestville
Date: Monday, February 13, 2023 6:22:21 AM

Mr. Gage, and Council Members,

My wife and I have lived in Forestville for over 30 years. We raised 2 children, ages 30 and 25 on Hughes Road, a wonderful, vibrant dead end street a few minutes from downtown. I am, besides being an attorney, also a real estate developer and have worked on historic low income housing projects for many years. I am all about creating more affordable housing, yet doing so in a sane and progressive manner that honors the pre-existing community and permits the timing and pace of building and integration of new residents and families to not be majorly disruptive and divisive.

This proposal to 'streamline' the rezoning and permit process to allow construction of up to 635 new dwellings that has 1,652 people as a proposed total population to a town presently with 3,880 people is, to put it bluntly, insane, and invariably would change the entire texture of this unique community. Just because SB-6 (Middle Class Housing Act of 2022) and AB-2011 (Affordable Housing and High Road Jobs Act of 2022) allow for streamlining the re-development process and affordable housing in current commercial and industrial zoning designated properties dos NOT mean that doing so in Forestville in such a manner that would increase the population by literally 50% makes any sense whatsoever.

Any one of the 'smaller' FOR Site proposals in the range of proposed total population of 185, would, in and of itself, increase the population of Forestville by 5%. A big move, but something that I suspect we could comfortably absorb. The Nolan Road FOR-2 site which would go from a density of 7 to 283 and result in a population increase of 736 would be a disastrous move, having anticipated and unintended repercussions for Covey Road and the entirety of Forestville.

PLEASE slow down and be do 'smart planning. Select one, tops two of the FOR sites with no more than a 250 person proposed total population increase and work with that. The proposed actions are just too drastic and if implemented, would represent the transformation of this west county community into something no longer recognizable nor desirable to live in for many many present and future residents of Forestville.

Thanks for your consideration.

Mitchell S. Genser

Attorney and Real Estate Developer

707.480.0138 (cell)

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From: [Patricia Brunelle](#)
To: [PermitSonoma-Housing](#)
Subject: EIR Proposal for Forestville
Date: Monday, February 13, 2023 2:30:04 PM

February 13, 2023

Dear Mr. Eric Gage:

The Workforce Housing Proposal which contains a provision adding 635 new housing units to the town of Forestville does not take into account several factors. Would you please address my concerns?

The following addresses are included in the plan for Forestville:

1. 6555 Covey Road
2. 6898 Nolan Road
3. 6220 Highway 116
4. 6090 Van Keppel Road
5. 6475 Packing House Road
6. 6250 Forestville Street
7. Mirabel Road and Highway 116

My concerns are related to all of these properties and addresses.

I have lived within 2 or 3 miles of these locations for the past 38 years and believe the addition of 635 housing units at these locations will severely negatively impact the quality of life for all residents, including those possibly living in the new housing.

1. All these roads are small and most do not have any sidewalks. To add hundreds of people driving, biking and walking them would create a safety hazard with the ensuing congestion. Do you have plans to build new roads to accommodate this increase? How are your plans consistent with the state's belief in city-centered growth? Why isn't housing being planned along transportation routes in the county, like in Santa Rosa? Or near the Smart Train? Living in Forestville requires having a car to get to work and school. How does this plan accommodate the parking and driving needs of the future and existing residents?

2. These living units will suddenly increase the town's population by at least 44%. How is this consistent with rational growth plans? How will the water and sewage needs be accommodated? How will the plans for public safety be assured when now we only have the

sheriff which is leaving a gap in coverage in our unincorporated area as it is? Why aren't these housing units being phased in in the larger city areas of the county, like Santa Rosa? There are many vacant lots available due to the fires in 2017 and are located near transportation, have water and sewer systems and bigger roads already. Have those lots been seriously considered? Those lots are already near the 101 corridor where most of the jobs are.

3. Why isn't this workforce housing located near where people are working? Certainly the climate crisis necessitates this type of planning to eliminate the burning of fossil fuels for transportation. Why isn't the corridor of the Smart train being used as it was intended-to provide transportation to eliminate the use of cars. It's a 10 mile drive from Forestville just to get to the smart train. Have bus routes been examined to place housing near them so people could walk to catch a bus to work? Has the use of bicycles by the residents been examined and planned into the land use?

4. When you came up with these addresses to add housing units to, did you talk to the people who live here? Who did you talk to? Did they raise any of the concerns I have? Will you study where the people will be working and make the housing convenient to the locations?

I am requesting answers to my questions and appreciate your addressing them before any further actions are taken to add 635 housing units to Forestville. Will you do this?

Please enter my letter into the record.

Sincerely,

Patti Brunelle and Janet Zagoria

[email: honeybj@comcast.net](mailto:honeybj@comcast.net)

mail: 6484 Mirabel Road P.O. Box 462, Forestville CA 95436

house: 8471 Champs De Elysees, Forestville CA

—

Patricia Brunelle

honeybj@comcast.net

707-486-9187

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From: [Robin Shopbell](#)
To: [PermitSonoma-Housing](#); [Susan Gorin](#); [Pat Gilardi](#); [David Rabbitt](#); [Andrea Krout](#); [district4](#); [Jenny Chamberlain](#); [district5](#); [Leo Chyi](#)
Cc: [Bob Shopbell](#)
Subject: Housing Element Update
Date: Tuesday, February 21, 2023 11:52:47 AM

Dear Sonoma County Leaders and Neighbors;

Regarding the Housing Element Update, specifically FOR-4, located at 6090 Van Keppel Rd. As the owner of 6073 Van Keppel we are in agreement with the Housing Element Update DRAFT EIR that states “.. and development could be dominant if it differs considerably from surrounding land uses.” Should this “... area accessible only by unpaved roads...” be selected for continued exploration, we feel this would be a mistake.

While the maps provided within the Update identifying the location of FOR-4, and the description associated with it, do not seem to align with the address of 6090 and our home of 6073 Van Keppel, we do know that Van Keppel itself is a single egress road. Given this single way in/single way out, the addition of 70+ housing units would have a significant impact should there be a need for an evacuation of Van Keppel.

Additionally, there currently does not exist a public sewer in the 6000 block of Van Keppel. We are on a septic tank, so I assume, in addition to the updates to the current road, sanitary systems would also need to be updated to accept these 70+ housing units.

We are opposed to continuing to explore FOR-4 as part of future high density planning, as Van Keppel itself cannot support these additional units, the public sewer system does not serve this area of Van Keppel, and the surrounding homes/properties, including our 1 acre parcel, are appreciably different in style and character from the anticipated housing project.

We are aware that denser, affordable housing is very much needed in Sonoma County, and so we do support this. But we feel that infrastructure costs associated specifically with FOR-4 to bring this parcel up to needed levels, combined with the fundamental changes to Van Keppel do not make fiscal sense to further pursue FOR-4 in the long range plans.

Sincerely,
Bob and Robin Shopbell
6073 Van Keppel Rd.
Forestville

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From: [Sabrina](#)
To: [PermitSonoma-Housing; Lynda Hopkins](#)
Subject: Proposed rezoning of 6 sites 95436
Date: Monday, February 13, 2023 11:40:38 AM

I am writing to you to express my opposition to the six parcel rezoning proposal for housing in Forestville Ca. While I not opposed to some housing, the current proposal is too much for our small town. We already have traffic issues and to introduce 1,600 more residents in a town of 3,800 is unsustainable. Not only will this ruin our small town charm, it also poses other issues such as:

- Gridlock during commute hours
- Not being able to evacuate safely
- Higher demands on our infrastructure, such as sewer, water supply, etc.
- Pedestrian safety
- Threats to wildlife

I have talked with my neighbors and they also share my concern.

I urge you to reconsider such a drastic change to our town.

Thank you for your time.

Sincerely,

Sabrina Zola

Resident and property owner Forestville, Ca.

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From: [Scott Ruthrauff](#)
To: [PermitSonoma-Housing](#)
Cc: [district4](#); [Susan Gorin](#); [Pat Gilardi](#); [David Rabbitt](#); [Andrea Krout](#); [Jenny Chamberlain](#); [district5](#); [Leo Chyi](#)
Subject: Housing Elements Update
Date: Monday, February 13, 2023 1:54:19 PM

Dear Mr. Gage and Sonoma County Board of Supervisors,

It has come to my attention through various neighbors and social media postings that Sonoma County is considering rezoning several parcels in the hamlet of Forestville to accommodate high density housing development projects. I understand the State of California is requiring all of the counties in the state to develop a plan with a specific number of housing units to meet a quota. However, the parcels that have been identified cannot accommodate the number of residents that are being proposed nor can the infrastructure of our township handle an estimate additional 1,652 residence.

I'm in favor of some higher density housing projects and definitely recognize that we need more housing in the State of California. However, this one-size-fits-all proposal doesn't make any sense in our community. By rezoning these parcels to accommodate 1,652 new residents, it would swell the Forestville population by 50% over it's projected 3,900 current residents. Furthermore, these new residents would be concentrated in the center of Forestville where we have limited space and only a single road in and out of town. Even if these projects resulted in improved services (water, sewer, electrical, etc...), the roadways cannot handle the additional traffic...especially when we've had to evacuate due to fires and floods.

Please reconsider the numbers allocated for these rezoning projects. I think a more modest rezoning proposal that would include closer to a total of 600 new residences and a total of 150 homes would be more feasible for our community and would help the County meet some of the targeted rezoning goals. Furthermore, placing more housing nearer to transportation hubs and services will be more beneficial to lower income residents who are more reliant on those services and employment opportunities. Santa Rosa, Rohnert Park, Windsor and Petaluma are all better suited to accommodate denser housing projects as they possess the infrastructure to handle that increase in population, as well as the law enforcement, health care, education and supportive services.

Hopefully you'll all be willing to listen to your constituents who will be most impacted by these rezoning decisions and adjust your proposals accordingly.

Thanks for your consideration.

Scott Ruthrauff
5921 Van Keppel Road
Forestville, CA 95436

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From: [S & A Perry](#)
To: [PermitSonoma-Housing](#)
Subject: Sonoma County Housing Element proposed rezoning of parcels # 054-290-057 and # 054-290-084 (GE-1 and GE-2).
Date: Monday, February 13, 2023 8:07:24 AM

The proposed rezoning and resulting increased density of parcels # 054-290-057 and # 054-290-084 in Glen Ellen should be removed from the proposed Housing Element changes.

The Proposal would increase allowed density on these parcels to around 300% of the current density and could go as high as 400+%. This would change the community's character by increasing population in the very limited downtown center, i.e. more people rather than more services.

Additionally, parking would be significantly impacted with additional vehicle counts generated by the increased density. The community already suffers from a dearth of parking. Most street parking in the vicinity has already been spoken for over the years with earlier approved proposals.

Add to all of this, the various proposals for the former Sonoma Developmental Center. All proposals increase density and traffic issues that will impact Glen Ellen and are not adequately addressed in the EIR prepared for the Housing Element proposal.

Over the years the community has worked very hard to protect itself with General Plan language and the Glen Ellen Design and Development Guidelines. Do not let our community down. Remove the Glen Ellen parcels, cited above, from the Housing Elements proposed rezoning!

Thank you,
Steve and Andrea Perry
Glen Ellen, CA

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From: [susan.mulcahy](#)
To: [PermitSonoma-Housing](#)
Subject: The proposed project in Glen Ellen
Date: Monday, February 13, 2023 5:15:12 PM

Dear planners.

I am 100% against the projects proposed by Marty Winter Glen Ellen Parcels #054-290-084 and #054290-057 GE 1 and 2.

I am not opposed to a reasonable sized development there. I can not imagine how gross a two-story 22 unit apartment complex will be there. And as we all know they are inclined to get the highest number of units possible as it does not seem the county listens to any of us out here in Glen Ellen !!!

This does not fit in with the county guidelines nor is it an appropriate use of the space. The bus service is minimal . The stores are very small so people would be driving outside of town mostly for all the needed services. It does not take into account the other proposed projects in the area including SDC, Hanna Boys center , Elnoka etc. I have to wonder if this was your neighbor, what would you think?.

Please please please reconsider these proposals

Thank You

Susan Mulcahy

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From: [Suzi Molofsky](#)
To: [PermitSonoma-Housing](#)
Subject: Rezoning in Glen Ellen
Date: Monday, February 13, 2023 1:05:42 PM

EXTERNAL

Sonoma County Housing Element proposed rezoning of parcels # 054-290-057 and # 054-290-084 (GE-1 and GE-2)

I am writing to object to the proposed rezoning of the parcels mentioned above. I am the owner of the commercial property across from one of these parcels (969 Carquinez Ave.) and a resident of Glen Ellen for over 40 years.

Downtown Glen Ellen is rural in character and this proposed increase in housing will gridlock the two block downtown area. This rezoning is not consistent with the General Plan and not consistent with the Glen Ellen Development Guidelines. The demand for new housing is already being addressed by the increase in ADUs in the area the proposed extensive development of the Sonoma Developmental Center and the proposed development of part of Hannah Boys Center. The intersection of Arnold Dr. And Warm Springs Road should be zoned for more commercial development if anything. There are many residents in this part of the valley who would prefer not to have to drive to Sonoma or Santa Rosa for shopping and errands. Regardless, this proposed number of units is way out of scale with the character and infrastructure of Glen Ellen. I object and request that the county object to this change.

Sincerely,

Suzi Molofsky
(707) 481-1327
12300 Manzanita Lane
Glen Ellen, CA 95442

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From: [Tamara Santry](#)
To: [PermitSonoma-Housing](#)
Subject: Housing Element Update-Forestville FOR-2
Date: Monday, February 13, 2023 3:12:35 PM

Dear Permit Sonoma,

Regarding the proposed rezoning of Forestville to include up to **1652** new residents, I'd like to first point out that as of the 2020 census the population of Forestville is **3788** people. Which means you are proposing increasing the size of our town by **50%**. An increase like this would seriously impact traffic, safety, and overall quality of life for our community.

Forestville simply does not have the infrastructure for growth like this, and there are communities with open space much closer to the 101 and public transportation, like Fulton. We have limited access to public transportation which is located on streets without sidewalks, an elementary school that is at capacity, no high school, few sidewalks, no access to medical and social services, limited sewer and water capacity and no police force.

Regarding the rezoning of FOR-2 on Nolan

1. Mirabel Rd. is a very busy and important 45 MPH thoroughfare, how do you propose to facilitate a safe flow of traffic for up to 736 additional cars entering the flow of traffic onto Mirabel Rd? Onto Hwy 116? Onto River Rd?
2. Mirabel Rd only has a sidewalk on one side of the street heading towards downtown. How do you propose to keep the many pedestrians and children from this high density housing safe? On their way to Speers Market? On their way to the River?
3. There is limited and infrequent public transportation in Forestville. Many of the residents, in the proposed high-density housing will surely rely on public transportation which is only accessible down a very busy Mirabel Rd. with no sidewalk and dangerous ditches on either side. What will you do to ensure the safety of the pedestrians and children on their way to the bus stop?
4. What will you do to improve public transportation from Forestville to Santa Rosa and throughout the Russian River?
5. What will you do to improve the local Elementary School, ensuring there are enough teachers to accommodate the influx of children?
6. Our local Sewer and Water system would need to be upgraded to handle the extra residents, what will you do to upgrade and improve our local Sewer and Water system? How is Forestville water district supposed to accommodate 283 extra homes?
7. Forestville doesn't have a police station, or much of a Sheriff's presence, how will you ensure that we receive the extra policing required for an additional 736 residents?
8. How do propose to improve appropriate access to medical and social services for these high density housing residents.

It's a wildly inappropriate proposal for any of the small communities in unincorporated Sonoma County to increase their population by 50% and Forestville seems to be bearing the brunt of the current effort to rezone for affordable housing in Sonoma County. I look forward to a sane and thoughtful process before you decide to rezone such a large swath of Forestville.

Thank you,

Tamara Sarkissian
8004 Savio Ln.
Forestville, CA. 95436

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EIR Comments

Prepared and submitted by Tim and Kathy Dellinger Forestville, CA

February 13, 2023

We are residents of Forestville, CA. Our street address is 135 Nolan Ct. We have reviewed the 600+ page EIR report regarding the rezoning of specific parcels in Sonoma County addressing the state mandates for the addition of housing.

We understand that this is not the forum to criticize the State of CA "mandate". We will however take the liberty to state that we are opposed to it. We believe that rezoning and determination of the numbers and types of homes to be constructed should be the primary and sole responsibility of counties/districts/cities and their citizens. Mandates in terms of "numbers" in exchange for "funding" considerations, as we believe is the case here, should not be permitted. Our comments going forward will focus solely on the EIR Report

Reports like the one we have reviewed are certainly a necessary part of the rezoning process. This one does a better than reasonable job of addressing the what is being considered and provides reasonable alternates to what is required in the mandate. We will limit our comments to the report's analysis and suggested alternatives for Forestville, CA as we do not think it is appropriate for us to comment on areas beyond our own community.

Questions

1. It is not clear how the sites for the Project were chosen. We do not believe this is addressed in this report. **Who are the parties responsible for selecting the sites, and what was the methodology used in the process?** It appears from the information we could find referenced in this report, in particular Association of Bay Area Governments (ABAG) and Regional Housing Needs Allocation (RHNA) Plan, that this was accomplished by select committees which included elected officials. While we did see some representation of Sonoma County cities, we did not see representation for the unincorporated areas of Sonoma County, (which includes the town where we live...Forestville.) **What representation and input did the Forestville community and their District Supervisor have in this process?**
2. The EIR offers alternatives as required by CEAQ. **Who will make the choice or selection of the best suited alternative? What input will citizens and their elected officials have?** we have read in the report, *"this Environmental Impact Report (EIR) identifies inventory sites included in the Housing Element; however, the County Board of Supervisors has the authority to remove sites from the Housing Element based on public comment or for other reasons, and the analysis is focused on sites that would be rezoned to allow for higher density housing"*. We have interpreted this as "the County of Sonoma has the final word regarding the selection and use of sites". **Is our interpretation of this statement a correct one?**

EIR Comments

Prepared and submitted by Tim and Kathy Dellinger Forestville, CA

February 13, 2023

3. Table 2-4 shows a housing buildout potential for FOR-2 and FOR-3 as follows:

TAKEN FROM Table 2-4 Housing Unit and Population Buildout Potential for Rezoning Sites

Rezoning Site	Total Allowable Dwelling Units Under Current Designation	Total Allowable Dwelling Units Under Proposed Designation	Change in Total Allowable Dwelling Units (Buildout Potential)	Total Population Under Current Designation ¹	Total Population Under Proposed Designation ¹	Change in Buildout Population Potential
FOR-2	7	283	276	18	736	718
FOR-3	3	33	30	8	86	78

In Alternative 3, FOR-2 and FOR-3 are omitted. Does that mean the Total Allowable Dwelling Units would remain at the current designation of 7 and 3 respectively?

Comments and Input

People choose to live in Forestville for many reasons. One reason that we believe is universal is that Forestville has and does provide a slower pace and peacefulness that comes with the population of a small village residing in low density housing. Our neighborhood is quiet day and night with the exception of occasional daytime noise from a nearby stone quarry and the trucks that transport those quarried materials on Mirabel Road and RT 116 to their destination. Mirabel Road connects the main traffic corridors of River Road and RT 116. RT 116 runs through the village center.

Rezoning that could potentially add 1,652 residents to the existing population of ~3,800 would result in major changes to the current way of life in Forestville, especially as nearly half of those residents would be added to a 14 acre "landlocked" site (FOR-2) located in a low-density residential neighborhood about .5 miles from the village center. This site is framed on 4 sides by Nolan Rd, Mirabel Rd and Giusti Rd. On the inside perimeter there are ~ 25 single family homes occupied by an estimated 100 residents. The majority of lot sizes for these existing homes are between .25 and .6 acres. Most of the structures are single story construction. It appears that most have septic systems and are not connected to the public sewage treatment system. The project proposes adding between 188 to 283 residences on FOR-2's 14-acre parcel. Three parking spaces for each residence and multiple ingress and egress points to the perimeter roads would be required. These conditions point to the construction of multi-story structures, towering above the current small single-story homes on the perimeter. While the report minimizes the impact of this esthetic change, we expect residents on the perimeter and passersby would strongly disagree. We oppose tall buildings in this space and believe it is reasonable to change the report to indicate this is a problem. We do not oppose adding housing that is similar to the current neighborhood standard, character and community feeling. Any addition must consider and address requirements for infrastructure improvement and safety.

Part of the road traffic on the perimeter road is foot traffic.... people walking, running, with pets and family (including) baby strollers. There are no sidewalks on either side of the perimeter roads. People in automobiles are likely to be confronted by both pedestrian traffic and vehicular traffic. The pedestrian

EIR Comments

Prepared and submitted by Tim and Kathy Dellinger Forestville, CA

February 13, 2023

traffic is literally on the perimeter roads. The absence of sidewalks is not mentioned in this report. We expect with a higher population density, there will be more of both types of traffic. We are not sure how sidewalks could be added. The perimeter roads are narrow allowing only adequate room for passing of opposing vehicular traffic.

During our twelve-year residence, we have never seen the perimeter roads used for parking vehicles other than for overflow parking during community picnics held in the "Forestville Youth Park" during the summer. This community park is on Mirabel Road directly across the street from this neighborhood and specifically the 14 acre FOR-2 site. We are assuming that this population of the FOR-2 site will include children. We wonder how they will safely cross this road which is heavily traveled by quarry trucks, grape gondolas, other commercial vehicles and automobile traffic.

Most people who live in Forestville do not work in Forestville. Data shows that the average one-way work commute time for people going to work is 24 minutes. At a speed of 35 MPH, that is ~15 miles. And while there is a small commercial sector in the village center, we venture that many of the employees commute similar distance from and back to their residence. Adding population to a place that does not have jobs to support it makes little sense to us.

The small commercial sector in the town center is comprised mostly of small retail and personal services businesses. Congestion due to lack of parking occurs at times but is currently tolerable. Contiguous sidewalks exist on one side of the street (RT 116) but not the other. Addition of a new and popular restaurant has increased the week end congestion. Another new restaurant is opening in a site vacated during the pandemic just across the street. There is one other vacant building on this same street site that we expect will be occupied in the coming year. The traffic through this commercial sector includes the people shopping or using the retail and personal services offered. We expect this to increase proportionally with population growth. The traffic also includes thru traffic from the towns of Sebastopol and Guerneville. We believe this was picked up in the Fehr and Peers transportation study, but we believe that its impact was underestimated. This traffic includes large truck traffic from the nearby quarry and from grape vineyards during the harvest season. Traffic signaling or road configuration that slows this traffic entering the commercial section does not exist even though it has been a topic of discussion for many years. This is a problem that needs correction with or without the added population.

In conclusion, we hope this provides valuable input to your process and final report.



Tim Dellinger 02/13/2023



Kathy Dellinger 02/13/2023

From: [toby.tobes](#)
To: [Permit@sonoma-housing.com](#); [Eric Gage](#); [Lynda Hopkins](#)
Cc: [kathiesendahl527@hotmail.com](#); [joe.rogoziński@gmail.com](#); [nic.rmac@gmail.com](#)
Subject: Public Comment regarding the Draft EIR Housing Element update
Date: Monday, February 13, 2023 4:52:08 PM
Attachments: [image.png](#)
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Hi- I would like to start by stating my position is that the vast majority of the sites within the Housing Element and Draft EIR look to be great additions to the housing inventory for Sonoma County and key to ensuring new housing which is needed.

My response and analysis is focused on the Cutten property as a resident since when I reviewed the EIR and proposed increases in density, I was taken aback since it didn't seem to make sense on the surface. The concern and inappropriateness of the re-zoning seemed to be what everyone was talking about as it just didn't make sense. We heard the same from multiple public officials during public meetings and from other non-residents about this site and the Laughlin site.

I wanted to be mindful of the goals and do not want to drive commentary that's from a self centered perspective so I took some time to review the documents and research which is provided below but again, the commentary all seems to be around these handful of Guerneville sites. Many of the other locations in the Housing Element and Draft EIR appear to be great sites and thusly aren't see the same questioning of appropriateness.

Based on my review and research of the EIR, the 2022 Housing Element and 2014 Housing Element, the gaps and lack of specific analysis and recommendations from the EIR seem to show why folk's original reaction was to question the rezoning. I hope some of these items will give a residents point of view and help form a more reasonable approach and remove these sites, specifically GUE-3 and GUE-2. I've not done more research on the Sunset site (GUE-1) but it too seemed to be an inappropriate selection.

When it was mentioned that the Cutten site had been in the 2014 plans, it was stated by Planning Department management that nothing had happened and likely nothing would happen. However that is concerning because that's not the point. Building housing that's commercially viable, close to services, has appropriate infrastructure, safe transportation, and doesn't have undue negative impacts on the environment, current residents and/ or future residents.

This site doesn't appear to be commercially viable due to the lack of sewer, water, parking, sidewalks, and appropriate roadways. This is a one lane road at many points and being 1.4miles from Guerneville means residents will be car dependent and the increase in traffic and lack of parking would be a notable negative impact and not make for an attractive site for development. Other sites along Armstrong Woods and in downtown Guerneville are obviously better candidates but are inexplicably absent from the nominated sites.

The following sections describe issues I've found with the EIR, alignment with county goals, alignment with Housing Element goals and which demonstrate the large uplift required for certain infrastructure and the impossibility of other infrastructure improvements such as roads due to geographic features and large slopes and/ or adjacent property where road widening and building sidewalks is either clearly not possible or would require an inordinate amount of resources lowering the financial viability of investment to build at the site on Cutten.

Housing Element history of the site and the large uplift in zoning from previous proposals

In researching where the Cutten property was nominated for the rezoning, I discovered that this property had a different zoning proposed in 2014. Even then, the remote distance from downtown is evident on the map as seen below. There are many other large vacant tracks closer to services, closer to town and with better infrastructure. Specifically water, sewer, roads and sidewalks. How did this increase occur? What was the rationale? It seems like the density was increased without analysis or looking at the actual site as the other notations in this comment document will show.

https://sonomacounty.ca.gov/Main%20County%20Site/General/Sonoma/Sample%20Dept/Department%20Information/Calendar%20-%20New/Meeting%20Archives/2014/_2014/_Packet/20140805_complete_agenda_packet.pdf

NOTE THIS IS PARCEL REFERENCE: 069-280-043 but maps to GUE-3 for the Cutten site in the 2022 Housing Element Draft EIR.

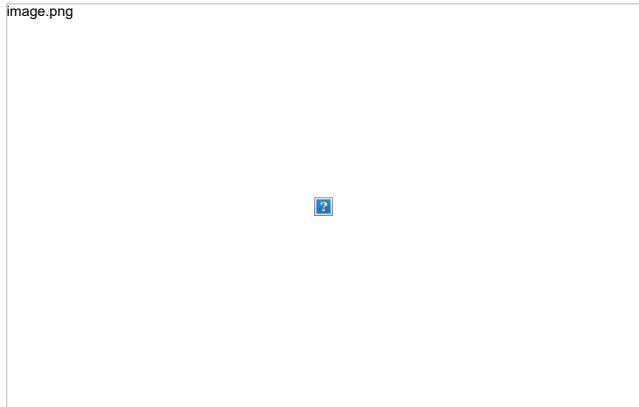
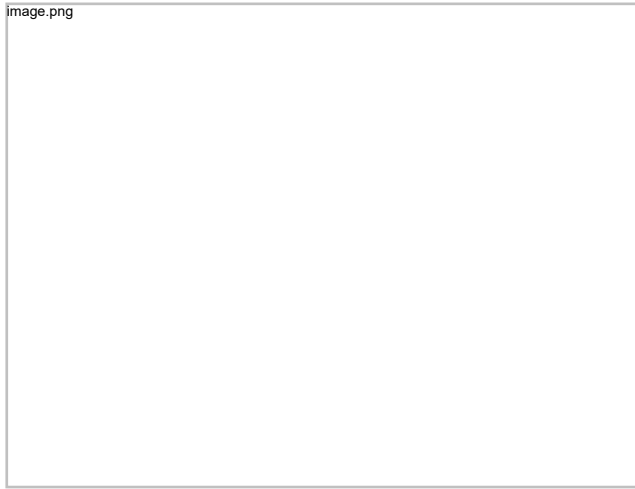
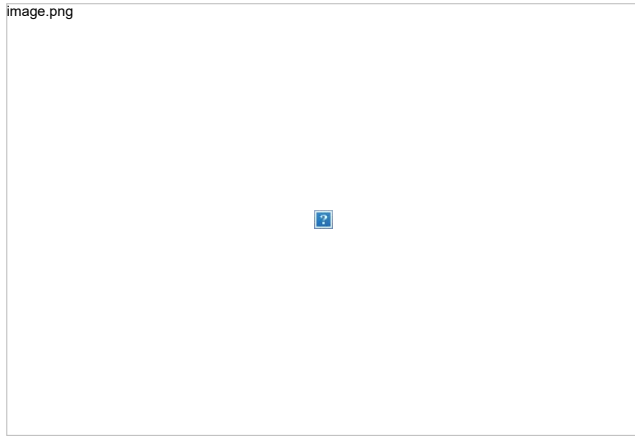


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<https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Long%20Range%20Plans/Proposed%20Plans/Housing%20Element/EIR/Housing%20Element%20Update%20Draft%20EIR.pdf>

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Infrastructure

Roads

GUE 2 and GUE 3 are accessible via one-lane roads that will need utility upgrades. The needed upgrades and road closures will severely impact the emergency egress for residents. Cutten Drive is a one-lane road that climbs up a ridge and is already dangerous for residents to navigate. There is a large Redwood on Laughlin that cannot be passed by 2-lane traffic. That redwood would need to be removed to widen the road to allow for needed traffic flow. Road work in these areas will need to be addressed before any construction can be considered, as heavy machinery can not safely make it into these areas without causing severe access issues and major disruption to residents.

Sidewalks & Bike Lanes

There are no sidewalks or bike lanes in our rural community. Increasing the foot traffic in these areas without sidewalks will result in many accidents and injuries. It is already dangerous, especially for summer visitors, who do not understand the intricacies of navigating these roads with small amounts of traffic.

POINT OF DEVIATION FROM PAGE 36 of the HOUSING ELEMENT - GOAL #3 and supporting POLICY HE-3g (page 36 of the Housing Element Plan). The EIR mentions distances (which it gets wrong) from services but doesn't mention that this is not a walkable area (10/100 walkable score on Zillow as an example not to mention 1.4 miles is a 30 minute walk which is more than what folks would consider a walkable area) and this will promote much more traffic which again ties into the lack of mention of the one lane road leading up to Cutten which can't be expanded due to geography and is prone to previously slides as evidenced by repairs. This is another area where the EIR's lack of context which eventually makes no mention of the poor viability of the Cutten site and is another area where the EIR is out of context from the Housing Element's goals and which spurs the broad public comment from officials and county residents who do not even live the not even live the area and noticed the issues after just driving through. (Watch public meetings for the Sonoma Planning commission call on Feb 2 and the later session where the Draft EIR was presented for public comment.



POINT OF DIVERGENCE FROM THE EIR AND Housing Element Goals: There are clear gaps in the EIR which don't speak to what has been commented on by my residents and public officials in public meetings surrounding the inappropriateness of the Cutten site being in the inventory.

To this end, the analysis below demonstrates that there isn't a mitigation nor is the public safety and lack of sufficient roadway addressed in the EIR. This clear gap to anyone who has been to the site may be driven by a consultant approach to the EIR and leveraging public records, internet research such as maps, etc. and shows a failure in the EIR to assess and provide any analysis outcomes for these key items at the Cutten site.

More detail and citations for this point of divergence from goals, obvious issues and the EIR. Is below.

Public transit and sidewalks for pedestrians doesn't appear to be addressed in the EIR report at all. This doesn't fall in line with the goals for Goal 6 elements of the Housing Element (see page 40 of the Nov 3rd 2022 Housing Element document. The focus of the discussion points in the goal are for environmentally sustainable aspects and Policy HE-6f (page 42 of the Housing Element) which states that Policy HE-6f: Provide high quality and equitable public services, including public transportation, fire and police safety, crime prevention, parks, sidewalks, street lighting, and recreational facilities and programs in lower-resource areas through the use of place-based strategies and master plans. (New; Fair Housing)

There are no sidewalks and the bus service is more than .4 miles away from the Cutten location navigating 1 lane roads and what would be significantly increased traffic. This area isn't well lit and doesn't appear to support the goals in the Housing Element as this isn't analyzed in the EIR. The EIR mentions sidewalks in Impact AQ-2/ AQ-1 around Basic Construction Mitigation measures but doesn't analyze the environment for not having sidewalks in the area nominated for re-zoning. The focus is mitigations (see AQ-1 Item 5 on EIR page 4.2-19) mentioning "All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used"

Further gaps on the item of sidewalks, crosswalks and pedestrian signals, the EIR mentions on page 4.16-8 "PEDESTRIAN FACILITIES Pedestrian facilities include sidewalks, crosswalks, and pedestrian signals. Historic downtown areas such as those located in Sonoma, Sebastopol, Petaluma, Cotati, Santa Rosa, Windsor, Healdsburg, and Cloverdale have long-established, central areas where pedestrians can reach a variety of destinations. Sidewalks are in place in almost all recently built residential, civic, and business developments. System gaps exist between older and newer development. Discontinuous sidewalks are also present in the County's unincorporated towns, and most rural roads lack sidewalks and have a shoulder area for pedestrians to walk on. Barriers to safe pedestrian travel include freeways and high-speed and multiple-lane arterials."

There is no mention of these gaps for the Cutten or Laughlin site - this again appears to be a gap with the EIR with respect to these sites, specifically the Cutten site where there isn't geographical possibility of building sidewalks given the one lane road and hills and a point of issue where the EIR fails to address these key safety items driving for what is widely seen as an inappropriate site for increasing housing density at such a high level for the Cutten site.

In section c. Project Images and Mitigation Measures, with respect to Pedestrian Facilities on page 4.16-15 of the EIR states:

Pedestrian Facilities Development facilitated by the project would propose no features that would be hazardous to pedestrians, nor is it forecast to generate pedestrian demand that would exceed the capacity of the area's pedestrian network. In addition, in compliance with the County of Sonoma's General Plan, development facilitated by the project would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks. No features are proposed that would conflict with County or regional plans, policies or ordinances pertaining to pedestrian facilities or travel. No significant impacts to pedestrian facilities would occur.

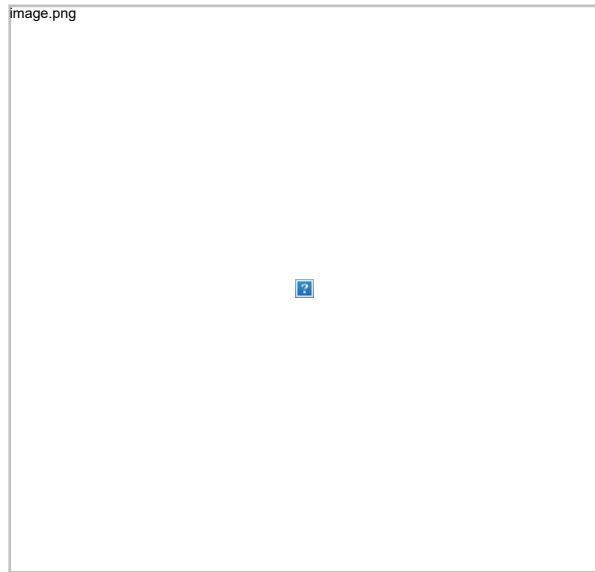
There is no mention in the EIR that these impacts would be mitigated. The state is only for Impact TRA-1 and mentions "this impact would be significant and Unavoidable" - This reads as there is no plan to address the side walks or roadways for the Cutten site which is a very large concern and without EIR analysis or statements of appropriateness of a site, it's obvious that the EIR isn't addressing this and the site should be removed from the inventory.

Water and Sewage -

this is a very large increase in population and the EIR doesn't provide any analysis to call out that the Cutten property falls at the bottom of the current infrastructure nor does it mention things like our water outages, our recent 6 day power outage, or other items which drive a concern for rezoning at this site.

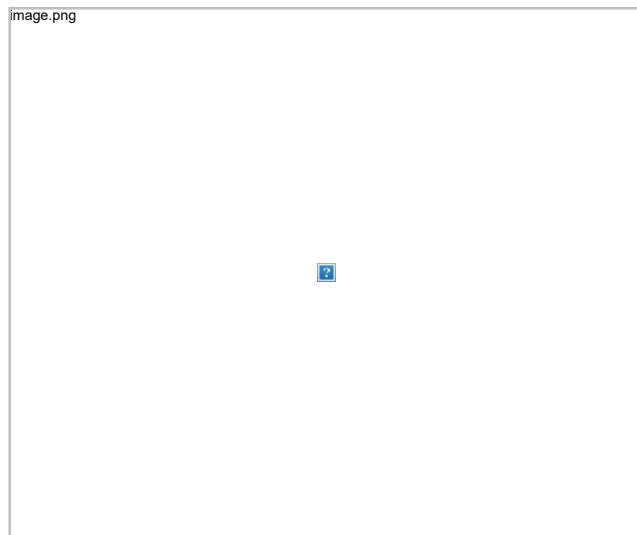
As a quick example, below is an extrapolation of the basic data from the EIR that would show the increase in water GPD

Per The EIR the water use would increase dramatically over the current population. Table 5-2 from the EIR appendix shows approx 134.77 GPD per individual in the population and with approximate 42 people on Cutten full time, then the sewer usage would go from a current 5660 GPD to over 20,000 GPD because of the large density uplift being proposed which is a 500% increase in current population (note the 21 one in the existing zoning aren't people there, those are potential people if housing was built at current zoning)



Sloping-

This table shows in context the issue with teh GUE-3, Cutten property. This doesn't appear to be mentioned with any analysis as to why this would need to be mitigated or why this would drive significant cost and reduce the 2 acre estimate of viable land. Again, a point in which the EIR doesn't appear to provide analysis services, only data reporting which diverge from what many folks see when they visit the site.

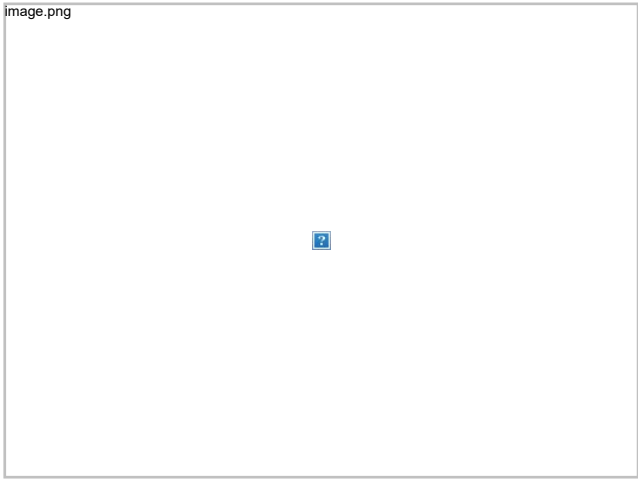


Historic Buildings

The family at the Cutten property has lived there for over 100 years and there doesn't seem to be a mention for impact or mitigation there nor the likelihood that the property would be sold thusly impacting the viability of the site to be in the inventory.



image.png



Health & Safety

The GUE 2,3 and 4 properties are within areas documented as high wildfire danger, flood plains, and earthquake-prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons. We have been evacuated for significant amounts of time in 2018, 2019 and 2020. Most recently, with the rain and wind, we were without power for over 7 days on Cutten Drive.

The nearest hospitals are at least 30 minutes away and our ambulance service is often overextended, especially dealing with the homeless community. Many low-income residents are elderly and it would be irresponsible to house them in an area that is so isolated from reliable emergency health services.

Additionally, Guerenville will need to increase the amount of law enforcement and emergency response given the significant increase in residents. I've seen little discussion or plans surrounding this issue.

Biological Resources

For GUE 3, future development facilitated by the project will impact special status species and their habitat during construction and/or operation. Development on this site would require the removal of redwoods and this meadow is a known habitat for California Quail, California Grey Foxes and Osprey.

GUE 3 is also adjacent to existing agricultural uses, and Mitigation Measure AG-1 would require an agricultural protection buffer for future development.

Visual Assessment

For GUE 3, Site Sensitivity should be high and not moderate and Visual Dominance should be considered Dominant. Old-growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high-density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed." There is no way to develop this property without removing a significant number of trees.

In the DEIR, "Figure 4.1-5 GUE-2 and GUE-3 Looking Westward from Cutten Avenue" is misleading and there should be additional photos of this property to fully show the immense beauty of this valley view - a pillar of the visual character of our community.

This is the photo taken from Google earth by the consulting company which looks to undermine the actual assessment of dominance in the area and below is another view just a few feet further to demonstrate the view and large redwoods on the site which would need to be removed to take advantage of the acreage.

Clearly the EIR didn't address the Dominance of a project on the site as

image.png

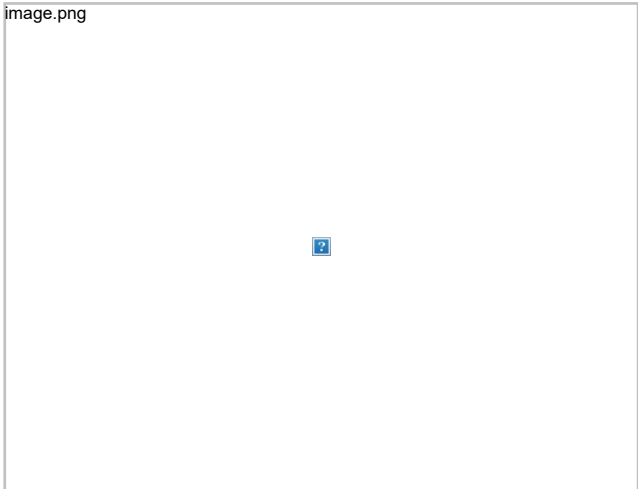
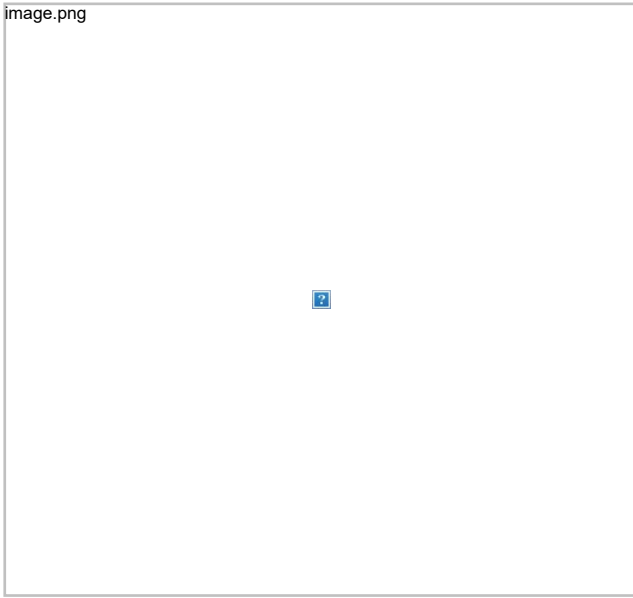
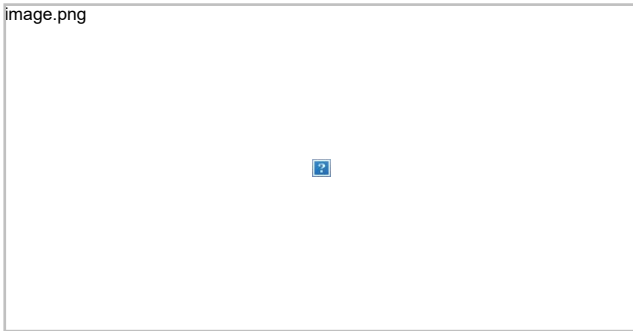


image.png



The dominance impact and site sensitivity mentioned in the EIR are inappropriate assessed and again, this is likely due to the use of a consultant group who made judgements missing a more in depth and local view of the area which should be reconsidered and is inaccurate in my view and many other's as mentioned above.

image.png



Unfortunately the time between the mailings and the meetings didn't allow for further research given the size of the documentation and issues with how the plans are communicated however, given more time there may be other inconsistencies which may be more technical than an average citizen could comment on. To that end I would hope that the planning officials, nominated officials and elected officials would give a deeper look and reconsider some of these questionable sites.

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

I oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct.

The hope is that a deeper look at the EIR and Housing Element by citizens will underscore the need to remove certain sites from the inventory and plan.

Name: Toby Barber

Address: 16400 Cutten Dr, Guerneville, CA 95446

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From: [Vikki Miller](#)
To: [PermitSonoma-Housing](#)
Subject: Housing Element ATTN: ERIC GAGE
Date: Monday, February 13, 2023 3:26:31 PM



ADDITIONAL RESIDENT COMMENTS REGARDING PROPOSED BUILDING SITES IN FORESTVILLE

Addendum to previously submitted comments.

Forestville does have a need for Workforce Housing in our quaint little town. Done with the right amount of conscientious planning to address the needs and issues residents already face and combining them to safely accommodate any new residents, this project has the potential to meet the State's mandates and quell the concerns regarding such an expansive endeavor.

The following is in consideration of the proposed Forestville sites:

Of all of the proposed sites, FOR-3 and FOR-6 hold the most promise to meet housing needs in our small community. Although FOR-6, as well as FOR-1, and FOR-5 are all being on the "Existing Hazardous Material Contamination" list . If those issues can be safely mitigated, they too hold promise.

Forestville has very little in the way of stores and restaurants, certainly not enough to serve the kind of population increase being proposed. There are also valid concerns about a significant increase in Greenhouse emissions as well as extreme traffic congestion. The most serious concern is the ability for our residents to safely evacuate given a natural disaster. These occurrences are not uncommon events as I have experienced them personally on multiple occasions during the decade I have been a resident here in Forestville.

FOR-1. An eye sore to the community for some time, this site is a good location for a building site with the exception of the traffic problem that would ensue and more importantly the ground is contaminated. I believe that would need to be addressed before any building occurs .Pouring cement over contaminated ground often leads to costly and time-consuming problems for builders and contractors. To avoid potential harm to the environment, building, and future occupants, the property owners, and their builder or environmental contractor should manage the contaminated soil. Left unmanaged, the contamination can potentially harm the environment, people, plants, and even the future building, including its foundation.

FOR-2 This location would not be a good location for numerous reasons. Putting a building of that scale would significantly impact the aesthetics of the small neighborhood as well as significant health and safety concerns. The roads going in and out of the neighborhood would not allow such a project of the proposed magnitude and emergency evacuations would be too dangerous to attempt.

FOR-3, and FOR-6 are relatively close in proximity and are a better fit for the proposed Housing Element with some additional infrastructure to accommodate the amount of people in the proposal. With nearby shops and access to public transportation, these 2 sites, absent any potential health hazards due to the proximity to the waste treatment plant, would be the most promising of the list of options.

FOR-4 The exact address of 6090 Van Keppel , in my estimation, does not actually exist which has many on the street perplexed as to where the intended lot would be The DEIR indicates proposed occupancy anywhere from 5-185 however there is a very narrow roadway made up of a rock and dirt driveway. Because of the logistics of this location, it too would not be conducive to an emergency evacuation as it would be extremely dangerous and impractical as a building site for that reason alone. The infrastructure simply isn't there.

FOR-5 This site has been looked at and grant monies acquired with the hopes of turning this site into a skate park. Forestville has a real need for youth services and this site would be ideal for that purpose. For several years, and with the support of our County Supervisor, this County owned site (Transportation and Public Works - now Sonoma Public Infrastructure), would meet such a need in our community. And equally as important could serve as a barrier to housing built near the sewage plant.

FOR-6 As mentioned above, this property makes the most sense because of its proximity to Main Street where the various small shops and access to public transportation are located. If safety measures can be put in place to mitigate any concerns from the nearby sewer treatment plant, it is a viable option.

FOR-7 This lot would be practical for a small scale unit but impractical for anything larger due to the traffic along Highway 116 and on Mirabel Road which would cause huge headaches for local residents as it would impact the two main thoroughfares.

Thank you for your consideration regarding these comments.

Vikki Miller
7491 Mirabel Road
Forestville, CA
707 887-1068

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From: [Wayne Weeks](#)
To: [PermitSonoma-Housing](#)
Subject: Housing planned at Sweetwater Springs??
Date: Monday, February 13, 2023 1:36:31 PM

I live just down the street from Sweetwater Springs on SunsetAve. If the amount of units being planned is 30, I am totally OPPOSED! This seems far to large of a development for the neighborhood(it would double the population of the hill, the street (one lane only) . If true, it is way to large of a development, and to large to not change the essence of our piece of paradise. Lastly, the county should have notified folks that would be impacted, and not one of my neighbors.

Wayne Weeks
14105 Woodland Dr.

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From: [caitlin_marigold](#)
To: [PermitSonoma-Housing](#)
Subject: Guerneville zoning
Date: Tuesday, February 14, 2023 9:41:06 AM

EXTERNAL

Good afternoon, I'm writing you as a resident at 16320 valley laneGuerneville. My partner and I oppose the rezoning and allowing of multiple units to be built. The streets are narrow and cannot handle the heavy traffic. Many people live in this neighborhood and moved here because of the quietness and zoning that doesn't allow for multi units. We have invested many years of our lives, time and money. We chose carefully where we wanted to live because of the low density zoning and lack of traffic and people. Not only can this neighborhood not handle the traffic, nor is it safe considering flooding, and fire dangers. It's not fair to the local community. Also because we live in a valley noise travels far and fast the added noise, traffic, and people would completely change the quality of living for those of us who live here. Please do not rezone our homes. Sincerely Caitlin marigold Sent from my iPhone

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From: [Jaye Deane Griffiths](#)
To: [PermitSonoma-Housing](#)
Subject: Fwd: Draft EIR comments:Housing element update
Date: Tuesday, February 14, 2023 2:55:19 PM

I sent my email yesterday morning. Today it came back returned. I hope you will be able to read the content. There is much thought put into the content.
With gratitude Jaye Griffiths

----- Forwarded message -----

From: **Jaye Deane Griffiths** <j.d.griffiths55@gmail.com>
Date: Mon, Feb 13, 2023, 10:04 AM
Subject: Draft EIR comments:Housing element update
To: <Permitsonoma-housing@sonomacounty.org>

Jaye Griffiths
14800 Armstrong Woods rd.
Guerneville

Thank you for allowing me to share my experiences and concerns regarding the property at 16050 Laughlin rd. The parcel directly adjacent to my property.

Rezoning greatly affects the safety of our children walking to the elementary school. This is not a pedestrian friendly road, additional development will increase traffic and put our children at risk. The property has a limited entrance and a lack of infrastructure. Will the school support additional attendance? Is there room and funds? I urge you to celebrate the lives and safety of the children of our community in NOT supporting rezoning this parcel.

Flooding on Armstrong Woods rd due to Fife Creek overflowing is an ongoing problem. The property shares a several acre boundary with the creek. What impact will there be in disturbing the boundary of this length of Fife creek should there be development? How will hard surface run-off affect the flow? Is there an upgraded evacuation plan added to the rezoning plan? The only other way out is a very windy, narrow road often limited to one way traffic in hazardous conditions.

Has Fish and Wildlife been notified about development along the border of Fife creek? The local water table is shallow. There is concern that evacuations might impact groundwater flow, levels, and quality and or contamination.

Will the proposed development affect the Historical Route? Is there consideration to the additional traffic affecting the State and National forest?

The impact to the already stressed local fire stations is of grave concern with the population increase, and additional traffic.

How does the population increase accommodate the infrastructure and the need for parking on

streets that have no sidewalks? (Once again mentioning children walking to school and riding their bikes on these streets.)

The opportunity to share my view and experiences as a resident of Armstrong Valley is appreciated.

Jaye Griffiths

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

RECEIVED
FEB 14 2023
PERMIT AND RESOURCE
MANAGEMENT DEPARTMENT

RE: Draft EIR Comments: Housing Element Update

From: The FOR-2 Neighborhood

Date: February 10, 2023

Dear Mr. Gage,

This letter is intended to specifically address the significant impacts and insufficient analyzation found in the Sonoma County Planning Update Draft EIR as it relates to the FOR-2 site, a 13.5 acre parcel located at 6898 Nolan Road in the town of Forestville beginning on Page 4.

As neighbors of the FOR-2 site, the 222 residents who signed this letter believe that before the HCD, Sonoma County Planning Commission and the Sonoma County Board of Supervisors make any decisions on rezoning the parcels in Forestville they must first understand what the community of Forestville does and doesn't have to offer in the way of resources, services, transportation and infrastructure.

Forestville California 95436

Forestville is a small rural town in West Sonoma County about 11 miles and a 20 minute drive from Santa Rosa, the nearest job center. The population of Forestville is considered to be about 3300 people following the general boundaries of the Urban Service Area. The Sonoma County Land Use Element, Policy LU-15g, states that the boundary of Forestville is that of the Elementary School District or approximately 6700 people. If all 6 sites, designated for rezoning in the General Plan Housing Element Update, were built to capacity the population of Forestville would increase by 1652 people according to the Sonoma County Update DEIR. This is 25% to 50% increase in population depending on which boundary is used. The proposed cumulative dwelling units added to the town of Forestville is 635. This is the largest number of proposed units and population increase, for any community, in the unincorporated area of the County, with the exception of the unincorporated area around the City of Santa Rosa.

The main road thru Forestville is HWY116 which becomes Front Street for the 3 blocks where most businesses are located. Front Street/HWY 116 is a narrow two lane State Highway built around the turn of the century. All of the side streets in this area are residential.

There are few formal, private business maintained parking lots on Front Street/Hwy 116. Street parking consists of parallel parking on the south side and a combination of parallel and diagonal

parking on the north side of the 3 block downtown area. Parking spaces are limited here and thus Downtown Park Open Space site is often used for overflow parking. The Downtown Park is located at the termination of the Joe Rodota Trail and is privately owned and maintained by a non-profit 501c3.

Sidewalks in the 3 block area of Front Street/HWY 116 are either nonexistent, non-contiguous or in extremely poor condition and dangerous. Limited sidewalks do exist from the intersection of Mirabel Road to the Forestville Youth Park. There are no other sidewalks in the neighborhoods that surround the downtown area. Walking the neighborhoods of Forestville requires walking on the narrow shoulders or in some cases in the middle of the road.

With the exception of the Joe Rodota Trail there are no bike lanes in the town of Forestville or surrounding neighborhoods.

Pedestrian or bicycle crossing Front Street/HWY 116, is facilitated by 2 uncontrolled crosswalks. One in the center of town and the other at Covey Road. The Forestville School District provides a crossing guard at the Covey Road intersection to facilitate the safe crossing of Front Street/Hwy 116 by school children. Crossing with or without a crosswalk or exiting a parallel parked car is dangerous on Front Street/HWY 116 due the road width, heavy traffic volume, including gravel trucks from the two local quarry's, as well as most vehicles traveling faster than the posted speed limit.

There is one informal southbound bus stop in the downtown area. The bus stops in the Front Street/HWY 116 southbound traffic lane, to load and unload passengers. Sonoma County Transit provides bus service to Forestville. Bus Route 20, Russian River/Santa Rosa Route, makes one pickup and one drop off a day in downtown Forestville. Bus Route 26, Forestville/Sebastopol/Cotati/Rohnert Park Route, also makes one pickup and one drop off a day in downtown Forestville.

For all intents and purposes the commercial area of downtown Forestville is built out. There are two commercial/industrial parcels available for development within or contiguous to the downtown area. The first parcel, 3.4 acres zoned PC, is located at the intersection of south side of HWY 116 at the Mirabel Road intersection. The other parcel, located at 6555 Covey Road, is currently being considered in the Draft Housing Element for rezoning (FOR-1). Also known as Electro Vector, the parcel is 2.86 acres and zoned MP, AH. This site is subject to unknown groundwater contamination from a previous industrial business on this site. Mitigations have been underway for quite some time and this site should be fully evaluated before it is removed from the Housing Element Update rezoning inventory (Alternative-3). One additional site with Industrial zoning, although not contiguous with Front Street/HWY 116, does exist. This site is also being considered for rezoning under the Draft Housing Element Update and is currently zoned M1. Designated as FOR-6 in the plan, it is 4.94 acres.

Street lighting in Forestville is limited to the 3 blocks of the downtown area along Front Street/HWY 116. This allows the surrounding neighborhoods to very good Night Sky Viewing Areas with minimal light emissions.

New jobs in Forestville are few and far between. Those that do exist are generally minimum wage service industry jobs. This is largely due to the lack of sufficient commercial and/or industrial business. Forestville is a rural bedroom community.

Government Services in Forestville consist of:

- Sewer and Water - Forestville Water District
- Schools - Forestville Union Elementary School District K-8
- Fire and EMS - Sonoma County Fire District Forestville Station
- Police Services – Sonoma County Sheriff’s Department
- Roads – Sonoma County Road Department

Notable business/retail services are limited in the downtown area of Forestville, off street parking is either non-existent or limited at all of these sites, very little future commercial growth is possible:

The following business can be found in Forestville:

A package store, pharmacy, hardware store, bakery, coffee shop, post office, laundromat, real estate office, hair salon, gas station, bar, liquor store, dog groomer, antique store, winery, bicycle shop, auto repair shop and five eating establishments.

The following human services are available in Forestville:

A dentist office, a church, food bank, and a pharmacy.

There are no social services, medical facilities or broadband and very limited cell service within a ½ mile of downtown Forestville. The closest grocery store to downtown Forestville is 1.25 miles away.

The following Land Use and Housing statements, policies and objectives are relative to the discussion of all future development in the town of Forestville.

Reference: Sonoma County Land Use Element - Page Lu-81

Another issue in this area is growth and development in Forestville. Specific issues that need to be addressed include the amount of additional development that could be absorbed without changing the rural character or straining public services, how to make available commercial and industrial opportunities to provide local employment, and how to preserve the desirable environmental qualities of the area.

Objective LU-15.4

Maintain the “rural village” character of Forestville through design development standards that support small-scale development with substantial open space and native landscaping.

Reference: Sonoma County Land Use Element - Page Lu-82

Policy LU-15a: Policy LU-15a: Phase residential and commercial development within the Forestville Urban Service Boundary to allow the community facilities and services adequate time to absorb new growth, and to maintain the community character. For any project of 10 or more housing units, require a precise development plan or master plan that specifies the maximum number of new residential units to be built per year.

Policy LU-15b: Require design review for major subdivisions within the Forestville Urban Service Boundary. Design review approval shall assure that:

(1) Project scale and design is consistent with existing rural village character.

(6) The project includes pedestrian access connecting new homes in a nearby commercial area.

Reference: Sonoma County Draft Housing Element

Policy HE-2a: Enhance opportunities for affordable housing production on all appropriate sites with adequate infrastructure and proximity to services ...

Policy HE-3g: “Strive to focus affordable housing development in moderate and high resource areas well-served by public transportation, schools, retail, and other services.

...

Policy HE-5d: Strive to provide for senior housing needs. Focus senior housing projects in areas well-served by transit, accessible sidewalks, and amenities...

Policy HE-6f: Provide high quality and equitable public services, including public transportation, fire and police safety, crime prevention, parks, sidewalks, street lighting, and recreational facilities and programs in lower-resource areas through the use of place-based strategies and master plans.

Response to DEIR - FOR-2 - 6898 Nolan Road

FOR-2 Neighborhood

There are three main streets that directly surround FOR-2, Mirabel Rd, Nolan Rd and Giusti Rd. There are 5 additional streets that are accessed from either Giusti Road or Nolan Road and are also considered part of the FOR-2 Neighborhood; Nolan Ct., Niki Lane, Poplar Drive, Ohaire Lane and Chope Lane. There are approximately 85 homes and 180 residents living in this neighborhood.

FOR-2 is a 13.5 acre parcel. All 4 sides of the parcel abuts the backyards of well-established single family, single story homes along Nolan and Giusti Roads. The maximum proposed density on the FOR-2 site is 283 dwelling units and 736 new residents. The FOR-2 site is currently zoned for 7 homes.

The FOR-2 Neighborhood is a walking neighborhood and not just for its residents, people come from other areas just to walk here. There are no sidewalks or on street parking in the FOR-2 Neighborhood. The FOR-2 Neighborhood is an excellent place to view the night sky due to the lack of any streetlights in the area.

There are 3 designated existing entrances/exits to FOR-2. One on the East side of the property on Mirabel Road, one on the south side of the property on Nolan Road and one on the West side of the property also on Nolan Road.

FOR-2 is a heritage apple orchard established by the current owner's family in 1911. The family has shared with the Neighborhood and the County, in person and in writing, they have no intentions of selling the property and wish to pass it down to future generations. See Attachment 1

Question:

- The County will require a minimum of 2 entrances/exits to the FOR-2 site if it is developed. The 3 lots that make up the entrance/exits to FOR-2 have their own unique APN's (completely separate lots) and appear to be owned by the owner of FOR-2. If the County rezones FOR-2 without the owner's permission, what stops the owner from selling one or more of the 3 entrance/exit lots thereby land locking the property?

Reference: Executive Summary

Alternative 3 (Fewer Rezoning Sites) – ES-3 Page 24

The Sonoma County Housing Element DEIR lists the FOR-2 site as one of the six rezoning sites that "have greater than average environmental constraints compared to the other Rezoning Sites. In particular, these sites would require off-site infrastructure water and sewer improvements to serve future development." The DEIR offers to remove these six sites, including FOR-2 as an alternative to the Plan. The following significant impacts are also associated with the FOR-2 site and not listed in the DEIR.

1. The parcel is considered by the California Department of Housing and Community Development (HCD) as being too large, over 10 acres, for an affordable housing development. (Page 6)
2. It is the largest project, 283 units/7736 residents, of all 59 sites proposed for rezoning in the unincorporated area of Sonoma County and it will increase the population size of the FOR-2 Neighborhood by 400%.

3. There are significant sewer pipeline size and capacity issues associated with the FOR-2 Site. (Pages 19-20)
4. School crossing traffic signal(s), traffic signal(s), left turn channelization, road widening and site distance and setback mitigations will be needed, on Mirabel Road, Giusti Road and Nolan Road as a result of this project. (Pages 14-19)
5. The FOR-2 site is approximately 100' from a Moderate Wildfire FHSZ and approximately 1000' from a High Wildfire FHSZ. (Pages 20-21)
6. Substantial water runoff from this project flows thru seasonal creeks and riparian corridors, causing flooding in the homes on Mirabel Road and the backyards of homes along Sunridge Lane and Trenton Road before flowing into the Russian River without any filtration or other mitigations. (Pages 12-13)
7. There is no broadband and limited cell coverage at the FOR-2 site.
8. The property owner has repeatedly assured the FOR-2 Neighborhood, verbally and in writing, that the Family has no intentions of selling the property and intend to pass it down to future generations. (Page 22 and Attachment #1)
9. California No Net Loss Laws discourage Jurisdictions from considering inadequate or unsuitable sites as adequate or available to achieve RHNA quotas.

Question:

- Given the above information, and further justifications to follow, would it be appropriate for the HCD, Sonoma County Planning Commission or the Sonoma County Board of Supervisors to remove FOR-2 from the list of sites to be rezoned?
- If no please explain how the County of Sonoma plans to assume legal responsibility for traffic accidents, storm water runoff pollution, damage to biological resources, flooding and sewerage backups as a result of permitting this project without analyzing these issues and developing appropriate mitigations?

Reference: Project Description

Comment: HCD Requirements

The DEIR identifies FOR-2, 6898 Nolan Road, 13.5 acres, as one of the 59 urban sites in the unincorporated area of Sonoma County for by-right, medium-density housing.

The California HCD, Realistic Development Capacity, Analysis of Sites and Zoning – Size of Sites States:

To achieve financial feasibility, many assisted housing developments using state or federal resources are between 50 to 150 units. Parcels that are large may require very large projects, which may lead to an over concentration of affordable housing in one location, or may add cost to a project by requiring a developer to purchase more land than is needed, or render a project ineligible for funding. A parcel smaller than one half acre or over 10 acres is considered inadequate to accommodate housing affordable to lower income households,

unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible. Please note, for purposes of this requirement, “site” means that portion of the parcel designated to accommodate lower income housing needs. The housing element must consider and address the impact of constraints associated with small or large lot development on the ability of a developer to produce housing affordable to lower income households. To demonstrate the feasibility of development on this type of site, the following analysis is required.

An analysis demonstrating that sites of equivalent size were successfully developed during the prior planning period with an equivalent number of lower income housing units as projected for the site.

Evidence that the site is adequate to accommodate lower income housing. Evidence could include developer interest, potential for lot consolidation for small sites or lot splits or subdivision for large sites...

A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.

Question:

- The site designated as FOR-2, APN 083-120-062, according to information provided in the DEIR, is 13.5 acres. According to the HCD any parcel over 10 acres is considered inadequate to accommodate housing affordable to lower income households. Has the County of Sonoma prepared sufficient documentation for the HCD to demonstrate the County’s history of successfully developing sites of similar size, its potential for lot splits or subdivision or the existence of a proposal to develop the site in accordance with HCD requirements?

Reference: Sewer and Water

Comment: Urban Service Area Boundary

The Urban Service Area indicated on Figure 2-6 Forestville Inventory Sites – Page 2-14 would lead the reader to assume that both sewer and water are on site or adjacent to the FOR-2 site. This is not entirely true and the map is misleading. Existing domestic secondary water supply lines do run to the site and the surrounding streets of Nolan Road and Giusti Road. They are serviced by a water main on Mirabel Road. However, the existing sewer pipeline stops approximately 1100’ south of the Mirabel Road entrance to the FOR-2 Site. Should the site be

developed the existing sewer pipeline would have to be extended, from its current location, approximately 1100', to the existing right of way to the site off of Mirabel Road.

Question:

- It would be appropriate for the County of Sonoma to place a footnote on the map to clarify this situation?

Reference: Environmental Impact Analysis

Comments: Forestville, Page 4.1-18

FOR-2 is a large parcel west of Mirabel Road surrounded by single-family homes on large lots and zoned LG/116 but outside the SR designation. Views of the ridgelines and open spaces are not visible from the streets looking across the lot due to existing residential development, flat topography, and mature vegetation on all sides (Figure 4.1-14). On Giusti Road, residences are large, single-story, and designed in a vernacular suburban ranch style. They are situated close to the roadway and are landscaped in a varied but unified manner. On Mirabel Road, a school is directly across the street from FOR-2. The residential development on Mirabel Road features a less unified design than that on Giusti Road, with fewer trees and some intermittent fencing. Residential development on both sides of Nolan Road is like that on Giusti Road, but with less unified design and landscaping. Overall, the area around the site exhibits visual unity as the homes are large and consistently feature mature landscaping. While the unity is high, the level of vividness is lower because the neighborhood does not offer expansive views or feature notable architecture. The site has moderate sensitivity and, depending on density and height, new development could be dominant.

Comments and Questions:

1. Any multi story, medium density development would be inconsistent with and pose a significant impact on the surrounding neighborhood where the majority of homes are single family/single story. In addition any construction over one story, would become the dominant feature in the neighborhood.
 - The last sentence in the paragraph should be corrected to read: Any construction over one story will be a dominant feature in the neighborhood.
2. The report is incorrect in stating that there are no ridgelines or opens spaces viewable from the neighborhood. There are expansive views of Mount St. Helena, the Santa Rosa foothills and portions of Trenton Hill and other closer ridgelines are visible from the upper areas of Nolan Road and Giusti Roads surrounding the site.

- The EIR should be corrected to include the areas in which expansive views are available.
3. The site is not flat as stated above but has a slope of 2 to 9 (generally 3 to 5 percent) percent as stated elsewhere in this report.
 - This statement should be corrected in accordance with the slope data provided elsewhere in the DEIR.
 4. There are mature redwood trees on the property but they do not block views of the surrounding hillsides from all locations.
 - This statement should be corrected.
 5. The FOR-2 site is not directly across the street from a school. The Forestville Youth Park, a privately owned 501c3 park, is directly across Mirabel Road from FOR-2 and was mistaken for a school.
 - This item should be corrected in the EIR.

Reference: Site Impacts and Recommended Mitigation Summary

The DEIR, Page 4.1-52 - The FOR-2 Site is listed with the following Impacts:

- Site Sensitivity – Moderate
- Project Potential Dominance – Dominant
- Potential Impact – Significant

Comment: Site Sensitivity Impact

The density of this project is 200% greater than the surrounding neighborhood. The vast majority of homes in the neighborhood are single story/single story on ½ acre lots. Any building 2 stories or taller, with a density of up to 20 units per acre, will become the Dominant feature in the neighborhood and the Site Sensitivity rating in the EIR should reflect that impact on the neighborhood.

Question:

- Based on the above information, the Site Sensitivity rating for FOR-2 should be changed from Moderate to Significant.

Reference: Aesthetics

Significance after Mitigation, Page 4.1-58

With implementation of Mitigation Measure AES-2, impacts from light and glare would be reduced to less than significant.

Comment: Significance after Mitigation

This statement is not sufficient and does not adequately represent or analyze the current night sky conditions in this area. The FOR-2 Neighborhood, Nolan Road, Giusti Road, Niki Lane, Poplar Drive and Nolan Court do not have street lights as does most of the Forestville area. This area is considered by its residents as a Night Sky Viewing Area with minimal light emissions and our visitors often comment on the beautiful night sky that we have. Any construction over a single story will impact the Night Sky Viewing in this area simply from uncontrolled and unmitigated light emitted second or third story units and a dramatic increase in night time vehicle traffic (headlights). Further analysis should be conducted to determine the effects of light emission in the FOR-2 Night Sky Viewing area.

Question:

- In accordance with General Plan Goal OSRC-4, Preserve and maintain views of the nighttime skies and visual character of urban, rural and natural areas, while allowing for nighttime lighting levels appropriate to the use and location. The EIR should acknowledge the significance and existence of night sky viewing areas and the impact of significantly altering those existing sights by developing FOR-2. The current analysis is insufficient. What additional mitigations are necessary to maintain the existing levels of Night Sky Viewing in the FOR-2 Neighborhood?

Reference Agriculture and Forestry Resources

Impact AG-1, Page 4.2-15: NONE OF THE REZONING SITES OCCUR ON LAND DESIGNATED AS PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE. THEREFORE, DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT CONVERT THESE TYPES OF LANDS TO NON-AGRICULTURAL USE.

All Rezoning Sites occur in County-designated Urban Service Areas, defined in the 2020 General Plan as geographical areas within the urban growth boundary of a city that are designated for urban development. Many of the identified parcels and their adjacent uses are currently zoned for rural residential or limited density, which in some cases means agricultural cultivation is currently underway; nonetheless, none of these lands are considered prime or important farmlands, as designated by the FMMP mapping program. The Rezoning Sites were selected out of dozens of possible sites in part specifically because rezoning them for higher density residential development would not convert productive, prime agricultural lands

The Sonoma County General Plan Goals:

Goal AR-3: Maintain the maximum amount of land in parcel sizes that a farmer would be willing to lease or buy for agricultural purposes.

Objective AR-3.1: Avoid the conversion of agricultural lands to residential or nonagricultural commercial uses.

Goal LU-9: Protect lands currently in agricultural production and lands with soils and other characteristics that make them potentially suitable for agricultural use. Retain large parcel sizes and avoid incompatible non-agricultural uses.

Objective LU-9.1: Avoid conversion of lands currently used for agricultural production to nonagricultural use.

It is a false statement to say that rezoning FOR-2 for higher density residential development would not convert productive, prime agricultural lands. The landowners have stated that this agriculturally important parcel has been used by the family since 1911. The California Department of Conservation's Interactive Map of Important Farmlands lists FOR-2 as Farmland of Local Importance. It was most likely excluded from the higher designations because it was not irrigated at some time during the four years prior to the mapping date of 2018. In fact, the property was listed as Prime Farmland up until 2004. The current owner wishes to rehabilitate the parcel into a more productive apple orchard.

Question:

- The above information requires the EIR to address the mitigation issues and impacts of rezoning FOR-2, a Farmland of Local Importance, to higher density residential housing.

Reference: Biological Study Area

Comment: Biological Study Boundaries, Page 4.4-5, Figure 4.4-4

The Biological Study Area – Forestville boundaries are not accurate in relation to the FOR-2 site, Figure 4.4-4 Biological Study Area - Page 4.4-5.

The majority of storm water runoff from FOR-2 that potentially affects biological resources flows north from the FOR-2 site and makes its way to the Russian River via unmaintained drainages ditches, seasonal creeks and riparian corridors to the Russian River. The effect to the biodiversity of these seasonal creeks, riparian corridors and the Russian River must be considered and investigated for Critical Habitat and Sensitive Communities.

Question:

- The Biological study area for FOR-2 should be expanded to include the ditches, seasonal creeks, riparian corridors from the site to the Russian River due to the increase runoff as a result of the development of FOR-2.

Reference: Biological Resources

Comment: Correction

The DEIR statement, Forestville - Page 4.4-13, does not mention that the FOR-2 site is connected to the Russian River via the storm water runoff from the site.

Question:

- This should be corrected so sufficient analyzation can occur and mitigation measures identified in the EIR.

Reference: Cultural Resources

Comment: Cultural Sites

The FOR-2 site is located within a half a mile of a known Native American cultural site where an ancient lake existed and Native American Community existed. Archaeological reviews are required on development projects in the area. Native American artifacts have been found on the FOR-2 Site and in the surrounding area.

Question:

- The EIR should state that this site is in proximity to a Native American cultural site and the possibility that artifacts and possibly human remains may be found on the site?

Reference: Hydrology and Water Quality

Comment: Storm Water Runoff

The FOR-2 site, is 13.5 acres with a slope of approximately 4.3% (52' in 1256') from the highest point on its western boundary (Nolan Road) to its lowest point at the intersection of Mirabel and Giusti Roads. Currently water runoff during heavy rainfall floods the crawl spaces and garages on the homes below the site and along Mirabel Road. One homeowner has installed a French drain to divert flows to the unmaintained drainage ditch on the west side of Mirabel Road. None of the current runoff is collected into storm drains. All runoff is uncontrolled and the vast majority flows along the west side of Mirabel Road downhill in a generally northerly

direction. The water from the FOR-2 site is collected in a concrete open collector between 7522 and 7566 Mirabel Road. The water then flows west in an open seasonal ditch/creek until it meets a “blue line creek” and riparian corridor also known as Sunridge Creek. This blue line creek crosses Trenton Road and runs behind the homes between Sunridge Avenue and Trenton Road. During heavy rains this creek inundates Trenton Road and the backyards and first floors of homes along Trenton Road and Sunridge Avenue. This runoff then makes its way to the Russian River without filtration or settling ponds.

The effect to the biodiversity of these seasonal creeks, riparian corridors and the Russian River must be considered and investigated for Critical Habitat and Sensitive Communities. Significant hard surfaces, incapable of absorbing water, will be created thru development on the FOR-2 site. 15 acres of land generates 407,000 gallons of rainwater per one inch of rain. Forestville receives an average of 41 inches of rain per year, non-drought years. That accounts for over 16 million gallons of water flowing from this site to the Russian River annually. Failure to identify the significant impacts and mitigation measures related to the storm water runoff from FOR-2 will impact biological resources and result in additional flooding of roadways and properties in the area

Question:

- The storm water runoff condition was not sufficiently analyzed in the DER to reflect the significant downstream effects of additional storm water runoff from the development of FOR-2. Further analysis and identification of mitigation measures must occur and be included in the EIR to avoid damage to the environment, biological resources and personal and public property.

Reference: Public Facilities and Services

Comment: Park Space and Funding

Page 4.15-8 - Policy PF-2c:

Use the following standards for determination of park needs: Twenty acres of regional parks per 1,000 residents countywide and five acres of local and community parks per 1,000 residents in unincorporated areas. A portion of State parklands may be included to meet the standard for regional parks.

Page 4.15-8 - Policy PF-2g:

Require dedication of land or in-lieu fees as a means of funding park and fire services and facilities.

Questions:

- There are no publically funded parks in Forestville. Please clarify if the full buildout in Forestville (1652 new residents) would require the addition of new public park space, how many acres and where it would be located, or if the existing two privately owned parks would qualify for the Policy PF-2c standard?
- The Forestville Youth Park is 7.93 acres and the Forestville Downtown Park is 4.26 acres and both are owned by non-profit organizations and available for public use. What population boundaries would be used to calculate population (PF-2c) and if in-lieu fees are obtained from the developer for parks do the existing privately owned parks receive that funding (PF-2g)?

Comment: Park Degradation

Impact PS-4, Page ES-38

The FOR-2 site is directly across Mirabel Road from the Forestville Youth Park. The FOR-2 Neighborhood is concerned that the Forestville Youth Park would see a considerable increase in use that would lead to a physical deterioration of the facility.

Question:

- What mitigation measures are in place if existing parks, Forestville Youth Park and the Forestville Downtown Park suffer degradation due to overuse? Both parks are privately funded and exist solely on donations. The addition of over 1600 new residents within a half mile of downtown Forestville will have an impact on these existing parks. An additional section could be added to the DEIR that address privately owned Parks and how new development could support them?

Reference: Traffic and Parking

Comment: Traffic Study

According to the County of Sonoma Traffic Counts (arcgis) there are 6909 total trips per day on Mirabel Road, in both directions. The speed limit on Mirabel Road, in the area of FOR-2 is 45 mph although vehicles drive faster than the posted speed limit in this area. Due to speed limit and vehicle traffic volume, including large gravel truck traffic, Mirabel Road is likely a Major Collector when compared to other roadways defined in the DEIR Existing Street Network.

Question:

- DEIR, Existing Street Network – Page 4.16-1 thru 4.16-5 - Mirabel Road is not listed in the Existing Street Network. This should be corrected in the DEIR.

Comment: Mirabel Road/HWY 116 Intersection

At a conservative calculation of 5 trips per day per residence, including the existing FOR-2 Neighborhood and the proposed addition of 283 residences at FOR-2, the total trips per day coming and going from the FOR-2 Neighborhood would be approximately 4000, almost doubling the trips per day currently observed on Mirabel Road and significantly affecting the LOS rating of the Mirabel/HWY 116 intersection.

According to the DEIR:

Peak Hour Traffic at the Mirabel/Hwy 116 intersection is 1040. The cumulative total, including other River area rezoning projects is estimated to be 1782. This a 70% increase Peak Hour Traffic for that intersection.

According to the County of Sonoma Guidelines for Traffic Impact Studies-Page 4,

If the project is located in a study area where one or more intersections are currently or projected to operate LOS E or Worse a Traffic Study is required.

Since the County has already determined that the intersection is failing, any development should be responsible for upgrades to the intersection due to increased Peak Hour Traffic. The last estimate available for a round-about at this intersection is 7.2 million dollars. The County has also considered a traffic signal at the intersection of River and Mirabel.

Questions:

- The DEIR is not clear whether traffic mitigations caused by the FOR-2 development, including the round-a-bout at Mirabel and HWY 116, as well as those on Mirabel Road and in the FOR-2 Neighborhood would be fully or partially the responsibility of the developer?
- The DEIR should require the need for a Traffic Study as a traffic mitigation requirement based on FOR-2's proximity to the Mirabel/HWY116 intersection due to the significant increase in trips per day that will be generated from the FOR-2 site and the substantial increase vehicle trips per day on Mirabel Road.

Comment: General Traffic Concerns

There are three existing access/right of ways to the FOR-2. One is directly off of Mirabel Road and two are off Nolan Road. Mirabel Road runs between River Road on the north end, a County Road, and HWY 116 on the south end, a State Highway.

There are two 4 way intersections between the northern border and the southern border of FOR-2. The intersection on the north side of FOR-2 is Giusti Road and Davis Road at Mirabel Road. The intersection on the south side of FOR-2 is Nolan Road and Speer Ranch Road at Mirabel Road. There are stop signs on Davis, Giusti, Nolan and Speer Ranch Road that control traffic entering Mirabel Road. Historically there have been serious accidents at the Giusti/Mirabel/Davis road intersections.

There are no are no turn lanes, at either of the four way intersection on Mirabel Road and traffic site distances are limited at both intersections. Site distances are also limited at the Mirabel entrance to FOR-2. The distance, along Mirabel Road between the two 4 way intersections, Giusti/Davis and Nolan/Speer Ranch, is about 1000'. The Mirabel Road entrance to FOR-2 lies roughly in the middle of the two intersections.

As residents of the FOR-2 Neighborhood we would like to share how difficult it can be to enter and exit Mirabel Road safely via either Giusti Road or Nolan Road. With the absence of turn lanes, the current speed limit, limited sight distances and high vehicle and gravel truck traffic, movements onto and off of Mirabel Road are currently dangerous. We anticipate entering FOR-2 from the designated right of way off of Mirabel Road will be equally dangerous.

In addition the County of Sonoma Guidelines for Traffic Impact Study Thresholds provide some references to possible mitigation measures that will be needed as the result of the planned development of the FOR-2 site. (Thresholds, PG 10)

A project would have a significant traffic impact if it results in any of the following conditions:

1. On-site Roads and Frontage Improvements: Proposed on-site circulation and street frontage would not meet the County's minimum standards for roadway or driveway design, or potentially result in safety hazards, as determined by the County in consultation with a registered Traffic Engineer or Civil Engineer.
6. Vehicle Queues: Project causes or exacerbates 95th percentile turning movement queues exceeding available turn pocket capacity.
7. Signal Warrants: The addition of the project's vehicle or pedestrian traffic causes an intersection to meet or exceed Caltrans or CA-MUTCD signal warrant criteria.
8. Turn Lanes: The addition of project traffic causes an intersection to meet or exceed criteria for provision of a right or left turn lane on an intersection approach.
9. Sight Lines: The project constructs an unsignalized intersection (including driveways) and/or adds traffic to an existing unsignalized intersection approach that does not have adequate sight lines based upon Caltrans criteria for State highway intersections and AASHTO criteria for County roadway intersections.
10. County Intersection Operations: The County level of service standard for County intersection operations is to maintain a Level of Service D or better pursuant to General

Plan Policy CT-4.2. The project would have a significant traffic impact if the project's traffic would cause an intersection currently operating at an acceptable level of service (LOS D or better) to operate at an unacceptable level (LOS E or worse). If the intersection currently operates or is projected to operate below the County standard, the project's impact is considered significant and cumulatively considerable if it causes the average delay to increase by five seconds or more. The delay will be determined by comparing intersection operations with and without the project's traffic for both the existing baseline and projected future conditions.

11. County Roadway Operations: The County level of service standard for County roadway operations is to maintain a Level of Service C pursuant to General Plan Policy CT-4.1; or, for specific roadway segments, the level of service standard adopted in the General Plan Figure CT-3. The project would have a significant traffic impact if the project's traffic would cause a road currently operating at an acceptable level of service (LOS C or better) to operate at an unacceptable level (LOS D or worse).

Sonoma County Standards for Traffic Impact Studies, Page 15

The project applicant shall retain a registered Traffic Engineer who is licensed to practice in the State of California. A TIS may be prepared by a registered Civil Engineer that has demonstrated appropriate expertise to the satisfaction of DTPW and is licensed to practice in the State of California. Said Engineer shall conduct objective qualitative and/or quantitative analysis, and submit a written traffic impact study that includes each of the following areas that apply to the proposed project. Please note that when a concern is identified, the Engineer shall propose a solution and identify funding for the solution.

Vehicle Queues: Identify situations where either the addition of project traffic causes or exacerbates 95th percentile turning movement queues exceeding available turn pocket capacity.

Signal Warrants: Identify situations where the addition of project vehicles or pedestrian traffic will cause an intersection to meet or exceed Caltrans or CA-MUTCD signal warrant criteria.

Turn Lanes: Identify situations where the addition of project traffic at an intersection, including project driveways, causes an intersection to meet or exceed criteria for provision of a right or left-turn lane on an intersection approach.

Questions:

- The DEIR does not sufficiently analyze the effects of traffic mitigation measures relative to FOR-2 and their impacts the County's plans to extend the Joe Rodota Trail Bike Path

along Mirabel Road between Hwy116 and Davis Road. How could traffic impact mitigations effect the plan construction of the Joe Rodota Trail in the area of FOR-2?

- The FOR-2 site adds 736 new residents and approximately 500 cars to the FOR-2 Neighborhood. In the EIR will traffic signal(s), turn lane(s), improved intersection setbacks, improved sight distances, and or controlled crosswalks be required mitigations, on Mirabel Road and the in the FOR-2 Neighborhood streets?
- Are there any potential mitigations that are likely to increase traffic on Giusti Road and Nolan Road at the other two entrances to FOR-2?

Comments: Crosswalks

The DEIR insufficiently analyzes the need for a controlled crosswalk at or near FOR-2 that will allow adults and children cross Mirabel Road to access the Youth Park, walk or bike to town, walk to school or access bus stops.

See Caltrans or CA-MUTCD Page 835 Section 4C.06 Warrant 5, School Crossing

Support: 01 The School Crossing signal warrant is intended for application where the fact that schoolchildren cross the major street is the principal reason to consider installing a traffic control signal. For the purposes of this warrant, the word “schoolchildren” includes elementary through high school students.

Standard: 02 The need for a traffic control signal shall be considered when an engineering study of the frequency and adequacy of gaps in the vehicular traffic stream as related to the number and size of groups of schoolchildren at an established school crossing across the major street shows that the number of adequate gaps in the traffic stream during the period when the schoolchildren are using the crossing is less than the number of minutes in the same period (see Section 7A.03) and there are a minimum of 20 schoolchildren during the highest crossing hour.

Also See Permit Sonoma – Pedestrian Facilities

Policy 4.05 - Where discretionary projects in Urban Service Areas and unincorporated communities are found to create additional demand for pedestrian travel, require the project to directly provide or participate in the funding of pedestrian improvements such as sidewalks, gap closures, steps, safety improvements, and/or trails that will improve pedestrian access to destinations located within ½ mile of the project site.

Policy 4.08 - Provide high-visibility crosswalk marking at all intersections in Urban Service Areas, unincorporated communities, and wherever feasible countywide. Wherever possible, avoid mid-block pedestrian crossings, and where mid-block crossings are necessary, install signalization, refuge islands and signage warning vehicles to stop for pedestrians and watch for cyclists.

Question:

- The FOR-2 Neighborhood would like to know what mitigations should be added to the EIR to allow the 736 new residents of FOR-2, including school children to safely cross Mirabel Road to attend school, visit parks, bike, and walk or obtain services including public transportation?

Comments: Parking

There is a trend in the County to reduce parking spaces per developed unit in order to increase density and force occupants to use other forms of transportation (reduce VMTs). This option may work in urbanized areas with robust public transportation or within walking distances to essential services and work. Forestville is a rural community, there are few jobs available within walking distance of FOR-2. There is no industry, no available commercial land for future development, minimal public transportation and no legal on street parking in the FOR-2 Neighborhood.

DEIR – Impact WFR-2, Page 4.19-26

Access to Rezoning Sites FOR-2, FOR-4, GRA-2, AGU-1, and AGU-2 currently does not meet County road standards of 20 feet in width or greater. Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways could be required. Those improvements would require a County encroachment permit if on a public right-of-way; however, widening County roads would not exacerbate fire risk.

Questions:

- The DEIR does not sufficiently analyze the lack of on street parking in the FOR-2 Neighborhood. Onsite parking should not be reduced for the FOR-2 development. How will the EIR mitigate the issue of assuring that there is sufficient parking on the FOR-2 site for a minimum 2 cars per unit due to the lack of robust public transportation?
- Residents of the FOR- Neighborhood are concerned about overflow traffic parking on our streets. What mitigations are included in the DEIR that will address this issue and who will enforce it?

Reference: Utilities and Service Systems

Comment: Sewer

The DEIR insufficiently analyzes the condition and size of the sewer pipeline serving FOR-2. The 8” sewer line that would service FOR-2 currently ends approximately 1000’ south of the access easement at the Mirabel Road entrance to the FOR-2 site. This 8” line runs from this termination location to the corner of Mirabel Road and Hwy 116. It then transitions to a 6” line, running under the north side of HWY 116 for approximately 1000’ to First Street, where it

connects to the main line to the sewer treatment plant. This line is gravity flow and not pumped. The EIR does not sufficiently analyze whether the 1000' of 6" sewer line has the capacity to handle the increased output from the FOR-2 project. A 6" sewer line carries one half the capacity of 8" sewer line. The FOR-2 Neighborhood is also aware that there have been problems with this 6" line clogging at or near 6661 Front Street/HWY 116 due to a low spot in the line. Failure to adequately estimate the capacity of the 6" sewer line with the increase demand associated with the addition of the FOR-2 development could result in the failure of the system or significant sewer spills at low points in the system.

The Sonoma County Water Agency – Design and Construction Standards for Sanitation Facility, Page 20

B. Minimum Pipe Sizes - The minimum pipe size for main sewers shall be eight (8) inches except as noted below. The minimum pipe size for side sewers shall be four (4) inches or the same size as the building drain plumbing stub whichever is greater.

Questions:

- Good planning for this project should include providing sewer access to the remainder of the FOR-2 Neighborhood which lies within or adjoining the boundaries of the Sewer District, does the DEIR adequately address this planning outlook?
- The FOR-2 Neighborhood should be added to the flow calculation when determining capacity of the, 1000' long 6" sewer pipeline, on Front Street/HWY 116. Has the County of Sonoma contacted the Forestville Water District to advise them of this planning issue and to assure it is included in any pipeline capacity calculations?
- If it is found that there are capacity issues related to the reduce size of the sewer line between Mirabel Road and First Street this should be included with mitigations in the EIR.
- If sewer line does need replacing who will be responsible for replacing 1000' of sewer line under HWY 116 for a distance of 1000'?

Reference: Wildfire

Comment: Threshold, Page 4.19-24

Threshold:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact WFR-1 THE PROJECT INCLUDES REZONING SITES THAT ARE IN OR NEAR AN SRA OR VERY HIGH FHSZS, BUT DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT SUBSTANTIALLY IMPAIR AN ADOPTED EMERGENCY RESPONSE OR EVACUATION PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

During our recent wildfire evacuations traffic has backed up on Mirabel Road south bound from the intersection of Mirabel Road/HWY 116 to Davis Road, approximately ½ mile. There are only 3 exits from FOR-2. Two of the exits are onto Nolan Road which is the closest proximity, west facing and south facing, of a wildland fire burning in the SRA. Using these exits would hamper the existing residents ability evacuate as well as put the evacuees of FOR-2 closer to proximity of the oncoming fire.

Question:

- The DEIR does not adequately analyze or provide sufficient mitigation measures relative to how an evacuation would occur, from the FOR-2 Neighborhood, with nearly 900 residents attempting to exit onto Mirabel Road at the same time while also attempting to merge with other evacuees. This certainly doesn't seem like a Less than Significant situation? These are issues that must be addressed in the EIR and not left to be dealt with after the project has been completed.

Comment: Wildfire Threshold, page 4.19-26

Threshold:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

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

When it comes to public safety, SIGNIFICANT AND UNAVOIDABLE do not belong in the same sentence, ever! There are always mitigations including not going forward with a project. The EIR should evaluate wildfire risk and mitigation options considering the knowledge gleaned from the recent devastating fires in Sonoma County.

The drainages directly west of FOR-2 are in a Moderate FHZ but are identical to those below Giusti Road designated a High FHSZ. A fire moving uphill from Martinelli Road will not differentiate between these two FHSZ's. It will run its course up slope seeking drainages where

rates of spread and intensity will increase. It is just as likely to arrive at Nolan Road as it is to arrive at Giusti Road. In this case a single ember could easily cross Nolan Road and ignite properties or landscaping in FOR-2. (Dan Northern, Forestville Fire Chief RET.)

Question:

- Given that Unavoidable is not an acceptable answer to a significant public safety issue what other wildfire mitigations are appropriate for the FOR-2 site, including removing the site from the Housing Element Update List?

Comment: Fire Hazard Severity Zone

FOR-2 is located 100 feet from a Moderate Fire Hazard Severity Zone and 1000' from a High Fire Hazard Severity Zone. The site is across the street from State Responsibility land on the West side of the site. The EIR, Page 4.19-26 States:

Access to FOR-2 ... does not meet County road standards of 20 feet in width or greater. Prior to approval of development on- and off-site improvements to County and/or private roadways could be required. Those improvements would require a County encroachment permit if on a public right-of-way; however, widening County roads would not exacerbate fire risk.

Question:

- Who would fund the on and off site road improvements and traffic mitigation measures, to meet County and Cal Trans standards should the FOR-2 site be developed?

Comments: Removing FOR-2 from the Rezoning List

A copy of the owner's letter to the County asking that the FOR-2 site be removed from the rezoning list is attached. The family clearly states that they have no intention to sell the property and in fact have other plans for it. The family has owned the property since 1911 and it has become their legacy. It is a heritage property that they intend to pass down to future generations. Rezoning this property would be against their wishes and ruin their ability to use in a manner for which it is currently zoned.

Question:

- Is it in the County's best interest to continue to rezone a property, against the owners wishes, knowing full well that the owner has no intention of selling the property that has been in their family since 1911 and that they intend to keep it in the family for future generations?

- Is there a process or policy to remove a property from the Housing Element Update at the owners request or if the County is aware that they have no intention of selling the property?
- If so who will make this decision and when will it be made?

Respectfully Submitted by the FOR-2 Neighborhood,

Susan and Kon Zaharoff
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707-495-7371

Contacts:

CC: Sonoma County Board of Supervisors
Sonoma County Planning Commissioners

Attachment 1:

FOR-2, potential rezoning site

From: kdpnick@aol.com
To: eric.gage@sonoma-county.org; dsnorthern@sbcglobal.net
Cc: bassman.pulley@gmail.com; klyonkrup@gmail.com
Date: Tuesday, February 7, 2023 at 10:16 PM PST

Good Morning,

Thank you for the opportunity to once again reach out to share my concerns regarding the proposed changes in property zoning for Sonoma County. I listened with intent, the zoom meeting held last week. I retreated from that meeting with mixed feelings, but felt that for the greater good, active listening and participation was done by those gathered and members present. This brings us forth, to this upcoming meeting, February 13th. Once again, it is imperative that I advocate for the land so wisely purchased and established by my Grandfather in 1911, from the original land owners of Forestville.

I must agree and ask like that of Mr. Carr, have committee members availed themselves by visiting the potential rezoning sites. What seems necessary to ask oneself and that of the committee, were the wisest sites selected, and based on criteria that might bring forth additional questions and concerns, prior to the Feb. 13th meeting. An example of question, in knowing that many of the sites do not have easy accessible water, sewer, roads, transportation, all of which would cost thousands, and yet within a few feet, yards, even a mile, there is viable land that would have easy access to those needed items. In examining the sites, were these questions asked as they pertained to each site.

I have read the lengthy report, and would like to share why I believe that the site I hold known as FOR-2 is not a desirable rezoning site.

Priority to all of the following reasons is the clear fact that I, as the owner of FOR-2, and subsequent generations to follow, have no interest in selling the land we own. As mentioned, we have owned this land since 1911, and while over time it has had great crop growth and production, low growth and production, and mediocre growth and production, what is constant is the fact that we have owned the land, worked the land, and it remains, a working Gravenstein apple orchard and vegetable farm. Currently, as previously stated in my first email, we are in the process of regenerating this land, a process begun in excess of five years ago.

Secondly, this land serves as water shed for the areas directly surrounding the proposed property. This is needed to maintain the existing permaculture, house wildlife, and maintain the ecosystem. The lack of respectfully interfacing with the permaculture, will increase and indeed incrementally damage the ecosystems and environment causing irreparable damage and significant effects to the ecosystem.

We have reason to believe and know, through the artifacts and mapping done, that our land at one time was home to several Native Americans who would travel along the coast as they passed from southern Sonoma County up the coast to Fort Bragg.

Fourth, the report mentions that if FOR 2 were to be rezoned, that due to the density factors, it would be a useful site only if mitigated use of appliances, plumbing, land use and landscaping, limited growth on each site, etc. were to be followed. Is this a wise use of land, and good land management? I don't believe so. How does

the committee measure greenhouse gases, emission hazards, unavoidable aesthetic cultural resources, for an unknown date in the future. Further, if to be developed, how is that managed and by what agency?

Fifth, which is now becoming a long list of concerns and reasons why not to rezone my land, is where it is located...or more accurately, where it is not located. Currently, there is limited regional transit, no SMART, etc. If allowed to be rezoned, and subsequently if the property were to be deemed needed, there would be increases in pollutants, significant changes in air quality, needs for increased infrastructure which would include water, sewer, garbage, police/sheriff, fire, road enhancements, traffic increases, and this is the short list. Impacts and indeed far-reaching unknown changes do not allow for informed or adequate decision making to be made.

Sixth, in studying the charts, analysis, more suggested outcomes, I have not been able to determine that there are any valuable gains to have my land rezoned. What I have learned through the studying of that data, is that it is apparent that FOR-2 is not a viable or useful piece of property to be rezoned. I fail to see positive outcomes. Why I would embrace the rezoning of my property is currently lacking, hence why I do not support this suggested rezone plan for FOR-2. Instead, the report continually uses the phrase significant impact. Does that translate to the unknown reality of what significant impact is, and would the county only stop growth once reached, which often and sadly means that significant impact was reached long before it is deemed time to stop development.

In summary, please reconsider the potential rezoning of FOR-2, my land and that of my family. We again humbly ask, to remove our land from the list. Thank you again for your committee work and the opportunity to have this communication.

Sincerely,

Karyn Pulley

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

DIANE GALIARDI

10675 CANYON RD.

Signature

Diane Galiardi

Forestville CA. 95436

Print Name

Address:

Myron Thorman

10670 Canyon Rd

Signature

Myron Thorman

Forestville Ca 95436

Print Name

Address:

SCOTT STRONG

10829 CANYON RD FORESTVILLE CA

Signature

Scott Strong

Print Name

Address:

DON CARMAN

10641 CANTON ROAD, FORESTVILLE

Signature

Don Carman

Print Name

Address:

ANN CARMAN

10641 CANTON ROAD, FORESTVILLE

Signature

Ann Carman

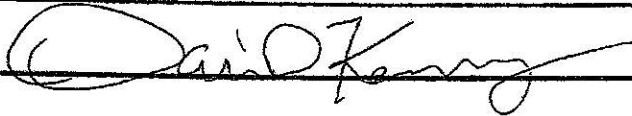
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Print Name

Address:

DANIEL KENNEY 11133 CANYON RD FORESTVILLE 95436

Signature

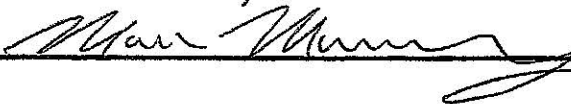


Print Name

Address:

MARK MURPHY 11133 Canyon Rd Forestville 95436

Signature

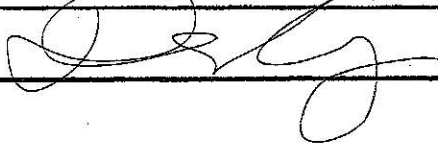


Print Name

Address:

DAVID WAIKELF 10821 CANYON RD. FORESTVILLE 95436

Signature

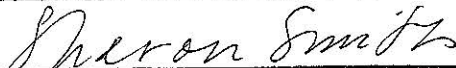


Print Name

Address:

MAARON SMITH 10821 Canyon Rd Forestville 95436

Signature



Print Name

Address:

Lorraine Libubb 10670 Canyon Road Forestville 95436

Signature



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Print Name

Address:

MARCO CALAVETTA

9489 ARGONNE WAY

Signature



Print Name

Address:

Edward Burtner

7024 Trenton Road

Signature



Forestville, CA

Print Name

Address:

Abram Mangano

6508 Mirabel Rd

Signature



Forestville CA 95436

Print Name

Address:

Rick Coyston

9315 CHAMPA DE ELIZABETH

Signature



FORESTVILLE CA 95436

Print Name

Address:

CHRISTOPH VOSS

6972 GIOVANNETTI RD

Signature



FORESTVILLE CA 95436

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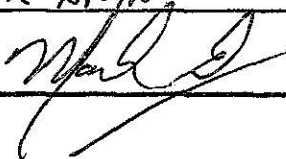
Print Name

MARK ARYA

Address:

6764 Ellen Ln.

Signature



Forestville CA

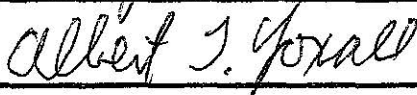
Print Name

Albert J. Yoxall

Address:

7383 Hidden Lake

Signature



Forestville CA 95436

Print Name

Christa Brallo

Address:

7397 hidden lake rd.

Signature



Forestville, 95436

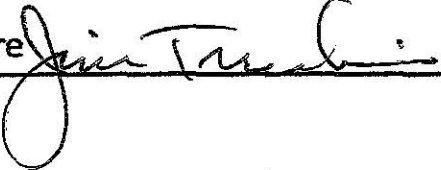
Print Name

JIM TRANCHINA

Address:

7404 HIDDEN LAKE RD

Signature



FORESTVILLE, CA

Print Name

MARY RAND

Address:

7404 Hidden Lake Road

Signature



Forestville, CA 95436

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Print Name

Address:

DAN BANTECOU

5720 PRIDE RD

Signature



FORESTVILLE, CA 95430

Print Name

Address:

PAUL PEARSON

7200 CORY RD

Signature



FORESTVILLE, CA

Print Name

Address:

Anne Lewis

P.O. Box 670 Forestville

Signature



Print Name

Address:

Ken McLEAN

8365 TEMPLEMAN Rd.

Signature



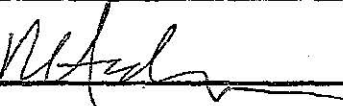
Print Name

Address:

RICHARD HICKMAN

8066 MARTINELLI RD

Signature



FORESTVILLE

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Print Name

Address:

Megan Doble

4450 Guerneville Rd 95401

Signature



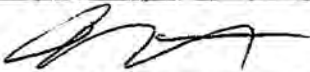
Print Name

Address:

Matt Edgob

5980 Anderson Rd 95436

Signature



Print Name

Address:

Cynthia Johnson

6088 Firont St Forestville 95436

Signature




Print Name

Address:

ERIC J DOBLE

4450 GUERNEVILLE RD

Signature



Print Name

Address:

Spencer Henderson

7400 Malone Rd

Signature



Forestville CA 95436

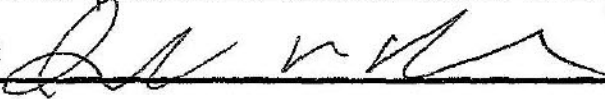
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Print Name

Address:

RANDOLPH W NELSON 11550 Sunnyside Ave

Signature



Forestville CA 95434

Print Name

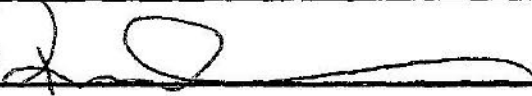
Address:

Ron Anderson

8693 Green Valley Rd.

SEASIDE, CA 9572

Signature



Print Name

Address:

Molly Brown

4450 Guerneville Rd

Signature



Santa Rosa CA 95401

Print Name

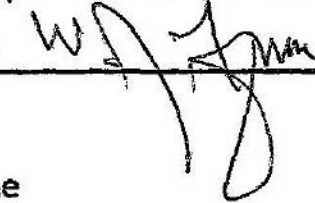
Address:

Bill Ferguson

8383 Hwy 116

Forestville CA

Signature



95436

Print Name

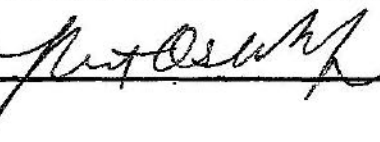
Address:

Robert O. PABA Jr.

7444 Parker Ave

Guerneville Ct. 95446

Signature



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Print Name

Address:

JOEY BURTNER

7024 TRENTON RD

95436

Signature



Print Name

Address:

Claude Schroeder

8739 Marianna

Forestville, CA

Signature



Print Name

Address:

GERALD D'ELIA

7829 RUGLEY AV

Signature



GUERRELLI, CA

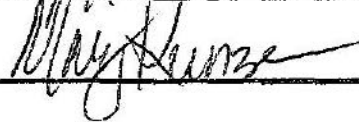
Print Name

Address:

Mary Kunze

7520 Niki Ln

Signature



Forestville

Not enough room for town needs.

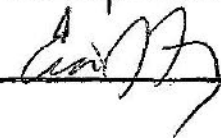
Print Name

Address:

Eric Fry

8330 1st Street, Forestville

Signature



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Print Name

Address:

ROBERT O. BABA III

6631 15th ST. FORESTVILLE, CA

Signature

Robert O. Baba III

Print Name

Address:

Christopher Smith

8645 Trenton Road, Forestville, CA 95437

Signature



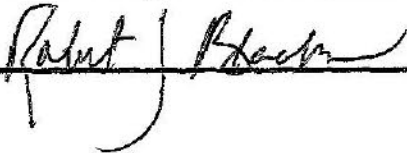
Print Name

Address:

ROBERT J BLACKER

7423 Poplar Drive

Signature



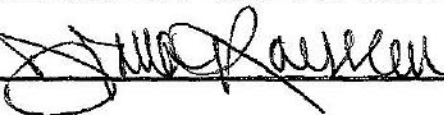
Print Name

Address:

DIANA ROUSSEAU

6830 Ellen Lane, Forestville

Signature



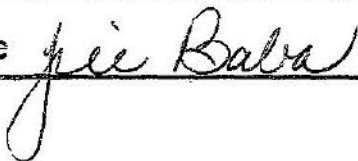
Print Name

Address:

JILL BABA

7444 PARKER, QUERNEVILLE

Signature



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Print Name

Address:

Laura Almada

5809 Vine Hill Rd

Signature

Laura Almada

Sebastopol

Print Name

Address:

Marc McLean

Signature

Marc McLean

Print Name

Address:

NATHAN Butler

5660 Hwy. 116 N-

Signature

Nathan Butler

Print Name

Address:

Jumli Smirnic 8501 Hwy 116

Signature

Jumli Smirnic

Print Name

Address:

ROGER BETTA

6303 Hendricks St

Signature

Roger Betta

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Print Name

Address:

Diana L. Stuart 6815 Giusti Rd, Forestville
CA 95436

Signature

Diana L. Stuart

Print Name

Address:

Carly Downs 6815 Giusti Rd.

Signature

Carly Downs

Forestville CA 95436

Print Name

Address:

Johnathon Downs 6815 Giusti Rd Forestville CA

Signature

[Signature]

95436

Print Name

Address:

Barbara Wishard 7521 Niki Lane

Signature

Barbara Wishard

Forestville, CA 95436

Print Name

Address:

CHRISTINE HUEMER 6740 Lavon Ct.

Signature

Christine Huemer

FORESTVILLE, CA 95436

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

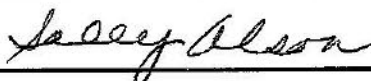
Print Name

Address:

Sally Olson

6537 Wayne Ct., Forestville, CA 95436

Signature

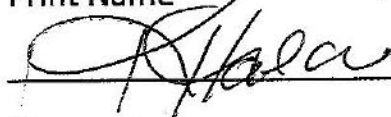


Print Name

Address:

Ken Harlan

6515 Wayne Ct



Signature

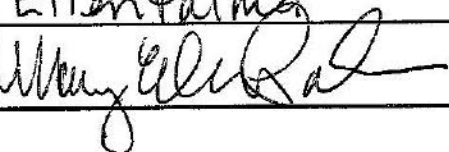
Print Name

Address:

Mary Ellen Palmer

8000 Speer Ranch Rd

Signature



Forestville, CA 95436


Print Name

Address:

Marshall John Palmer

8000 Speer Ranch Rd

Signature



Forestville, CA 95436

Print Name

Address:

Judy L. Lubas

6505 Wayne Ct.

Signature



Forestville, CA 9505

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Print Name

SANDRA FARKAS

Address: 6845 GIUSTI RD.

FORESTVILLE, CA 95436

Signature

SANDRA FARKAS

Print Name

Colleen O'Neill

Address:

8065 Speer Ranch Rd Forestville CA
95436

Signature

Colleen O'Neill

Print Name

Jennifer Alwood

Address:

6733 Lavon Ct Forestville, CA
95436

Signature

Jennifer Alwood

Print Name

Mike Alwood

Address:

6733 Lavon Ct Forestville, CA 95436

Signature

Mike Alwood

Print Name

Peggy Gramala

Address:

6725 LAVON COURT
FORESTVILLE, CA 95436

Signature

Peggy Gramala

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Print Name

Address:

RONALD WININGARZ

6900 ELLEN LANE FORESTVILLE CA

Signature

Ronald M. Winingarz

Print Name

Address:

Amy Ferguson

6718 Laron Ct. Forestville

Signature

Amy Ferguson

Print Name

Address:

C.L. Tree

C.J. Tree

6610 JIM CT, FORESTVILLE

Signature

Print Name

Address:

LARRY LOEBLIG

6610 Jim CT Forestville

Signature

Larry Loeblich

Print Name

Address:

MARY CLARE CAWLEY

6632 Jim CT Forestville

Signature

Mary Clare Cawley

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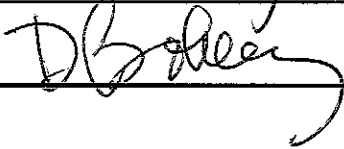
Print Name

Debra Bohling

Address:

6632 Jim Ct

Signature



Print Name

Ian Welsh

Address:

6644 Jim Ct

Signature



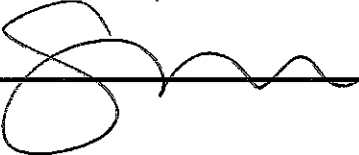
Print Name

Sarah Hoffmann

Address:

6644 Jim Court

Signature



Print Name

Leone Manri

Address:

6506 Wayne Ct

Signature



Print Name

Mel Manni

Address:

6506 Wayne CT

Signature



We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name) Kent Wilson Address: 6536 Wayne Ct.
Forestville, CA 95436
Signature Kent Wil

Print Name Nancy Dempster Address: 6730 1st St
Forestville Ca, 95436
Signature Nancy Dempster

Print Name Vikki Miller Address: 7491 Mirabel Rd cottage 1 Forestville
95436
Signature Vikki Miller

Print Name Rebecca Boye Address: 10825 Canyon Rd Forestville
CA 95436
Signature [Signature]

Print Name Donna Winger Address: 6900 Ellen Lane Forestville, CA
95436
Signature Donna Winger

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

Richard Benyo

7050 Giustini Rd, Fontville CA 95426

Signature

Print Name

Address:

Chris Mullins

8065 S Pours Ranch Rd Fontville

Signature

Print Name

Address:

Allen Adams

8111 Speer Ranch

Signature

Print Name

Address:

Melody Adams

8111 Speer Ranch

Signature

Print Name

Address:

CHARLENE PETERSON

8123

SPEER RANCH RD

Signature

Charlene Peterson

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

Maria Birch 7446 Niki Lane

Signature

Maria Birch

Print Name

Address:

Richard Birch 7446 Niki Lane

Signature

Richard Birch

Print Name

Address:

Tami Barrick 7485 Niki Lane Forestville CA

Signature



95436

Print Name

MICHAEL BAUMAN

Address:

6875 GIUSTI RD

Signature

Michael Bauman

Print Name

Address:

Carol Singleton 6000 Highway 116


Signature

Carol Singleton

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name Rebecca Wessling Address: 6020 Hwy 116
Signature Rebecca Wessling Forestville, CA
95436

Print Name Karen Denise Langford Address: 5995 Hwy. 116
Signature Karen Denise Langford Forestville, CA 95436

Print Name Greg Gallemore Address: 8135 Speer Ranch Road
Signature  Forestville, CA 95436

Print Name Kristen Gallemore Address: 8135 Speer Ranch Rd Road
Signature KMGallemore Forestville, CA 95436

Print Name Frances Oliver Address: 8368 Trenton Rd.
Signature Frances Oliver Forestville CA 95436

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Print Name

Address:

Laurie Schefer 8147 Speer Ranch Rd. Forestville Ca 95436

Signature

Laurie B Schefer

Print Name

Address:

Thomas Schefer 8147 Speer Ranch Rd Forestville Ca 95436

Signature

Thomas R Schefer

Print Name

Address:

Christine Bell 8168 Speer Ranch Rd Forestville CA 95436

Signature

CA Bell

Print Name

Address:

Richard Phillips 8132 Speer Ranch Rd

Signature

Richard Phillips

Print Name

Address:

Jacqueline Keywood 8132 Speer Ranch Rd.

Signature

Jacqueline Keywood

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

SCOT COVINGTON

8031 SPEER RANCH ROAD

Signature



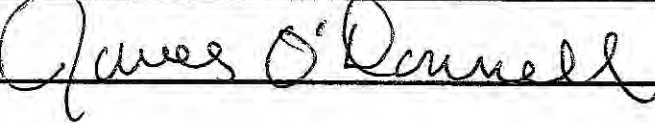
Print Name

Address:

JAMES O'DONNELL

8024 SPEER RANCH RD

Signature



Print Name

Address:

Barbara O'Donnell

8024 Speer Ranch Rd

Signature



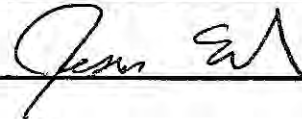
Print Name

Address:

Jessica Earl

8012 Speer Ranch

Signature



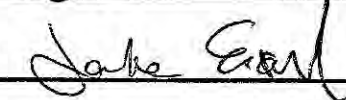
Print Name

Address:

Jake Earl

8012 Speers Ranch

Signature



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Print Name

JAMES W. MACLURE

Address:

7453 Poplar Dr.

Signature



FORESTVILLE, PA 95436

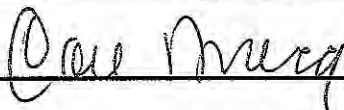
Print Name

Corinne Domela

Address:

7455 Poplar Dr

Signature



Forestville, CA 95436

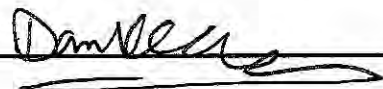
Print Name

Dan Kenner

Address:

7455 Poplar Dr

Signature



Forestville, CA 95436

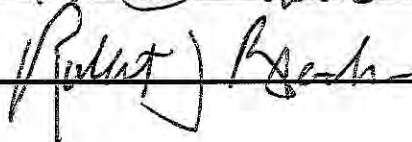
Print Name

ROBERT J. BLOCKER

Address:

7423 Poplar

Signature



FORESTVILLE CA

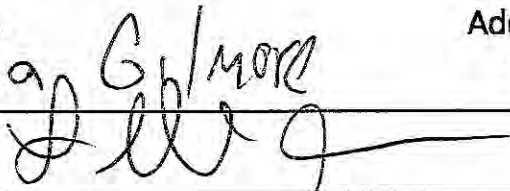
Print Name

Lisa Gilmore

Address:

7518 Mirabel Rd

Signature



We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

Mona Behan

6867 Nolan Rd., Forestville 95436

Signature Mona A Behan

1/28/23

Print Name

Address:

ALAN CRISP

6867 NOLAN RD, FORESTVILLE 95436

Signature

Alan Crisp

1/28/23

Print Name

Address:

Regan Crisp

6867 Nolan Rd. Forestville

Signature

Regan Crisp

95436

Print Name

Address:

TONY BRITTON

7420 POPLAR
DRIVE, FORESTVILLE

Signature

Tony Britton

Print Name

Address:

ANDRÉ JACKSON

7480 POPLAR DR. FORESTVILLE, CA 95436

Signature

Andre Jackson

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Print Name

Address:

James Kay

7492 Poplar Dr

Signature

James Kay

Forestville CA 95436

Print Name

Address:

Molly Kay

7492 Poplar Drive

Signature

Molly Kay

Forestville CA 95436

Print Name

Address:

Kevin Williams

7498 Poplar Drive

Signature

Kevin Williams

Forestville, CA 95436

Print Name

Address:

Ron Ruiz

7500 Poplar Drive

Signature

Ron Ruiz

Forestville, CA 95436

Print Name

Address:

Sandra McClure

7463 Poplar Dr.

Signature

Sandra E McClure

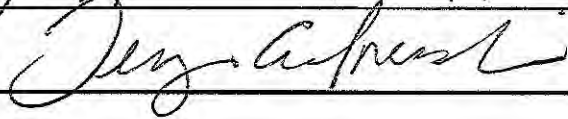
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Print Name

Address:

TERRY ANDREACCH, 7785 GIUSTI RD

Signature

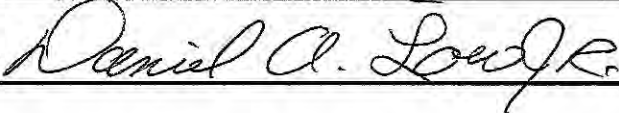


Print Name

Address:

DANIEL A. LOW JR 7767 GIUSTI RD.

Signature

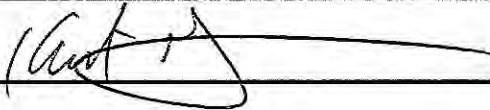


Print Name

Address:

KURT GIUSTI 7750 GIUSTI RD

Signature

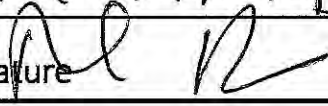


Print Name

Address:

RICHARD BIRCH 7446 NIKI LN

Signature



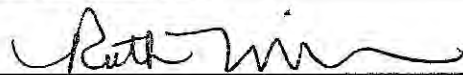
FERRISVILLE

Print Name

Address:

Ruth Wilson 6536 Wayne Ct. Forestville

Signature



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Print Name

Address:

Alice Shoffet 6830 Giusti Rd

Signature

Alice Shoffet

Print Name

Address:

Mike Barats

6996 Mirabel RD
Forestville Ca 95436

Signature

Mike Barats

Print Name

Address:

Janet Bauman

7366 Mirabel Rd

Signature

Janet Bauman

Forestville, Ca 95436

Print Name

Address:

Linda Barker Perkins

6835 Giusti Rd Forestville

Signature

L B Perkins

Print Name

Address:

Michael D. Perkins 6835 Giusti Rd Forestville

Signature

Michael D. Perkins

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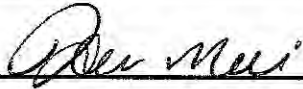
Print Name

DAN MORI

Address:

6970 Giusti Rd.

Signature



Print Name

Alex Cruz

Address:

6875 Giusti Rd

Signature




Print Name

Heather Dale Best

Address:

6986 Mirabel Rd.

Signature



Print Name

Robert Best

Address:

6986 Mirabel Rd

Signature



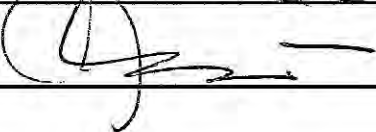
Print Name

GIRTS REAR

Address:

7445 - Nike Forestville

Signature



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Print Name

Address:

John Franceschi 6874 Nolan Rd Forestville CA

Signature John Franceschi

Print Name

Address:

Thomasine A. Franceschi 6995 Giusti Rd. Forestville, CA.

Signature Thomasine A. Franceschi

Print Name

Address:

Lloyd Franceschi 6995 Giusti Rd Forestville CA.

Signature Lloyd Franceschi

Print Name

Address:

Cece Gannon 6955 Giusti Rd, Forestville CA

Signature Cece Gannon 707 887 7223

Print Name

Address:

C. Taylor Brown 6935 Giusti Rd.

Signature [Signature] Forestville, CA 95436

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Print Name

Address:

Steve McDonald 6985 Nolan Rd. 1/27/23

Signature

Steve McDonald

Print Name

Address:

Karen McDonald 6987 Nolan Rd. 1-27-23

Signature

K McDonald

Print Name

Address:

Elisa Baker 7423 POPLAR DR. 1/28/23

Signature

Elisa Baker

Print Name

Address:

ROGER STANCLIFF 129 NOLAN CT Forestville 1/28/23

Signature

Roger Stancliff

Print Name

Address:

Valerie Stancliff 129 Nolan Ct Forestville, 1/28/23

Signature

Valerie Stancliff

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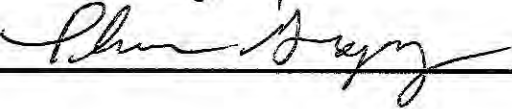
Print Name Chase Reece

Address: 7445 Niki Lane

Signature 


Print Name Thomas Gregory

Address: 7485 Niki Ln

Signature 

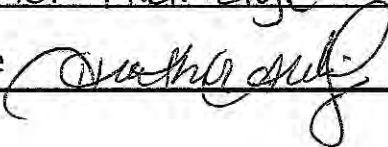
Print Name MARK ALDRIDGE

Address: 7484 NIKI LN

Signature 

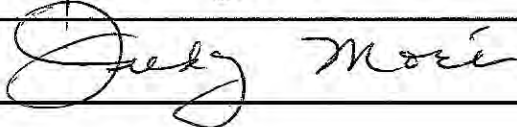
Print Name Heather Aldridge

Address: 7484 Niki Ln.

Signature 

Print Name Judy Mori

Address: 7495 Niki Ln.

Signature 

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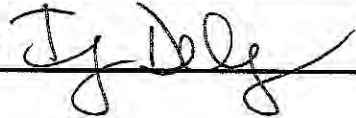
Print Name

TIMOTHY DELLINGER

Address:

135 NOLAN CT FORESTVILLE, CA

Signature



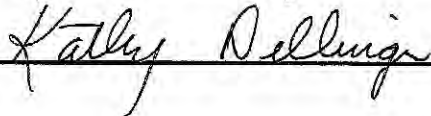
Print Name

Kathy Dellinger

Address:

135 Nolan Ct. Forestville, CA

Signature



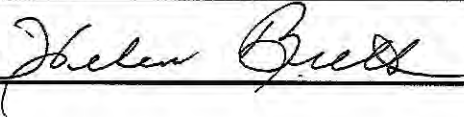
Print Name

Helen Butt

Address:

122 Nolan Ct. Forestville Ca 95432

Signature



Print Name

Kirsten Franceschi

Address:

6874 Nolan Rd. Forestville, CA

Signature

Kirsten Franceschi

95436

Print Name

Starlee Rownd

Address:

Nolan Rd. Forestville, CA

Signature



95436

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Print Name

Address:

1/28/2023

MARY K. DAUGHERTY

7107 GIUSTI RD.

Signature

Mary K. Daugherty

FORESVILLE, CA
95436

Print Name

Address:

EKaterina Bleeker

7600 Giusti Rd. Forestville, CA 95436

Signature



Print Name

Address:

Melody Clark

7680 Giusti Rd

Signature

Melody Clark

Print Name

Address:

Adele Turk

7680 Giusti Rd

Signature

Adele Turk

Print Name

Address:

Dana Riven

7635 Giusti Road

Signature

Dana Riven

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name Robin Trimble Address: 6955 Nolan Rd.
Signature R. Trimble Forestville, CA
95436

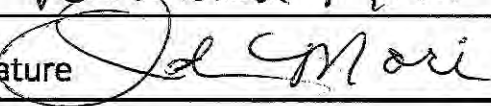
Print Name Jim Kline Address: 6955 Nolan Rd
Signature Jim Kline Forestville, CA
95436

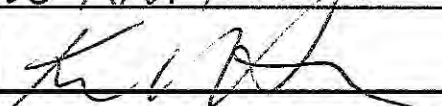
Print Name Mark Collischoun Address: 6955 Nolan RD Forestville, CA
Signature Mark Collishoun 95436

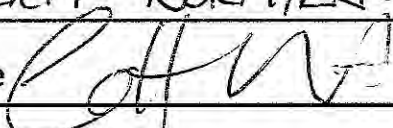
Print Name JON STURTEVANT Address: 6955 Nolan Rd. Forestville, CA
Signature Jon Sturtevant 95436

Print Name Salvy Quady Address: 7635 Giusti Rd., Forestville CA
Signature Salvy Quady 95436


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Print Name Edward Moti Address: 7495 N.K. Ln
Signature 

Print Name Kara Northern Address: 7682 Gustb Rd
Signature 

Print Name GARRETT NORTHERN Address: 7682 GUSTI RD.
Signature 

Print Name Sunoma Northern Address: 6925 Nolan Rd
Signature Sunoma NMA Forestville, CA

Print Name DAN NORTHERN Address: 6925 NOLAN RD
Signature  FORESTVILLE

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

Nick Comaich

6831 Nolan RD

Signature

Nick Comaich

Print Name

Address:

Amara Danzart

6829 Nolan RD

Signature

Amara Danzart

Print Name

Address:

Karl Hallstrom

6815 Nolan Rd

Signature

Karl Hallstrom

Print Name

Address:

Erin Hallstrom

10815 Nolan rd.

Signature

Erin Hallstrom

Print Name

Address:

Rhonda Provost

7050 Givsti ROAD

Signature

Rhonda Provost

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name Kon Zaharoff Address: 6875 Nolan Rd
Forestville, CA

Signature K. Zaharoff 1-27-2023

Print Name Susan Zaharoff Address: 6875 Nolan Road 1-27-2023
Forestville, CA 95436

Signature Susan Zaharoff

Print Name Karen Krell Address: 6860 Nolan Rd Forestville CA 95436

Signature Karen Krell 1-27-2023

Print Name Florentino Garcia Address: 6854 Nolan Rd Forestville CA 95436

Signature Florentino Garcia 1-27-2023

Print Name Dewitt Blackman Address: 6854 Nolan Rd Forestville CA 95436

Signature D. Blackman 1-27-2023

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Print Name Nancy L. Jones Address: 6975 Giusti Rd, Forestville
Signature Nancy L. Jones 1-27-2023

Print Name Ken Jones Address: 6975 Giusti Rd, Forestville
Signature Ken Jones 1-27-2023

Print Name DOLORES VOIGHT Address: 8000 SPEER RANCH RD, FORESTVILLE
Signature Dolores Voight 1-27-2023

Print Name Douglas Mark Dutina Address: 6884 Nolan Road Forestville
Signature Mark Dutina 1-27-2023

Print Name Dawn Dutina Address: 6824 Nolan Rd. Forestville
Signature Dawn Dutina 1-27-2023 CA

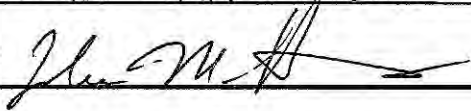
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Print Name

Address:

Johannes HENNEBERGUE 6844 Nolan Road, Forestville, CA 95436

Signature



1/27/23

Print Name

Address:

Ryan Hennebergue 6844 Nolan Rd. Forestville, CA 95436

Signature



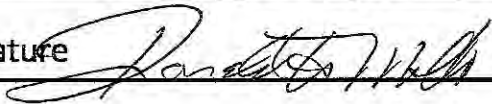
1/27/23

Print Name

Address:

Ken Mollo 6857 Nolan Rd Forestville 95436

Signature



1-27-23

Print Name

Address:

Barbara Schwoerer 6815 Nolan Rd, Forestville, CA

Signature



1-27-23

Print Name

Address:

Michael Schwoerer 6815 Nolan R Forestville

Signature



1-27-23

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Print Name

Address:

Jeannette Smith

1780 Giusti Rd Forestville

Signature

Jeannette Smith

Print Name

Address:

Diane Nelson

6341 Van Keppel Rd.

Signature

Diane Nelson Forestville, CA

Print Name

Address:

Tim Nelson

6341 Van Keppel Rd.

Signature

Tim Nelson Forestville, CA

Print Name

Address:

Debra Rypka

7096 O'Hare Lane

Signature

Debra Rypka

Forestville, CA 95436

Print Name

Address:


Dyana Foldvary

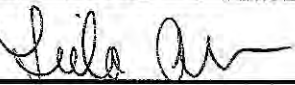
7381 Hidden Lake rd 95431


Signature


Dyana Foldvary

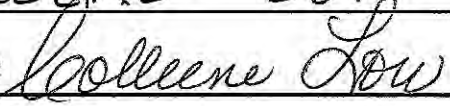
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Print Name Timothy Allen Address: 7581 Giusti Rd Forestville
Signature 

Print Name Leila Allen Address: 7581 Giusti Rd. Forestville
Signature 

Print Name GLENN Trowbridge Address: 7000 Nolan Rd
Signature 

Print Name CRAIG R. LEVITT Address: 7685 GIUSTI Rd. Forestville
Signature 

Print Name COLLEENE LOW Address: 7767 GIUSTI Rd. Forestville
Signature  95436

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

Gary Beyruti

11140 Canyon Rd, Forestville, CA 95436

Signature



Print Name

Address:

Daryl Springer

11140 Canyon Rd Forestville, CA 95436

Signature



Print Name

Address:

Joel Woodbury

10905 Canyon rd.

Signature



Print Name

Address:

Signature

Print Name

Address:

Signature

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Print Name

Address:

Margaret Katta

7430 Hidden LAKE Rd.

Signature

Margaret L Katta

Print Name

Address:

Ellen Farina

6400 Hidden Lake Rd.

Signature

Ellen Farina

Print Name

Address:

Signature

Print Name

Address:

Signature

Print Name

Address:

Signature

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and wildland mitigations that would make the project financially impossible for a developer to overcome
e current density and that it would be unwise to ignore these issues in order to meet the RHND allocation
eeds.

Print Name

Gillian Hayes

Address:

7385 Hidden Lake Rd
Forestville, CA 95436

Signature

Gillian Hayes

Print Name

tyler Haen

Address:

7385 Hidden Lake Rd
Forestville, CA 95436

Signature

Tyler Haen

Print Name

Address:

Signature

Print Name

Address:

Signature

Print Name

Address:

Signature

From: [Kathy R.](#)
To: [PermitSonoma-Housing](#)
Cc: [Eric Gage](#); [Lynda Hopkins](#); [Leo Chyi](#); [Susan Gorin](#); [David Rabbitt](#); [James Gore](#); [Chris Coursey](#)
Subject: Re: Housing Element Draft EIR, Objections, request for additional time for public review
Date: Tuesday, February 14, 2023 12:54:51 AM

EXTERNAL

I was alerted to this report a week ago and I'm very concerned about how this will change our town in Forestville. I have driven to and seen all of the sites they are proposing zoning changes to, and all but one of these sites are within a mile or two of each other and are on or near a Scenic Highway and will be seen from Hwy 116. Most homes in the area are single story. Having multi-story homes or apartments on any of these sites doesn't fit in with the character of the neighborhoods. How can any of these properties be built without significant improvements to Hwy 116 or Mirabel Rd? I haven't see any infrastructure to support the proposal. And the burden is unfairly put on Forestville. Also, have any of you walked along the sidewalks in downtown Forestville? Tried to safely cross the street here? The sidewalks and curbs are uneven and severely cracked too.

I'm asking for additional time for public review. It's a complicated document to go through and I have noticed multiple things in the report that are not correct or are concerning. For instance, one item in the report that caught my attention was it mentions a school on Mirabel Rd near the F2 site. There is no school on Mirabel, however, there is the Forestville Youth Park.

Thank you for your time and consideration to request additional time for public review.

Sincerely,

Kathy Rodrigues
10520 Woodside Dr.
Forestville CA. 95436

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

February 13, 2023

Eric Gage
Permit Sonoma
2550 Ventura Ave.
Santa Rosa, CA 95403
Permitsonoma-housing@sonoma-county.org

REC'D
FEB 14 2023
PERMIT AND RESOURCE
MANAGEMENT DEPARTMENT

Subject: Draft EIR Comments: Housing Element Update

Dear Mr. Gage,

My comments and concerns relate directly to FOR-2 APN, located in Forestville, and more generally to the Forestville sites proposed for increased housing. I am a 25-year resident of Forestville, own a home which backs on FOR-2, and am most familiar with this parcel and the vicinity in which it is located. My concerns include wildfire danger, impacts relative to climate change (GHG's), lack of water and sewers, egress and ingress, traffic, and the lack of local amenities.

I have reviewed a portions of the Draft Program EIR and was pleased that some of my concerns were addressed in the document. I do, however, want to emphasize that there are concerns that warrant consideration.

It appears that Alternative #3 (ref. ES-4 and Section 6—Alternatives) is in the best interest of the community, the county and the environment, as opposed to the Draft as written. Consider as it relates to FOR-2:

- The potential for and the actual significant adverse impacts that will result (ref. Table ES-1);
- The environmental constraints;
- Unknowns not yet explored for FOR-2 (e.g. water supply and wastewater generation impacts—page ES-42 - 43, and pages 6-13 - 6-16);
- There was no "Alternatives" discussion of "Alternative locations" (see below for further discussion and CEQA Guidelines Section 15126.6).
- "Based on the alternatives analysis provided ..., Alternative 3 would be the environmentally superior alternative (ref. page 6-18)."

There are other sites outside those discussed in the Draft PEIR that would seem less impactful from an environmental standpoint. They would be less costly from an infrastructure standpoint, would reduce the potential for wildfire impacts and other significant adverse impacts identified. It is important that although the County has a state mandate to fill, and is under a timeline to fulfill that mandate; the environmental impacts identified for the sites chosen must be considered and the resulting adverse impacts should outweigh the mandate requirement. It is imperative to identify housing sites, but it is also imperative that the county does its due diligence to identify housing that won't result in significant environmental damage, and put the residents and the community in a potentially harmful situation.

Based on the CEQA Guidelines Section 15126.6 (see below), it appears that "Alternative Locations" must be considered in the PEIR and evaluated given the significant adverse impacts that will result as described in the current document. How were the sites for analysis chosen? Was this a methodical endeavor? Are the sites chosen for this EIR the least impactful sites in the county? Are these the only feasible sites in all of

Sonoma County for rezoning? These questions are important when considering alternatives to the project as proposed.

It should be noted that in the last couple of weeks, landowners adjacent to FOR-2 were given a letter by the FOR-2 landowners that included: "Let us be clear in no uncertain terms: WE ARE NOT SELLING THE ORCHARD. We plan on continuing to restore and expand the agricultural and environmental function of the land, with hopes of selling food to local stores and individuals in the near future, and eventually retiring here. This property has been in the family for 5 generations and will continue to be so." They have verbalized this for the last few years to various neighbors. I have not attached the letter, as the FOR-2 landowners indicated they would also be submitting a letter to you. Given the landowner's desire, and the significant adverse effects identified relative to rezoning the parcel as described, it does not seem that realistically this parcel will be available for the 283 houses the rezoning Draft PEIR identifies, or would it result in a realistic number for the county to submit to the state.

Given the size of Sonoma County, it appears that there may be many sites in Sonoma County that would not result in significant adverse impacts, compared to the impacts described for some of the sites in this draft PEIR.

Pursuant to the CEQA Guidelines Section:

"15126.6. CONSIDERATION AND DISCUSSION OF ALTERNATIVES TO THE PROPOSED PROJECT.

- (a) **Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project** (my emphasis), which would feasibly attain most of the basic objectives of the project **but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives** (my emphasis). An EIR need not consider every conceivable alternative to a project. **Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation** (my emphasis). An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.
- (b) **Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly** (my emphasis).
- (c) **Selection of a range of reasonable alternatives.** The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

(d) Evaluation of alternatives. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

Continuing, (f) defines Rule of reason, feasibility, and alternative locations

“(f) **Rule of reason. The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project (my emphasis).** Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

(1) Feasibility. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives. (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553; see Save Our Residential Environment v. City of West Hollywood (1992) 9 Cal.App.4th 1745, 1753, fn. 1).

(2) **Alternative locations (my emphasis).**

(A) **Key question. The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location (my emphases).** Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

(B) **None feasible. If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR (my emphasis).** For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location.

(C) **Limited new analysis required.** Where a previous document has sufficiently analyzed a range of reasonable alternative locations and environmental impacts for projects with the same basic purpose, the lead agency should review the previous document. The EIR may rely on the previous document to help it assess the feasibility of potential project alternatives to the extent the circumstances remain substantially the same as they relate to the alternative.

(3) An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. “

Based on the CEQA Guidelines listed above, it seems unreasonable to not have included "Alternative Locations" in the Draft PEIR. I submit that this must be addressed so that all who are reviewing the proposal have adequate information to make an informed decision, and sites are chosen for rezoning that lessen and/or remove significant adverse impacts.

FOR-2 is located in an "urban service area," of an unincorporated area. The community of Forestville, in which it is located, is several miles from most of the amenities that people require, compared with most of the other parcels being considered under the EIR. There is a small grocery store, one dentist, a small medical clinic, and very little to no opportunity for permanent employment nearby.

FOR-2 would add approximately 783 people (there would be 1652 people added considering all Forestville sites), and it's my understanding that other site(s) within the urban service area of Forestville have already been rezoned for additional houses (e.g. the property across from Rotten Robbie's?). According to information obtained on "Google" the 2020 census showed ~3,800 people living in Forestville. This (granted over time) would result in a sharp rise in population; and would result in most of the population commuting several miles to jobs, the larger grocery stores, and medical appointments. This does not appear to be the best solution for addressing ghg's, impact on the community itself, or the other needs of the population. Would public services (e.g. the Sheriff's office staffing) be increased in the community?

As mentioned above, the increased population will add to environmental impacts by adding traffic congestion and CO2 to the air. In addition, it will increase impacts to the road surfaces. I appreciate that some mitigation was suggested (e.g. added bus lines and bike paths), however, it's unclear whether this will be a requirement. Additionally, these means will not generally get people to their desired destination in a timely manner; and most people will continue to drive.

The increased density in housing (635 houses in Forestville, and an added population of 1,652 people—ref. Table 2-4, pages 2-25 - 2-26) will have a significant adverse impact on traffic on Mirabel Rd. and Front St., in particular. These roads are already heavily impacted, and at times congested by the heavy use of gravel trucks (traveling at 45 mph on Mirabel Rd.), along with the "normal" traffic traveling these roads.

Referencing 4.16 Transportation, I was unable to find any reference to Mirabel Rd. which would be an important artery for FOR-2. I was surprised that Mirabel Rd. and Front St. are not described as "Minor Collectors" of traffic (ref. page 14.16-4 - 14.16-5); or analyzed for significant impacts (unless I missed it). If development of FOR-2 occurs, Mirabel Rd. will be the road that those residents will "collect on". Front St. will be a "collector" for the other FOR parcels, in addition to FOR-2.

These two-lane roads, which have little to no shoulder are dangerous to walk or ride bicycles on now. There are no sidewalks, bike paths, traffic lights or other measures to slow traffic, or accommodate pedestrians or bicycles particularly on Mirabel Rd., and Front St. is not much better. Mirabel Rd. has a stop sign where it intersects River Rd., and a stop sign where it intersects Front St./Hwy 116. The current conditions would not provide safe passage to the downtown area, to the Youth Park, Speers (our small local grocery store), or the river. In addition to the gravel truck traffic, vehicles have to back onto Front St. when they are leaving some of the businesses located there.

Forestville's high school—El Molino—is no longer an option for the general high school public. As a result high school students are required to bus, or be driven to Sebastopol (or elsewhere) for school, and associated events. This adds to traffic concerns and congestion, and added ghg. With the added population, the situation will be exacerbated.

Referencing page 4.1-18: "On Mirabel Road, a school is directly across the street from FOR-2." This is not accurate. The Forestville Youth Park is located across the street from FOR-2. School locations are: El Molino, located on Covey Rd., and The Forestville Elementary School and Academy located at 6321 Hwy 116.

The Draft PEIR indicates that transportation would result in significant and unavoidable impacts (ref. 4.16 and page 5-3). Nevertheless, it seems that Mirabel Rd. and Front St., given their current use and that proposed, would be important roads to discuss, analyze for significant adverse impacts, and mitigation measures; and disclosed for the purpose of thoughtful decision making.

Referencing pages 2-25 and 4.16.14. According to Table 2-4 the population buildout will be highest in FOR-2 compared to other parcels listed. Table 4.8-6 #4 indicates the project is consistent with reducing travel demand through focused growth. Although this may be true for some of the housing sites, it doesn't appear to be true for FOR-2, in that travel demand to work, grocery stores, high school, etc. will be greater than if located closer to the amenities needed for a large number of people. As noted above, Forestville has very few amenities and working opportunities.

As indicated in the Draft PEIR, the FOR-2 parcel does not have sewer hook-ups. The homes that surround the parcel are on septic, as there is no sewer system available. Additionally, water availability is scarce. With the drought, and the prediction by some, that this will continue into the future, I question whether there will be water available to accommodate another 783 people (1652 for all of Forestville) even with the mitigation proposed in the Draft PEIR. How and where will additional water be obtained? Where will the sewage be transported? Will additional sewage ponds be required?

Referencing page 2-4, "...the County narrowed its list to 59 Potential Sites based on meeting these four basic requirements: ... 2. Site must be located within an established Urban Service Area where public sewer and water service is available". As indicated in the DEIR: sewer is not available in FOR-2; and water availability and wastewater treatment are unknowns, and would require further study. It appears FOR-2 should have been eliminated from consideration in the DEIR, as were other sites. Why was it not?

Has FOR-2 been analyzed relative to hydrology, comparing the recharge that it currently provides (an area where water can absorb into the soil, and not have to be transported) to the area covered with houses, cement and asphalt? During large rain storms there is minor flooding along Mirabel Rd. as it descends towards the river, and flooding at the junction of Nolan and Mirabel and to a lesser extent at Giusti and Mirabel, particularly when drainage structures have not been cleaned. It appears a housing development has the potential to exacerbate the situation. Where will the drainage from the housing development be directed? Will it further impact potential for flooding?

Regarding wildlife, FOR-2 provides habitat for a number of species: deer, coyotes, bobcats, foxes, racoons, opossums, snakes, lizards, skinks, rats, mice, gophers, moles, and native bees, just to mention the obvious. It also provides roosting opportunities and hunting ground for owls, a variety of hawks—red shoulder hawks teach their young how to hunt in the orchard, sometimes a merlin in the winter, great blue herons, egrets, and a huge variety of other birds. Granted none of these species are "threatened" or "endangered", however, putting housing in, at the density proposed, will reduce habitat for these species.

Impacts from wildfire are a major concern relative to the housing development being considered for FOR-2. Forestville is located in and/or adjacent to a wildland urban interface (WUI). With our changing climate and increased droughts, the danger of wildfires increases. This community has been evacuated twice in the last few years because of threat of fire. Substantially increasing the population will add to the difficulty of evacuation, particularly considering the 2-lane exit roads; and also increase the concern for a catastrophic outcome for those people who are unable to get out in time.

Referencing 4.19—Wildfire—page 4.19-1, includes a projection that extreme wildfire events are expected to increase in frequency by 20 percent by 2050 and 50 percent by the end of the century. The county recognizes that, “although high-density structure-to-structure loss can occur, structures in areas with low- to intermediate-density housing were most likely to burn, potentially due to intermingling with wildland vegetation or difficulty of firefighter access.” On page 4.19-2 (Table 4.19-1), FOR-2 is described as having 2-9% slopes on site with 0-75% slopes nearby. On page 4.19-4, vegetation is said to be less than Guerneville sites but more than Larkfield’s. On page 4.19-5, FOR-2 is shown to have a Very High FHSZ in less than one mile. Page 4.19-26 includes: “Development facilitated by the project would increase the potential buildout of the Rezoning Sites, concentrating this population growth in designated urban service areas of the Unincorporated County, where the risk of wildfire is generally less than in more rural areas where fuels are more abundant. However, as evidenced by recent wildfires in the County, urban areas, particularly those on the outer edges of urban development, are also susceptible to wildfires, despite the (sic) having less abundant typical wildfire fuels. Page 4.19.26 goes on to state, “Access to Potential Sites FOR-2, FOR 4...currently does not meet County road standards of 20 feet in width or greater. Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways could be required. Those improvements would require a County encroachment permit if on a public right-of-way; however, widening County roads would not exacerbate fire risk.” Why is it “could be required”? It seems the document should say “must be required”.

As it pertains to the statements made in the Draft PEIR, some of which I referenced above, it appears that in and near WUI’s housing density is “inherently” less. Putting high density housing in or near WUI’s, where drought and wildfires will only increase over time does not appear to be a good idea. It sets up a situation of potential disaster. I’m remembering the Tubbs fire. Fountain Grove was built in an area that actually had burned in the past. In 2017 the area burned again—this time with houses, and it appears the wind carried the added fuel from Fountain Grove across the freeway to Coffey Park. Although the orchard in FOR-2 may not be dense and contain a high fuel load now, even with the mitigations proposed to reduce fire in the proposed structures, the fuel overall will be increased, and increase a wildfire burning through. As stated on page 4.19-28, “However, it is not possible to prevent a significant risk of wildfires or fully protect people and structures from the risks of wildfires, despite implementation of mitigation. Thus, this impact would remain significant and unavoidable.” Considering the location of FOR-2, compared to many of the other proposed sites, it appears that there is an even greater significant risk relative to wildfire, and locating housing here only increases the risk for the community as a whole.

I wonder if there are studies that have been done which evaluate the best location for housing relative to climate change, drought and the danger of wildfires. It seems that these should be studied, and decisions made for the benefit of Sonoma county and the individuals and communities located in the county. I appreciate and agree with keeping open space between communities, however, when it comes to housing people in areas which would result in significant cumulative impacts as opposed to an area where impacts are minimal, I think it important to reconsider some areas currently “off-limits” to housing (e.g. areas near amenities, and areas where no significant adverse impacts would result).

Referencing page 4.8-22, it appears that the Cumulative Impacts focuses on GHG emissions generated by development of the project. I was unable to find (I could have missed) what impacts are projected once the housing development is in place and the people who occupy the 283 dwellings (FOR-2), or 635 dwellings (Forestville as a whole), are traveling on a daily basis.

Referencing page 5.2.1, “CEQA requires decision makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. The analysis contained in this EIR concludes that the proposed project would result in significant and unavoidable aesthetic, cultural resources, greenhouse gas emissions, hazards, transportation, utilities, and wildfire impacts. Although

development facilitated by the project would be required to implement mitigation measures, impacts would remain significant and unavoidable due to this irreversible loss.”

It is unclear how it is a greater good to continue on with a Draft PEIR that will result in significant adverse impacts for the people, the community and the county, as opposed to exploring areas of the county that will result in lesser impacts than the current proposal, with the consideration to rezoning those areas. Another indication that this document must address “Alternative Locations” as described under CEQA 15126.6

Given this is a Draft PEIR, the Impact Analysis speaks to the impacts of the housing sites in more general terms, and does not show the impacts relative to each parcel proposed for housing. There is a wide variety of parcels being considered in a variety of locations. Presumably, before some of the parcels are developed an additional EIR will be required. However, it is unclear how a zoning change can be decided when enough facts are still unavailable to determine whether the proposal is even feasible. How can you propose to change the zoning and allow up to 283 housing units on FOR-2, when there are still many environmental and feasibility unknowns?

As presented in the Draft PEIR and the Impact Analysis for Alternative #3, it clearly appears Alternative #3 is the superior environmental alternative, specifically as it relates to FOR-2, and is in the best interests of the community and Sonoma County. However, above and beyond this, other locations should be evaluated in the PEIR pursuant to the CEQA Guidelines Section 15126.6.

Thank you for considering my comments.

Sincerely,



Leslie Markham
6975 Nolan Rd.
Forestville, CA

From: [Alisa Sanders](#) on behalf of [PlanningAgency](#)
To: [PermitSonoma-Housing](#)
Subject: FW: EIR FOR-1-7 - Lack of Access to Grocery Store via Safe Walkways
Date: Thursday, February 16, 2023 8:52:04 AM

Alisa Sanders
Administrative Assistant
County of Sonoma
Planning Division | Comp Planning
2550 Ventura Avenue, Santa Rosa, CA 95403
707-565-6186
www.PermitSonoma.org

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

From: CL Tree <cltree2@gmail.com>
Sent: Saturday, February 11, 2023 5:48 PM
To: [PlanningAgency](mailto:PlanningAgency@sonoma-county.org) <PlanningAgency@sonoma-county.org>
Subject: EIR FOR-1-7 - Lack of Access to Grocery Store via Safe Walkways

EXTERNAL

How will the proposed development of sites FOR1-7 address the issue of the lack of a nearby Grocery store. The small grocery store at the North end of Mirabel is the only grocery store nearby without driving out of town via a car or a bus. Mirabel does not have sidewalks or a bike path and pedestrians are at risk due to the Gravel trucks and other vehicles using Mirabel throughout the day. How will this be migrated with the proposed influx of population.

Thank you,

C.L. Tree
6610 Jim Court
Forestville, CA 95436

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From: [Alisa Sanders](#) on behalf of [PlanningAgency](#)
To: [PermitSonoma-Housing](#)
Subject: FW: EIR FOR-1-7 Traffic & Parking Infrastructure
Date: Thursday, February 16, 2023 8:52:09 AM

Alisa Sanders
Administrative Assistant
County of Sonoma
Planning Division | Comp Planning
2550 Ventura Avenue, Santa Rosa, CA 95403
707-565-6186
www.PermitSonoma.org

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

From: CL Tree <cltree2@gmail.com>
Sent: Saturday, February 11, 2023 6:24 PM
To: [PlanningAgency](mailto:PlanningAgency@sonoma-county.org) <PlanningAgency@sonoma-county.org>
Subject: EIR FOR-1-7 Traffic & Parking Infrastructure

EXTERNAL

How will the proposed development of sites FOR1-7 affect the need for both increased parking in general along with also thinking through the fact that Mirabel is a emergency corridor for both fire and sheriff vehicles. A quick exit and clearance strategy for emergency vehicles being called out is critical to rescue and disaster response efforts ... especially during the height of our summer season. We currently have traffic issues with rush hour traffic heading south ... waiting to turn left onto 116 ... that backing up to vehicles past the Water Company which is right next to the Fire Department. And during rush hour there is often a same scenario at the other end of Mirabel at River for cars trying to turn onto River. How will this be migrated and factored into the proposal to increase of almost doubling the population of Forestville?

Thank you

C.L Tree
6610 Jim Court
Forestville, CA 95436

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From: [Alisa Sanders](#) on behalf of [PlanningAgency](#)
To: [PermitSonoma-Housing](#)
Subject: FW: EIR FOR-1-7 - Sidewalk & Traffic Light Infrastructure
Date: Thursday, February 16, 2023 8:51:55 AM

Alisa Sanders
Administrative Assistant
County of Sonoma
Planning Division | Comp Planning
2550 Ventura Avenue, Santa Rosa, CA 95403
707-565-6186
www.PermitSonoma.org

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

From: CL Tree <cltree2@gmail.com>
Sent: Saturday, February 11, 2023 5:48 PM
To: [PlanningAgency](mailto:PlanningAgency@sonoma-county.org) <PlanningAgency@sonoma-county.org>
Subject: EIR FOR-1-7 - Sidewalk & Traffic Light Infrastructure

EXTERNAL

How will the proposed development of sites FOR1-7 affect the current lack of sidewalks & traffic lights be addressed?

Currently there are only small sections of sidewalk along one side of Mirabel and a haphazard sidewalk structure down main street. A pedestrian needs to currently tread carefully to avoid tripping downtown as there are several levels and folks often walk behind parked cars to walk on a level surface ... right next to all fashions of country drivers including Gravel trucks, pick up trucks and automobiles. An additional hazard for both walkers and drivers is the fact that there is no traffic light at 2 extremely dangerous corners — (Mirabel & Front St. and Covey and Front St.) How will this be migrated with the proposed increase of almost doubling the population of Forestville?

Thank you,

C.L. Tree
6610 Jim Court
Forestville, CA 95436

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From: [Eric Gage](#)
To: [PermitSonoma-Housing](#)
Subject: FW: Some input
Date: Friday, February 17, 2023 12:36:46 PM
Attachments: [image001.png](#)
[image005.jpg](#)
[image004.png](#)
[image003.png](#)
[image002.png](#)

From: Janice Stenger <janicestenger@yahoo.com>
Sent: Tuesday, February 14, 2023 1:01 PM
To: Planner <planner@sonoma-county.org>
Subject: Re: Some input

I was commenting on Laughlin Road, which is in Guerneville....it applies to our property 16450 Laughlin but it also pertains to the other two properties that were chosen; one on Laughlin and one on Cutten Drive. Thank you for your help.

On Tuesday, February 14, 2023 at 11:48:13 AM PST, Planner <planner@sonoma-county.org> wrote:

Hello Janice,

Thank you for your comments. Could you please specify which project these comments pertain to, so that I can make sure they get to the right person?

Thank you,

Doug Bush, MCRP

He/Him

Planner III

Planning and Zoning 707-565-1900 (option 5)

Planner@sonoma-county.org



Permit Sonoma logo



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Permit Sonoma's public lobby at 2550 Ventura Ave in Santa Rosa is open Monday, Tuesday, Thursday, Friday from 8:00 AM to 4:00 PM, and Wednesday from 10:30 AM to 4:00 PM.

From: Janice Stenger <janicestenger@yahoo.com>
Sent: Monday, February 13, 2023 1:47 PM
To: PermitSonoma <PermitSonoma@sonoma-county.org>
Subject: Some input

Of course, over-population has nothing to do with anything. Importing poverty has nothing to do with the decades long slide into failing education, clogged roads, overcrowded hospitals and poverty. High taxes, high energy costs and very very little for the actual citizen taxpayers. Our state managed to make the pandemic worse with rules that made no sense, billions in unemployment fraud and thousands that lost their jobs. The water situation is real, but also enhanced by the recent governors reluctance to build water storage infrastructure. Sorry that you didn't see the golden days of California, when the majority of people built their own sturdy houses, counties made it easy and communities grew organically and established bonds that don't exist here today.

And the whole story is a canard for the developer lobby. Farm work is seasonal and transient. Farm workers tend to be from elsewhere and are just looking for a place to crash between shifts. There is no economic sense to building permanent housing for temporary workers. But nicer dorms make sense — unfortunately developers looking to make their millions aren't interested in building stuff like that.

Since the county is running the EIR,, all their heads of sewer, water, roads, parks will assure us that everything is fine. Our failing Sewer system does need a \$25 million do over because of original shoddy work (as was told to us only a year ago). And yes they put the treated effluent in the River all summer long while they have lowered the water flow from Lake Sonoma, a mitigation required for the Dry Creek Dam and the havoc it played on spawning creeks. Here in Sonoma Co, they identified 59 parcels that were : "suggested" by (unknown) people (I'm guessing developers) some that are already in talks with the county. Why wasn't it facilitated for the owners to meet and share thoughts? We have just had a county wide water problem , have a road system that hasn't been improved much in 20 years of outlandish growth and hundreds of houses, maybe thousands, that have been turned into VRBO's and taken out of the rental market. The property owners, people that have owned the houses and land now being coveted, with tiny print and slight of hand, the 59 irrelevant owners have had no real information as to the process in any way and the DEIR just magically appeared in January with a comment period that stretches to....Feb. 15th. 1600 pages of university

land planning lingo that would take months to untangle. Window dressing

Objective LU-7.1: Restrict development in areas that are constrained by the natural limitations of the land, including but not limited to, flood, fire, geologic hazards, groundwater availability and septic suitability.

From the General Plan. How does building on Laughlin Road fit with this? No fire danger? No Liquefaction in our valley...can you prove that with maps? Particularly old maps that might be untinged by what the county and state wants.

The project is located within the jurisdictional boundaries of the State Responsibility Area for fire protection and is therefore subject to comply with the Department of Forestry and Fire Protection Fire Safe regulations as provided under Title 14 of the California Code of Regulations, Sections §1270 - §1276.

State fire safe regulations prohibit a single-lane design and configuration of the access road. State law requires safe access for emergency wildfire equipment and civilian evacuation concurrently and requires roads to provide unobstructed traffic circulation during a wildfire emergency (14 CCR §1273.00). The current requirement is for two 10-foot-wide lanes. The project access road does not meet this requirement. State law

allows for consideration of one lane roads that connect on both ends to a public two-lane road.

Policy 2.7 (5): Protect against intensive development of lands constrained by geologic hazards, steep slopes, poor soils or water, **fire and flood prone areas, biotic and scenic areas, and other constraints.**

Staff Comment:

Policy LU-7d: Avoid new commercial, industrial, and residential land use designations in areas subject to "high" or "very high" fire hazards, as identified in the Public Safety Element, unless the combination of fuel load, access, water supply, and other project design measures will reduce the potential fire related impacts of new development to insignificant levels.

Staff Comment: The project site is subject to the “High” fire hazard severity zone and adjacent to a “Very High” fire hazard severity zone. The General Plan limits development potential on the property to one primary dwelling unit per 200 acres.

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From: [Eric Gage](#)
To: [PermitSonoma-Housing](#)
Subject: FW: Sonoma County Housing Element Update: A Plea from Worried Residents
Date: Friday, February 17, 2023 10:45:09 AM

Sincerely,

Eric Gage

Planner III

From: Mona Behan <monabehan@gmail.com>

Sent: Friday, February 10, 2023 4:16 PM

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

Subject: Sonoma County Housing Element Update: A Plea from Worried Residents

To: Eric Gage, the Sonoma County Planning Commission, the Board of Supervisors, and Mike McGuire

Subject: Sonoma County Housing Element Update

Date: February 10, 2023

My husband and I moved to Sonoma County in 2009. We've lived in a condo in Healdsburg, a house in Fountaingrove (may it rest in peace), back to a condo in Healdsburg, and then, finally and thankfully, to our house in Forestville in 2019.

We treasure our town (well, census-designated place) and our neighborhood for its peaceful rural character, friendly and caring residents, scenic backroads, connection to nature, and what perhaps best be described simply as elbow room. So you can imagine our dismay when we recently learned that the county is considering a proposal to rezone six sites in Forestville to allow medium-density housing, including a 14-acre apple orchard directly across the street from us. Currently, this site, FOR-2, is zoned for seven houses, each on a two-acre lot; the proposed changes would raise that number to a staggering 283 housing units with a possible total population of 736 residents.

Overall, if rezoned and built as proposed, the six sites in Forestville would drastically and forever change the nature of our rural community, and not for the better. The rezoning plan would increase Forestville's population by more than 1,650 people—roughly 25 percent—in a very short period of time. It would add congestion on our roads and modern, multi-story buildings completely out of character with our farmhouse-studded town. There would be tremendous impacts on our schools, water resources, parks, wildlife, and, alarmingly, wildfire-evacuation routes. The infrastructure costs would be astronomical to install the necessary sewer lines (most of us are on septic currently), sidewalks on Mirabel and other busy roadways, and stoplights or roundabouts to manage the dramatic surge in traffic, to name just a few considerations.

There are also a number of reasons why building higher-density housing in Forestville doesn't make sense for medium- to low-income households. We are in the boonies here, people, with spotty bus service, an almost 20-minute drive to a major grocery store like Safeway or a mall,

and few employment opportunities in town.

Please understand that we acknowledge the need to add more affordable housing throughout California, including in Sonoma County, but the sites chosen for rezoning to accommodate medium- and high-density housing must be chosen with care, a respect for existing local character, and equity. To blend in with the community and provide easy access to essential services, most of the sites should be close to urban centers. When one looks at the proposed rezoning in Sonoma County, it's a real head-scratcher: Sonoma town would get 78 occupancies and 202 residents; Petaluma would get 170 occupancies and 441 residents. How can it possibly be fair to add 635 new occupancies and 1,652 residents to tiny, rural Forestville, second only to the 1,022 occupancies and 2,656 residents proposed for Santa Rosa? Some new, well-placed building would certainly be welcome in our hamlet; just not the avalanche that was designated in the EIR.

We understand that the owners of FOR-2 do not want to sell the land or have it rezoned; they'd like to keep it in their family and used for agricultural purposes, as it has been since their forebears purchased it in the early 20th century. We hope that that is enough to remove this property from rezoning consideration, but if it isn't, we hope that common sense and parity are.

Thank you for considering our point of view. Forestville's motto is "The Good Life," and all of its residents would like to keep it that way.

Sincerely,

Mona Behan & Alan Crisp
6867 Nolan Road, Forestville, CA 95436

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From: [Eric Gage](#)
To: [PermitSonoma-Housing](#)
Subject: FW: Sonoma County Housing Element Update
Date: Friday, February 17, 2023 12:17:28 PM

From: Susan Ziegler <szyz@sbcglobal.net>
Sent: Monday, February 13, 2023 4:40 PM
To: Eric Gage <Eric.Gage@sonoma-county.org>
Subject: Sonoma County Housing Element Update

February 13, 2023

Permit Sonoma
County of Sonoma
Permit & Resources Management Department

Ref: Sonoma County Housing Element Update

Attn: Eric.Gage@sonoma-county.org

My name is Susan Ziegler, I live in Guerneville near the Senior Center located on Armstrong Woods Road and just recently found out about the referenced project. I found some information on the Permit Sonoma website but must admit I was a bit overwhelmed. I looked at the Draft Environmental Impact Report and some of the other reports and still not clear what this project entails. These are some of my questions:

What kind of units will be built, single family, duplex, 4 plex. Will they be owner occupied or rentals. What are the terms of ownership. For example, will buyer be able to re-sell at any time to anyone.

Is the plan to develop all the properties listed on the report.

Will the rezone program, rezone all properties listed even if they will not be used for this project.

Based on page 100 of the Report, there are 6 sites listed in Guerneville, 4 rezoned sites GUE-1 to GUE-4 and 2 more GUE-5 & GUE-6. The Report stated the rezoned sites would potentially add a 616 Buildout Population. There was no info on the Buildout Population potential for GUE-5 & GUE-6 (what's the acres of GUE-5 & Gue-6). Is the intent to use all 6 sites in Guerneville?

How many cars will be used by the additional population. The increase in the number cars would have to include delivery vehicles for mail, packages, etc. The environmental impact from exhaust would be unbearable. The roads that lead to GUE-2 & GUE-3 have two roads to the property, Laughlin & Watson-Valley Ln. These roads are narrow with parts that only allows for one way traffic. There are no sidewalks. This also would apply to the property on Sunset GUE-1 as well.

The added vehicles and traffic from these 6 sites would impact the downtown Guerneville and the surrounding area including River Road and 116.

How can I get more information and questions answered about this project? Will community input be required before the project moves forward. Will there be an opportunity to give input and have these questions be answered?

Sincerely,

Susan Ziegler

16130 Brookdale Dr.

Guerneville, CA 95446

szyz@sbcglobal.net

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From: [Marilyn Cannon](#)
To: [PermitSonoma-Housing](#)
Subject: Fwd: Draft EIR Comments: Housing Element Update
Date: Tuesday, February 21, 2023 4:12:25 PM

----- Forwarded message -----

From: **Marilyn Cannon** <cannon@sonoma.edu>
Date: Monday, February 13, 2023
Subject: Draft EIR Comments: Housing Element Update
To: Permitsonoma-housing@sonoma.org

To Eric Gage:

I am sending my response to the draft EIR:Housing Element Update to request the removal of FOR-2 from the rezoning plan found in Alternative 3 - removal of FOR-2 due to "greater than average environmental constraints compared to the other Rezoning Sites." The need for water and sewer improvements are very significant. The density of housing suggested for this parcel are inconsistent with this neighborhood, and would substantially increase air pollution and traffic in this area, to name two serious impacts.

Wildfires are another very significant concern since FOR-2 is located only about 99 feet from a moderately high fire zone. I live on Nolan Road, which is in very close proximity to two of the boundaries of FOR-2. During 2018 and 2020, we and our neighbors on Nolan Road and Giusti Road and other smaller streets were under mandatory evacuation orders from the Sonoma County Sheriff. It was not easy at all for all the people to get out of town. This would be a huge nightmare if hundreds or thousand more potential residents had to evacuate from this area! The traffic leaving our town of Forestville on those nights was terrible and took hours to get to safety. People trying to evacuate from Highway 116 through Pocket Canyon would also be unimaginably impacted in escaping wildfires.

Forestville is far from any significant grocery shopping and from hospitals and is not therefore suitable for adding multi-family households and many hundreds more residents. There would be increased traffic in and out of Forestville. As it is, there are many large gravel trucks traversing Mirabel Road and Front Street (Highway 116) through Forestville, and adding many extra vehicles which are indirectly proposed by this rezoning would be very dangerous and cause even more congestion on these two-lane roads.

Another negative issue associated with the rezoning of FOR-2 are the availability of schools and increased school traffic to other towns. El Molino High School has been closed permanently and now all the high school students from Forestville and all the way out to the coast along Highway 116, who used to attend El Molino High School must be transported to Analy High School in Sebastopol. Students walking to the elementary school, Forestville School, would be endangered due to so much increased traffic along Mirabel Road (which has only one tiny stretch of sidewalk). They would be walking next to traffic with no buffer zone in between them and vehicles. Walking for anyone, whether for school or not, would also be significantly more dangerous, and would therefore negatively impact the quality of life of

current residents of Forestville.

I believe the FOR-2 rezoning project, as addressed in the EIR, has greater than average environmental constraints. It would be very unwise to ignore these other important issues that I also raise.

Thank you for listening to my concerns.

Marilyn Cannon
6975 Nolan Road
Forestville, California 95436

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Professor Emeritus
Biology Department, Sonoma State University
1801 E. Cotati Ave., Rohnert Park, CA
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707-217-6303

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From: [R.S.](#)
To: [PermitSonoma-Housing](#)
Cc: [Eric Gage](#); [Greg Carr](#); [Larry Reed](#); [Martin Sessi](#); [Emma Mann](#); [Don Seppa](#); [Lyndi Brown](#); [R. Savel](#)
Subject: Attn: Eric Gage: #2 Penngrove PSZ comments - PRMD DHE DEIR - Permit Sonoma Rezoning Housing Sites for Housing Update
Date: Wednesday, February 22, 2023 11:09:37 AM
Attachments: [2002 - 404 Penngrove Sewer Capacity Study.pdf](#)

2/22/22

Attn: Eric Gage
Permit Sonoma
2550 Ventura Avenue
Santa Rosa, California 95403.
(707) 565-1391
eric.gage@sonoma-county.org

Permit Sonoma Rezoning Housing Sites for Housing Update - DEIR comments

**RE: Penngrove Sewer Zone (PSZ) Capacity Study dated November 4, 2002
updated by me, SCWA PSZ engineer David Grundman (retired)**

I noted several corrections to the Kennedy/Jenks/Chilton study of June, 1990 ***with the conclusion that under the existing physical conditions the collection system did not have sufficient capacity to handle the expected land use build out. Please see the complete study attached.***

To my knowledge, nothing has been done to change the physical situation during the past 30 years. However, there has been yet another study done which, was updated September 2016. From my experience, it does little good to do multiple studies and not address actual corrections to the existing problems.

In the September 2016 SCWA PSZ SSPM updated study, there are a number of items that I would take issue with.

SCWA SSPM Section 8:

The Summary suggests that that the Penngrove system would benefit from continued I/I monitoring and lays out a good monitoring plan, however it does little to determine and identify where the existing identified physical problem areas are located and solving actual known physical problems.

How will monitoring fix an already established previously identified physical problem the known locations?

The system is very old and is in need of repairs in order to reduce I/I, a major cause of overflows and inadequate capacity.

System Evaluation: second page, first paragraph, suggests that securing manhole covers (this will likely lead to backflows into homes/businesses) and temporarily diverting flows. Where do they plan to divert the flows to? (*It appears to me that this section may have been written by someone(s) lacking actual experience in the operation of a sewer system.*)

SCWA SSPM Section 9:

While this section does layout a good monitoring plan, it does little to determine where the problem areas are located. It is not likely that monitoring flows will serve any purpose at this time, lacking normal storm

patterns.

It appears that there is a lot of resources being spent on studies and very little on actually solving the already identified existing conditions and problems.

David Grundman (SCWA retired)
Email: dave_pat_1999@yahoo.com

Attachment: [Penngrove Sewer Zone \(PSZ\) Capacity Study dated November 4, 2002](#)

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To: [PermitSonoma-Housing](#)
Cc: [Eric Gage](#); [Greg Carr](#); [Larry Reed](#); [Martin Sessi](#); [Emma Mann](#); [Don Seppa](#); [Lyndi Brown](#); [R. Savel](#)
Subject: Attn: Eric Gage: #1 Penngrove PSZ comments - PRMD DHE DEIR - Permit Sonoma Rezoning Housing Sites for Housing Update
Date: Wednesday, February 22, 2023 11:10:02 AM
Attachments: [2002 - 404 Penngrove Sewer Capacity Study.pdf](#)
[General-Plan-Public-Facilities-and-Services-Element.pdf](#)

2/22/22

Attn: Eric Gage
Permit Sonoma
2550 Ventura Avenue
Santa Rosa, California 95403.
(707) 565-1391
eric.gage@sonoma-county.org

Permit Sonoma Rezoning Housing Sites for Housing Update - DEIR comments

The EIR consultant stated that the agency (SCWA) “**did not provide any system information**” for the PSZ and relied on the 2016 SCWA SSPM update.

The 2016 SCWA SSPM sewer capacity evaluation only addresses constraints due to i/i sources but does not address the actual physical corrections needed as already identified in the SCWA 2002 PSZ update for PRMD’s GP DHE.

The 2016 SCWA SSMP analysis is an i/i study, a single purpose exercise intended to identify areas of storm water infiltration into the collection system and pose future remedies. In that sense it is uni-dimensional and not intended to be used as a systemic multi-dimensional, multi variant systemic analysis.

The SCWA SSPM 2016 does not take into consideration the established existing baseline data regarding the physical limitations of the trunk line collection system and estimated capacity constraint under full land use build out conditions as identified in the SCWA 2002 system capacity evaluation, *notably the “required” replacement of line “L”, and line “P. as already identified in SCWA’s 2002 PSZ system update for PRMD’s proposed GP DHE (April 20, 2001)*

The 1990 and SCWA’s 2002 update have governed the limitations on any land use plan density increases in the PSZ since 1990. It established *no extra hook ups for increased land use densities beyond what was established in the 1984 Penngrove Specific Plan* and did not change during the 2020 County General Plan update and still exist to present day.

The County has no records of any significant land use density amendments to the General Plan or the Penngrove Specific Plan to increase parcel densities in the PSZ since 1984, **none**. The same land use element densities used during the 2020 General Plan update are still in effect now.

During the 2020 General Plan update PRMD used the latest PSZ figures from SCWA for PRMD’s proposed GP DHE (April 20, 2001) SCWA reported - *The current loading is calculated to be about 1,251 people based upon the current master list load of 471.29 ESDs using PRMD’s SFD factor of 2.655 persons per ESD factor.* For example: $471.29 \text{ ESDs} \times 2.655 \text{ persons per ESD} = 1,251.12 \text{ people within the sewer district as of November 4, 2002.}$

The 2016 SCWA SSPM and PRMD DHE consultant used the 2016 ESD count of 517 ESDs, **however SCWA’s current 2021 ESD count is 550.**

The County land use element estimates a population of **1300-1450 people at full build out conditions under existing collection system conditions.**

Using PRMD's 2021 DHE EIR SFD factor of 2.6 people per ESD X 550 ESDs = **1430** people which is close to the maximum upper end of the limitations of **1300-1450** people for the existing system until the replacement of line "L", and line "P" as identified in the 1990 study, SCWA's 2002 study update, 2020 General Plan Housing Element, and LAFCo.

The 2016 SCWA SSMP states: "The PSZ currently has an Agreement with the City for the City to treat the equivalent volume of sewage for a maximum of 3,000 people. 2010 Census population: 2,522 people."

However the "2010 Census population of **2,522 people**" refers to the entire population in the Penngrove area outside the PSZ combined with the population inside the PSZ. How many people did the 2016 SCWA SSMP analysis assume **were within the PSZ** in 2016?

*The 2016 SCWA SSMP states: The PSZ was built in 1992 however the 1st capacity study was done in 1990, two years BEFORE it was built? This is because **the PSZ was built in 1975, not 1992!***

There is substantial evidence on the administrative record concerning reasonably foreseeable "worst case" existing condition limitations of the sewer line collection system constraint as **indicated by PRMD's statement** in Sonoma LAFCo's City of Petaluma MSR (Municipal Services Review). **"PRMD reports that to meet future demand, the existing trunk sewer line between Penngrove and Petaluma will require replacement."** "According to the PRMD's calculations, the PSZ has adequate capacity (maximum service capacity for 3,000 people) **with sewer line improvements."**

The cost of replacement of line "L", and line "P" **has already been identified and included in SCWA's annual budget in the past.** However subsequently the budget item was withdrawn diverting the funding in favor of pursuing other (i/i) storm water infiltration projects.

In addition to the General Plan land use densities, existing, and future "build out" estimated population numbers were also reported in the original 1990 PSZ capacity study, and 2002 SCWA staff revision of the 1990 PSZ capacity study.

The data used in PRMD's draft DHE EIR references the 2016 SCWA SSMP for the EIR capacity analysis. However the 2016 SCWA SSMP does not cite the existing, and future estimated, "build out" population numbers based on the land use densities allowed in the General Plan. If SCWA no longer follows its past practice of citing existing, and future estimated, "build out" population numbers than **how many persons per ESD are assumed in the 2016 SSMP modeling analysis?** This is essential information for an analysis to properly evaluate the existing system capacity when commenting on an EIR.

Does the SCWA SSPM 2016 update claim to establish a new, as of yet unidentified, population baseline over the prior Specific Plan land use element estimated amount of **1300-1450 people at full build out conditions?**

SCWA anticipates a more complete comprehensive systemic analysis of the PSZ will be available when the City of Petaluma and SCWA do the new joint comprehensive update some time in the future.

There are **two separate build out scenarios** for consideration within the PSZ:

- 1) Under the current land use Plan for 1300-1450 people at full build out with the PSZ existing conditions needing collection system improvements.
- 2) Future build out to the maximum allowable sewer capacity entitlement in Petaluma at the treatment plant for 3000 people **AFTER** sewer collection system improvements.

The DHE EIR consultant notes: "The Penngrove sites may be viable if the capital improvement projects

have been completed and it may require a revised agreement with the city of Petaluma for treatment”

- 1) Specify exactly which capital improvement projects are needed?
- 2) Specify revisions needed to the agreement with Petaluma for treatment?

6.0 Recommendations, page 20: The DHE EIR consultants claim that “high-level analysis investigation ... of the sewer system capacity and wastewater treatment capacity was performed, *and continues* “28 of the sites appear to have existing sewer infrastructure capacity in order to accommodate additional residential density due to the proposed re-zoning?

In the PSZ the DHE EIR consultant has conflated the wastewater treatment infrastructure in Petaluma available for the maximum allowable future sewer capacity entitlement for **3000 people** at the treatment plant *AFTER* PSZ sewer collection system improvements ... with the existing PSZ limited capacity of the collection system infrastructure under the current land use Plan for **1300-1450 people** at full build out until the collection system improvements are completed.

There should be a count of existing hook ups, an estimate of total hook ups needed for the land use plan FULL build out, plus a reserve capacity maintained to allow for failing septic systems in the future. This baseline information should be required before ANY serious consideration is given to the idea of having "any extra excess capacity" for additional unplanned for new DHE housing projects.

PSZ ratepayers are entitled to know if there are any anticipated proposed land use changes being considered that could adversely impact their ability to hook up in the future to the sanitation system they finance. If there is any mishap due to mistakes in properly calculating the existing condition capacity who will be financially responsible for the damages and repairs to the system?

Will developers of the DHE be required to post bond in case there are damages to the system? Will the PRMD DHE EIR analysis specify who or what agency(s) will be financially liable if their proposed DHE experiment fails the PSZ system?

Given the long standing **existing physical conditions** of the PSZ collection system constraints and that it is close to its established estimated “full build out” capacity of **1300-1450 people RIGHT NOW**, PRMD and SCWA staff should pursue implementation of **General Plan policy PF1b**, see attached, and **consider moratoria on plan amendments and zoning changes in order to protect services to existing residents and entitlements to residents in the zone who have not hooked up yet.**

Sonoma County General Plan Public Facilities and Services Policy PF-1b: Prepare or encourage the preparation of master plans or equivalent documentation for all wastewater management systems prior to approval of project facilities. Design and construct all facilities in accordance with General Plans of the applicable jurisdictions. **In the event that a master plan or monitoring fails to show adequate facilities or supplies for planned growth, consider moratoria on plan amendments, zoning changes, building permits or other entitlements in order to protect services to existing residents.** The minimum contents necessary for an adequate master plan or equivalent documentation are:

- (1) Maps showing future service area boundaries, ^(L)_(SEP)
- (2) Forecasted growth that reflects all potential sources of future demand for facilities and the relationship to General Plan projections and limits, ^(L)_(SEP)
- (3) Projected service and facility needs, ^(L)_(SEP)
- (4) Estimated costs and revenues for needed improvements, ^(L)_(SEP)
- (5) System design parameters and assumptions, ^(L)_(SEP)
- (6) A program for water use reduction, ^(L)_(SEP)
- (7) A program to reduce storm water infiltration, and ^(L)_(SEP) (
- (8) A program to monitor and account for amendments of the General Plan Land Use Map over time.

Documents attached:

- 1) Penngrove Sewer Zone (PSZ) Capacity Study updated November 4, 2002 (SCWA)
- 2) Sonoma County General Plan Public Facilities and Services Element (Page PF-8)

Thank you.

Rick Savel
Marin LAFCo Commission, public member
Penngrove Area Plan Advisory Committee, co-chair
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Sonoma County General Plan 2020

PUBLIC FACILITIES AND SERVICES ELEMENT

**Sonoma County Permit and Resource Management Department
2550 Ventura Avenue
Santa Rosa, CA 95403**

**Adopted by Resolution No. 08-0808
of the Sonoma County Board of Supervisors
September 23, 2008**

Amended by Resolution No. 16-0283 on August 2, 2016

**PUBLIC FACILITIES AND SERVICES ELEMENT
TABLE OF CONTENTS**

- 1. INTRODUCTION5
 - 1.1 PURPOSE.....5
 - 1.2 RELATIONSHIP TO OTHER ELEMENTS5
 - 1.3 SCOPE AND ORGANIZATION.....5
- 2. WATER AND SEWER SERVICES.....6
 - 2.1 WATER SERVICES6
 - 2.2 SEWER SERVICES7
- 3. OTHER PUBLIC SERVICES11
 - 3.1 PARK AND RECREATION SERVICES11
 - 3.2 PUBLIC EDUCATION SERVICES11
 - 3.3 FIRE PROTECTION SERVICES12
 - 3.4 SOLID WASTE MANAGEMENT SERVICES13
 - 3.5 PUBLIC UTILITIES.....14
 - 3.6 YOUTH AND FAMILY SERVICES.....19
- 4. PUBLIC FACILITIES AND SERVICES IMPLEMENTATION PROGRAM.....21

FIGURES

Figure PF-1: Sewer and Water Services in Unincorporated CommunitiesAfter Text

PUBLIC FACILITIES AND SERVICES ELEMENT

1. INTRODUCTION

1.1 PURPOSE

The Public Facilities and Services Element addresses eight types of public services mostly related to the physical development of the County. These include water, wastewater management, public education, parks and recreation, fire protection, solid waste management, utilities, and youth and family services.

This element's purpose is to lay the groundwork for future decisions related to these public services and infrastructure, to establish future policy regarding the provision of these services, and to integrate public service concerns into land use decision making. The element is designed to increase the likelihood that public services will be available when needed to serve the residents and businesses in the County.

1.2 RELATIONSHIP TO OTHER ELEMENTS

The Land Use and Housing Elements contain the economic and population projections which are the basis for the assessment of public service needs. Highway and public transportation needs are identified and addressed in the Circulation and Transit Element. Aviation facility needs are identified in the Air Transportation Element. Water supply and water quality issues are also addressed in the Water Resources Element. Needed park facilities are identified and addressed in the Open Space and Resource Conservation Element.

1.3 SCOPE AND ORGANIZATION

This element describes the current status of the public services in terms of service capacity and demand in relation to projected growth. It is divided into three sections. The first two provide policy direction and the third contains the implementation program.

2. WATER AND SEWER SERVICES

2.1 WATER SERVICES

An adequate and healthful water supply is essential if Sonoma County is to sustain its residential population and its economic stability. As noted above, the Water Resources Element establishes goals, objectives, and policies addressing a broad range of water related issues, including water supply and quality pertaining to private wells and public water systems. This section is intended to address issues regarding development of new water systems and extension of water services to new areas not currently served.

Sonoma County has approximately 400 water systems that fall under the regulatory authority of the State as “public water systems”. These range in size from the Sonoma County Water Agency’s Russian River system (which supplies water through a number of water contractors, water districts, cities and water companies), to systems serving as few as fifteen service connections. The Sonoma County Water Agency diverts and delivers water to its customers through its transmission system, consisting of diversion facilities, treatment facilities, pipelines, water storage tanks, booster pump stations and groundwater wells. The water contractors and other Agency customers then deliver water to their customers through their own distribution systems.

State Small Water Systems are regulated by the County’s Environmental Health Division and provide potable water to at least five but no more than fourteen service connections. On occasion, operator inattention or lack of funding leads to system failure and to requests for County takeover. County management of the system can improve reliability, but funding may still be lacking. These long term management issues suggest that care be taken in relying upon small water systems to support new development.

Extension of public water outside of designated Urban Service Areas is also an important public water supply issue. Often, water managers are interested in extending service boundaries to increase the size of the ratepayer base in order to fund improvements. Such extensions, however, can lead to inappropriate sprawl and increase development pressure in rural areas.

On the other hand, these extensions can provide needed supplies to existing development on nearby properties that may be experiencing problems with private wells that are either running dry or becoming contaminated. In many such cases, drilling a new well does not resolve the problem. As a result, policy is needed that balances the needs of existing residents and the public interest in avoiding sprawl.

2.2 SEWER SERVICES

Untreated or improperly treated wastewater contains bacteria, viruses, chemicals and nutrients that can cause human diseases, kill or injure plants, animals and fish, and produce surface waters that are discolored or odorous. Since all wastewater is eventually returned to the environment, the public has a vital interest in assuring proper wastewater management. The Water Resources Element establishes goals, objectives, and policies pertaining to water quality and wastewater management. This section is intended to address issues regarding development of new wastewater systems and extension of sewer services to new areas not currently served.



Wastewater management service providers face a different array of issues. Most troublesome for the many smaller scale service areas in unincorporated communities are meeting current standards for wastewater treatment and disposal which change over time, maintaining and expanding treatment and disposal capacity to meet both changing standards and additional growth, and funding and constructing needed facility improvements.

Most of these issues are best resolved at the service area level, due to the variability of local circumstances, through the master facility planning process. Historically, Federal and State Clean Water Act funds have been used to pay for the major share of the cost of facility improvements. But, since future funds are likely to be less available, local funding sources such as sewer connection fees are likely to become a more significant piece of the funding picture. However, this source of revenue is limited by the typically small ratepayer base in unincorporated communities.

Another option for wastewater treatment is the so-called package treatment plant. These modular systems provide treatment and disposal of wastewater where standard septic systems are not feasible, but on a smaller scale than a conventional municipal system.

Increased reliance upon these systems may provide improved water treatment for larger uses in rural areas, thereby increasing the potential range and scale of uses which can be accommodated. However, where they are utilized for multiple uses on multiple lots, the responsibility for long term system management may become critical as the costs of operation and maintenance increase over time. As these systems deteriorate and landowners are unable to finance the improvements, the County or another public entity are likely to be asked to step in and take over management responsibility.

Like water systems discussed above, extension of sewer service outside of designated urban service boundaries can induce unplanned growth, but also can improve water quality problems resulting from existing development on failing septic systems.

GOAL PF-1: **Assure that water and wastewater services are available where necessary to serve planned growth and development without promoting unplanned growth.**

Objective PF-1.1: Operate County water and wastewater facilities in accordance with planned growth and in compliance with applicable State and Federal standards.

Objective PF-1.2: Help resolve water problems resulting from proliferation of small water systems.

Objective PF-1.3: Limit extension of public water and sewer services into rural areas.

Objective PF-1.4: Plan for wastewater facilities adequate to serve the growth projected in the General Plan.

The following policies, in addition to those in the Water Resources and Open Space and Resource Conservation Elements, shall be used to achieve these objectives:

Policy PF-1a: Plan, design, and construct sewer services in accordance with projected growth except as provided in Policy LU-4d.*

Policy PF-1b: Prepare or encourage the preparation of master plans or equivalent documentation for all wastewater management systems prior to approval of project facilities. Design and construct all facilities in accordance with General Plans of the applicable jurisdictions. In the event that a master plan or monitoring fails to show adequate facilities or supplies for planned growth, consider moratoria on plan amendments, zoning changes, building permits or other entitlements in order to protect services to existing residents. The minimum contents necessary for an adequate master plan or equivalent documentation are:

- (1) Maps showing future service area boundaries,
- (2) Forecasted growth that reflects all potential sources of future demand for facilities and the relationship to General Plan projections and limits,
- (3) Projected service and facility needs,
- (4) Estimated costs and revenues for needed improvements,
- (5) System design parameters and assumptions,
- (6) A program for water use reduction,
- (7) A program to reduce storm water infiltration, and
- (8) A program to monitor and account for amendments of the General Plan Land Use Map over time.*

Policy PF-1c: Give the highest priority for water and sewer improvement planning to those service providers whose capacity for accommodating future growth is most limited. These include the Occidental County Sanitation District, the Geyserville Water Works and Geyserville Sanitation Zone, the Sweetwater Springs Water District, Monte Rio, the Town of Windsor (water supply to the Airport Industrial Area), the California American Water Company (Larkfield-Wikiup), the Airport-Larkfield-Wikiup County Sanitation Zone, the Valley of the Moon Water District, and the Sonoma Valley Sanitation District, or any entities which may succeed these service providers.*

Policy PF-1d: Require as part of discretionary project applications within a water or sewer service area written certification that either existing services are available or needed improvements will be made prior to occupancy.*

Policy PF-1e: Avoid General Plan amendments that would increase demand for water supplies or wastewater treatment services in those urban areas where existing services cannot accommodate projected growth as indicated in Table LU-1 or any adopted master plan.*

Policy PF-1f: Avoid extension of public sewer services outside of either a sphere of influence or Urban Service Area. To the extent allowed by law, consider exceptions to this policy only:

- (1) Where necessary to resolve a public health hazard resulting from existing development, or
- (2) Where appropriate to allow farmworker housing or an affordable housing project providing exclusively lower income housing on properties adjoining urban service boundaries.*

Policy PF-1g: Use the following guidelines for any exception allowed by Policy PF-1f:

- (1) The property must adjoin the Urban Service Boundary or the proposed connection to a public sewer system must be no more than 200 feet from the Urban Service Boundary,
- (2) Size sewage facilities to serve development consistent with the General Plan, and
- (3) Require written certification that adequate service capacity is available for the use to be connected to the system.*

Policy PF-1h: Avoid extension of public water service to a property that is outside of both the Urban Service Area and sphere of influence of the water provider. Consider exceptions to this policy, to the extent allowed by law, only:

- (1) Where necessary to resolve a public health hazard resulting from existing development such as failing wells or groundwater contamination, or
- (2) Where water service is to be extended for a property which is located within a water district boundary in effect in November, 2003, or

- (3) Where appropriate to allow an affordable housing project providing exclusively lower income housing on properties adjoining Urban Service Boundaries.*

Policy PF-1i: Use the following guidelines for any exception allowed by Policy PF-1h:

- (1) Size facilities to serve development consistent with the General Plan,
- (2) Require written certification that adequate service capacity is available for the use to be connected to the system or planned to be connected in the future, and
- (3) Utilize out-of-service area agreements rather than annexations.*

Policy PF-1j: When considering formation of new water service agencies, favor systems owned and operated by a governmental entity over privately or mutually owned systems. Continue to authorize new privately or mutually owned systems only if system revenues and water supplies are adequate to serve existing and projected growth for the life of the system. Ensure this through agreements or other mechanisms setting aside funds for long term capital improvements and operation and maintenance costs.

Policy PF-1k: Consider approval of new conventional wastewater management systems owned and operated by a governmental entity only when necessary to resolve an existing public health hazard.*

Policy PF-1l: Avoid new privately owned package treatment plants which serve multiple uses or serve separate parcels. Allow use of package treatment plants to serve affordable housing or other projects on a single parcel under one ownership provided that they comply with the following criteria:

- (1) The package treatment plan must comply with water quality and health standards and protect water resources,
- (2) The design and appearance of package treatment plants located in agricultural and other rural areas must be compatible with the rural area's character, and
- (3) The project must include provisions for the operation, maintenance, and eventual replacement and/or removal of the package treatment plant, and include adequate financing for these provisions through bonds, sinking funds, or other mechanisms, for the long term.

Package treatment plants are not intended to be used as a basis for amending the General Plan to allow for more intensive development.*

Policy PF-1m: Consider use of Experimental Sewage Disposal Systems only to serve a single land use on a single parcel, and only if the availability of the system does not result in new development, except as allowed by the General Plan.

Policy PF-1n: Where substantial numbers of failing septic systems or other health and safety problems exist outside Urban Service Areas that could be addressed by extension of public sewer service, evaluate the feasibility of enlarging the Urban Service Area to include such areas. The evaluation should assure sufficient capacity to serve existing connections and potential buildout within the existing Urban Service Area.

Policy PF-1o: Ensure expansion of Urban Service Area boundaries do not include lands designated as Community Separator.

3. OTHER PUBLIC SERVICES

3.1 PARK AND RECREATION SERVICES

Outdoor recreation contributes to the tourism economy, enhances the quality of life for County residents and visitors, and conserves unique natural and cultural resources. The various types of parklands found in Sonoma County are classified based upon the National Recreation and Parks Association (NRPA) category recommendations. Federal Recreation Areas and State Parks provide recreation opportunities intended to serve national or statewide populations. Regional parks provide opportunities for a broad range of recreational activities generally within a 30-60 minute drive from urban areas at a rate of 20 acres per 1,000 persons. Community parks are large enough to accommodate a variety of activities within a 30 minute drive of population centers at a rate of 2.5 acres per 1,000 persons. Neighborhood parks are smaller, multi-use facilities within one half mile of the population serviced. The standard is 2.5 acres per 1,000 persons.



Proposed additions to the County regional park system would result in a ratio of about 19 acres per 1,000 population in 2005. The ratio is substantially higher when region serving State parks are included. Additional community and neighborhood parks are proposed that would result in a ratio of 5.7 acres per 1,000 population in unincorporated areas.

3.2 PUBLIC EDUCATION SERVICES

Sonoma County has 41 school districts whose attendance areas are wholly contained within the County, and five districts which provide facilities outside of the County. Each district has its own revenue base, elected board, and administration. The Sonoma County Office of Education provides some administrative and business services to all districts.

A major issue in planning for new facilities is the need for increased coordination between land use and facilities planning. Districts must be aware of the projected residential growth within their service area so that new school needs can be accurately forecast.



An important source of financing for new school facilities is the "school impact" fee on new residential construction. State law now authorizes local school districts to charge development fees for permanent facilities. However, funding will likely continue to be dependent on State sources. California law also enables a county to acquire new school sites by dedication as a condition of subdivision approval.

Existing school facilities and district owned vacant sites are shown on the Land Use Maps. General locations are shown for new sites when there is a known need in an area.

3.3 FIRE PROTECTION SERVICES

Fire protection, emergency medical and rescue services are essential to the protection of life and property in Sonoma County. They are provided by four types of agencies. Fire protection districts provide services with revenues from property taxes. Volunteer companies provide local services in rural communities. County Service Areas (CSA) and Community Services Districts (CSD) rely primarily upon volunteer staffs. The County contracts with various municipal and district fire agencies to provide backup services to volunteer companies. The County has established the Department of Emergency Services (DES) to coordinate the service agencies in the County.



Fire suppression services are highly dependent on paid call, part time and volunteer personnel. Although this dependency remains, the number of volunteer fire fighters has fallen off in recent years. While the County generally has been receiving acceptable levels of service, problems have resulted from the condition of existing equipment and matching the type of equipment and staff training to the type of fire.

Demand for increased fire suppression and emergency medical services will not be generated by housing, population or job growth alone. Increases in tourism, increases in level of service expectations, and changes in the population mix will also affect demand.

The Department of Emergency Services projects that the most pressing and costly needs involve manpower. It anticipates a shift from volunteer supported services to an even greater reliance on paid personnel. This shift will be accompanied by a trend from volunteer companies to formation of special districts.

The primary tasks with regard to fire services planning are to ensure that needed organizational changes occur in a timely and cost effective manner and to secure adequate revenue sources. Emergency medical services should also be evaluated, since growth in medical calls over the first half of the decade has consistently outpaced fire related emergencies.

3.4 SOLID WASTE MANAGEMENT SERVICES

State law requires cities and/or counties to prepare a Countywide Integrated Waste Management Plan (CoIWMP) to identify and reserve sites for solid waste facilities and ensure that land uses adjacent to or near solid waste facilities are compatible with those facilities. Sonoma County, in cooperation with the cities in the County, prepared a CoIWMP in 1994. An amended CoIWMP was adopted in 2003. The California Integrated Waste Management Board approved the final 2003 CoIWMP in March of 2004.



The CoIWMP is the principal planning document for solid waste management in the County. Solid waste management facilities located in unincorporated areas, including landfills and transfer stations, are designated in the Land Use Element. Issues pertaining to solid waste management include:

- (1) The need to temporarily close the Central landfill and transition from a landfill based system to an outhaul based system (truck and/or rail transport) due to the expense and regulatory uncertainty associated with expanding the Central landfill and securing flow-control agreements from the cities,
- (2) The need to accommodate the sludge disposal needs of wastewater treatment facilities serving both cities and unincorporated areas and other types of waste matter, including compostable yard waste and organic matter, recyclable in-organics (plastic, glass, metal, etc.) and non-compostable organic matter, by treating them as a resource rather than a waste product, and
- (3) Reduction of the quantity of waste deposited in landfills by 50% or greater after 2000, based on waste generation rates of 1990.

The CoIWMP contains goals, policies, and short, medium, and long range objectives, together with measures designed to guide solid waste management and disposal actions of the County

and other applicable agencies. The Public Facilities and Services Element is intended to complement the adopted policies of the CoIWMP and any subsequent amendments thereto.

3.5 PUBLIC UTILITIES

Certain public utilities, such as electricity, natural gas, and telephone services, require transmission and maintenance facilities that may affect natural and scenic resources or neighborhood character.

The Land Use Element designates existing public utility facilities in the Publio of this element is to establish policies for the designation of needed new facilities and provide for the review of proposed facilities.



GOAL PF-2: **Assure that park and recreation, public education, fire suppression and emergency medical, and solid waste services, and public utility sites are available to the meet future needs of Sonoma County residents.**

Objective PF-2.1: Provide an adequate supply and equitable geographic distribution of regional and local parks and recreation services based on population projections.

Objective PF-2.2: Use the National Recreation and Parks Administration (NRPA) standards as the minimum standards for determining park needs.

Objective PF-2.3: Assist school districts in developing more precise estimates of population growth within their attendance areas.

Objective PF-2.4: Use estimates by school districts of new school site needs as the basis for applying school site designations on land use plan maps.

Objective PF-2.5: Promote cooperation among fire and emergency service agencies in the area of public education and awareness, especially in those areas isolated from emergency service providers either by distance or topography.

Objective PF-2.6: Integrate fire protection systems into new structures as a means of improving fire protection services through adoption of a County ordinance.

Objective PF-2.7: Encourage more effective use of existing emergency and medical services by emphasizing an integrated Countywide response system.

- Objective PF-2.8:** Continue to coordinate fire protection services and planning with all other related agencies.
- Objective PF-2.9:** Use the CoIWMP, and any subsequent amendments thereto, as the policy document for solid waste management in the County.
- Objective PF-2.10:** Locate and design public utility transmission, distribution, and maintenance facilities to minimize adverse effects on natural and scenic resources.

The following policies, in addition to those of the Open Space and Resource Conservation Element, shall be used to achieve these objectives:

Policy PF-2a: Plan, design, and construct park and recreation, fire and emergency medical, public education, and solid waste services and public utilities in accordance with projected growth, except as provided in Policy LU-4d.*

Policy PF-2b: Work with the Cities to provide park and recreation, public education, fire and emergency medical, and solid waste services as well as public utilities. Use proposed annexations, redevelopment agreements, revenue sharing agreements, and the CEQA process as tools to ensure that incorporated development pay its fair share toward provision of these services.*

Policy PF-2c: Use the following standards for determination of park needs: Twenty acres of regional parks per 1,000 residents countywide and five acres of local and community parks per 1,000 residents in unincorporated areas. A portion of State parklands may be included to meet the standard for regional parks.

Policy PF-2d: Provide community parks as needed in Urban Service Areas until the area incorporates, are annexed, or another service providing entity is established.

Policy PF-2e: In the event that a proposed park or school site is designated on the GP 2020 Land Use Maps (Figures LU-5a through 5i) or Open Space and Resource Conservation Maps (Figures OSRC-5a through 5i), consider the designation as applying to a general area rather than a particular parcel, unless and until a particular site is acquired and approved for public use development authorized by the land use plan.

Policy PF-2f: Adopt and implement a new Outdoor Recreation Plan with parks and recreation facilities necessary to meet the needs of GP2020.*

Policy PF-2g: Require dedication of land or in-lieu fees as a means of funding park and fire services and facilities.*

Policy PF-2h: Consider establishing a land acquisition reserve fund to purchase park or recreation lands in areas lacking adequate park facilities.

Policy PF-2i: Consider user fees in County park areas where special facilities are available. Offer discounts to County residents.

Policy PF-2j: Where there is an unmet need for local park facilities, encourage the formation of County service areas or other special districts to meet the need, if economically feasible.

Policy PF-2k: Assist school districts in estimating the amount, rate and location of projected population growth within their attendance areas.*

Policy PF-2l: Continue to implement State law pertaining to school impact mitigation that allows for the dedication of land, the payment of fees, or both, as a condition of approval for development projects.*

Policy PF-2m: Prepare a Fire Services Master Plan for urban and rural areas in cooperation with the Cities, State, and other fire service agencies. The minimum contents necessary for an adequate master plan are:

- (1) A statement of objectives, policies and programs,
- (2) A forecast of growth,
- (3) Projected fire and emergency medical service needs, and
- (4) A level of service assessment.

Policy PF-2n: Require prior to discretionary project approval written certification that fire and related services customarily provided to comparable uses are available or will be available prior to occupancy for projects within the service area of the applicable fire agency.*

Policy PF-2o: The Department of Fire Service shall review and comment on any proposed changes in the boundaries of areas of State and local responsibility for wildland fire protection and the service boundaries of local fire districts and volunteer companies.*

Policy PF-2p: Amend the CoIWMP as necessary to continue to address potential shortfalls in future landfill capacity.*

Policy PF-2q: Review projects on or near designated solid waste facilities sites for compatibility with such facilities.*

Policy PF-2r: When opportunities occur, the County may acquire buffer zones adjacent to solid waste disposal facilities to help reduce local impacts and provide land for potential environmental mitigation.*

Policy PF-2s: Permit the application of biosolids generated in Sonoma County to agricultural lands in the County if they meet all of the following criteria. In the event that one or more of the criteria are not met, a General Plan amendment shall be required.

- (1) The project's primary purpose is to enhance agricultural use. The rate of biosolid application shall be designed to enhance existing agricultural operations or designed in conjunction with a detailed management plan for proposed agricultural use,
- (2) The rate of biosolid application shall not result in any future limitations on the potential agricultural use of the area of application,
- (3) The project shall be subject to the approval of the applicable Regional Water Quality Control Board,
- (4) A use permit and, if necessary, a solid waste facility permit, shall be obtained,
- (5) A permit shall be obtained from the local solid waste enforcement agency,
- (6) The biosolids to be applied to agricultural lands shall be limited to those originating from an approved Sonoma County biosolids source, and
- (7) The project shall include provisions for periodic review and evaluations of long term impacts on soils, water, and agricultural production.

In the event that the biosolids generated within the County is inadequate to address the agricultural demand for biosolids, the County may consider site specific General Plan text amendments for the application of biosolids generated outside of the County provided that the above criteria 1 through 5 and 7 are met and that:

- 1) The applicant can satisfy local public health officials that the method of production and content of the biosolids will not be detrimental to public health,
- 2) The applicant demonstrates that traffic and other impacts of the proposed project are mitigated to the maximum extent feasible, and
- 3) The applicant demonstrates that there are no alternative sources of biosolids within the county.

Notwithstanding this policy, lime treated biosolids from the Vallejo Sanitation District may be applied to Tubbs Island, a 2500 acre site. (APN 068-180-008, 004, 005, 006, 011, 013; 068-190-005, 007, 008, 013, 017).*

Policy PF-2t: Review proposals for new transmission lines or acquisition of easements for new transmission lines for consistency with GP 2020 policies. Request wherever feasible that such facilities not be located within designated Community Separators or biotic resource areas. Give priority to use of existing utility corridors over new corridors.*

Policy PF-2u: Review proposals for public and private telecommunication facilities for consistency with General Plan policies and adopted siting and design criteria. In order for a public telecommunication facility to be found consistent with this plan, it must meet the standards and siting and design criteria of the applicable zoning district.

Policy PF-2v: Consider requiring the undergrounding of new electrical transmission and distribution lines where appropriate in Community Separators, Scenic Landscape Units, along Scenic Corridors and in selected urban areas. Where feasible and under the Public Utility Commission (PUC) rules, convert existing overhead lines to underground facilities in urban areas.

Policy PF-2w: Encourage consolidation of multiple utility lines into common utility corridors wherever practicable.

Policy PF-2x: Utilize development fees to require that new development pay for its share of needed infrastructure as identified in existing and future Capital Improvement Plans prepared by the County.

Policy PF-2y: Minor public facilities, defined as those that are located in a public road right of way or are not the primary use of the subject property, are allowed in any land use category, provided they are compatible with neighborhood character and designed to have minimal impact on natural and scenic resources. Projects that are clearly significant in terms of cost, scope of environmental impacts, public controversy, or involve more than one parcel, shall not be considered minor.

Policy PF-2z: Acquisition of land for all larger public facilities not addressed by Policy PF-2y, including parks, schools, wastewater treatment and water transmission facilities, is consistent with all nonagricultural land use categories, provided that:

- (1) A formal public hearing on the proposed facility is required to provide an opportunity for public review and comment before a final decision on the facility is made, and
- (2) Following approval of the use, a General Plan Amendment to designate the site Public/Quasi-Public on the Land Use Map will be processed by the responsible public agency.

Acquisition of land for these larger public facilities is generally inconsistent with agricultural land use categories.

3.6 YOUTH AND FAMILY SERVICES

The traditional focus of general plans has been on land use, housing, open space, and other land use related matters. While youth, family and other social services are not typically considered in this context, many local jurisdictions are beginning to acknowledge the valuable contribution that these services make to a community's quality of life. Issues such as housing, recreation and child care have a direct link to land use and applicable policies have been developed and are presented in this section. Other issues, such as neighborhood security, youth participation in government, child abuse, drug and alcohol prevention, etc are not as directly related to land use but, nonetheless, Sonoma County recognizes the importance of these issues and will continue to solicit Federal and State funding to address a full range of health and human service programs designed to create an environment where the County's children, youth and families, senior citizens and persons with disabilities live in secure and healthy communities. Programs intended to address such significant issues as the prevention of child abuse, youth violence, drug and alcohol use by minors, as well as those which enhance diversity, promote parent education and support services, affordable child care and youth recreation programs, neighborhood revitalization, school based health services and programs which provide for the needs of low income seniors and disabled persons would continue to be supported by the County.



- GOALS PF-3:** **Address youth and family issues related to land use.**
- Objective PF-3.1:** Promote living conditions in homes and neighborhoods that support safety and security for residents of unincorporated areas.
- Objective PF-3.2:** Encourage the development of quality child care facilities, including large and small family child care homes, and public and private daycare centers, in order to provide a wide range of alternatives that meet the diverse needs of children and parents.
- Objective PF-3.3:** Foster a safe living environment that encourages independence, promotes opportunities for socialization, and facilitates the creation of adequate and affordable housing options for seniors and persons with disabilities that consider all levels of care, including independent living, assisted living, board and care, skilled nursing facilities, and day care options.

The following policies shall be used to achieve these objectives:

Policy PF-3a: Collaborate with stakeholders to establish long term goals for improving the living conditions of children, youth, families, senior citizens and persons with disabilities, and continue to monitor available data regarding their status.

Policy PF-3b: Encourage school districts, the Cities, and the County to work together to provide safe walking and bike paths around schools and neighborhoods.

Policy PF-3c: Design public spaces to reflect the needs of children, youth, families, seniors and persons with disabilities and protect their safety. In designing park and recreational facilities, recognize that accessibility will vary depending on the location and purpose of the facility, consistent with State and Federal guidelines.

Policy PF-3d: Consider the potential negative impacts of proposed projects involving the selling or serving of alcohol, tobacco products, or the dispensing of marijuana or any other controlled substance of a similar nature. When reviewing new proposals, consider the site's proximity to other such uses and to youth serving facilities, and consider denial of Use Permit applications that would result in negative impacts.

Policy PF-3e: Encourage and support the availability of sites for community based health services, including school based health services and facilities.*

Policy PF-3f: Encourage and support the availability of sites for alcohol, drug and mental health treatment, as well as housing for persons receiving such treatment.

Policy PF-3g: Encourage opportunities for safe physical activity as an important component in the design and development of parks and public spaces.

Policy PF-3h: Continue to allow child care facilities in all land use map designations, and encourage such facilities in underserved areas.

Policy PF-3i: Consider streamlining zoning regulations and reducing fees from their 2002 level for large family child care homes and day care centers. Cooperate with the cities and the Sonoma County Child Care Planning Council and non-governmental organizations in creating a uniform and simplified review process for childcare facilities.*

Policy PF-3j: Encourage child care facilities in new housing or office/industrial developments, and require it in large projects where a legal nexus between the new development and the need for childcare can be established.*

Policy PF-3k: As resources allow, encourage the inclusion of space for child care facilities in buildings that house the County government workforce.

Policy PF-3l: Encourage schools to offer recreation programs and before- and after-school care whenever possible.*

Policy PF-3m: Consider the needs of youth in transportation planning. Seek youth participation in such decisions.

Policy PF-3n: Site new housing and public facilities, which provide youth, family and senior services, near transit stops when feasible.

Policy PF-3o: Consider the needs and limitations of senior citizens and persons with disabilities when planning for public transit routes and equipment.

Policy PF-3p: Consistent with the Housing Element, provide seniors and persons with disabilities with access to affordable housing by continuing to assist in the planning and construction of such housing.

4. PUBLIC FACILITIES AND SERVICES IMPLEMENTATION PROGRAM

Public Facilities and Services Program 1: Wastewater Management System Master Plans

Program Description: Work with wastewater service providers to prepare and adopt master facilities plans for all wastewater management entities serving the unincorporated area (Policy reference: PF-1b).

Public Facilities and Services Program 2: Capital Improvements Program

Program Description: Review updated five year plans and budget for facility improvements for the Sonoma County Water Agency and all County wastewater management districts, parks and other facilities annually for General Plan consistency.

Public Facilities and Services Program 3: School Facility Planning Program

Program Description: Provide maps, data and technical assistance, as resources permit, to school districts to assist in estimating the amount, rate and locations of projected population growth (Policy reference: PF-2k).

Public Facilities and Services Program 4: Ordinances Authorizing Development Fees and/or Dedication of Land for Public Facilities

Program Description: Prepare and update ordinances enabling the County to require the payment of fees and/or the dedication of lands for public facilities as a condition of approval for development projects (Policy reference: PF-2g, 2h, 2l).

Public Facilities and Services Program 5: Fire Service Master Plan

Program Description: Prepare and implement a Fire Services Master Plan (Policy reference PF-2h).

Public Facilities and Services Program 6: Zoning Regulations for Child Care

Program Description: Review existing zoning regulations and fee schedules in order to identify and consider streamlining of permit requirements and procedures that would reduce barriers to construction of child care facilities (Policy reference: PF 3i, 3j).

PENNGROVE SEWER CAPACITY STUDY

By David Grundman November 4, 2002

SUMMARY

The Penngrove sewage collection capacity was analyzed based upon the current flow rates projected to build out and then included the proposed additional loading from the Sonoma County General Plan – Draft Housing Element. It was found that the existing collection system is not adequate to handle build out flows from the sanitation zone.

Three reaches of the collection system appear to be inadequate. When the additional loadings from the Draft Housing Element are 100% applied, then the situation becomes worse. Two of the reaches will need to be upgraded even under the current projected buildout plan. The current flow rates are handled by the collection system and the addition of the proposed Draft Housing Element will not tax the collection system under current flow conditions.

PURPOSE

The purpose of this study is to evaluate only the sewer capacity of the Penngrove collection system based upon current flow data and current zoning with proposed changes. Those changes are suggested in the Draft Housing Element of the Sonoma County General Plan, April 20, 2001.

DOCUMENTS

Exhibit A: Kennedy/Jenks/Chilton (K/J/C) completed a sewer capacity study in June of 1990. Corrections were made to reflect current flow rates and zoning.

Exhibit B: Sonoma County General Plan – Draft Housing Element (DHE), April 20, 2001, December 17, 2001 revisions, excerpts relative to Penngrove. It appears that a total of 55 units are proposed with about 34 being additional units.

Exhibit C: Master list for Penngrove listing all of the sewer connections dated 10-17-01 for a total of 471.29 ESDs.

Exhibit D: An old document dated September 4, 1992 showing a calculation for the average dry weather flow (ADWF)/ESD to be 236 gpd/ESD. This number may have come down over the years due to water conservation, but there are no current meter readings available for Penngrove.

Exhibit E: A partial set of plans for the Penngrove collection system along with capacity calculations for each reach.

Exhibit F: A series of spreadsheets, which analyze the expected flows at buildout with and without the DHE included.

BACKGROUND

The sewage from this system is pumped to Petaluma for treatment under an agreement, which currently limits the connected load to the equivalent of 3,000 people. The current loading is calculated to be about 1,251 people based upon the current masterlist load of 471.29 ESDs and the 2.655 persons per ESD as shown in Exhibit B.

J/K/C completed a sewer capacity study in May of 1988. The study formed a basis for this current study. The J/K/C study contains two errors for the capacity of Lines E and N. The line E error was for the slope of the line, which when corrected did not change the ability of the collection system to handle additional loading.

Line N is a different matter. This line is actually composed of two 6-inch lines used for siphons. It appears that the cross sectional area of the two pipes was totaled and an equivalent pipe used to produce the capacity calculation. The correct method would be to simply add the capacity of each separate line together instead of attempting an equivalent pipe. The end result, including an adjustment for the n-factor, is that Line N has an actual capacity of 0.52 MGD instead of 1.18 MGD shown in the study.

The J/K/C study points out two other reaches that appear to be in need of upgrading in order to carry the total buildout flows. They are known as lines P and L in the J/K/C study.

ANALYSIS

The K/J/C study was corrected directly per the notes above. This information was then entered into a series of spreadsheets (Exhibit F), which developed the peak wet weather flow (PWWF) with and without the DHE. Spreadsheet #9 shows where the DHE comes from. This information is then routed to Spreadsheets #1 and #2, which develop the (ADWF) as a basis.

The PWWF is then developed in spreadsheets #3 and #4 by adding the I&I to the ADWF (increased by a wet weather factor ranging from 4.5 to 5).

Spreadsheet #5 and #6 are a summary comparison of the PWWF to the sewer capacity. The spreadsheets suggest that capacity is already limited in three reaches of the collection system. Spreadsheet #5 indicates that the siphon located in reach point 5-13 (area N) will be short about 15 ESDs under current buildout conditions. Additional study may show that this will not be a problem. It appears that the K/J/C study may have simply used a straight pipeline analysis to determine the capacity of the siphon instead of a siphon analysis.

Two other reaches for areas P and L are also short on capacity under the same conditions. Areas P and L were also pointed out in the K/J/C study as being short on capacity.

A comparison between spreadsheets #5 and #6 show that the addition of the DHE units will just make things worse as can be expected. The proposed DHE units are located above the areas P and L, which are the two lowest reaches of the collection system; therefore moving the DHE units to another reach will not accomplish anything.

Spreadsheets #7 and #8 show that the two lowest reaches (areas P and L) can accommodate the additional loading from the DHE units under current flow conditions. An overloading of the two lower reaches is expected some time in the future unless additional capacity is developed. This can take the form of greater water conservation, parallel lines, or direct replacement of some existing lines. It is unlikely that Area N (the siphon) will be able to accommodate the additional loading from the DHE units without further study.

CONCLUSION

The Penngrove collection system does not appear to have sufficient capacity to handle the expected build out loading under current zoning conditions along three reaches of the system. Capacity improvements are required just to meet the current buildout plan. The additional load from the DHP cannot be handled without capacity improvements.

Kennedy/Jenks/Chilton

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4 June 1990

Mr. K. Giovannetti
Senior Civil Engineer
Sanitation Division
County of Sonoma
575 Administration Drive
Room 117A
Santa Rosa, CA 95403

Subject: Penngrove (CSA #19) Sewer System Capacity Study
K/J/C 900010.00

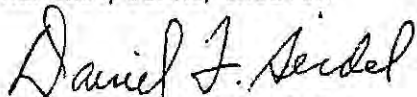
Dear Mr. Giovannetti:

We have completed the sewer system capacity study for the Penngrove area in accordance with our Agreement. The enclosed report describes the work performed, and presents our conclusions and recommendations. Twenty-five copies are furnished.

We have enjoyed working with you, Larry Brown, and John Sciborski on this study. The analysis was done by Jill Bicknell and Kerwin Allen of our office, under my direction. If we can provide any further assistance on this matter, please call.

Very truly yours,

KENNEDY/JENKS/CHILTON



Daniel F. Seidel, P.E.
Project Manager

DFS/kadWPC113

Enclosure

TABLE OF CONTENTS

<u>Title</u>	<u>Page</u>
INTRODUCTION	1
Background	1
Objectives	1
METHODOLOGY	1
Sources of Information	1
Method of Approach	2
Design Criteria	3
RESULTS	4
Average Dry Weather Flows	4
Peak Wet Weather Flows	4
Sewer System Capacity	4
CONCLUSIONS AND RECOMMENDATIONS	5

LIST OF TABLES

- Table 1 - Estimated Average Dry Weather Flows, Ultimate Build-out Condition
- Table 2 - Estimated Peak Flows and Available Capacity
- Table 3 - Estimated Capacity of Sewer Lines

LIST OF FIGURES

- Figure 1 - Penngrove Land Use Plan Map
- Figure 2 - Sewage Flow Peaking Factors
- Figure 3 - Sewer System Map

INTRODUCTION

Background

County Service Area No. 19 (CSA 19) provides sewer service to the community of Penngrove. The community is located in central Sonoma County along the Highway 101 corridor, within the Rohnert Park-Cotati planning area. A land use plan map is presented on Figure 1.

Penngrove is a community of primarily urban and rural residential land uses, with some commercial and industrial areas along Old Redwood Highway. Its population was estimated at 800 in 1980, and projected to increase to 900 in 1990 and 1,400 by the year 2005. It is surrounded by rural residential development areas which are beginning to be developed.

In order to be able to respond to requests for new sewer services, the Sonoma County Department of Public Works (the County) retained Kennedy/Jenks/Chilton to perform a sewer system capacity study and estimate the available capacity in the existing sewer system. Kennedy/Jenks/Chilton was authorized to perform the study per Agreement with the County dated 30 November 1989 and to begin work on 29 January 1990.

Objectives

The study involved an evaluation of the Penngrove sewer system with the following objectives:

1. Determine the system capacity required to serve the "build-out" population of CSA 19 allowed by the 1989 General Plan within the existing service area boundaries;
2. Determine the residual capacity available in each pipe line at ultimate build-out conditions.

The results of the study provide the County with information to help respond to requests for annexations or increases in population densities.

METHODOLOGY

Sources of Information

The following information was obtained from the County for use in this study:

1. Sonoma County General Plan - Land Use Element and Public Facilities and Services Element, Sonoma County Planning Department, adopted 23 March 1989;
2. Land Use Plan Map: Rohnert Park-Cotati and Environs, Sonoma County General Plan, adopted 23 March 1989;

3. Sonoma County Assessor's Parcel Maps;
4. Sanitation User Inventory Master List, prepared by Sonoma County Public Works Department, dated 27 October 1989;
5. Construction Drawings, County Service Area No. 19, Wastewater Collection and Pumping Facilities Project C-06-1112, Sheets G-1, C-1 through C-47, February 1977.

Peaking factors for wastewater flows were obtained from Figure 4 of Design and Construction of Sanitary and Storm Sewers, American Society of Civil Engineers, Manuals and Reports on Engineering Practice, No. 37, 1969. The selected peaking factor curve is reproduced on Figure 2 of this report.

Method of Approach

The methodology used to estimate the available capacity in the Penngrove sewer system is described below:

1. A map of the existing sewer system was superimposed on a composite of the assessor's parcel maps and divided into 15 major sewer lines of relatively uniform diameter and slope. The boundaries of the contributing areas to each line were determined and the size of each area in acres was estimated, using information from the assessor's maps and the construction drawings. (Note that the size of a contributing area equals the sum of the areas of its individual parcels and does not include street and road areas.)
2. The estimated average dry weather flow (ADWF) from each contributing area was calculated as follows. The existing wastewater flows were determined from the County's sanitation user inventory master list of equivalent single dwellings (ESDs) on each developed parcel in the service area. Future flows from undeveloped parcels were estimated based on the maximum density allowed by the land uses specified in the General Plan (Figure 1) and unit flow rates associated with those uses (see Design Criteria). Estimated flows from all parcels in a contributing area were summed to compute the total ADWF from each area. Area ADWFs are presented in Table 1.
3. The total (or cumulative) ADWF for each pipe line was estimated by adding ADWFs from all upstream lines to the ADWF of the contributing area to that line (see Table 2).
4. Peak dry weather flows (PDWFs) for each pipe line were estimated by applying a peaking factor to the cumulative ADWF for that line. The peaking factor was selected from a graph of peaking factors versus population (Figure 2). To use the graph, an equivalent population associated with the cumulative ADWF of a particular line was calculated, based on the ESD

flow rate and an average household size of approximately 2.7 persons (from the County General Plan, Land Use Element, Table LU-11). The cumulative ADWF multiplied by the peaking factor yielded the cumulative PDWF (see Table 2).

5. Wet weather infiltration/inflow (I/I) was computed on a gallon per day per acre (gpad) basis. The estimated I/I from each contributing area was summed to produce a cumulative I/I for each pipe line. The cumulative I/I was added to the cumulative PDWF to obtain the peak wet weather flow (PWWF) for each line (see Table 2). The estimated PWWF represents the total capacity required in a given line to adequately serve the needs of its contributing service area.
6. The design capacity of each pipe line was computed using Manning's equation for open channel flow. Since pipe capacity is controlled by slope, the minimum slope of the line was used to compute the capacity of the line if the entire line was not of constant slope. The pipe characteristics and computed design capacities are presented in Table 3.
7. The final step was to subtract the PWWF from the computed design capacity to determine the available capacity in each line. The results of these computations are presented in the last columns of Table 2. The available capacities are expressed in million gallons per day (MGD) and in equivalent single dwellings (ESDs). A negative result indicates that the line has insufficient capacity for peak wet weather flows under build-out conditions.

A map of the Penngrove sewer system showing the 15 designated pipe lines and contributing areas is presented on Figure 3.

Design Criteria

For estimating existing ADWFs, a value of 220 gallons per day (gpd) per ESD was used. This value was estimated by the County Public Works Department based on actual wastewater flow data collected during the period July through October 1989, and is higher than the 181 gpd per ESD used in the General Plan revision of 1989. For estimating future ADWFs from undeveloped parcels, the following unit flow rates were assumed for each specified land use on Figure 1:

1. Residential (UR and RR): 1 ESD (220 gpd) per unit, assuming maximum density (in whole units)
2. Commercial (Limited and General): 600 gpad
3. Industrial (Limited): 800 gpad
4. Quasi-Public (Schools and Parks): 220 gpd per ESD value assigned by Sanitation User Inventory Master List

Ultimate build-out was used to evaluate the worst case hydraulic condition for the system. It is not anticipated that the General Plan population of 1,400 for the year 2005 will be exceeded.

Peak I/I rates were assumed to be 800 gpad, regardless of land use. Flowing full capacities of pipe reaches were computed using Manning's equation, assuming an "n" value of 0.013 for transite (asbestos concrete) pipe.

RESULTS

Average Dry Weather Flows

The computation of ADWFs at the ultimate build-out condition is presented in Table 1. The estimated total ADWF generated from the service area is approximately 151,000 gallons per day.

Peak Wet Weather Flows

The computations of cumulative ADWFs, cumulative PDWFs, contributions from I/I and cumulative PWWFs are presented in Table 2. The cumulative PDWF for the entire system is approximately 0.70 MGD. The cumulative I/I for the system is estimated to be approximately 0.32 MGD, bringing the total cumulative PWWF to 1.0 MGD.

At the request of the County, an I/I rate of 800 gpad was used to calculate cumulative I/I and PWWFs. Based on this assumption, total I/I represents about 30 percent of the peak wet weather flow. This assumption may be conservative, given that the sewer system is only 13 years old and that local groundwater levels are typically below the pipe inverts. However, this rate is probably appropriate for a future condition of ultimate build-out and a somewhat deteriorated sewer system.

Sewer System Capacity

The flowing-full capacity of each sewer line was computed and presented in Table 3. These capacities were then transferred to Table 2 and compared to the estimated cumulative PWWFs to determine the available capacity of each line. In most cases, sewers were designed using a slope that would achieve a minimum self-cleansing velocity of approximately 2 feet per second.

In Table 2, available capacity is expressed in MGD and in ESDs (by dividing the available capacity in gpd by 220). Available ESDs represent the excess capacity in the sewer line above the capacity required to serve build-out in the area served by each line. Build-out is calculated using densities allowed in the General Plan.

The computations indicate that all lines have sufficient capacity for peak wet weather flows at ultimate build-out except the two most downstream sections, line P (from point 13 to point 9) and line L (point 9 to point 10). The flowing-full capacities of lines P and L appear to be less than required capacity by 0.06 and 0.24 MGD, respectively.

CONCLUSIONS AND RECOMMENDATIONS

The analysis of the Penngrove (CSA 19) sewer system capacity and the estimated peak flows under ultimate build-out conditions indicates that the existing sewer system has sufficient capacity for future flows in the upper reaches of the sewer system. However, two reaches of the main trunk sewer (shown as lines L and P on Figure 3) connecting the upper reaches to the pump station have inadequate capacity for build-out conditions. Line L causes the most severe restriction due to its flat (minimum) slope and limits system capacity to 0.78 mgd.

Replacing the existing 10-inch diameter pipes in lines L and P with 12-inch diameter pipes or constructing a relief sewer will be necessary to meet build-out conditions within the CSA. No excess capacity exists to serve areas outside of the CSA, unless the two lines are replaced.

Based on these conclusions, the following recommendations are made:

- The County should continue to monitor sewer system flows to verify I/I rates and unit ESD flow rates.
- Lines L and P should be replaced when approaching their 0.78 mgd capacity. Installation of 12-inch diameter pipes will increase capacity to 1.02 mgd, matching the estimated build-out flow.
- Consideration should be given to installing 15-inch diameter pipes for these lines if it is contemplated that areas outside the CSA boundaries will be annexed in the future.

TABLE 1
 PENNGROVE SEWER CAPACITY STUDY
 ESTIMATED AVERAGE DRY WEATHER FLOWS,
 MAXIMUM BUILD-OUT CONDITION

CONTRIBUTARY AREA TO LINE	GENERAL PLAN	AREA (AC)	EQUIV. SINGLE DWELLINGS (ESDs)	ULTIMATE ADWF (GPD) (1)	TOTAL ADWF TO LINE
A	UR-1	27.0	27	5940	24,860
	UR-2	21.4	42	9240	
	UR-4	11.7	44	9680	
B	UR-1	42.8	42	9240	9,240
C	UR-1	5.2	5	1100	20,460
	UR-2	14.5	28	6160	
	LIM. IND	16.5	NOT APPLICABLE	13200	
D	UR-1	21.6	21	4620	4,620
E	UR-1	7.8	7	1540	3,300
	UR-2	4.7	8	1760	
F	UR-1	1.2	1	220	13,340
	UR-2	26.5	52	11440	
	GEN. COMM.	2.8	NOT APPLICABLE	1680	
G	UR-2	14.4	28	6160	11,260
	LIM. COMM.	8.5	NOT APPLICABLE	5100	
H	UR-1	8.4	8	1760	25,360
	UR-6	13.2	78	17160	
	UR-2	4.3	8	1760	
	QUASI	7.3	6 (2)	1320	
	GEN. COMM.	2.2	NOT APPLICABLE	1320	
LIM. COMM.	3.4	NOT APPLICABLE	2040		
I	UR-1	18.2	18	3960	17,600
	UR-2	21.3	42	9240	
	LIM. COMM.	4.3	NOT APPLICABLE	2580	
	LIM. IND.	2.0	NOT APPLICABLE	1600	
	QUASI	2.3	1 (2)	220	
J	RR-2	4.8	2	440	440
K	RR-2	1.5	1	220	760
	GEN. COMM.	0.90	NOT APPLICABLE	540	
L	UR-2	6.5	12	2640	4,840
	RR-2	21.2	10	2200	
M	UR-4	11.4	44	9680	11,300
	LIM. COMM.	1.6	NOT APPLICABLE	960	
	QUASI	5.5	3 (2)	660	
N		0.0	NOT APPLICABLE	0	0
P	RR-2	36.7	18	3960	3,960
TOTALS		403.6			151,340

NOTE:

- 1) Based on ESD flow rate of 220 gpd/unit for residential areas, 600 gpd for commercial areas, and 800 gpd for industrial areas.
- 2) ESD for quasi-public area obtained from Sanitary User Inventory Master List.

TABLE 2
PENNGROVE SEWER CAPACITY STUDY
ESTIMATED PEAK FLOWS AND AVAILABLE CAPACITY

LINE NO	FROM POINT	TO POINT	INCR ADWF (GPD) (1)	CUMULATIVE ADWF (GPD)	CUM EQUIV POP (2)	PEAKING FACTOR	CUMULATIVE PDWF (MGD)	INCR AREA (ACRES)	PEAK I/I (MGD) (4)	CUM I/I (MGD)	CUMULATIVE PMPF (MGD)	LINE CAPACITY (MGD) (5)	AVAILABLE CAPACITY (MGD)	AVAILABLE EQUIV. ESD	LINE NO
A	1	5	24,860	24,860	305	5.0	0.124	60.1	0.048	0.048	0.172	0.500	0.328	1,490	A
B	2	4	9,240	9,240	113	5.0	0.046	42.8	0.034	0.034	0.080	0.500	0.420	1,908	B
H	4	12	25,360	34,600	425	5.0	0.173	38.8	0.031	0.065	0.238	0.500	0.262	1,190	H
M	12	5	11,300	45,900	563	5.0	0.230	18.5	0.015	0.080	0.310	0.500	0.190	866	M
C	3	11	20,460	20,460	251	5.0	0.102	36.2	0.029	0.029	0.131	0.500	0.369	1,676	C
I	11	6	17,600	38,060	467	5.0	0.190	48.1	0.038	0.067	0.258	0.500	0.242	1,101	I
D	14	15	4,620	4,620	57	5.0	0.023	21.6	0.017	0.017	0.040	0.360	0.320	1,454	D
E	15	7	3,300	7,920	97	5.0	0.040	12.5	0.010	0.027	0.067	0.500	0.433	1,969	E
K	7	6	760	8,680	107	5.0	0.043	2.4	0.002	0.029	0.073	0.500	0.427	1,943	K
J	6	13	440	47,180	579	5.0	0.236	4.8	0.004	0.100	0.336	0.500	0.164	746	J
N	5	13	0	70,760	868	5.0	0.354	0.0	0.000	0.128	0.482	1.188 ^{0.520}	0.698	3,173	N
P	13	9	3,960	121,900	1,496	4.8	0.585	36.7	0.029	0.257	0.843	0.780	-0.063	0	P
F	8	16	13,340	13,340	164	5.0	0.067	30.5	0.024	0.024	0.091	0.360	0.269	1,224	F
G	16	9	11,260	24,600	302	5.0	0.123	22.9	0.018	0.042	0.165	0.500	0.335	1,523	G
L	9	10	4,840	151,340	1,857	4.6	0.696	27.7	0.022	0.323	1.019	0.780	-0.239	0	L

NOTES:

- 1) From Table 1
- 2) Based on an ESD flow rate of 220 gpd and an average of 2.7 persons per single dwelling
- 3) From Figure 2
- 4) Based on an assumed I/I rate of 800 gpd
- 5) From Table 3

92 METER REACHES = $228 \frac{236}{24} \text{ GPM} + 10\% = 260 \text{ GPM}$
 USE FOR A.D.W.F.
 TOTAL ADW.F. ESD = 26
 FIRST TRY: ADD 26 ESD TO ALL REACHES
 INCLUDE 10% FS

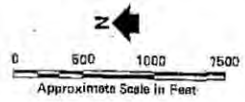
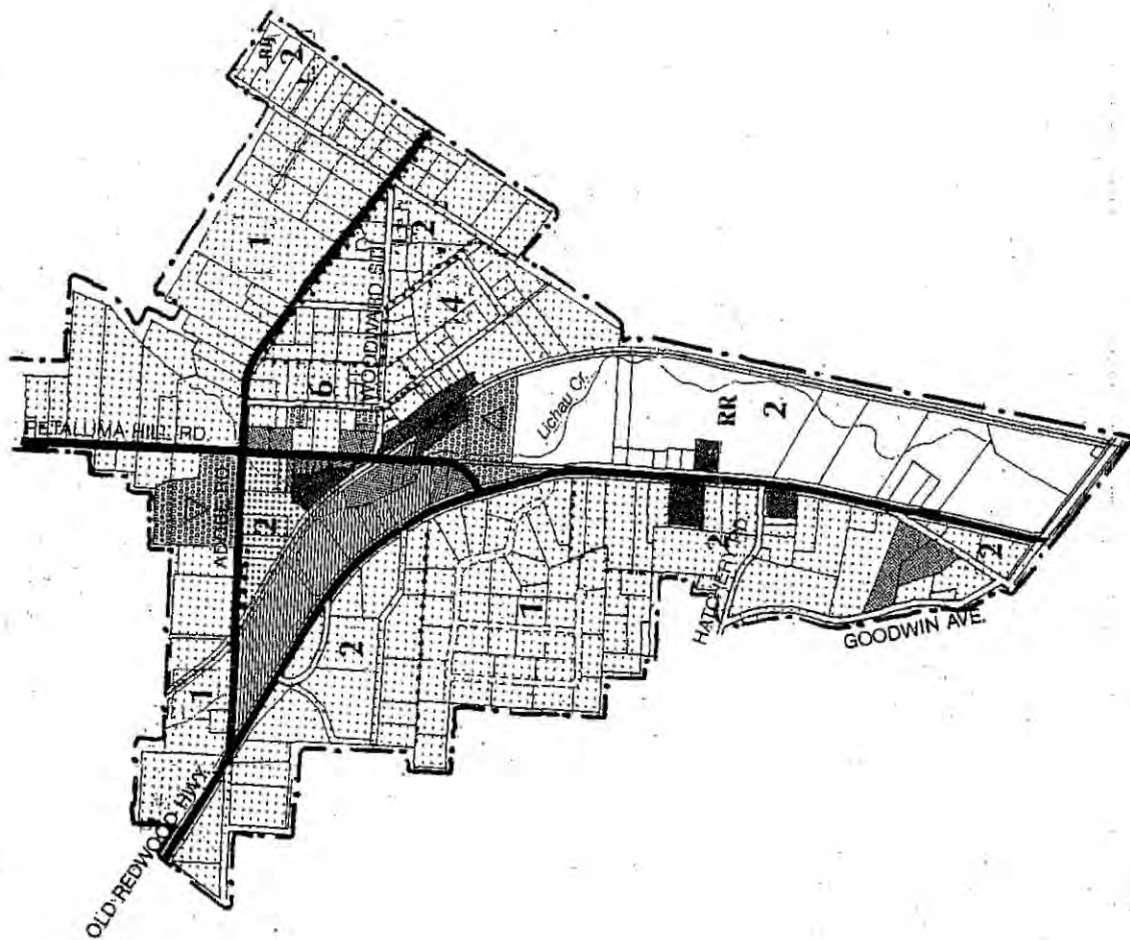
TABLE 3
 PENNGROVE SEWER CAPACITY STUDY
 ESTIMATED CAPACITY OF SEWER LINES

LINE DESIGNATION	FROM POINT	TO POINT	DIAM (IN)	PIPE TYPE	MIN. SLOPE (FT/FT) (1)	AREA (FT ²)	HYD RADIUS	'n' VALUE	ESTIMATED CAPACITY (MGD)
LINE A	1	5	8	TRANSITE	0.0040	0.35	0.167	0.013	0.50
LINE B	2	4	8	TRANSITE	0.0040	0.35	0.167	0.013	0.50
LINE H	4	12	8	TRANSITE	0.0040	0.35	0.167	0.013	0.50
LINE M	12	5	8	TRANSITE	0.0040	0.35	0.167	0.013	0.50
LINE C	3	11	8	TRANSITE	0.0040	0.35	0.167	0.013	0.50
LINE I	11	6	8	TRANSITE	0.0040	0.35	0.167	0.013	0.50
LINE D	14	15	6	TRANSITE	0.0100	0.20	0.125	0.013	0.36
LINE E	15	7	8	TRANSITE	0.0040 0.01	0.35	0.167	0.013	0.50
LINE K	7	6	8	TRANSITE	0.0040	0.35	0.167	0.013	0.50
LINE J	6	13	8	TRANSITE	0.0040	0.35	0.167	0.013	0.50
LINE N	5	13	(2x6)	TRANSITE	0.0100	0.40	0.250	0.013	0.50
LINE P	13	9	10	TRANSITE	0.0030	0.55	0.208	0.013	0.78
LINE F	8	16	6	TRANSITE	0.0100	0.20	0.125	0.013	0.36
LINE G	16	9	8	TRANSITE	0.0040	0.35	0.167	0.013	0.50
LINE L	9	10	10	TRANSITE	0.0030	0.55	0.208	0.013	0.78

0.010 PER PANS TOTAL FOR 2- 6" PIPES IE WRONG APPROACH
 0.013 + 0.18 = 0.52
 .014 FOR CIP

NOTE:

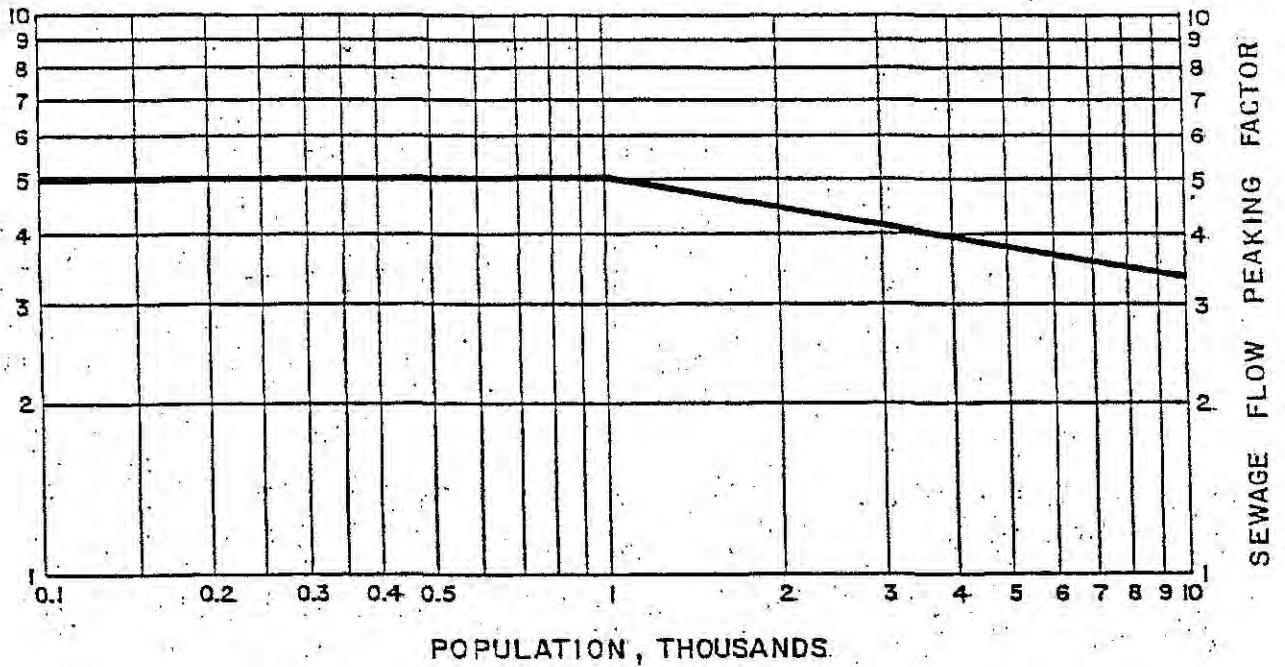
- 1) Represents minimum slope of pipe sections in each line. Most pipes were designed at minimum slope, i.e. that slope which would maintain a flowing-full velocity of approximately 2 ft/sec.



- Legend:**
- Urban Residential (1)
 - Rural Residential (2)
 - General Commercial
 - Limited Commercial
 - Limited Industrial
 - Quasi-Public
 - Parks
 - Schools
 - Density Boundary
 - Service Area Boundary

Notes:
 (1) Number indicates units per acre.
 (2) Number indicates acres per unit.

Kennedy/Jerks/Chilton
 Pennagro Sewer Capacity Study
 Sonoma County, California
 Pennagro Land Use Plan Map
 K/J/C 800010
 March 1990
 Figure 1



Source:

Design and Construction of Sanitary and Storm Sewers, American Society of Civil Engineers, Manuals and Reports on Engineering Practice, No. 37, 1969.

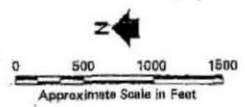
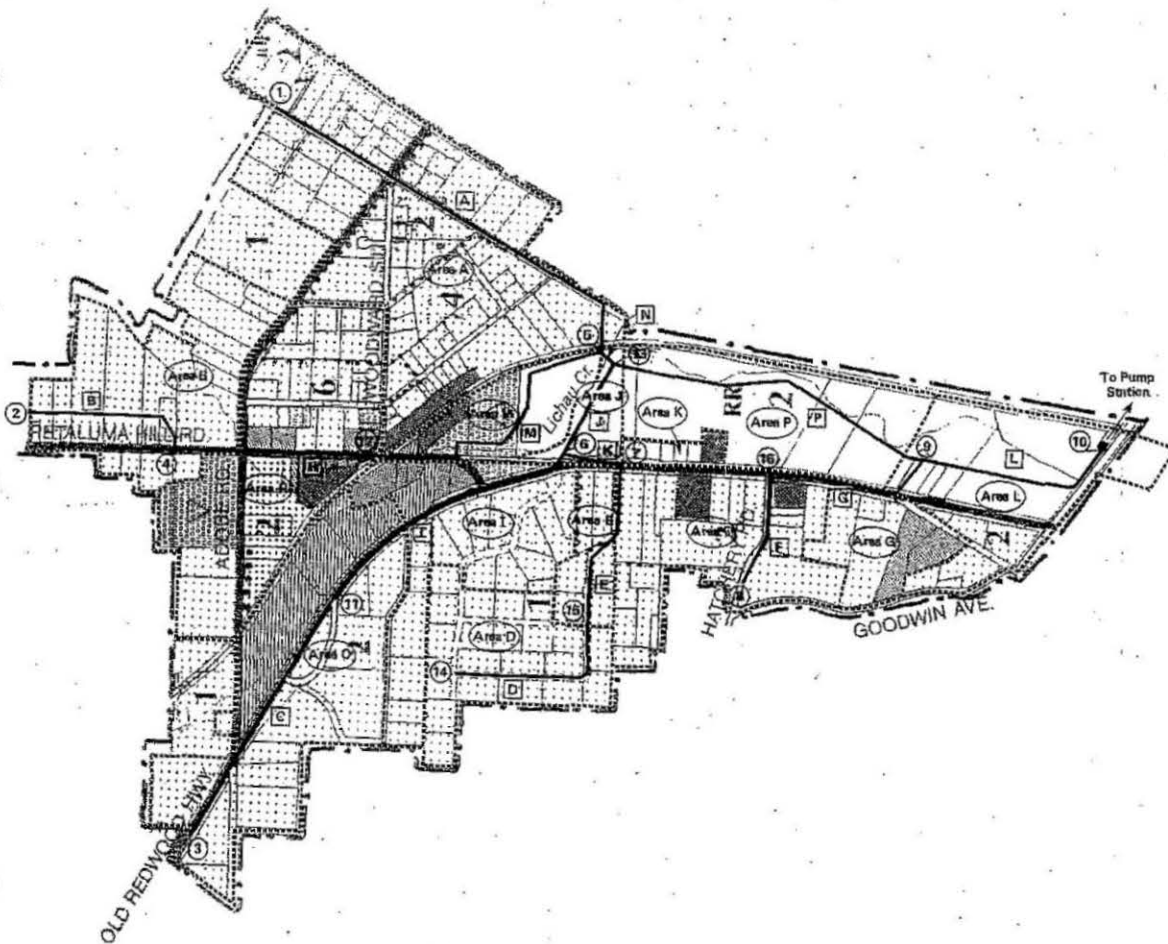
Kennedy/Jenks/Chilton

Penngrove Sewer Capacity Study
Sonoma County, California

Sewage Flow Peaking Factor

K/J/C 900010
March 1990

Figure 2



- Legend:**
- ① Typical Node
 - Ⓐ Typical Sewer Line Designation
 - Ⓐ Typical Contributing Area Designation
 - Sewer Line
 - Contributing Area Boundary
 - - - - - Service Area Boundary

Note:
 1. Minor tributary sewer lines are not shown.

Kennedy/Jenks/Chilton
 Pungrovi Sewer Capacity Study
 Sonoma County, California
 Sewer System Map
 KJ/C 800010
 March 1990
 Figure 3

SONOMA COUNTY GENERAL PLAN
DRAFT HOUSING ELEMENT

APRIL 20, 2001



EXHIBIT B

7.3.8 Penngrove

Water service in the Penngrove area is provided by the Penngrove Water Company (PWC), while sewer service is provided by the City of Petaluma under contract to the Penngrove Sanitation Zone (PSZ). The PWC provides service within the Urban Service Boundary, to a few scattered parcels on the west side of the Urban Service Boundary, and to the Cannon Manor subdivision.

Water Service. PWC has water service from the SCWA. PWC staff "doesn't know" if they have sufficient supply to serve the holding capacity of the General Plan Land Use Map, which was 189 units in 1990. Future ability to increase service will depend on the ability of SCWA to increase diversions of Russian River water.

Sewer Service. The contract for sewer service with the City of Petaluma has a service area population cap of 3,000 persons. Service is currently provided to 460 ESDs (equivalent single family dwellings). Averaging the 1990 household sizes of the two Censüs tracts in which Penngrove is located yields an average household size of 2.655 persons, yielding a current service area population of 1,220 persons. Subtracting 1,220 from 3,000 suggests that the service area could accommodate an additional 670 housing units at the 1990 average household size. Since 189 units remain to be built under 1990 holding capacity estimates, it appears that sufficient capacity exists to serve the population anticipated by the General Plan Land Use Map.

7.3.9 Russian River

Urban water and sewer service in the lower Russian River area are provided by the Sweetwater Springs Water District (SSWD) and the Russian River County Sanitation District (RRCSD). The service areas of the two entities are very different, with the SSWD service area encompassing a large area that is outside the service area of the RRCSD. The RRCSD service area is coterminous with the General Plan Urban Service Boundary, and includes the communities of Guerneville and Rio Nido, plus the intervening area along the Russian River.

Water Service. According to SSWD staff, the District has water rights to 1,214 acre-feet per year, with 147.32 acre-feet per year available to serve new connections. Current average demand per connection is 4,048 gallons per month, with no peaking issues due to adequate storage. Therefore, the SSWD could serve an additional 988 connections at the average demand rate. Since the 1990 holding capacity of the General Plan Land Use Map for the Urban Service Area allowed for 636 additional residential units, it appears that the SSWD could serve all residential development allowed by the General Plan within the Urban Service Area. However, the potential for additional demand originating outside the boundaries of the Urban Service Area is unknown, as is the potential for commercial/industrial redevelopment.

Sewer Service. Staff of the RRCSD has stated: "We will be able to provide sanitary sewer service for the [RRCSD] assuming the existing urban service boundary and land use identified in the existing General Plan do not change. Changes to the General Plan may require changes to our facilities plan to accommodate any potential increase in treatment plant, storage, or disposal capacity."

Table 4

**Sonoma County Urban Service Area
Housing Site Inventory
With Availability of Water and Sewer Services**

hein74c.xls

KEY:
 (1) "ID#" identifies the subject property on the Urban Service Area Maps. (2) "APN" means Assessor Parcel Number. (3) "Units Base" means the number of housing units required by mapped density. (4) "GP Den." means the mapped General Plan residential density in units per acre. (5) See text for meaning of "State Density Bonus," "Housing Opportunity A" and "Housing Opportunity C." (6) For water and sewer service, "yes" means provider has capacities rated "More Than Adequate," "Adequate" or "Adequate With Concerns" as shown in Table 7.6 and text. (7) "T" means total units; "VL" means Very Low Income; "L" means low income, "M" means moderate income and "AM" means above moderate income.

UR4

Site#	Map ID#	Status	Urban Service Area (Map #)	APN #	Acres	Units Base	Exist Units	GP Den.	Zoning	Housing Opportunity A				Housing Opportunity C				Water Available?	Sewer Available?	
										T	VL	L	AM	T	VL	L	M			
1	9	Vacant	Geyserville (3)	140-160-011	1.11	5	0	UR 4.8	R1 B6 4.8DU/AC	0	0	0	0	13	2	6	5	Yes	Yes	
	10	Vacant	RR (7)	069-250-024	5.74	22	0	UR 4	R1 B6 4DU/AC	0	0	0	0	64	8	31	25	Yes	Yes	
	11			069-250-025																
3	12	Vacant	RR (7)	070-070-040	1.38	5	0	UR 4	R1 B6 4DU/AC	0	0	0	0	16	2	8	6	Yes	Yes	
4	13	Vacant	RR (7)	070-160-018	3.56	14	0	UR 4	R1 B6 4DU/ACF1F2SRBR	0	0	0	0	40	4	20	16	Yes	Yes	
5	14	Vacant	RR (7)	070-180-005	1.32	5	0	UR 4	R1 B6 4DU/AC	0	0	0	0	15	2	7	6	Yes	Yes	
6	15	Vacant	RR (7)	070-200-011	1.70	6	0	UR 4	R1 B6 4DU/AC	0	0	0	0	19	2	10	7	Yes	Yes	
7	16	Vacant	Bod Bay (1)	100-180-022	4.00	16	0	UR 4	R1 CC B6 4DU/AC	0	0	0	0	44	5	22	17	Yes	Yes	
8	48	Underutilized	Bod Bay (1)	100-200-037	1.92	7	1	UR 4	R1 CC R6 4DU/AC	0	0	0	0	22	3	11	8	Yes	Yes	
	49			140-150-001																
9	50	Underutilized	Geyserville (3)	140-150-004	3.94	18	5	UR 4.8	R1 B6 4.8DU/AC	0	0	0	0	45	6	22	17	Yes	Yes	
	51			150-150-008																
10	52	Underutilized	Penngrove (6)	047-164-006	3.41	13	1	UR 4	R1 B6 4DU/AC	0	0	0	0	38	4	19	15	Yes	Yes	
11	54	Underutilized	RR (7)	069-280-043	2.00	8	1	UR 4	R1 B6 4DU/AC	0	0	0	0	22	3	11	8	Yes	Yes	
12	55	Underutilized	RR (8)	070-010-005	1.86	7	1	UR 4	R1 B6 4DU/AC	0	0	0	0	21	3	10	8	Yes	Yes	
13	56	Underutilized	RR (7)	071-060-069	2.98	11	1	UR 4	R1 B6 4DU/AC	0	0	0	0	33	4	16	13	Yes	Yes	
14	57	Underutilized	RR (8)	071-140-017	3.16	12	1	UR 4	R1 B6 4DU/ACF1F2 BR	0	0	0	0	35	4	17	14	Yes	Yes	
15	58	Underutilized	RR (8)	071-250-008	1.87	7	3	UR 4	R1 B6 4DU/AC F2	0	0	0	0	21	3	10	8	Yes	Yes	
16	59	Underutilized	Son Valley (11)	054-381-010	1.26	5	1	UR 4	R1 B6 4DU/ACF2SDBR	0	0	0	0	14	2	7	5	Yes	Yes	
17	60	Underutilized	Son Valley (11)	054-381-011	1.38	5	1	UR 4	R1 B6 4DU/ACSD	0	0	0	0	16	2	8	6	Yes	Yes	
SUBTOTAL					42.81	166	16				0	0	0	0	373	43	235	144		

38

UR 5

Site#	Map ID#	Status	Urban Service Area (Map #)	APN #	Acres	Units Base	Exist Units	GP Den.	Zoning	Housing Opportunity A				Housing Opportunity C				Water Available?	Sewer Available?
										T	VL	L	AM	T	VL	L	M		
18	17	Vacant	Graton (4)	130-165-001	1.12	5	0	UR 5	R1 B6 5DU/AC	0	0	0	0	13	2	6	5	Yes	Yes
19	19	Vacant	SR (9)	043-041-054	1.26	6	0	UR 5	R1 B6 5DU/AC	0	0	0	0	14	2	7	5	Yes	Yes
20	20	Vacant	SR (9)	125-042-015	3.55	17	0	UR 5	R1 B6 5DU/AC	0	0	0	0	40	4	20	16	Yes	Yes
21	21	Vacant	Larkfield (5)	039-025-043	1.82	9	0	UR 5	R1 B6 5DU/AC	0	0	0	0	22	3	11	8	Yes	Yes
22	22	Vacant	Son Valley (12)	052-402-001	1.07	5	0	UR 5	R1 B6 5DU/ACF2BR	0	0	0	0	12	2	6	4	Yes	Yes
23	23	Vacant	Son Valley (12)	056-481-032	2.09	10	0	UR 5	R1 B6 5DU/AC	0	0	0	0	23	3	11	9	Yes	Yes
24	24	Vacant	Son Valley (12)	058-690-008	1.22	6	0	UR 5	R1 B6 5DU/AC	0	0	0	0	14	2	7	5	Yes	Yes
25	26	Vacant	Son Valley (12)	133-150-038	1.37	6	0	UR 5	R1 B6 5DU/ACF2BR	0	0	0	0	16	2	8	6	Yes	Yes

Table 4

26	61	Underutilized	Graton (4)	130-101-037	1.15	5	1	UR 5	R1 B6 5DU/AC	0	0	0	0	13	2	6	5	Yes	Yes
27	62	Underutilized	Graton (4)	130-145-003	1.00	5	1	UR 5	R1 B6 5DU/AC	0	0	0	0	11	2	5	4	Yes	Yes
28	63	Underutilized	Graton (4)	130-294-016	1.01	5	1	UR 5	R1 B6 5DU/AC	0	0	0	0	12	2	6	4	Yes	Yes
29	64	Underutilized	Larkfield (5)	039-025-019	1.02	5	1	UR 5	R1 B6 5DU/AC	0	0	0	0	12	2	6	4	Yes	Yes
30	65	Underutilized	Larkfield (5)	039-380-018	1.51	7	1	UR 5	R1 B6 5DU/AC	0	0	0	0	17	2	9	6	Yes	Yes
31	66	Underutilized	Larkfield (5)	039-380-026	1.09	5	1	UR 5	R1 B6 5DU/AC	0	0	0	0	12	2	6	4	Yes	Yes
32	67	Underutilized	Larkfield (5)	039-380-027	1.04	5	2	UR 5	R1 B6 5DU/AC	0	0	0	0	12	2	6	4	Yes	Yes
33	71	Underutilized	SR (9)	125-301-043	1.71	8	1	UR 5	R1 B6 5DU/AC	0	0	0	0	19	2	10	7	Yes	Yes
34	18	Vacant and Underutilized	SR (9)	043-041-046	24.41	118	12	UR 5	R1 B6 5DU/AC	0	0	0	0	272	30	136	106	Yes	Yes
	25			125-501-007															
	68			043-041-001															
	69			043-041-034															
	72			125-451-002															
	73			125-451-009															
74	125-501-021																		
35	75	Underutilized	Son Valley (12)	052-211-045	1.76	8	1	UR 5	R1 B6 5DU/AC	0	0	0	0	20	2	10	8	Yes	Yes
36	76	Underutilized	Son Valley (11)	054-130-030	1.60	8	1	UR 5	R1 B6 5DU/ACSRSD	0	0	0	0	18	2	9	7	Yes	Yes
37	77	Underutilized	Son Valley (12)	056-072-043	1.28	6	1	UR 5	R1 B6 5DU/ACSRSD	0	0	0	0	14	2	7	5	Yes	Yes
38	78	Underutilized	Son Valley (12)	133-150-039	2.37	11	1	UR 5	R1 B6 5DU/ACF2BR	0	0	0	0	27	3	14	10	Yes	Yes
SUBTOTAL					54.63	260	25			0	0	0	0	283	37	206	123		

UR 6

Site#	Map ID#	Status	Urban Service Area (Map #)	APN #	Acres	Units Base	Exist Units	GP Den.	Zoning	Housing Opportunity A				Housing Opportunity C				Water Available?	Sewer Available?
										T	VL	L	AM	T	VL	L	M		
39	27	Vacant and Underutilized	Geyserville (3)	140-130-027	5.01	28	3	UR 6	R2 B6 6DU/AC	62	15	12	35	57	7	29	21	Yes	Yes
	81			140-130-005															
	82			140-130-028															
	84			140-150-012															
40	79	Underutilized	Geyserville (3)	140-100-004	4.67	27	6	UR 6	R2 B6 6DU/AC	58	13	12	33	53	6	26	21	Yes	Yes
	80			140-100-013															
	83			140-130-059															
41	85	Underutilized	Penngrove (6)	047-173-016	1.36	8	1	UR 6	R2 B6 6DU/AC	17	4	3	10	15	2	7	6	Yes	Yes
42	86	Underutilized	Son Valley (12)	052-173-007	0.87	5	2	UR 6	R2 B6 6DU/AC	11	3	2	6	10	1	5	4	Yes	Yes
43	87	Underutilized	Son Valley (12)	052-272-027	1.43	8	1	UR 6	R2 B6 6DU/AC	18	4	4	10	16	2	8	6	Yes	Yes
SUBTOTAL					13.34	76	13			96	35	33	74	151	18	75	56		

UR 8

Site#	ID#	Status	Urban Service Area (Map #)	APN #	Acres	Units Base	Exist Units	GP Den.	Zoning	Housing Opportunity A				Housing Opportunity C				Water Available?	Sewer Available?
										T	VL	L	AM	T	VL	L	M		
44	29	Vacant	RR (8)	070-100-042	1.00	8	0	UR 8	R2 B6 8DU/ACF1F2BRSR	16	4	3	9	0	0	0	0	Yes	Yes
SUBTOTAL					1.00	8	0			16	4	3	9	0	0	0	0		

Table 4

UR 10

Site#	Map ID#	Status	Urban Service Area (Map #)	APN #	Acres	Units Base	Exist Units	GP Den.	Zoning	Housing Opportunity A				Housing Opportunity C				Water Available?	Sewer Available?
										T	VL	L	AM	T	VL	L	M		
45	89		RR (6)	070-020-037	0.78	7	1	UR 10	R2 B6 10DU/AC F2	18	4	3	9	0	0	0	0	Yes	Yes
46	90 93	Underutilized	SR (10)	043-141-002 043-141-045	2.57	25	7	UR 10	R2 B6 10DU/AC	52	11	10	31	0	0	0	0	Yes	Yes
47	30 81 92	Vacant and Underutilized	SR (10)	043-141-033 043-141-020 043-141-035	3.27	31	5	UR 10	R2 B6 10DU/AC	87	15	13	38	0	0	0	0	Yes	Yes
48	94	Underutilized	SR (10)	043-143-004	3.74	37	16	UR 10	R2 B6 10DU/AC	75	15	15	45	0	0	0	0	Yes	Yes
49	95 96 97 98 99	Underutilized	SR (10)	043-144-001 043-144-003 043-144-004 043-144-005 043-144-006	6.25	61	5	UR 10	R2 B6 10DU/AC	126	27	25	74	0	0	0	0	Yes	Yes
50	100 101	Underutilized	SR (9)	125-251-001 125-251-002	2.54	24	2	UR 10	RR B6 10AC	52	11	10	31	0	0	0	0	Yes	Yes
51	31 102 103	Vacant and Underutilized	SR (9)	125-252-002 125-252-003 125-252-004	13.58	135	2	UR 10	RR B6 10AC	273	56	55	162	0	0	0	0	Yes	Yes
SUBTOTAL					32.73	320	38			533	115	107	318	0	0	0	0		

UR 11

Site#	ID#	Status	Urban Service Area (Map #)	APN #	Acres	Units Base	Exist Units	GP Den.	Zoning	Housing Opportunity A				Housing Opportunity C				Water Available?	Sewer Available?
										T	VL	L	AM	T	VL	L	M		
52	32 33	Vacant	Larkfield (5)	039-025-082 039-025-083	4.57	49	0	UR 11	R2 B6 11DU/AC	101	21	20	60	0	0	0	0	Yes	Yes
53	35		Larkfield (5)	059-230-071	3.06	33	0	UR 11	R2 B6 11DU/AC	68	14	14	40	0	0	0	0	Yes	Yes
54	104 105 108	Underutilized	Larkfield (5)	039-025-003 039-025-005 039-025-071	2.43	26	3	UR 11	R2 B6 11DU/AC	55	12	11	32	0	0	0	0	Yes	Yes
55	106 107	Underutilized	Larkfield (5)	039-025-053 039-025-054	4.31	46	4	UR 11	R2 B6 11DU/AC	95	20	19	56	0	0	0	0	Yes	Yes
56	109		Larkfield (5)	039-390-015	0.67	7	1	UR 11	R2 B6 11DU/AC	15	3	3	9	0	0	0	0	Yes	Yes
57	110 112 113 114 115 117 118	Underutilized	Larkfield (5)	058-171-006 058-171-023 058-171-024 058-171-025 058-171-032 058-171-039 058-171-040	7.86	85	34	UR 11	R2 B6 11DU/AC	176	39	34	103	0	0	0	0	Yes	Yes
	116		Larkfield (5)	058-171-033	1.27	13	6	UR 11	R2 B6 11DU/AC	26	6	6	16	0	0	0	0	Yes	Yes
SUBTOTAL					24.17	259	48			538	115	107	318	0	0	0	0		

Table r.4

UR 15

Site#	ID#	Status	Urban Service Area (Map #)	APN #	Acres	Units Base	Exist Units	GP Den.	Zoning	Housing Opportunity A				Housing Opportunity C				Water Available?	Sewer Available?
										T	VL	L	AM	T	VL	L	M		
58	36	Vacant and Underutilized	SR (9)	043-064-010	4.17	61	4	UR 15	R3 B6 15DU/ACSR	128	27	26	75	0	0	0	0	Yes	Yes
	121			043-064-007															
	122			043-064-008															
	123			043-064-009															
124	043-064-011																		
59	37	Vacant and Underutilized	SR (9)	125-381-003	5.84	87	1	UR 15	R3 B6 15DU/AC	176	36	35	105	0	0	0	0	Yes	Yes
	134			125-381-004															
60	120	Underutilized	SR (9)	043-064-004	1.09	18	1	UR 15	R3 B6 15DU/ACSR	33	7	7	19	0	0	0	0	Yes	Yes
	126			125-131-029															
61	127	Underutilized	SR (9)	125-131-030	2.49	35	8	UR 15	R3 B6 15DU/AC	76	17	16	43	0	0	0	0	Yes	Yes
	128			125-131-031															
	129			125-131-032															
	130			125-131-033															
61	131	Underutilized	SR (9)	125-131-053	1.32	19	1	UR 15	R3 B6 15DU/AC	40	8	8	24	0	0	0	0	Yes	Yes
62	134	Underutilized	SR (9)	125-381-004	4.95	74	1	UR 15	R3 B6 15DU/AC	149	30	30	89	0	0	0	0	Yes	Yes
SUBTOTAL					19.86	292	16			602	25	22	355	0	0	0	0		

UR 17

Site#	ID#	Status	Urban Service Area (Map #)	APN #	Acres	Units Base	Exist Units	GP Den.	Zoning	Housing Opportunity A				Housing Opportunity C				Water Available?	Sewer Available?
										T	VL	L	AM	T	VL	L	M		
63	136	Underutilized	RR (8)	072-120-046	0.36	5	3	UR 17	R3 B6 17 F2 SR	12	3	2	7	0	0	0	0		
SUBTOTAL					0.36	5	3							0	0	0	0		

UR 20

Site#	ID#	Status	Urban Service Area (Map #)	APN #	Acres	Units Base	Exist Units	GP Den.	Zoning	Housing Opportunity A				Housing Opportunity C				Water Available?	Sewer Available?
										T	VL	L	AM	T	VL	L	M		
64	137	Underutilized	Son Valley (11)	054-340-033	0.36	7	1	UR 20	R3 B6 20HD SD	15	3	3	9	0	0	0	0	Yes	Yes
SUBTOTAL					0.36	7	1							0	0	0	0		

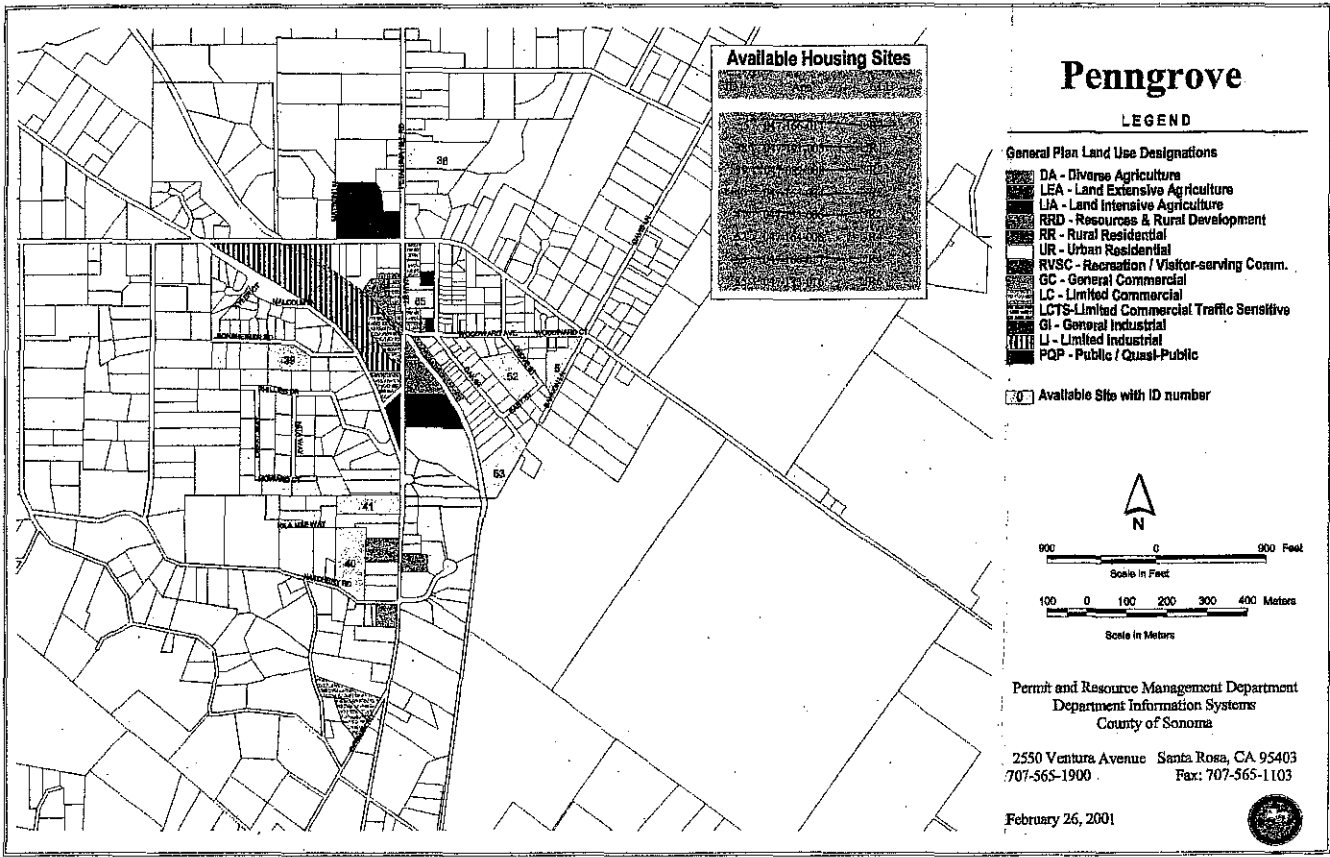
TOTAL	Acres	Units Base	Exist Units	Housing Opportunity A				Housing Opportunity C			
				T	VL	L	AM	T	VL	L	M
	188.96	1393	160	2010	428	401	1181	1091	134	641	416

TOTAL UNITS ALLOWED ON VACANT AND UNDERUTILIZED RESIDENTIALLY ZONED PROPERTIES

T	VL	L	M	AM
3101	562	942	416	1181

NOTES:

Shaded totals reflect the highest-yielding housing programs. These totals are reflected in the grand totals.



DISTRICT 08-PENNGROVE

RATE 541.00 RATE2 0.00

45
46
47
48
49

APN	CHG CD.	TRA	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT	SITUS ADDRESS
047-052-027	1	138-007	0051	1.00	541.00	MC HUGH B ELAINE ET AL	SFD (MS 7092)	01997 140 PENNGROVE
047-052-028	1	138-007	0057	1.80	973.80	BRAYTON STANLEY W	SFD+GU 00-0470 00-0417 02001	100 PENNGROVE
047-071-011	1	138-007	0052	2.00	1082.00	TENNYSON HELEN	2 SFD	A4547 795 GOODWIN
047-082-001	0	138-007	0050	.00	.00	WILKINSON JAMES CARTER TR	MAINSHH10LATS 00-0384 00-0051	191 PENNGROVE
047-082-008	1	138-007	0052	2.80	1514.80	GOSSAGE JOSEPHINE A TR	2 RES.+MOBILE	A4161 405 RONSHEIMER
047-082-022	1	138-007	0051	1.00	541.00	TARCA MADELINE R TR	1 SFD	A4704 6167 OLD REDWOOD HWY
047-082-023	1	138-007	0051	1.00	541.00	HEIKELL EVELYN	1 SFD	A4705 6171 OLD REDWOOD HWY
047-082-026	1	138-007	0051	1.00	541.00	HENDERSON ALLAN E & VANETTA J	1 SFD	A4198 6061 OLD REDWOOD HWY
047-082-030	1	138-007	0051	1.00	541.00	MOORE LAWRENCE D & SHEILA R	1 SFD	A4540 530 PALM
047-082-031	1	138-007	0051	1.00	541.00	HUNT JOHN S & DONNA J	1 SFD	A4541 520 PALM
047-082-035	1	138-007	0051	1.00	541.00	ORR NORMAN	SFD PLNCHK 01-436 A4542	6079 OLD REDWOOD HWY
047-082-036	1	138-007	0051	1.00	541.00	TUFT JED L & CONNIE A	1 SFD	A4545 501 RONSHEIMER
047-082-037	1	138-007	0051	1.00	541.00	OCHS LOIS M TR	1 SFD	A4544 503 RONSHEIMER
047-082-038	1	138-007	0052	2.00	1082.00	HENDERSON ALLAN E & VANETTA J	2 SFD	A4197 6055 OLD REDWOOD HWY
047-082-046	1	0-000	0000	1.00	541.00		SFD 01-0279	0
047-083-006	1	138-007	0052	3.00	1623.00	BURKE BRIAN H	3 SFD	A4158 6075 OLD REDWOOD HWY
047-083-019	1	138-007	0057	2.00	1082.00	MILLER EUGENE A & PHYLLIS F TR	2SFD ZLAT 99-0503 99-0069(005)	408 RONSHEIMER
047-083-020	1	138-007	0056	1.80	541.00	CASTELLI ANTONIO	SFD 00-0091 99-053 A4158	406 RONSHEIMER
047-083-021	1	138-007	0056	1.80	541.00	HEAGLEY DARRELYN ET AL	SFD 99-0503 99-0069 WAS 005	400 RONSHEIMER
047-084-003	1	138-008	0090	35.20	19043.20	VALCESCHINI HAROLD & JOAN TR	41 MH, DUPLX, COTTAGE	A4620 6070 OLD REDWOOD HWY
047-084-004	1	138-008	0320	3.80	2055.80	BRANDAL THOMAS & KATHY	SEE APN & UP 9989 1648 A4645	100 ADOBE
047-084-005	1	138-008	0051	1.80	973.80	COOK CLARENCE D & EDITH H	SFD + GU	A4650 162 ADOBE
047-084-007	1	138-008	0010	1.80	973.80	CHEEK DONALD T & PATRICIA A	SFD + GU	A4128 240 ADOBE
047-084-008	1	138-008	0010	1.80	541.00	TERRIBILINI JOSEPH C & VIRGINI SFD		A4637 186 ADOBE
047-091-007	1	138-008	0051	1.00	541.00	CAMPBELL ROBERT M & PAULA G	1 SFD	A4190 8815 PETALUMA HILL
047-091-013	1	138-008	0052	2.00	1082.00	WHITE SCOTT ET AL	2 SFD	A4150 355 ADOBE
047-091-018	1	138-008	0051	1.00	541.00	BECKMANN RALPH & GAIL ALTSCHUL	1 SFD	A4177 8925 PETALUMA HILL

DISTRICT 08-PENNGROVE

RATE 541.00 RATE2 0.00

APN	CHG CD.	TRA	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT	SITUS ADDRESS
047-091-020	7	138-008	0940	7.68	4154.88	PENNGROVE SCHOOL DISTRICT	SCHOOL INV ADA A4742	8945 PETALUMA HILL
047-091-028	6	138-008	0940	.00	.00	PETALUMA CITY SCHOOL DIST OF T NT PUBLIC (NEC)		0 NONE
047-091-033	1	138-008	0052	9.00	4869.00	TERRIBILINI JOSEPH & VIRGINIA	5 SFD-1 APT-2 DUP	A4528 225 ADOBE
047-091-049	1	138-008	0051	1.00	541.00	SHAN JANET Y TR	SFD(MS8071)	A4135 8905 PETALUMA HILL
047-091-050	1	138-008	0051	1.00	541.00	GOLDBECK KENNETH & TOBIE	SFD(MS8071)	A4136 8845 PETALUMA HILL
047-091-052	1	138-008	0051	1.00	541.00	BONELLI RICHARD J & ANTOINETTE	SFD	125 ADOBE
047-091-053	0	138-008	0000	.00	.00	BONELLI RICHARD & ANTOINETTE	VAC	125 ADOBE
047-091-058	1	138-008	0051	1.00	541.00	GROSSMANN RICHARD J & LAURA A	SFD	99-0187 603 MATSONS
047-152-002	1	138-007	0052	1.00	541.00	PINE LORRAINE H TR	SFD V: 4/97	A4121 260 GOODWIN
047-152-003	1	138-007	0052	7.40	4003.40	KEPA ALICE ESTELLA TR	SFD/APT DLPX 4NH 3COMM OFFICE	5601 OLD REDWOOD HWY
047-152-004	0	138-007	0052	.00	.00	SCHWARTZ SYLVIA TR	NOT CONNECTED	5609 OLD REDWOOD HWY
047-152-006	1	138-007	0052	2.00	1082.00	LEE WINSTON WING & PUI KWAN TR	2 SFD	A4195 5621 OLD REDWOOD HWY
047-152-008	1	138-007	0051	1.00	541.00	SEPPA EMIL M & MARIE S TR ET A	1 SFD	A4611 217 HATCHERY
047-152-009	1	138-007	0010	2.00	1082.00	SCHWARTZ SYLVIA	2 SFD	A4607 5615 OLD REDWOOD HWY
047-152-010	1	138-007	0042	5.60	3029.60	BENSON INVESTMENTS INC	5 APT U + DPLX 01524 A4535	5675 OLD REDWOOD HWY
047-152-011	1	138-007	0320	1.80	973.80	BENSON INVESTMENTS INC	8900 SF WAREHOUSE	A4610 5701 OLD REDWOOD HWY
047-152-013	0	138-007	0052	.00	.00	PINE LORRAINE H TR	NOT CONNECTED	230 GOODWIN
047-152-014	1	138-007	0052	4.80	2596.80	PINE LORRAINE H TR	4 RES - 1 MOBILE	A4119 204 DENMAN
047-152-015	1	138-007	0054	1.60	865.60	KEPA ALICE ESTELLA TR	2 MOBILES SEE FILE	150 DENMAN
047-152-016	1	138-007	0010	1.80	541.00	LA MONICA JOSINE ET AL	SFD	01321 211 HATCHERY
047-152-017	1	138-007	0010	1.80	541.00	WRIGHT GREG M	SFD	01622 205 HATCHERY
047-152-018	1	138-007	0051	1.80	541.00	LAIN CONNIE	SFD	01625 203 HATCHERY
047-152-019	0	138-007	0050	.00	.00	LEE WINSTON WING & PUI KWAN TR	VAC	7863 0 GOODWIN
047-152-020	0	138-007	0050	.00	.00	LEE WINSTON WING & PUI KWAN TR	VAC	7863 0 GOODWIN
047-152-021	1	138-007	0051	1.00	541.00	LEE WINSTON WING & PUI KWAN TR	SFD 7863 6609 1704 A4194	630 GOODWIN
047-152-022	1	138-007	0051	1.00	541.00	LEE WINSTON WING & PUI KWAN TR	SFD 7863 6609 1704 A4194	638 GOODWIN
047-153-004	1	138-007	0051	1.00	541.00	CREIGHTON DORIS A TR	1 SFD	A4612 220 HATCHERY

DISTRICT 08-PENNGROVE				RATE 541.00 RATE2 0.00		LISTING		10/17/01 PAGE 561	
APN	CHG CD.	TRA	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT	SITUS ADDRESS	
047-153-005	1	138-007	0051	1.00	541.00	BOTTARINI GEORGE R JR & PHYLLI	1 SFD	A4522	5797 OLD REDWOOD HWY
047-153-006	1	138-007	0052	2.00	1082.00	GARZOLI STELLA M TR	2 SFD	A4185	5865 REDWOOD
047-153-007	1	138-007	0051	1.00	541.00	HOAR MARILYNNE S ET AL	1 SFD	A4523	5703 OLD REDWOOD HWY
047-153-008	0	138-007	0054	.00	.00	HOAR MARILYNNE S ET AL	VACANT		5721 OLD REDWOOD HWY
047-153-009	1	138-007	0052	2.00	1082.00	BOTTARINI GEORGE TR ET AL	2 SFD	A4614	5739 OLD REDWOOD HWY
047-153-010	1	138-007	0280	4.40	2380.40	BOTTARINI GEORGE TR ET AL	60 SEAT BAR + 4 BAY GAR	A4521	5745 OLD REDWOOD HWY
047-153-011	0	138-007	0054	.00	.00	BOTTARINI GEORGE TR ET AL	VACANT/RZ10453		5795 OLD REDWOOD HWY
047-153-014	1	138-007	0051	1.00	541.00	BUTTERWORTH ROBERT C & JACQUEL	1 SFD	A4546	802 GOODWIN
047-153-018	1	138-007	0051	1.00	541.00	ORSINI JAMES J	1 SFD	A4613	222 HATCHERY
047-153-020	1	138-007	0057	1.80	973.80	KOBROFSKY MARVIN & RITA ET AL	SFD+GRANNY	8094 7873 A4732	800 GOODWIN
047-153-021	1	138-007	0051	1.00	541.00	HORN JAMES L & CELESTE Y	SFD	7424 6681	210 NILA MAE
047-153-022	1	138-007	0051	1.00	541.00	LUTZ JAMES E & NORMA L TR	SFD	6962 6681	220 NILA MAE
047-153-023	1	138-007	0051	1.00	541.00	STUTRUD ADRIENE	SFD	A4733	230 NILA MAE
047-161-003	6	138-008	0941	1.70	919.70	RANCHO ADOBE FIRE PROTECTION D	NT INV-FIRE	20355 20472 A418	11007 PETALUMA HILL
047-161-006	0	138-008	0100	.00	.00	SESSI MARTIN TR ET AL	LAT BLDGSEWER 01-411 NO OCC		10098 MAIN
047-162-006	1	138-008	0010	1.00	541.00	ALMEIDA JOSEPH & MARIE TR	1 SFD	A4608	9981 GROVE
047-162-007	1	138-008	0052	2.00	1082.00	LEWIS RICHARD H & ANDREA L	2 SFD	A4648	498 ADOBE
047-162-008	1	138-008	0010	1.00	541.00	PORTELLI FRANK & JOLENE	SFD	A4514	9971 GROVE
047-162-009	1	138-008	0051	1.00	541.00	SIM CYRIL MOOGEL & JAE KYUNG	1 SFD	A4515	500 ADOBE
047-162-011	1	138-008	0051	1.00	541.00	RICHMOND BRADFORD S & JANE E	SFD V3NOV98		9885 GROVE
047-162-012	1	138-008	0010	1.00	541.00	ORME BONNIE	SFD	01091	9997 GROVE
047-162-013	1	138-008	0052	1.80	973.80	ROEMER FRED W	SFD + GRANNY	8592 0420	9991 GROVE
047-162-014	1	138-008	0051	1.80	973.80	BROWN KRISTIN E	SFD + GU	8082 7705 A4705	269 WOODWARD
047-162-015	1	138-008	0010	1.00	541.00	SANTERD BARRY J & LOIS B TR	SFD	8084	285 WOODWARD
047-162-016	1	138-008	0010	1.00	541.00	REICHARDT JAMES D & ALLISON C	SFD	8083	291 WOODWARD
047-164-002	1	138-008	0010	1.00	541.00	CALLEN TIMOTHY J & MARLENE	1 SFD	A4549	309 OAK
047-164-003	1	138-008	0010	1.00	541.00	BRANT KENNETH L & MARILYN N TR	1 SFD	A4520	301 OAK

DISTRICT 08-PENNGROVE				RATE 541.00 RATE2 0.00		LISTING		10/17/01 PAGE 562	
APN	CHG CD.	TRA	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT	SITUS ADDRESS	
047-164-006	1	138-008	0051	1.00	541.00	KANDY INVESTMENTS LLC ET AL	PC - BAHNSEN SUB	41305 A4530	10025 GROVE
047-164-011	1	138-008	0010	1.00	541.00	LIBERATI LOUIS R & JOLYNE D	1 SFD	146	205 EAST
047-164-013	1	138-008	0010	1.00	541.00	WURST TIMOTHY C & JANICE I	SFD	00872	270 WOODWARD
047-164-014	1	138-008	0010	1.80	973.80	MC CLELLAND EARTHA D	SFD + APT	A4146	286 WOODWARD
047-164-016	1	138-008	0010	1.00	541.00	GREFFLY WILLIAM J & GLENDA K	SFD	A4640	409 OAK
047-164-017	1	138-008	0032	2.60	1406.60	SOMMERS JEFFREY L	SFD+DUPLX	A4640	416 OAK
047-164-018	1	138-008	0051	1.00	541.00	JAMES JULIE ET AL	SFD	A4147	292 WOODWARD
047-164-019	0	138-008	0000	.00	.00	DEMPSEY SETH & JOHANNA	VAC		0 GROVE
047-165-003	1	138-008	0051	1.00	541.00	FECHTER GAREN DALE ET AL	1 SFD	A4189	714 OLD ADOBE
047-165-004	1	138-008	0010	1.00	541.00	REIS JEFFREY DEAN	SFD	A4626	9996 WOODWARD
047-165-005	1	138-008	0057	1.80	973.80	PROULX ALBERT G & ANDREA L	SFD+GRANNY	30691 A4625	9994 WOODWARD
047-165-006	1	138-008	0051	1.00	541.00	PIAZZA JAMES A & ANNETTE M ET	1 SFD	A4624	9995 WOODWARD
047-165-007	1	138-008	0010	1.00	541.00	WACKER GREGORY MARVIN & MARIA	SFD LOT1	6297 6131 5785 A4192	325 WOODWARD
047-165-008	1	138-008	0010	1.00	541.00	WALSH JOHN T & JOAN M	SFD LOT2	6298 6131 5785 A4192	9990 GROVE
047-165-009	1	138-008	0010	1.00	541.00	HASLAM GERALD W & JANICE E	SFD+APT 01-422	6298 6131 A4192	9986 GROVE
047-165-010	1	138-008	0010	1.00	541.00	ADAMS STEPHAN M	SFD LOT4	A4192	9980 GROVE
047-165-011	1	138-008	0010	1.00	541.00	CONLON J PATRICK & PATRICIA S	SFD LOT5	6300 6131 5785 A4192	9970 GROVE
047-165-012	1	138-008	0010	1.00	541.00	OVA GENE D & ANN M TR	SFD LOT7	6301 6131 5785 A4192	620 OLD ADOBE
047-165-013	1	138-008	0010	1.00	541.00	PEROTTI DAVID M & KIMBERLY D	SFD LOT6	6302 6131 5785 A4192	355 WOODWARD
047-166-003	1	138-008	0051	1.00	541.00	WILLIAMSON LOTTIE PEARL	1 SFD	A4145	264 EAST
047-166-004	0	138-008	0005	.00	.00	HOWE KEN ET AL	4CAR GARAGE V17AUG98		10050 GROVE
047-166-005	1	138-008	0022	1.80	973.80	JENSEN DOUGLAS A & NANCY A	SFD + GRANNY	9236 A4173	10020 GROVE
047-166-006	1	138-008	0051	1.00	541.00	HICKS JAMES P & CINDY L	1 SFD	A4152	10028 GROVE
047-166-007	1	138-008	0051	1.00	541.00	HOWE KEN ET AL	1 SFD	A4176	10050 GROVE
047-166-010	1	138-008	0051	1.00	541.00	LICHAU GLORIA TR	1 SFD	A4175	450 WOODWARD
047-166-011	0	138-008	0054	.00	.00	HOWE KEN ET AL	VACANT 2.65ACRE V17AUG98		10050 GROVE
047-166-012	0	138-008	0050	.00	.00	LICHAU GLORIA J	DRIVEWAY/EASEMENT V17AUG98		440 WOODWARD

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DISTRICT 08-PENNGROVE				RATE 541.00	RATE2 0.00				
APN	CHG CD.	TRA	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT	SITUS ADDRESS	
047-166-013	1	138-008	0051	1.00	541.00	KALOGIANNIS JOHN P & MARIE E T 1	SFD	A4168	460 WOODWARD
047-166-014	1	138-008	0010	1.00	541.00	FISHMAN WILLIAM R & MARGARET H	SFD	00553	240 EAST
047-166-015	1	138-008	0010	1.00	541.00	MEDINA EMIL ET AL	SFD	A4183	200 EAST
047-166-016	1	138-008	0010	1.00	541.00	STANDRING LOIS	SFD	00554	501 OAK
047-166-017	1	138-008	0051	1.80	973.80	NISSEN NAHMEN B TR	SFD + MH	01121/A4702	502 OAK
047-166-018	1	138-008	0010	1.00	541.00	NISSEN NAHMEN B TR	SFD	A4701	500 OAK
047-166-019	1	138-008	0010	1.00	541.00	MARCUS CORY	SFD V17AUG98	A4126	470 OAK
047-166-021	1	138-008	0010	1.00	541.00	WISE ROGER M & TERESA A	SFD	A4115	308 OAK
047-166-022	1	138-008	0010	1.00	541.00	SHAW LINDA LEE TR	SFD	A4157	300 OAK
047-166-023	1	138-008	0320	1.28	692.48	NISSEN NAHMEN B TR	6400 SF WAREHOUSE	A4703	11790 MAIN
047-166-024	0	138-008	0690	.00	.00	PENNGROVE SOCIAL FIREMEN	PENNGROVE COMMUNITY PARK		11800 MAIN
047-166-025	1	138-008	0320	1.00	541.00	NEGRO ANTHONY C & REBEKAH L	WHSE	A4736	11830 MAIN
047-166-026	1	138-008	0690	2.00	1082.00	PENNGROVE SOCIAL FIREMEN	SFD+RSTRMS V3NOV98 7429	A4550	11850 MAIN
047-166-028	1	138-008	0010	1.00	541.00	BENDER BERNARD J & REBECCA	SFD A4531		716 WOODWARD
047-166-029	1	138-008	0051	1.00	541.00	CUMMINGS BANO	SFD	01292	718 WOODWARD
047-166-030	1	138-008	0329	2.00	1082.00	T C ENTERPRISES	MINI STRGE+SFD 99-0346		120 WOODWARD
047-166-031	1	138-008	0051	1.00	541.00	CHRETIEN DENIS N & JACQUELINE	SFD	A4156	5868 OLD REDWOOD
047-166-032	1	138-008	0057	1.80	973.80	KALAM MOHAMMAD & SONIA	SFD+GRANNY 10056 10053	8416	804 LICHAU WOODS
047-166-033	1	138-008	0051	1.00	541.00	KROLAK PAUL ROBERT & JANET L T	SFD 0052 8249		806 LICHAU WOODS
047-166-034	1	138-008	0010	1.00	541.00	SANDBERG DAMON C & JANET A	SFD	8415	808 LICHAU WOODS
047-166-035	1	138-008	0051	1.00	541.00	CERESA SCOTT B & JACQUELINE LE	SFD 0162 8430		810 LICHAU WOODS
047-166-036	0	138-008	0050	.00	.00	KISSMANN GUNNART & SALLY M ET	VAC		0 NONE
047-166-037	1	138-008	0010	1.00	541.00	TUCK FRED JAMES JR & CINDY MAR	SFD	96-0067	400 OAK
047-166-038	1	138-008	0010	1.00	541.00	TUSLER ANTHONY F TR ET AL	SFD		410 OAK
047-166-039	1	138-008	0010	1.00	541.00	FLORES RENE E JR	SFD LOT 3	41256	420 OAK
047-166-040	1	138-008	0010	1.00	541.00	EVANS CHARLES W & HANNELORE J	SFD LOT 4	41131	440 OAK
047-166-041	1	138-008	0010	1.00	541.00	CARPENTER E STAR ET AL	SFD	41387	0 OAK

DISTRICT 08-PENNGROVE				RATE 541.00	RATE2 0.00				
APN	CHG CD.	TRA	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT	SITUS ADDRESS	
047-166-042	1	138-008	0051	1.00	541.00	ROBIN MONIKA	SFD LOT 6	41126	480 OAK
047-166-043	0	138-008	0850	.00	.00	NORTHWESTERN PACIFIC RAILROAD	NT VACANT		0 NONE
047-166-044	1	138-008	0052	1.80	973.80	BOYSEN SOENKE G & HARRIET C TR	SFD+GU	41117 A4144	0 EAST
047-166-045	0	138-008	0801	.00	.00	STANDRING LOIS	VACANT+LAT 0.37ACRE	97-0333	400 BANNON
047-171-004	1	138-008	0010	1.80	973.80	HITCHCOCK FRANCES J	SFD + GU	A4157	9990 OAK
047-171-005	1	138-008	0010	1.00	541.00	BELL TIMOTHY JAMES & JENNIFER	SFD+LATERAL	99-0135 A4196	265 WOODWARD
047-171-006	1	138-008	0010	1.00	541.00	SLACK RONALD JR & LORI	SFD	00631	263 WOODWARD
047-171-011	1	138-008	0010	1.00	541.00	HICKLES LINDSAY M TR	1 SFD	A4629	275 WOODWARD
047-171-013	1	138-008	0010	1.00	541.00	PERKINS ELSEBETH TR	1 SFD	A4114	9936 OAK
047-171-015	1	138-008	0010	1.00	541.00	MC RAE JOHN & MOIRA AGNES	SFD	4789	9996 OAK
047-171-016	1	138-008	0010	1.00	541.00	CLARK JIM W & CINDY A	SFD	01120	9998 OAK
047-171-017	1	138-008	0010	1.00	541.00	PALLMANN MARYANNE	SFD	A4744	261 WOODWARD
047-171-022	1	138-008	0010	1.00	541.00	DAVIDSON STEVEN	SFD		9960 OAK
047-171-023	1	138-008	0010	1.00	541.00	BORDESSA JERRY A & JEAN M	SFD	30671 30635	9968 OAK
047-171-025	1	138-008	0010	1.00	541.00	DE HAAN ABEL & FRANCES	SFD	4895	9982 OAK
047-171-026	0	138-008	0000	.00	.00	KINT THOMAS M & MARIE J	VACANT		9980 OAK
047-171-027	0	138-008	0000	.00	.00	KINT THOMAS M & MARIE J	VACANT		9982 OAK
047-171-028	1	138-008	0010	1.00	541.00	GOLDBECK ELLA K TR	SFD	A4110	0 NONE
047-171-029	1	138-008	0010	1.00	541.00	MORRIS ROBERT M ET AL	SFD	01515	9956 OAK
047-171-030	1	138-008	0010	1.80	541.00	OSBORN CHARLES R & PAULINE I	SFD	A4164	9984 OAK
047-171-031	0	138-008	0001	.00	.00	KINT THOMAS M & MARIE J	VAC		0 NONE
047-171-032	1	138-008	0010	1.00	541.00	KINT THOMAS M & MARIE J	SFD	5883	9986 OAK
047-171-033	0	138-008	0001	.00	.00	KINT THOMAS M & MARIE J	VAC		0 NONE
047-171-034	0	138-008	0001	.00	.00	KINT THOMAS M & MARIE J	VAC		0 NONE
047-171-036	1	138-008	0010	1.00	541.00	CERMAK FRANK S & KATHLEEN M	SFD+SHOP	A4105	9950 OAK
047-171-037	1	138-008	0010	1.00	541.00	STEPHENSON MATTHEW & ELIZABETH	SFD	97-0437 97-0434	100 EICHTEN
047-171-039	1	138-008	0010	1.00	541.00	DION JEFFREY THOMAS & JOY LORR	SFD	98-0030 97-0434	120 EICHTEN

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DISTRICT 08-PENNGROVE				RATE 541.00	RATE2 0.00				
APN	CHG CD.	TRA	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT		SITUS ADDRESS
047-171-040	1	138-008	001	1.00	541.00	WOLLENBERGER LOUIS VERNON ET A	SFD	98-0082 97-0434	140 EICHTEN
047-171-041	1	138-008	0010	1.00	541.00	LIBOR CURTIS A	SFD	98-0199 97-0434	160 EICHTEN
047-172-003	1	138-008	0010	1.00	541.00	SHALAGIN SERGE R	1 SFD	A4630	289 OAK
047-172-004	1	138-008	0010	1.00	541.00	CHILTON FRANK B & JOAN D TR	SFD		285 OAK
047-172-005	1	138-008	0010	1.00	541.00	KOONCE RUSSELL I & RHEAMA S	SFD	A4155	256 WOODWARD
047-172-006	1	138-008	0010	1.00	541.00	MARKS JOYCE K & RICHARD L	SFD LOT 2 MS 8341	4922	254 WOODWARD
047-172-007	1	138-008	0010	1.00	541.00	WACKER LISETTE	SFD LOT 3	4955 4940 4816	271 OAK
047-172-008	1	138-008	0010	1.00	541.00	WACKER EARL TR ET AL	SFD LOT 4	4955 4940 4816	279 OAK
047-173-002	1	138-008	0010	1.00	541.00	SILVEIRA TROY R ET AL	1 SFD	A4543	9947 OAK
047-173-003	1	138-008	0710	1.00	541.00	PENNGROVE COMMUNITY CHURCH	CHURCH	A4130	9970 OAK
047-173-004	0	138-008	0711	.00	.00	PENNGROVE COMMUNITY CHURCH	PARKING LOT V17AUG98		9971 OAK
047-173-005	1	138-008	0010	1.00	541.00	LENTZ ALICE G	1 SFD	A4108	9985 OAK
047-173-007	1	138-008	0640	1.00	541.00	PENNGROVE SOCIAL FIREMEN	LODGE HALL	A4601	385 WOODWARD
047-173-008	1	138-008	0780	1.00	541.00	HUTCHINSON GERALD KELLY	FIREHOUSE VOLUNTEER	A4154	365 WOODWARD
047-173-009	1	138-008	0320	1.16	627.56	MAYFIELD CLYDE A	ZWHSE/OFF+/RETAIL	A4166	9550 PETALUMA HILL
047-173-010	1	138-008	0113	4.00	2164.00	TERRIBILINI JOSEPH C & VIRGINI	COMMERCIALSUNITS+SFD	A4178	10010 MAIN
047-173-011	1	138-008	0010	1.00	541.00	DLUZAK CHRISTOPHER	1 SFD	A4174	361 WOODWARD
047-173-012	1	138-008	0010	1.00	541.00	SARASY LE ANNE S & BRIAN P	1 SFD	A4109	9937 OAK
047-173-016	1	138-008	0051	1.00	541.00	PENNGROVE COMMUNITY CHURCH	SFD	A4127	9989 OAK
047-173-017	1	138-008	0010	1.00	541.00	PENNGROVE COMMUNITY CHURCH	SFD	A4131	9995 OAK
047-173-018	0	138-008	0100	.00	.00	MONDINO BILL JACK & LUCY	VACANT 0.44ACRE V17AUG98		9500 MAIN
047-174-003	1	138-008	0010	1.00	541.00	BRANT DARREL M & LAURIE E	1 SFD	A4619	280 OAK
047-174-004	1	138-008	0010	1.00	541.00	SILVA HAROLD E JR	1 SFD	A4743	282 OAK
047-174-005	1	138-008	0010	1.00	541.00	MEYER THOMAS G & SHELLY A	1 SFD	A4519	286 OAK
047-174-006	1	138-008	0010	1.00	541.00	MEIER VAIRA TR	1 SFD	A4718	290 OAK
047-174-008	1	138-008	0112	3.00	1623.00	NISSEN NAHMEN B TR	COMMERCIALSUNITS	A4703	10070 MAIN
047-174-009	0	138-008	0811	.00	.00	NISSEN NAHMEN B TR	UTILITY EASEMENT		10078 MAIN

DISTRICT 08-PENNGROVE				RATE 541.00	RATE2 0.00				
APN	CHG CD.	TRA	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT		SITUS ADDRESS
047-174-012	1	138-008	0010	1.00	541.00	MC CLINTOCK ESTHER L TR	SFD	A4106	201 WOODWARD
047-174-014	1	138-008	0051	1.00	541.00	KNOLL DANIEL D & MARTHA E	SFD	7580 0823	278 OAK
047-174-015	1	138-008	0010	1.00	541.00	FRANCIS DAVID H & EILEEN M	SFD		276 OAK
047-181-001	1	138-008	0010	1.00	541.00	MEYER KRISTIN LUND & MICHAEL D	1 SFD	A4148	9483 MAIN
047-181-003	1	138-008	0010	1.00	541.00	SCOTT MARK S JR	1 SFD	A4532	9575 PETALUMA HILL
047-181-004	1	138-008	0110	1.00	541.00	MERTES ANTHONY U TR	RETAIL STORE	A4734	9575 MAIN
047-181-006	0	138-008	0100	.00	.00	HERPICK JOHN	VACANT		9901 MAIN
047-181-009	1	138-008	0121	1.87	1011.67	CURRAN PATRICK J	BEAUTY SHOP RETAIL BAR	A4169	10009 MAIN
047-181-011	1	138-008	0081	1.80	973.80	TRIMMER DIANE B ET AL	SEE FILE	A4191	10045 MAIN
047-181-014	1	138-008	0010	1.00	541.00	ZASTROW CHARLES J	1 SFD	A4524	11051 PETALUMA HILL
047-181-015	1	138-008	0720	1.80	973.80	CAESARI GEORGE TR	1 SFD + TLR	A4725	11201 MAIN
047-181-016	1	138-008	0170	1.00	541.00	HAZZIE RALPH N TR	POST OFFICE (1900SF)	01051	11401 PETALUMA HILL
047-181-018	1	138-008	0023	2.80	1514.80	THURSTON SCOTT W & MARY JO	2SFD+GU 00-0406 99-0478		228 ADOBE
047-181-020	1	138-008	0393	1.00	541.00	SORENSEN PHILLIP & CATHERINE T IND.		A4133	6040 OLD REDWOOD
047-181-027	0	138-008	0851	.00	.00	MYLES GEORGE & GLADYS M	R/W		10037 MAIN
047-181-028	0	138-008	0001	.00	.00	MOSHELL ADELINE H	NOT CONNECTED		11601 PETALUMA HILL
047-181-030	1	138-008	0113	2.60	1406.60	BAER LEWIS MICHAEL & JANET GLI	SEE FILE	A4636	9595 MAIN
047-181-032	0	138-008	0100	.00	.00	MERTES ANTHONY U TR	VACANT LOT		9585 MAIN
047-181-033	1	138-008	0202	1.00	541.00	LASLEY SPENCER H & LISA K ET A COML		A4167	9555 MAIN
047-181-034	1	138-008	0010	1.00	541.00	STEVENSON CINDY	1 SFD	A4149	9543 MAIN
047-181-035	1	138-008	0052	2.00	1082.00	BONELLI SHARON M	2 SFD	A4132	360 ADOBE
047-181-038	1	138-008	0320	1.00	541.00	MYLES GEORGE F & GLADYS H TR	FEED STORE	8123 8111	10035 MAIN
047-181-039	1	138-008	0121	3.20	1731.20	TOMROSE WILLIAM	3 APTS + 2 OFFICES	A4715	9591 MAIN
047-181-040	1	138-008	0341	1.00	541.00	BUCHANAN JACK D & LENELLA TR	COLD STORAGE	A4140	6030 OLD REDWOOD HWY
047-191-003	1	138-008	0051	1.80	973.80	PHILLIPS DONALD H	SFD + MH	6676 A4632	8840 PETALUMA HILL
047-191-010	1	138-008	0051	1.00	541.00	FUENTES SALVADORE & GEORGIA N	1 SFD	A4731	487 ADOBE
047-191-011	1	138-008	0051	1.80	973.80	SOARES DOROTHY E TR	SFD + GU	A4737	505 ADOBE

42 }
43 }

DISTRICT 08-PENNGROVE				RATE 541.00	RATE2 0.00				
APN	CHG CD.	TRA	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT	SITUS ADDRESS	
047-191-014	1	138-008	0052	2.00	1082.00	ESTRADA MICHAEL E & PATRICIA M 2	SFD	A4200	475 ADOBE
047-191-016	1	138-008	0051	1.00	541.00	BAUGARTEN ROSS & THERESA ANNE	1 SFD	A4142	8920 PETALUMA HILL
047-191-017	1	138-008	0051	1.00	541.00	WHEELER TREVOR J	1 SFD	A4533	8850 PETALUMA HILL
047-191-018	1	138-008	0051	1.00	541.00	NOWELL TIMOTHY G	1 SFD	A4518	8764 PETALUMA HILL
047-191-026	1	138-008	0010	1.00	541.00	SAVEL RICHARD L & ARLENE ET AL	1 SFD	A4644	511 ADOBE
047-191-030	1	138-008	0051	1.00	541.00	TARCA JOHN C & TERRI L	1 SFD	A4141	489 ADOBE
047-191-040	1	138-008	0051	1.00	541.00	CHOPNAK CHARLENE M ET AL	1 SFD	A4112	447 ADOBE
047-191-041	1	138-008	0051	1.00	541.00	SULLIVAN ELIZABETH S	SFD	3800 3779	449 ADOBE
047-191-042	1	138-008	0051	1.00	541.00	CAPDAREST JEAN B & TRAUTE E	SFD	A4502	8816 PETALUMA HILL
047-191-043	1	138-008	0051	1.00	541.00	CAPDAREST JEAN B & TRAUTE E	SFD	A4502	8810 PETALUMA HILL
047-191-044	1	138-008	0035	3.20	1731.20	CAPDAREST JEAN B & TRAUTE E	2 DPX	A4502	8790 PETALUMA HILL
047-191-045	1	138-008	0010	1.00	541.00	MC CULLOCH SCOTT W & CAROL E	SFD	A4609	8718 PETALUMA HILL
047-191-046	1	138-008	0052	2.60	1406.60	DEMPSEY JACK A & VICTORIA	SFD + 2 APTS	A4707	8722 PETALUMA HILL
047-191-047	1	138-008	0051	1.00	541.00	SOCHET TERRY DIANE TR	SFD+GARAGE	97-0336 A4139	8930 PETALUMA HILL
047-191-048	1	138-008	0052	1.80	973.80	SOCHET TERRY DIANE TR	SFD+GARAGE+GU	99-0175 99-0159	8922 PETALUMA HILL
047-191-049	1	138-008	0051	1.00	541.00	SOCHET TERRY DIANE TR	SFD GAR/W RM&BATH	00-0314	8926 PETALUMA HILL
047-191-050	0	138-008	0051	.00	.00	SAVEL RICHARD L & ARLENE E	NOT CONNECTED WAS	047-191-027	517 ADOBE
047-212-002	0	138-007	0050	.00	.00	WARD MELISSA TR ET AL	VACANT		5575 OLD REDWOOD HWY
047-212-003	1	138-007	0051	2.00	1082.00	WARD MELISSA TR ET AL	2 SFD	124	5586 OLD REDWOOD HWY
047-212-004	1	138-007	0051	1.00	541.00	WARD MELISSA TR ET AL	1 SFD	126	5580 OLD REDWOOD HWY
047-212-005	0	138-007	0050	.00	.00	CALDWELL MICHAEL C & CAROLE	VACANT		5579 OLD REDWOOD
047-213-004	1	138-011	0113	3.60	1947.60	GESSLER SIGRUN TR ET AL	1 RES-1 DUP-1 MKT	A4534	8 ELY
047-213-005	1	138-011	0280	2.00	1082.00	SENHOR SANTO CRISTO SOCIETY	AUTO SRVC (UP 10420)	A4750	5500 OLD REDWOOD HWY
047-213-009	0	138-011	0101	.00	.00	SENHOR SANTO CRISTO SOCIETY	NC (UP 10420)		79 ELY
047-214-005	1	138-007	0052	3.00	1623.00	SNYDERMAN FAMILY LLC	3 SFD	A4633	5520 OLD REDWOOD HWY
047-214-014	1	138-007	0051	1.00	541.00	FRITZ RUSSELL F & KARYN SARGAN	SFD LOT 1	96-0137	27 ELY
047-214-015	1	138-007	0051	1.00	541.00	ESTOURMES MICHAEL & JUDITH	SFD MS-7538	41599	29 ELY

DISTRICT 08-PENNGROVE				RATE 541.00	RATE2 0.00				
APN	CHG CD.	TRA	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT	SITUS ADDRESS	
047-214-016	1	138-007	0051	1.00	541.00	PETERSEN NIS S & DOREEN	SFD MS-7538 20389 20394	31	ELY
047-214-017	1	138-007	0051	1.00	541.00	YAVENNER RANDY L	SFD MS-7538 20388 20395	33	ELY
047-214-018	1	138-007	0051	1.00	541.00	SHADLEY CORWIN W	SFD(MS-7524)	7233 7229 A4728	5650 OLD REDWOOD
047-214-019	1	138-007	0051	1.00	541.00	SILACCI LLOYD H & JUNE TR	SFD-V 4/97		5660 OLD REDWOOD
047-214-020	1	138-007	0052	2.00	1082.00	CALDWELL MICHAEL C	2SFD	7233. 7229 A4729	5590 REDWOOD NORTH
047-214-021	1	138-007	0051	1.00	541.00	OLSEN JOHN H & DONNA L	SFD	A4729	5600 REDWOOD NORTH
047-221-001	1	138-007	0051	1.00	541.00	DURANDO JOHN A & FREIDA C	SFD	6623 A4605	5696 OLD REDWOOD HWY
047-221-002	1	138-007	0051	1.00	541.00	GERHARDT CLARENCE L & BETTY A	1 SFD	A4717	5700 OLD REDWOOD HWY
047-221-004	1	138-007	0281	1.00	541.00	SHOEMAKER JOHN H	AUTO SERV	A4639	5730 OLD REDWOOD HWY
047-221-005	1	138-007	0010	1.00	541.00	LEAVELL JENNIE K	1 SFD	A4143	5736 OLD REDWOOD HWY
047-221-006	1	138-007	0051	1.00	541.00	KELLEHER TRAVIS	1 SFD	132	5740 OLD REDWOOD HWY
047-221-015	1	138-007	0051	1.00	541.00	CROUSE JAMES & EILEEN	1 SFD	A4508	5800 OLD REDWOOD HWY
047-221-017	1	138-007	0051	1.00	541.00	DIAMANTINE TONY J	1 SFD	A4509	5866 OLD REDWOOD NOR
047-221-018	0	138-007	0050	.00	.00	MAGLIULO MARTIN & JENNIFER	VACANT		5820 OLD REDWOOD HWY
047-221-024	0	138-007	0540	.00	.00	MAGLIULO MARTIN & JENNIFER	VACANT		5836 OLD REDWOOD HWY
047-221-027	1	138-007	0051	1.00	541.00	JOHNSON WILLIAM J & BETTY J	1 SFD	A4604	321 BANNON
047-221-033	1	138-007	0010	1.00	541.00	PIOTRKOWSKI IRV & CLAUDIA L	SFD	4591	708 ADOBE
047-221-034	1	138-007	0051	1.00	541.00	AGUIAR ERNIE J & OLIVINE	SFD 28567A4529		704 ADOBE
047-221-035	1	138-007	0051	1.00	541.00	PIOTRKOWSKI	1 SFD	1611	275 BANNON
047-221-036	1	138-007	0051	1.00	541.00	STOCKHAM SUSAN K	SFD	3840	303 BANNON
047-221-037	0	138-007	0050	.00	.00	PIOTRKOWSKI IRV ET AL	VACANT		0 ADOBE
047-221-038	1	138-007	0010	1.00	541.00	PIOTRKOWSKI IRV	SFD (83)	01412	279 BANNON
047-221-039	1	138-007	0051	1.00	541.00	GHIRINGHELLI JON PHILIP	SFD	A4117	307 BANNON
047-221-040	1	138-007	0052	1.80	973.80	RANDALL MYRON & MARILYN	SFD + COTTAGE	A4117	309 BANNON
047-231-012	1	138-008	0051	1.00	541.00	BARELLA LINDA K ET AL	1 SFD	A4138	35 DAVIS
047-231-013	1	138-008	0051	1.00	541.00	BARELLA DONALD G & SUZANNE A	1 SFD	A4510	25 DAVIS
047-231-019	1	138-008	0051	2.60	1406.60	AARON VICTOR A TR	SFD + 2 GU	A4506	710 OLD ADOBE

DISTRICT 08-PENNGROVE				RATE 541.00	RATE2 0.00				
APN	CHG CD.	TRA	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT		SITUS ADDRESS
047-231-021	1	138-008	0010	1.00	541.00	BECHTOLD FRED G & JUDITH K.	1 SFD	01612	711 OLD ADOBE
047-231-023	1	138-008	0010	1.00	541.00	SCHULTZ LOUIS A & MARILYN S TR	1 SFD	01628	65 DAVIS
047-231-024	1	138-008	0051	1.00	541.00	DAVIS STEVEN H & VICKI J	SFD	01607	51 DAVIS
047-231-025	1	138-008	0052	1.80	973.80	STEWART LEROY H & MARY F	SFD+GU 99-0419		53 DAVIS
047-231-026	1	138-008	0051	1.00	541.00	REIDER HENRY J JR & ELIZABETH	SFD	6542 01298	55 DAVIS
047-231-027	1	138-008	0010	1.00	541.00	BAILLY KERRY & ANNIE	SFD	01348	57 DAVIS
047-231-032	0	0-000	0000	.00	.00		MAINLINE 99-0327 PLNCHK96-0256		0
047-232-019	1	138-008	0051	1.00	541.00	KALOGIANNIS JOHN P & MARIE E T	1 SFD	A4170	12 DAVIS
047-232-020	1	138-008	0051	1.00	541.00	TARCA JOHN C & TERRI LEE	1 SFD	A4171	735 ADOBE
047-232-021	1	138-008	0051	1.00	541.00	KALOGIANNIS JOHN P & MARIE E T	1 SFD	01615	28 DAVIS
047-232-023	1	138-008	0010	1.00	541.00	WING WAYNE D & MARLENE C	SFD	6236	70 DAVIS
047-232-024	1	138-008	0051	1.00	541.00	KAUMEYER JAMES A TR ET AL	SFD 20406		60 DAVIS
047-232-026	1	138-008	0051	1.00	541.00	DORSEY MICHAEL J & PEGGY J	SFD	A4706	50 DAVIS
047-232-027	1	138-008	0010	1.00	541.00	ORNE JAMES A	SFD	01343	48 DAVIS
047-232-028	1	138-008	0051	1.00	541.00	WACKER EARL	SFD	A4187	110 DAVIS
047-232-030	1	138-008	0051	1.80	973.80	WACKER EARL TR	SFD+GRANNY 3631 2269	A4187	120 DAVIS
047-232-032	0	138-008	0050	.00	.00	WACKER EARL TR	VACANT		0 DAVIS
047-232-035	0	138-008	0000	.00	.00	KALOGIANNIS JOHN P & MARIE E T	VACANT MS 160.861	01701	0 DAVIS
047-232-036	0	138-008	0000	.00	.00	KALOGIANNIS JOHN P & MARIE E T	VACANT MS 160.861	01701	0 DAVIS
047-232-037	1	138-008	0010	1.00	541.00	KRAUSSE PETER & URSULA TR	SFD MS 160.861 20467	01701	32 DAVIS
047-232-038	0	138-008	0000	.00	.00	KALOGIANNIS JOHN P & MARIE E T	VACANT MS 160.861	01701	0 DAVIS
047-232-039	1	138-008	0010	1.00	541.00	MC ISAAC KELVIN D	SFD	00777	755 ADOBE
047-232-040	1	138-008	0057	1.80	973.80	MC ISAAC ERIC R & MARIANNE	SFD + GU 9420 7238 7099		749 ADOBE
047-232-041	1	138-008	0051	1.00	541.00	DAVIDSON FRED JOHN & IRENE MAR	SFD	A4116	100 DAVIS
047-232-042	1	138-008	0010	1.00	541.00	NADEAU KIM A ET AL	SFD	01747	88 DAVIS
047-310-001	1	138-007	0051	1.00	541.00	BOCALDONI BRUNO F & DIANE L TR	1 SFD	A4104	820 PHILLIPS
047-310-002	1	138-007	0051	1.00	541.00	FARRON JACQUELINE H	1 SFD	A4627	800 PHILLIPS

DISTRICT 08-PENNGROVE				RATE 541.00	RATE2 0.00				
APN	CHG CD.	TRA	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT		SITUS ADDRESS
047-310-003	0	138-007	0054	.00	.00	GRAHAM CLAUD A JR & JANETT N	VACANT		504 PHILLIPS
047-310-004	0	138-007	0051	.00	.00	JOHNSON MARY LOUISE TR	NOT CONNECTED		600 PHILLIPS
047-310-005	1	138-007	0051	1.00	541.00	MELO JOHN	1 SFD	A4111	500 PHILLIPS
047-310-006	1	138-007	0051	1.00	541.00	HEINZ EDWARD & MONIKA	SFD	A4507	498 PHILLIPS
047-310-007	0	138-007	0051	.00	.00	O KEEFE SEAN ET AL	NOT CONNECTED		400 PHILLIPS
047-310-008	0	138-007	0054	.00	.00	PHILLIPS STEPHEN C & NANCY R	VACANT		200 PHILLIPS
047-310-009	1	138-007	0051	1.00	541.00	SCHNEIDER DOREEN MARIE TR	SFD	7779	96 PHILLIPS
047-310-010	0	138-007	0051	.00	.00	PHILLIPS J HOWARD & NITA	R/W		6007 OLD REDWOOD HWY
047-310-011	1	138-007	0051	1.00	541.00	WOLDEMAR LUCILLE M & ROBERT P	1 SFD	A4134	101 PHILLIPS
047-310-014	1	138-007	0051	2.00	1082.00	MILLER SARA TR ET AL	2 SFD	130	405 PHILLIPS
047-310-015	0	138-007	0051	.00	.00	JASONI GORDON R & MARILYN L	NOT CONNECTED		509 PHILLIPS
047-310-016	0	138-007	0050	.00	.00	JASONI GORDON R & MARILYN L	VACANT		200 NITA
047-310-017	1	138-007	0051	1.00	541.00	NACKORD ERNEST J JR	SFD	02409	198 NITA
047-310-018	1	138-007	0056	1.00	541.00	PINNE ROBERT A & AVERILL M TR	SFD	5692 5545	196 NITA
047-310-019	1	138-007	0051	1.00	541.00	MC ALEXANDER ALVA E & ROBBE T	1 SFD	A4618	22 HOWARD
047-310-020	1	138-007	0051	1.00	541.00	SUNHEIM ERIK STEVEN & ESPERANZ	SFD	30715	25 HOWARD
047-310-021	1	138-007	0051	1.80	973.80	CASELLA RICHARD A & BEVERLY A	SFD+GRANNY 5910	A4713	35 HOWARD
047-310-022	1	138-007	0051	1.00	541.00	NUNES DAVID R & CAROL R TR	1 SFD	A4735	45 HOWARD
047-310-023	1	138-007	0051	1.00	541.00	BRANSEN MARGARET H TR	SFD (BUILDING LATERAL)	8555	75 CREST
047-310-024	1	138-007	0051	1.00	541.00	MAESTRI ANTHONY C & ANNE A	SFD	3851	61 CREST
047-310-025	1	138-007	0051	1.00	541.00	CONSTANTINO MAUREEN	1 SFD	A4602	55 CREST
047-310-026	1	138-007	0051	1.00	541.00	PHILLIPS STEPHEN C & NANCY	SFD	02021	45 CREST
047-310-029	1	138-007	0051	1.00	541.00	FRANK LA MOYNE G & SANDRA J	1 SFD	A4628	60 CREST
047-310-030	1	138-007	0051	1.00	541.00	MORRIS PERRY J & SUSAN H	1 SFD	A4516	40 HOWARD
047-310-031	1	138-007	0051	1.00	541.00	JORDAN TIMOTHY P & DEBORAH LEE	1 SFD	A4643	10 NITA
047-310-032	1	138-007	0051	1.00	541.00	MATTOS ANTHONY J	1 SFD	A4631	20 NITA
047-310-033	1	138-007	0051	1.00	541.00	CHURCHILL PETER TANSEY & ROBIN	SFD 01-0216		211 NITA

SAB		SONOMA COUNTY WATER AGENCY SANITATION USER INVENTORY				LISTING	10/17/01 PAGE 571			
DISTRICT 08-PENNGROVE				RATE 541.00	RATE2 0.00					
APN	CHG CD.	TRA CD.	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT	SITUS ADDRESS		
047-310-036	1	138-007	0051	1.00	541.00	SEMFTEN ROBERT & LINDA	1 SFD	A5354	5871	OLD REDWOOD HWY
047-310-037	1	138-007	0051	1.00	541.00	TSUJIHARA MITSUD & HELEN TR	1 SFD	A4165	5867	OLD REDWOOD HWY
047-310-038	0	138-007	0851	.00	.00	TSUJIHARA MITSUD & HELEN TR	NOT CONNECTED		5863	OLD REDWOOD HWY
047-310-041	1	138-007	0051	1.00	541.00	BORG GIGI E & JOHN T	1 SFD	A4539	5875	OLD REDWOOD HWY
047-310-042	1	138-007	0051	1.00	541.00	ANGLIN CARROLL A JR & JEANNETT	1 SFD	A4638	5877	OLD REDWOOD HWY
047-310-043	1	138-007	0051	1.00	541.00	GRAY JAMES P & CAROLYN B TR	1 SFD	A4616	305	PHILLIPS
047-310-044	0	138-007	0811	.00	.00	KEN ROBERTS & SON GEN CONTRACT			105	PHILLIPS
047-310-045	0	138-007	0050	.00	.00	WOLDEMAR LUCILLE M & ROBERT P	VACANT		103	PHILLIPS
047-310-046	1	138-007	0051	1.00	541.00	BECK MARK S & DEBORAH A	SFD	8346	805	PHILLIPS
047-310-047	1	138-007	0052	1.00	541.00	HARTMAN WILLIAM H & STEPHANIE	SFD (+SFDNC V 4/97)	96-0354	50	CREST
047-480-001	1	138-007	0052	2.00	1082.00	GALLAGHER ROBERT E & CYNTHIA G	2 SFD 0157-8 9014 8328	A4184	5702	HATCHERY
047-480-002	1	138-007	0051	1.00	541.00	MAGLIULO JAMES L & MARCELEE A	SFD 20327		5700	HATCHERY
047-480-003	1	138-007	0052	1.80	973.80	KING WILMA O TR	SFD+GRANNY	30746 20137	5704	HATCHERY
047-480-004	0	138-007	0050	.00	.00	DEBERNARDI ROSE M LIFE EST			0	NONE
047-480-005	1	138-007	0051	1.00	541.00	DEBERNARDI ROSE M LIFE EST	SFD	9014 8328 A4184	0	NONE
047-480-006	1	138-007	0051	1.00	541.00	O BRIEN JOHN F & PATTI J	SFD LOT 6	40990	5710	HATCHERY
047-480-007	1	138-007	0052	1.80	973.80	WEST WILLIAM & JACQUELYN	SFD+GRANNY	40991 30747	5712	HATCHERY
047-480-008	1	138-007	0057	1.80	973.80	MAGLIULO MARTIN A & JENNIFER	SFD+GU	96-0283 41091	5716	HATCHERY
047-480-009	1	138-007	0051	1.00	541.00	MAGLIULO WAYNE T & DIANNE K	SFD		5718	HATCHERY
047-640-002	1	138-007	0051	1.00	541.00	TAYLOR KELVIN L & SANDYE S	SFD	99-0074 98-0003	222	KATIE
047-640-003	1	138-007	0057	1.80	973.80	MC BRIEN JAMES & MARY ANN	SFD+GU00-0386	99-0460 00-0459	232	KATIE
047-640-004	1	138-007	0051	1.00	541.00	MC MAHON GERALD P & CYNDA TR	SFD 99-0461		482	RONSHHEIMER
047-640-005	1	138-007	0051	1.00	541.00	TUCKER KENNETH S & JANICE M	SFD	98-0108 98-0003	452	RONSHHEIMER
047-640-006	1	138-007	0051	1.00	541.00	PEPPER S JORDON & JULEE A	SFD	98-0107 98-0003	462	RONSHHEIMER
047-640-007	1	138-007	0051	1.00	541.00	MEYER RICHARD A & MEAVEEN R	SFD	99-0102 98-0003	472	RONSHHEIMER
047-640-008	1	138-007	0051	1.00	541.00	SESSI MITCHELL & JENNIFER	SFD	98-0142 98-0003	492	RONSHHEIMER
047-640-009	0	138-007	0050	.00	.00	SESSI SHERRI	LOT9VACANT V10AUG98	98-0003	452	RONSHHEIMER

SAB		SONOMA COUNTY WATER AGENCY SANITATION USER INVENTORY				LISTING	10/17/01 PAGE 572			
DISTRICT 08-PENNGROVE				RATE 541.00	RATE2 0.00					
APN	CHG CD.	TRA CD.	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT	SITUS ADDRESS		
047-640-010	1	138-007	0057	1.80	973.80	SESSI MARTIN TR ET AL	SFD+GAR+GU	97-0468 A4621	233	KATIE
047-640-011	1	138-007	0051	1.00	541.00	JOHNSTON ANTHONY M & JENNIFER	SFD	98-0080 98-0004	6081	MALCOLM
047-640-012	1	138-007	0051	1.00	541.00	DOLLAR JUSTIN G ET AL	SFD 00-0334	99-0448 98-0004	6077	MALCOLM
047-640-013	1	138-007	0051	1.00	541.00	FAREY RONALD L & CATHY J	SFD	97-0335 96-0243	442	RONSHHEIMER
047-640-014	1	138-007	0057	1.80	973.80	KELLER CYNTHIA A TR ET AL	SFD+GU	97-0134 97-0083 96-0243	432	RONSHHEIMER
047-640-015	1	138-007	0051	1.00	541.00	SESSI MARTIN TR ET AL	MH	A4621	422	RONSHHEIMER
047-640-016	1	138-007	0051	1.00	541.00	BRYON BRAD & KAREN	SFD	96-0257 96-0243	412	RONSHHEIMER
047-640-017	1	138-007	0051	1.00	541.00	SILVA WILLIAM M & JILL M	SFD 99-0075	99-0003	6095	MALCOLM
047-640-018	1	138-007	0051	1.00	541.00	SCHOENHOLZER KATHERINE M & BYR	SFD 00-0118		129	KYLERS
047-640-019	1	138-007	0051	1.00	541.00	BECK ROY L & AMY	SFD 00-0243		157	KYLERS
047-640-020	1	138-007	0050	1.80	973.80	SESSI MARTIN TR ET AL	SFD+GU	01-432 01-0364	175	KYLERS
047-640-021	1	138-007	0051	1.00	541.00	BORG RICHARD D & ROSALIE	SFD+BARN	99-0504 99-0189	6165	OLD REDWOOD
047-640-022	1	138-007	0051	1.00	541.00	GALLOWAY GARY G & CHERYL A	SFD LOTS	00-0026	168	KYLERS
047-640-023	1	138-007	0051	1.00	541.00	SESSI MARTIN TR ET AL	SFD	00-0418	144	KYLERS
047-640-024	0	138-007	0051	.00	.00	NELSON BYRON N & EDITH ANN	VACANT		108	KYLERS
047-650-001	1	138-008	0051	1.00	541.00	NELSON NEWMAN B	SFD 00-0124		805	RAINSHINE
047-650-002	1	138-008	0051	1.00	541.00	NELSON BUILDERS INC	SFD 00-0123		855	RAINSHINE
047-650-003	1	138-008	0051	1.00	541.00	NELSON BUILDERS INC	SFD 00-0122		865	RAINSHINE
047-650-004	1	138-008	0051	1.00	541.00	LAUDARI JOSEPH A & SHIRLEY A	SFD 99-0465		870	RAINSHINE
047-650-005	1	138-008	0010	1.00	541.00	SPARKS KENNETH G & KATHRYN C	SFD 00-0120		860	RAINSHINE
047-650-006	1	138-008	0051	1.00	541.00	STICE MARTIN ET AL	SFD 00-0121		850	RAINSHINE
047-650-007	1	138-008	0051	1.00	541.00	AMY RON & HOLLIE K	SFD 99-0467		840	RAINSHINE
047-650-008	1	138-008	0051	1.00	541.00	BUCKLEY CHARLES T ET AL	SFD 99-0467		830	RAINSHINE
047-650-009	1	138-008	0051	1.00	541.00	GANNON BRIAN ET AL	SFD 99-0467		810	RAINSHINE
047-650-010	0	138-008	0001	.00	.00	NELSON BUILDERS INC	VACANT	1JUN99	820	RAINSHINE
047-660-001	1	138-008	0051	1.00	541.00	WATERFORD ASSOCIATES LLC	SFD 00-0388		9053	RANCHO ADOBE
047-660-002	1	138-008	0051	1.00	541.00	WATERFORD ASSOCIATES LLC	SFD 00-0389		9011	RANCHO ADOBE

DISTRICT 08-PENNGROVE				RATE 541.00	RATE2 0.00				
APH	CHG CD.	TRA	USE CD.	ESD CD.	COMPUTED FLAT CHARGE	NAME	COMMENT	SITUS ADDRESS	
047-660-003	1	138-008	0051	1.00	541.00	WATERFORD ASSOCIATES LLC	SFD 00-0390	8977	RANCHO ADOBE
047-660-004	1	138-008	0051	1.00	541.00	WILL RUSSELL L JR & PATRICIA C	SFD 00-0391	8939	RANCHO ADOBE
047-660-005	1	138-008	0051	1.00	541.00	WATERFORD ASSOCIATES LLC	SFD 00-0392	8901	RANCHO ADOBE
047-660-006	1	138-008	0051	1.00	541.00	WATERFORD ASSOCIATES LLC	SFD 00-0393	8920	RANCHO ADOBE
047-660-007	1	138-008	0051	1.00	541.00	WATERFORD ASSOCIATES LLC	SFD 00-0394	8958	RANCHO ADOBE
047-660-008	1	138-008	0051	1.00	541.00	WATERFORD ASSOCIATES LLC	SFD 00-0395	8994	RANCHO ADOBE
047-660-009	1	138-008	0051	1.00	541.00	WATERFORD ASSOCIATES LLC	SFD 00-0396	9032	RANCHO ADOBE
047-660-010	1	138-008	0051	1.00	541.00	WATERFORD ASSOCIATES LLC	SFD 00-0397	9076	RANCHO ADOBE

TOTALS FOR DISTRICT 08

TOTAL APNS: 386
 TOTAL APNS WITH ERRORS: 00
 CHARGE CODE 0 ESDS: .00
 CHARGE CODE 1 ESDS: 461.91
 CHARGE CODE 2 ESDS: .00
 CHARGE CODE 3 ESDS: .00
 CHARGE CODE 4 ESDS: .00
 CHARGE CODE 5 ESDS: .00
 CHARGE CODE 6 ESDS: 1.70
 CHARGE CODE 7 ESDS: 7.68
 TOTAL ESDS: 471.29

x 2.655 PEOPLE /ESD

REF DMB p86

ESTIMATED POPULATION = 1251 PEOPLE

ESTIMATED ADWWF = 471.29 ESD X 260 (INCLUDES 10% FS)
 = 122535 GPD
 = 20.123 MGD

Terry.
info only.
W.

Sonoma County Public Works
Wastewater Operations Department
18400 Neeley Road
Guerneville, Calif. 95446
(707) 869-2809

Mr. Chris McAuliffe
Box 777
Petaluma, Calif.
94952

September 4, 1992

RE: Meter Readings from Penngrove Lift station

Dear Chris,

The data you require from the flow meter at Penngrove Lift Station is as follows;

June 3, 1992 to July 2, 1992	=	2.61 MG total in 29 days
		.090 MGD
July 2, 1992 to Aug 3, 1992	=	2.82 MG total in 31 days
		.091 MGD
Aug 3, 1992 to Sept 3, 1992	=	2.65 MG total in 31 days
		.085 MGD

Average = 88,667 GPD

376 ESP

= 236 GPD/ESP AVERAGE

Ronald E. Laufer
Wastewater Supervisor
West County Division

1306890/pgreads

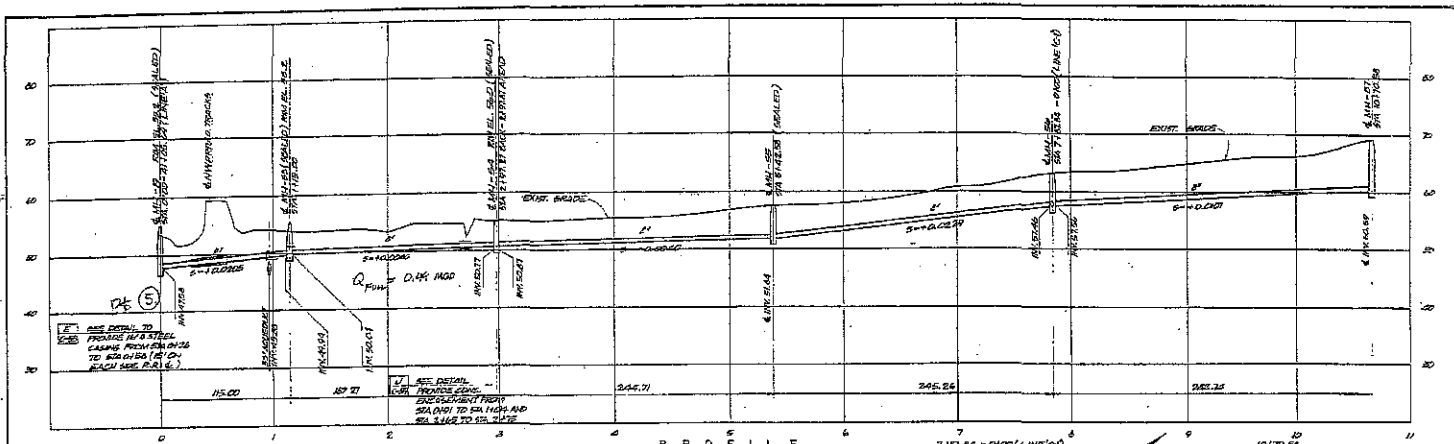


A
 Penngrove Reach 1-5
 Worksheet for Circular Channel

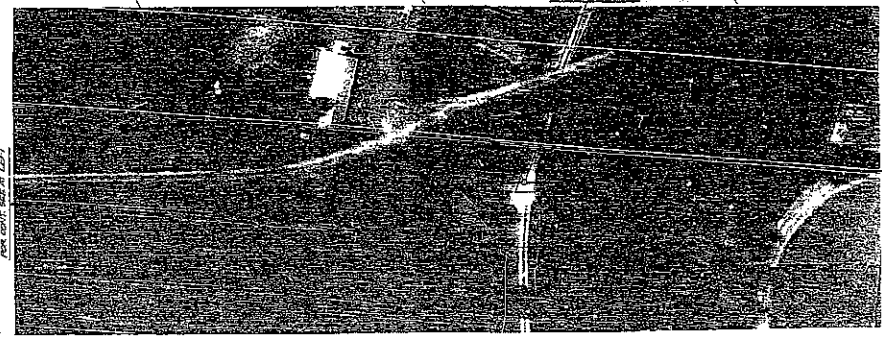
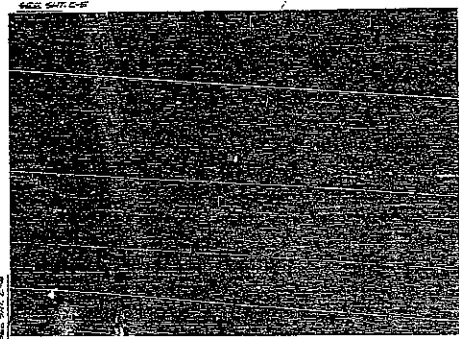
Project Description	
Project File	d:\nsesad\m\project1.in2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Discharge

Input Data	
Manning's Coefficient	0.013
Channel Slope	0.004000 ft/ft
Depth	0.67 ft
Diameter	0.00 in

Results	
Discharge	0.49 mgd
Flow Area	0.35 ft ²
Wetted Perimeter	2.09 ft
Top Width	0.00 ft
Critical Depth	0.41 ft
Percent Full	100.00
Critical Slope	0.008027 ft/ft
Velocity	2.19 ft/s
Velocity Head	0.07 ft
Specific Energy	FULL ft
Froude Number	FULL
Maximum Discharge	0.82 cfs
Full Flow Capacity	0.76 cfs
Full Flow Slope	0.004000 ft/ft



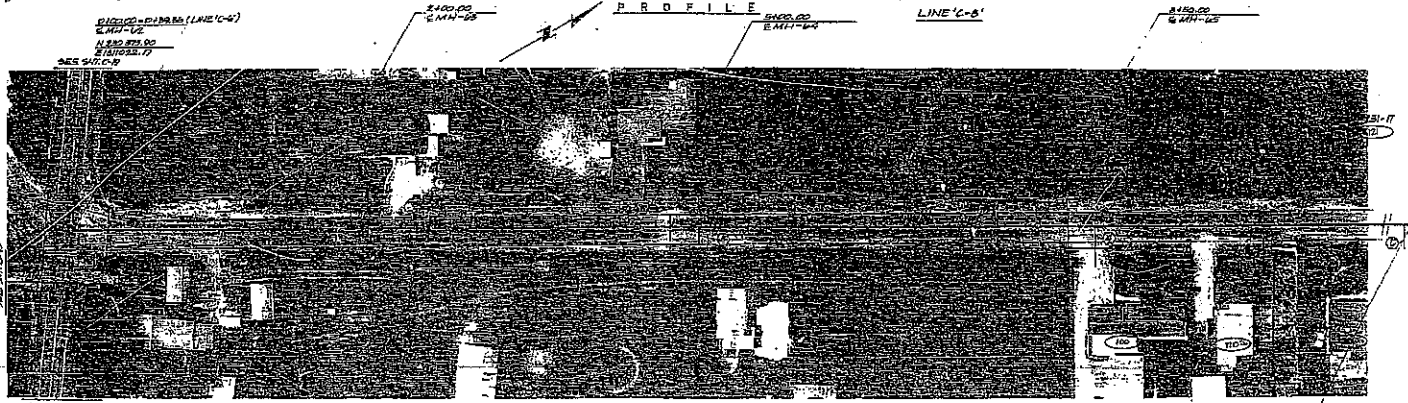
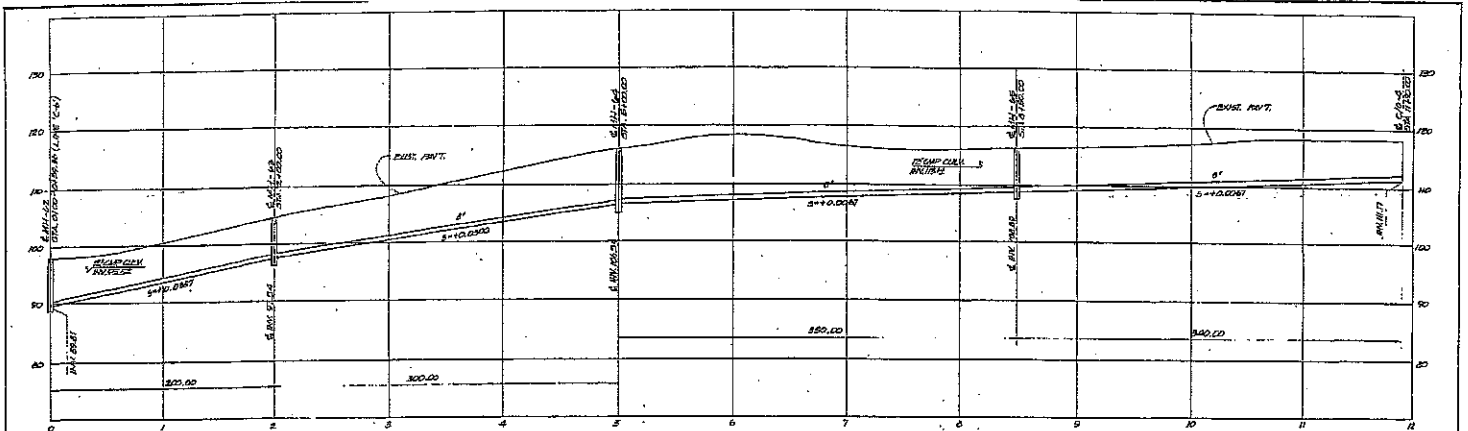
LINE 'C' PROFILE



P L A N

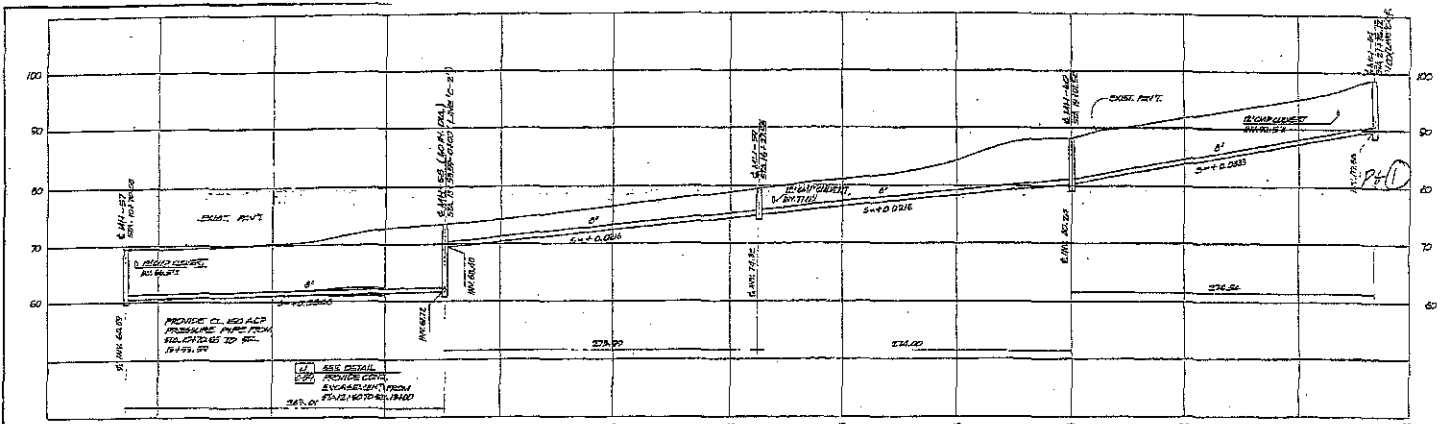
019964

SCALE: HORIZ. 1"=40' VERT. 1"=4'		REVISIONS: NO. DATE DESCRIPTION	CONTRACT NO. 1574 DATE 11/27/17	JAMES E. MONTGOMERY CONSULTING ENGINEERS, INC. 1000 S. GARDEN AVENUE ANAHEIM, CALIFORNIA 92805	APPROVED: _____ EXT. _____ APPLIED: _____ EXT. _____	COUNTY SERVICE AREA 13, PENNSBORO WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT CDA-1112 LINE C STA. 0+00 TO 1+40.00	SHEET C-14 OF 14 SHEETS
--	--	------------------------------------	------------------------------------	---	---	---	--------------------------------------

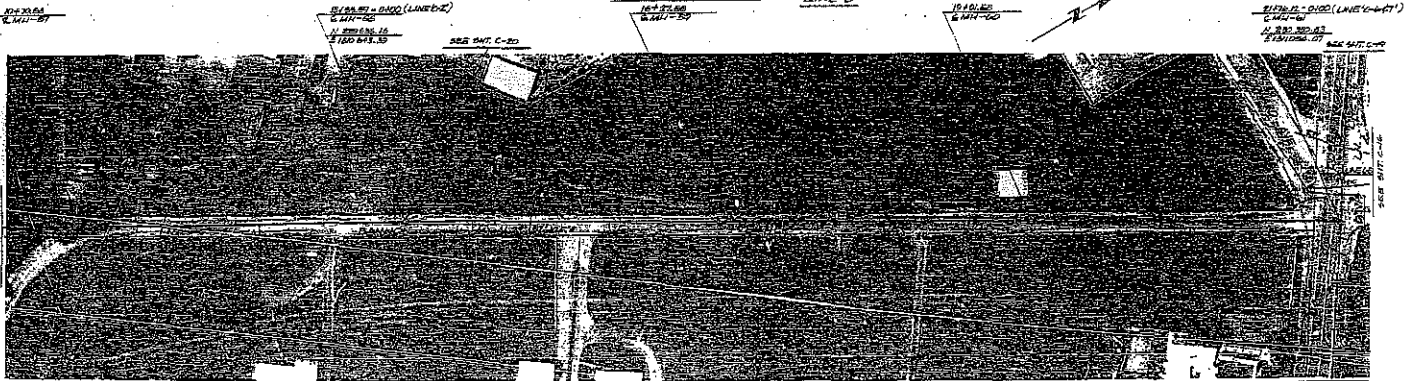


019966

SCALE: HORIZONTAL 1"=40' VERTICAL 1"=8' MODEL: 1"=40' VERT: 1"=8'		SUBMITTED: 11/17/22 DATE: 11/17/22 DRAWN: [Signature] CHECKED: [Signature]		JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC. 180 NORTH CALIFORNIA BLVD. PALMDALE, CALIFORNIA 91368 (818) 341-1111 FAX: (818) 341-1112		COUNTY SERVICE AREA 19, PENNSBORO WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT C-04-1112 LINE C-4 STA. 0+00 TO 1+00		SHEET C-16 OF 74 SHEETS
--	--	---	--	--	--	---	--	--------------------------------------



PROFILE LINE 'C'



- ① STA 11.50 12" DIA. 12' MANHOLE
- ② STA 16.50 12" DIA. 12' MANHOLE
- ③ STA 19.50 12" DIA. 12' MANHOLE
- ④ STA 21.00 12" DIA. 12' MANHOLE
- ⑤ STA 21.50 12" DIA. 12' MANHOLE

019965

P L A N

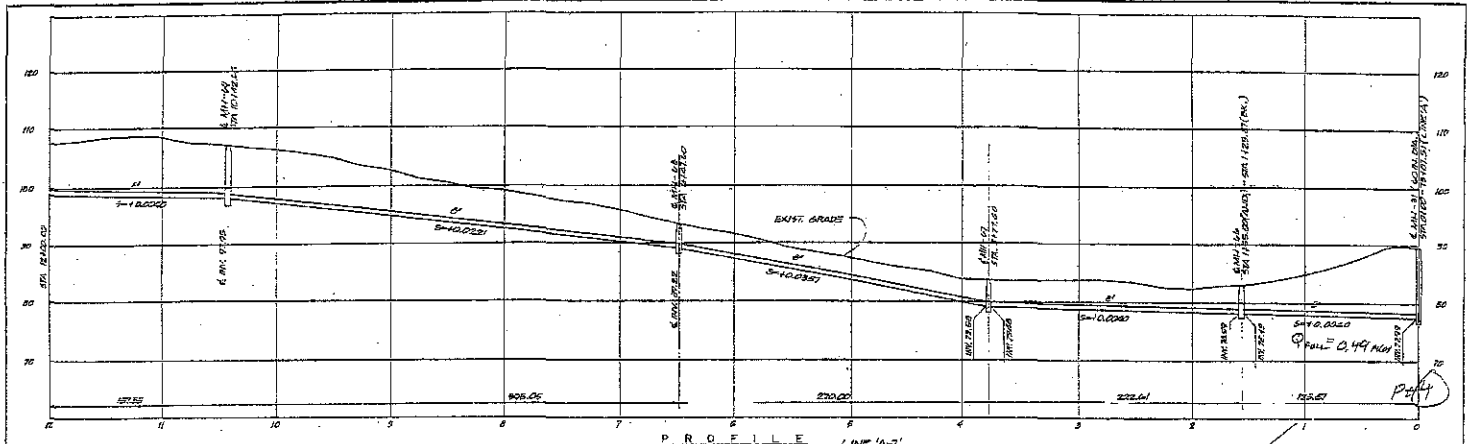
SCALE: HORIZ. 1"=40' VERT. 1"=4'	DRAWN BY: <i>[Signature]</i>	CHECKED BY: <i>[Signature]</i>	DATE: 11/14/77	JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC. 1700 NORTH CALIFORNIA BLVD. SUITE 200 VAN HOUT ENGEL, CALIFORNIA 92690	APPROVED: <i>[Signature]</i>	COUNTY SERVICE AREA 14, RENDOMBO	SHEET C-15
	PROJECT: WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT C-10-11E	LINE: C	STA. 10+50.00 TO 21+50.00		DATE:	APPROVED:	DATE:

B
 Penngrove Reach 2-4
 Worksheet for Circular Channel

Project Description	
Project File	d:\heated\fmw\project1.fm2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Discharge

Input Data	
Manning's Coefficient	0.013
Channel Slope	0.004000 ft/ft
Depth	0.67 ft
Diameter	8.00 in

Results	
Discharge	0.49 mgd
Flow Area	0.35 ft ²
Wetted Perimeter	2.09 ft
Top Width	0.00 ft
Critical Depth	0.41 ft
Percent Full	100.00
Critical Slope	0.008027 ft/ft
Velocity	2.19 ft/s
Velocity Head	0.07 ft
Specific Energy	FULL ft
Froude Number	FULL
Maximum Discharge	0.82 cfs
Full Flow Capacity	0.76 cfs
Full Flow Slope	0.004000 ft/ft



PROFILE LINE 'A-A'



- ① S.W. 12.00
- ② S.W. 11.00
- ③ S.W. 10.00
- ④ S.W. 9.00
- ⑤ S.W. 8.00
- ⑥ S.W. 7.00
- ⑦ S.W. 6.00
- ⑧ S.W. 5.00
- ⑨ S.W. 4.00
- ⑩ S.W. 3.00
- ⑪ S.W. 2.00
- ⑫ S.W. 1.00
- ⑬ S.W. 0.00

PLAN

019967

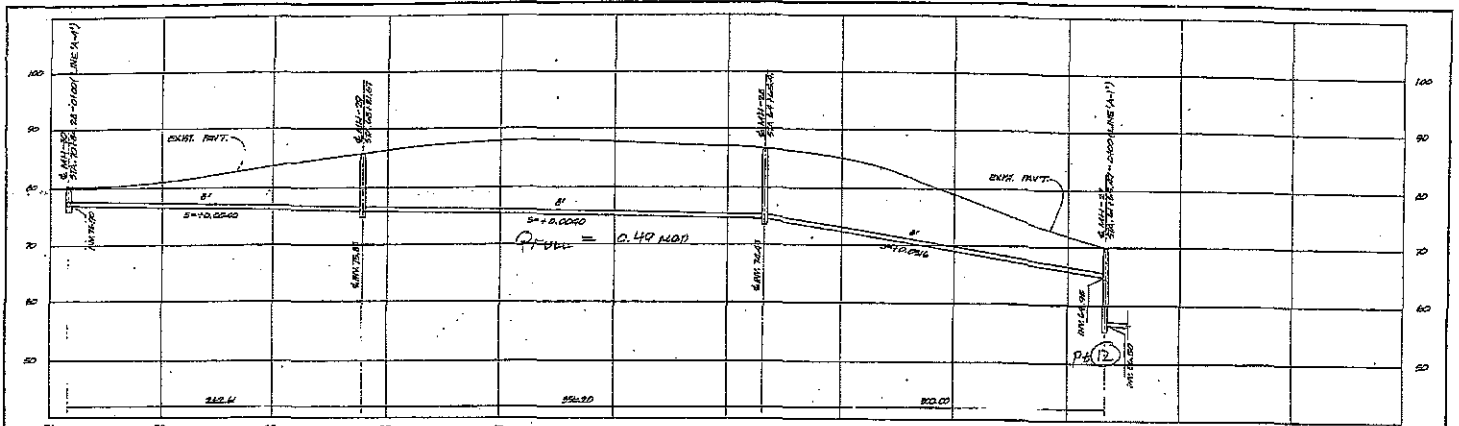
SCALE: HORIZ. 1"=40' VERT. 1"=4'		EXAMINED: [Signature] DATE: 11/1/77 CHECKED: [Signature] DATE: 11/1/77		PROJECT: [Signature] DATE: 11/1/77		APPROVED: _____ DATE: _____ APPROVED: _____ DATE: _____		COUNTY SERVICE AREA 19, PENNSBORO WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT C-08-1112 LINE 'A-A' STA. 0+00 TO 0+12.50		SHEET C-17 OF 24 SHEETS
DESIGNER: JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC. 180 NORTH CALIFORNIA BLVD. WAGNER CREEK, CALIFORNIA 95691		PROJECT NO.: 1112 SHEET NO.: 17		DATE: 11/1/77		COUNTY SERVICE AREA 19, PENNSBORO WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT C-08-1112 LINE 'A-A' STA. 0+00 TO 0+12.50		SHEET C-17 OF 24 SHEETS		

H
 Penngrove Reach 4-12
 Worksheet for Circular Channel

Project Description	
Project File	d:\haestad\fmw\project1.fm2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Discharge

Input Data	
Manning's Coefficient	0.015
Channel Slope	0.004000 ft/ft
Depth	0.57 ft
Diameter	3.00 ft

Results	
Discharge	0.49 mgd
Flow Area	0.35 ft ²
Wetted Perimeter	2.09 ft
Top Width	0.00 ft
Critical Depth	0.41 ft
Percent Full	100.00
Critical Slope	0.008027 ft/ft
Velocity	2.19 ft/s
Velocity Head	0.07 ft
Specific Energy	FULL ft
Froude Number	FULL
Maximum Discharge	0.82 cfs
Full Flow Capacity	0.76 cfs
Full Flow Slope	0.004000 ft/ft



PROFILE LINE 'A'

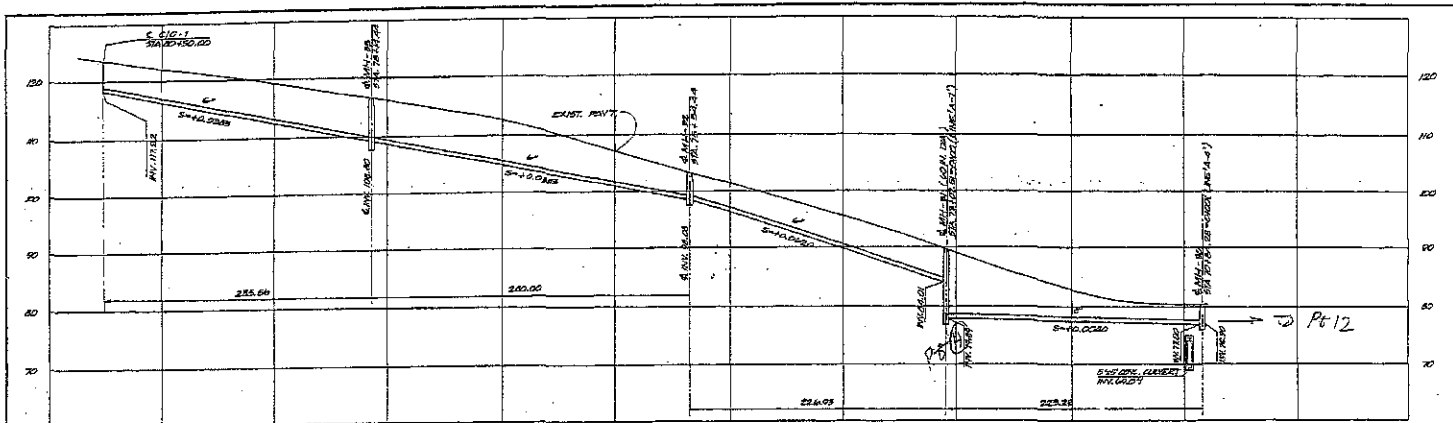


NOTE: CONTRACTOR SHALL REPAIR ENTIRE SURFACE OF PIEDALINA HILL ROAD FROM 250 FT. SOUTH OF INTERSECTION TO 250 FT. NORTH OF INTERSECTION OF THIS ROAD AND PIEDALINA HILL ROAD SEE S-25.

SEE SHT. C-27
SEE SHT. C-28
SEE SHT. C-29

P L A N		APPROVED		COUNTY SERVICE AREA 19, PENNSBORO		SHEET	
NO.	DATE	DATE	BY	DATE	BY	NO.	OF TOTAL SHEETS
1	11/11/27	11/11/27	JMM	11/11/27	JMM	C-7	7
JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC. 1302 NORTH CALIFORNIA BLVD. WALNUT CREEK, CALIFORNIA 94596		APPROVED: _____ DATE: _____		COUNTY SERVICE AREA 19, PENNSBORO WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT C-05-1112		SHEET C-7 OF 7 TOTAL SHEETS	

019957



NOTE: CONTRACTOR SHALL REPAIR EXISTING SURFACES OF RETAINING WALLS FROM 150' TO 200' OF PROPOSED LINE TO 200' NORTH OF THE INTERSECTION OF ABOVE ROAD AND RETAINING WALL ROAD SEE SHEET 019958.

NOTE: CONTRACTOR MAY ENCOUNTER ROCKS 12" AND SMALLER TO A DEPTH OF 24" TO 36" WITHIN AREA SHOWN.

- ① STA 69+35 PVI 8' 11"
- ② STA 70+30 PVI 9' 11"
- ③ STA 71+00 PVI 9' 11"
- ④ STA 72+66 PVI 9' 11"
- ⑤ STA 73+80 PVI 9' 11"

73+80 PVI 9' 11"
 74+66 PVI 9' 11"
 75+00 PVI 9' 11"

019958

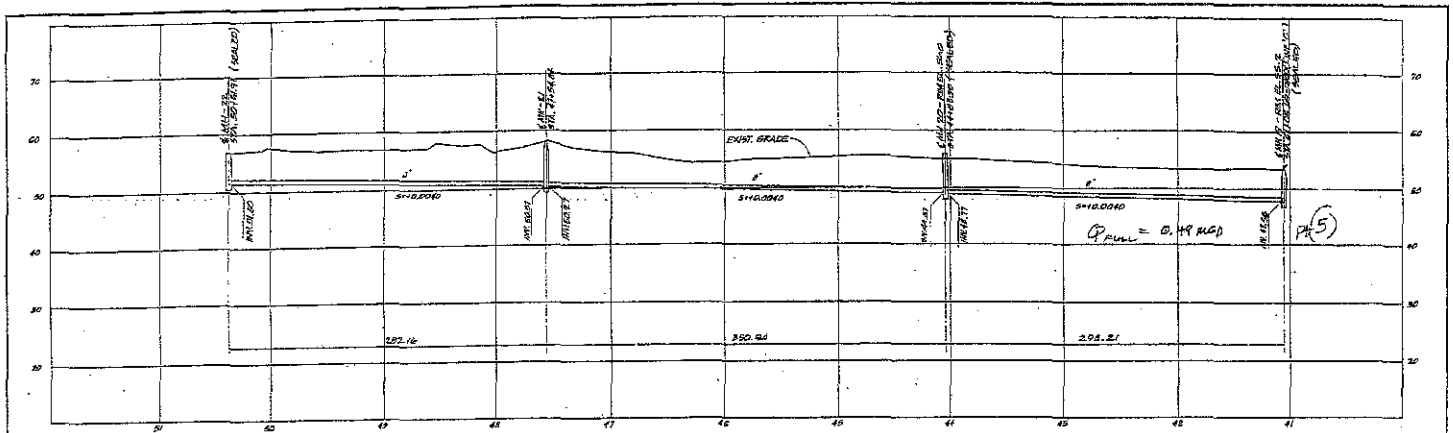
SCALE: HORIZ. 1"=40' VERT. 1"=4'		DRAWN BY: JMK CHECKED BY: JMK DATE: 11/77	PROJECT: COUNTY SERVICE AREA 15, PENNSBORO WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT C-8-1112	SHEET: C-8 OF 14 SHEETS
CONTRACTOR: JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC. 280 NORTH CALIFORNIA BLVD. WALKER BRICK, CALIFORNIA 95691		DATE: 11/77	LINE A STA. 70+66.25 TO 80+32.00	

M
 Penngrove Reach 12-5
 Worksheet for Circular Channel

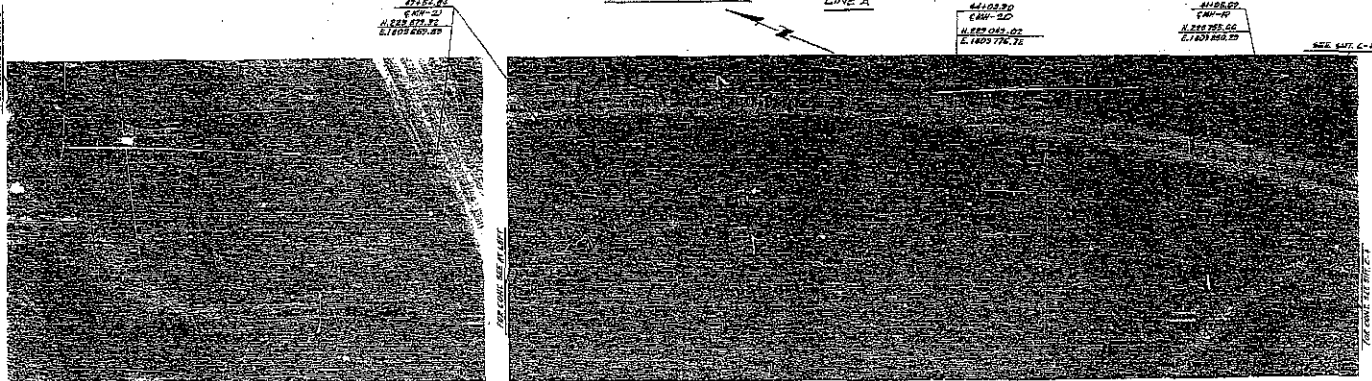
Project Description	
Project File	d:\naestad\umw\project1.fm2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Discharge

Input Data	
Mannings Coefficient	0.013
Channel Slope	0.004000 ft/ft
Depth	0.67 ft
Diameter	8.00 in

Results	
Discharge	0.49 mgd
Flow Area	0.36 ff
Wetted Perimeter	2.09 ft
Top Width	0.00 ft
Critical Depth	0.41 ft
Percent Full	100.00
Critical Slope	0.008027 ft/ft
Velocity	2.18 f/s
Velocity Head	0.07 ft
Specific Energy	FULL ft
Froude Number	FULL
Maximum Discharge	0.82 cfs
Full Flow Capacity	0.76 cfs
Full Flow Slope	0.004000 ft/ft



PROFILE LINE 'A'

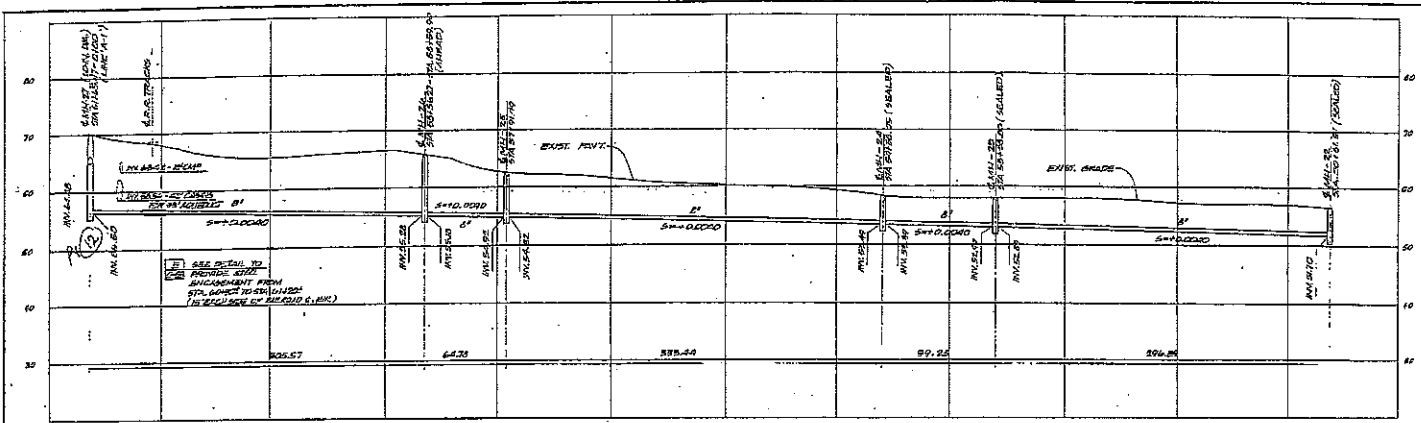


PLAN

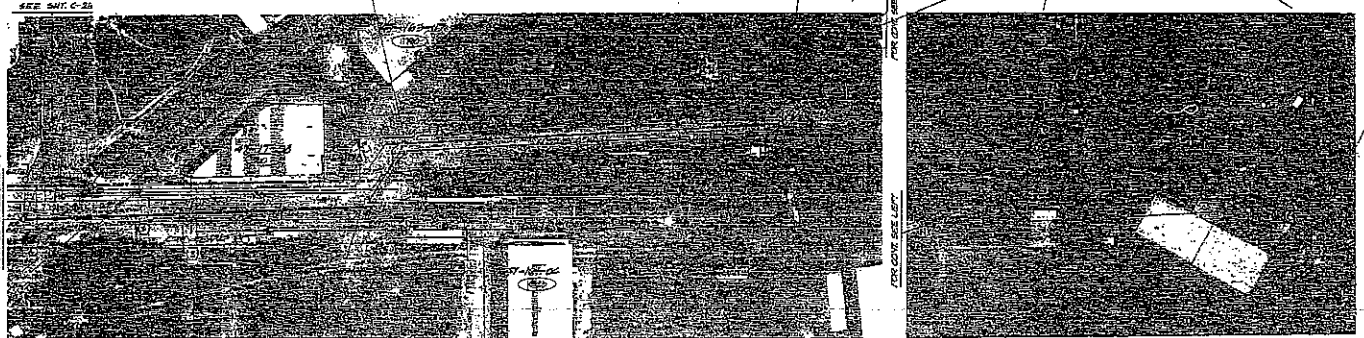
019955

COUNTY OF SAN LUIS OBISPO SAN LUIS OBISPO PROJECT NO. 019955	SCALE: HORIZ. 1"=40' VERT. 1"=4'	SUBMITTED: 2.8.12 DATE: 4/1/12 BY: JMM CHECKED: JMM DATE: 4/1/12	APPROVED: _____ DATE: _____ APPROVED: _____ DATE: _____	COUNTY SERVICE AREA 18, PENNSHORE WASTEWATER COLLECTION AND PUMP-OUT FACILITIES PROJECT C-05-1112 LINE A STA. 4106.49 TO 3048.81	SHEET C-5 OF 24 SHEETS
	PROJECT NO. 019955 PROJECT NAME: WASTEWATER COLLECTION AND PUMP-OUT FACILITIES PROJECT C-05-1112 PROJECT LOCATION: LINE A STA. 4106.49 TO 3048.81	CONTRACT NO. 019955 CONTRACT NAME: WASTEWATER COLLECTION AND PUMP-OUT FACILITIES PROJECT C-05-1112 CONTRACT LOCATION: LINE A STA. 4106.49 TO 3048.81	PROJECT NO. 019955 PROJECT NAME: WASTEWATER COLLECTION AND PUMP-OUT FACILITIES PROJECT C-05-1112 PROJECT LOCATION: LINE A STA. 4106.49 TO 3048.81	PROJECT NO. 019955 PROJECT NAME: WASTEWATER COLLECTION AND PUMP-OUT FACILITIES PROJECT C-05-1112 PROJECT LOCATION: LINE A STA. 4106.49 TO 3048.81	PROJECT NO. 019955 PROJECT NAME: WASTEWATER COLLECTION AND PUMP-OUT FACILITIES PROJECT C-05-1112 PROJECT LOCATION: LINE A STA. 4106.49 TO 3048.81

JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC.
 1800 NORTH CALIFORNIA BLVD. WARMUP CREEK, CALIFORNIA 95060
 PHOENIX: 602.954.8888 FAX: 602.954.8889



PROFILE



PLAN

NOTE: CONTRACTOR SHALL REPAIR EXISTING CURBS OF PAVEMENT SHALL BE REPAIRED TO ORIGINAL GRADE. TO BE REPAIRED TO ORIGINAL GRADE. SECTION OF LEGAL ROAD AND PAVEMENT SHALL BE REPAIRED.

NOTE: THE CONTRACTOR MAY ENCOUNTER BROKEN CONCRETE RIP-RAIP (ASBESTOS) BETWEEN STATION 38+00 AND STATION 42+00. RIP-RAIP IS LOCATED WESTERLY OF PIPELINE ALIGNMENT.

NOTE: CONTRACTOR MAY ENCOUNTER WATER AT A DEPTH OF 4-6 FEET BETWEEN STATION 38+00 AND STATION 42+00.

019956

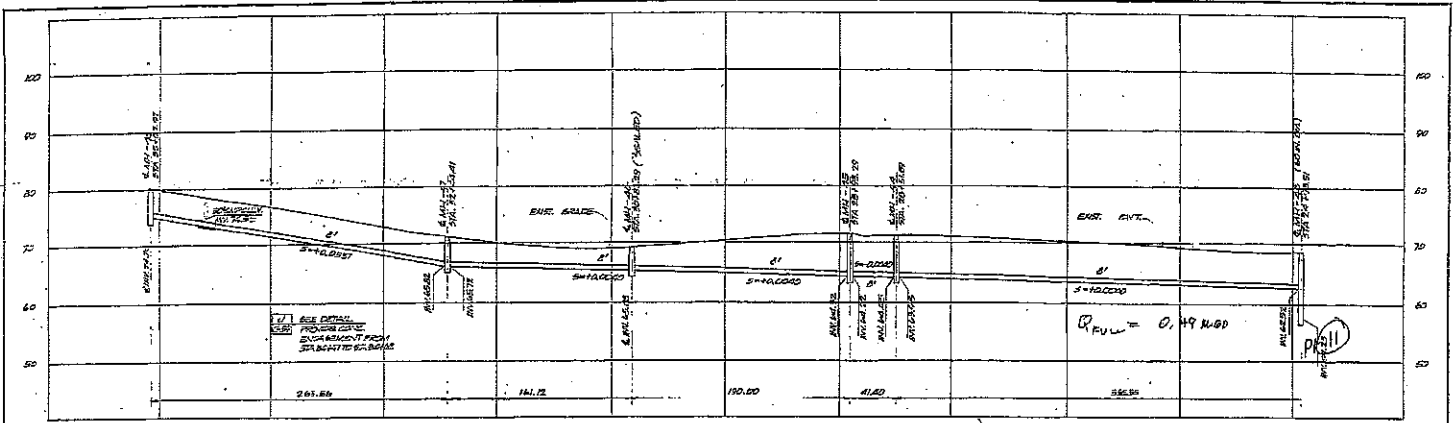
SCALE: HORIZ. 1"=40' VERT. 1"=4'	DESIGNED BY: CHECKED BY: DATE:	PROJECT NO.: SHEET NO.:	JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC. 180 NORTH CALIFORNIA BLVD. SUITE 200 RICHMOND, CALIFORNIA 94801	APPROVED BY: DATE:	COUNTY SERVICE AREA NO. 19, PENNSYLVANIA WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT 01-04-1112 LINE A STA. 38+00 TO 42+00	SHEET NO. C-6 OF 24 SHEETS
--	--------------------------------------	----------------------------	---	-----------------------	---	----------------------------

C
 Penngrove Reach 3-11
 Worksheet for Circular Channel

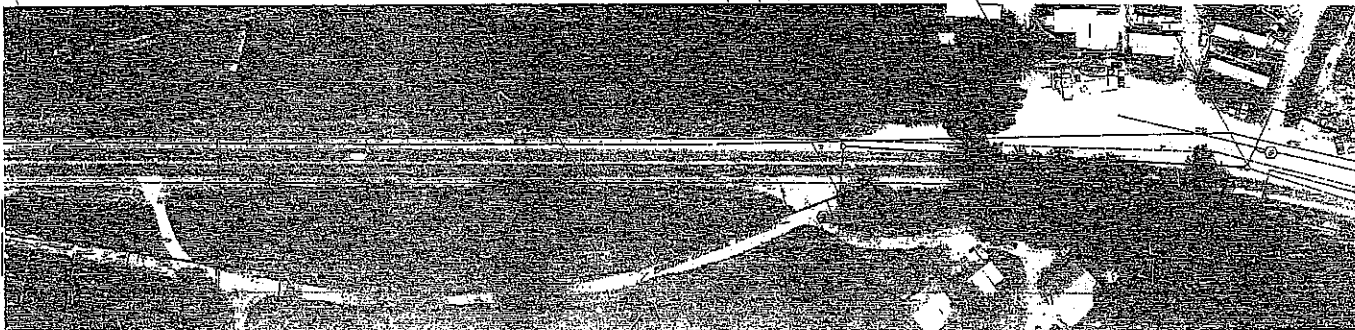
Project Description	
Project File	d:\haestad\fmw\project1.fm2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Discharge

Input Data	
Mannings Coefficient	0.013
Channel Slope	0.004000 ft/ft
Depth	0.67 ft
Diameter	8.00 in

Results	
Discharge	0.48 mgd
Flow Area	0.35 ft ²
Wetted Perimeter	2.09 ft
Top Width	0.00 ft
Critical Depth	0.41 ft
Percent Full	100.00
Critical Slope	0.008027 ft/ft
Velocity	-2.18 ft/s
Velocity Head	0.07 ft
Specific Energy	FULL ft
Froude Number	FULL
Maximum Discharge	0.82 cfs
Full Flow Capacity	0.78 cfs
Full Flow Slope	0.004000 ft/ft



PROFILE LINE 'B'



- 1. PROPOSED 36\"/>
- 2. EXIST. 36\"/>
- 3. EXIST. 48\"/>
- 4. EXIST. 60\"/>
- 5. EXIST. 72\"/>
- 6. EXIST. 84\"/>
- 7. EXIST. 96\"/>
- 8. EXIST. 108\"/>
- 9. EXIST. 120\"/>

019962

P L A N

SCALE: HORIZ. 1"=40' VERT. 1"=4'		DATE: 1/22/52		PROJECT: WATERWORKS PROJECT		COUNTY SERVICE AREA 10, ZEPHROVE		SHEET: C-12	
DRAWN BY: J.M.M.		CHECKED BY: J.M.M.		PROJECT NO.: 101-101		PROJECT DATE: 1951		SHEET NO.: 12 OF 14	
TITLE:		CLIENT:		ENGINEER:		COUNTY SERVICE AREA 10, ZEPHROVE		WATERWORKS COLLECTION AND PUMPING FACILITIES PROJECT C-00-112	
PROJECT NO.:		PROJECT DATE:		PROJECT LOCATION:		PROJECT DRAWN BY:		PROJECT CHECKED BY:	
PROJECT LOCATION:		PROJECT DRAWN BY:		PROJECT CHECKED BY:		PROJECT DATE:		PROJECT SCALE:	

JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC.



DATE: 1/22/52

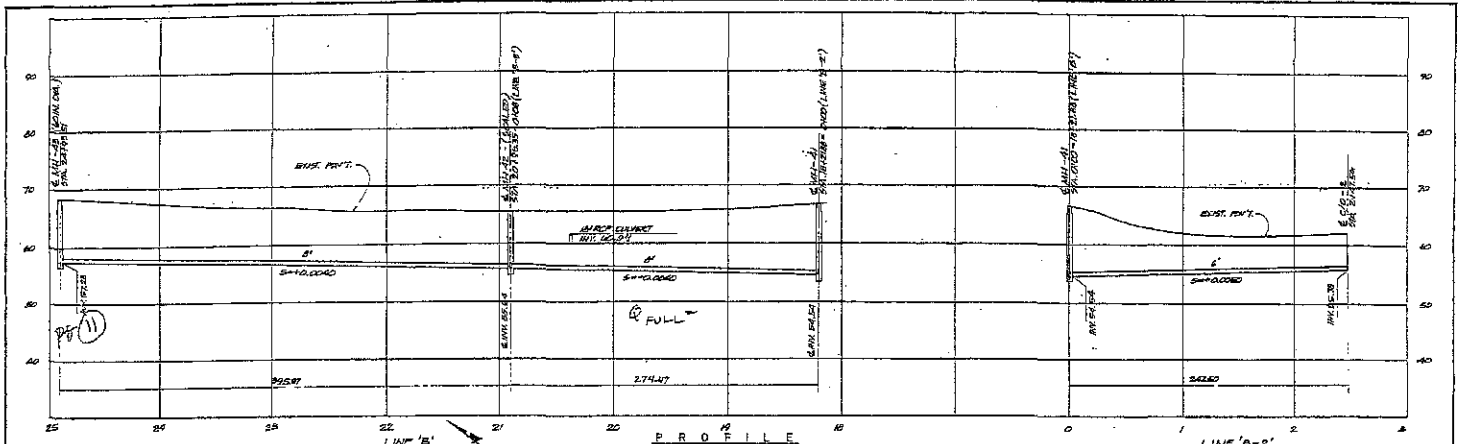
LINE B STA. 54+00 TO 58+00

1
 Penngrove Reach 11-6
 Worksheet for Circular Channel

Project Description	
Project File	d:\haestad\fmw\project1.fm2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Discharge

Input Data	
Mannings Coefficient	0.013
Channel Slope	0.004000 ft/ft
Depth	0.67 ft
Diameter	8.00 in

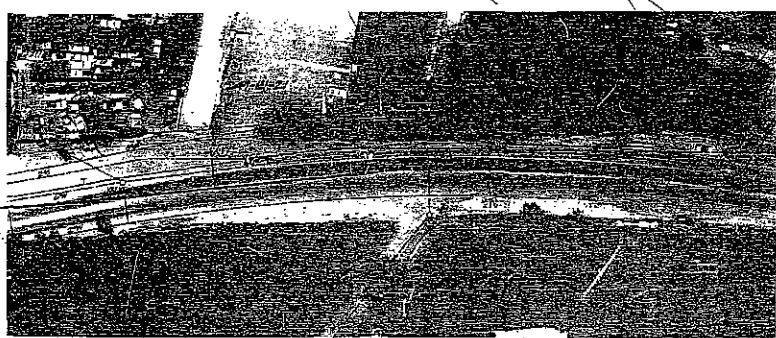
Results	
Discharge	0.49 mgd
Flow Area	0.35 ft ²
Wetted Perimeter	2.08 ft
Top Width	0.00 ft
Critical Depth	0.41 ft
Percent Full	100.00
Critical Slope	0.008027 ft/ft
Velocity	2.19 ft/s
Velocity Head	0.07 ft
Specific Energy	FULL ft
Froude Number	FULL
Maximum Discharge	0.82 cfs
Full Flow Capacity	0.76 cfs
Full Flow Slope	0.004000 ft/ft



DATA POINTS
 1. STA 25.00+00
 2. STA 25.50+00
 3. STA 26.00+00
 4. STA 26.50+00
 5. STA 27.00+00
 6. STA 27.50+00
 7. STA 28.00+00

DATA POINTS
 1. STA 28.00+00
 2. STA 28.50+00
 3. STA 29.00+00
 4. STA 29.50+00
 5. STA 30.00+00
 6. STA 30.50+00
 7. STA 31.00+00

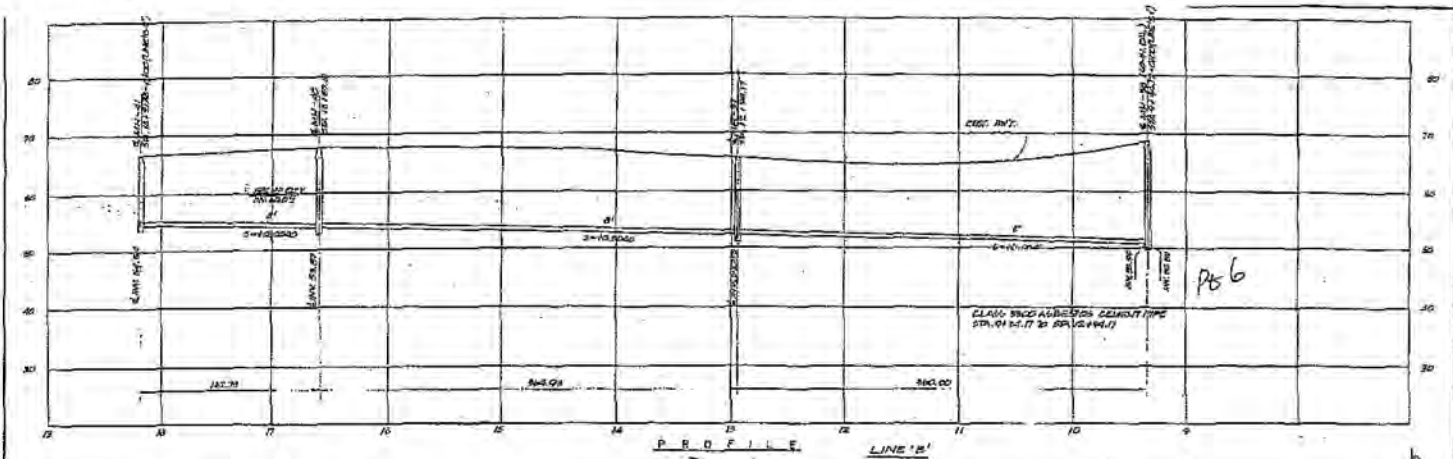
DATA POINTS
 1. STA 31.00+00
 2. STA 31.50+00
 3. STA 32.00+00
 4. STA 32.50+00
 5. STA 33.00+00
 6. STA 33.50+00
 7. STA 34.00+00



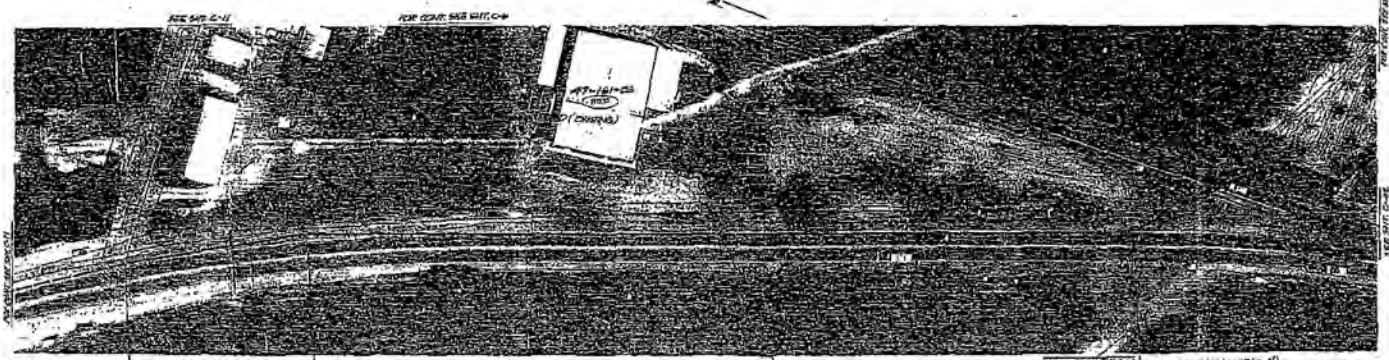
- 1. STA 25.00+00
- 2. STA 25.50+00
- 3. STA 26.00+00
- 4. STA 26.50+00
- 5. STA 27.00+00
- 6. STA 27.50+00
- 7. STA 28.00+00
- 8. STA 28.50+00
- 9. STA 29.00+00
- 10. STA 29.50+00
- 11. STA 30.00+00
- 12. STA 30.50+00
- 13. STA 31.00+00
- 14. STA 31.50+00
- 15. STA 32.00+00
- 16. STA 32.50+00
- 17. STA 33.00+00
- 18. STA 33.50+00
- 19. STA 34.00+00

019961

SCALE: HORIZ. 1"=40' VERT. 1"=4'		PERMITTED: JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC. 190 NORTH CALIFORNIA BLVD. WALNUT CREEK, CALIFORNIA 94696 PHONE: 925-938-1100 FAX: 925-938-1101		APPROVED: _____ DATE: _____ COUNTY SERVICE AREA 15, FERRISBURG WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT C-08-1112 LINE B STA. 27.44 TO 28.00+00 LINE B-2 STA. 27.44 TO 28.00+00		SHEET C-11 OF 34 SHEETS
--	--	---	--	--	--	-------------------------------



PROFILE LINE 'B'



18.150.00
ELEVATION
ELEVATION

18.150.00
ELEVATION
ELEVATION

18.150.00
ELEVATION
ELEVATION

18.150.00
ELEVATION
ELEVATION

18.150.00
ELEVATION
ELEVATION

18.150.00
ELEVATION
ELEVATION

019960

P L A N

SHEET NO. _____ OF 10 SHEETS		DATE: _____ SCALE: _____ PROJECT: _____	COUNTY: _____ CITY: _____ ADDRESS: _____	SHEET NO. _____ OF 10 SHEETS
DRAWN BY: _____ CHECKED BY: _____ DATE: _____		JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC. 280 NORTH CALIFORNIA BLVD. WALNUT CREEK, CALIFORNIA 94598 PHONE: (925) 938-1100 FAX: (925) 938-1101		COUNTY OF SAN JOAQUIN WASTEWATER COLLECTION AND FURNACE FIDELITY PROJECT - SHREVE LANE 8 STA. 10+00 TO 10+50

D
 Penngrove Reach 14-15
 Worksheet for Circular Channel

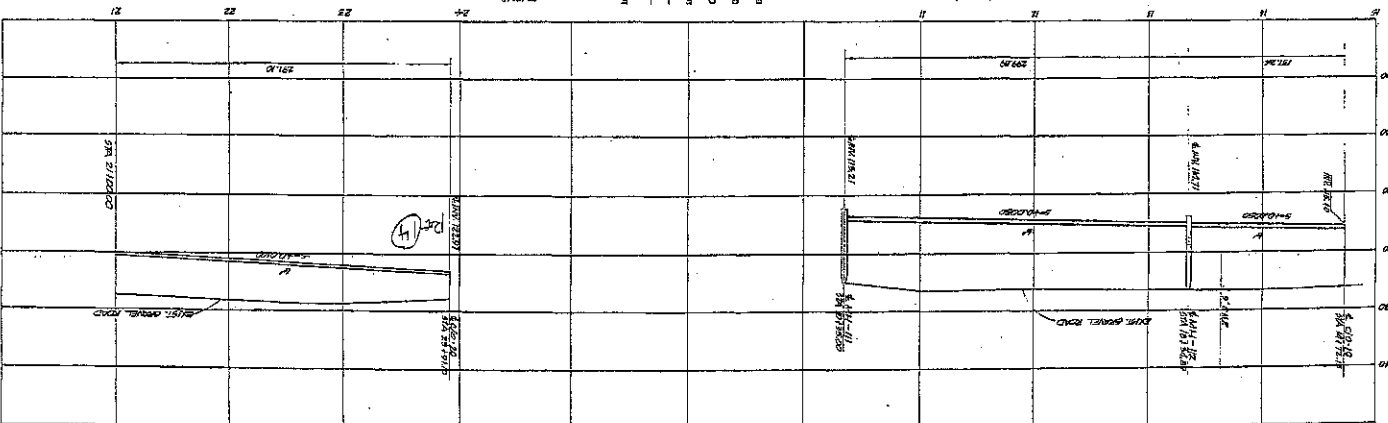
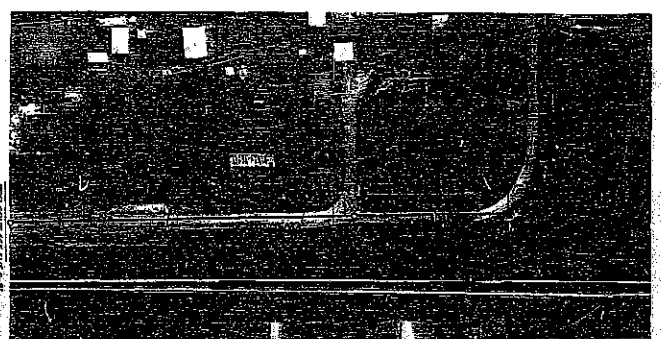
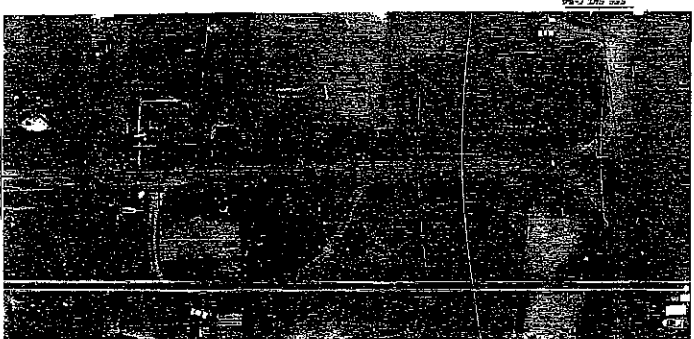
Project Description	
Project File	d:\hess\d\m\w\proj\oct1.fm2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Discharge

Input Data	
Manning's Coefficient	0.013
Channel Slope	0.010000 ft/ft
Depth	0.50 ft
Diameter	6.00 in

Results	
Discharge	0.36 mgd
Flow Area	0.20 ft ²
Wetted Perimeter	1.57 ft
Top Width	0.00 ft
Critical Depth	0.38 ft
Percent Full	100.00
Critical Slope	0.011553 ft/ft
Velocity	2.86 ft/s
Velocity Head	0.13 ft
Specific Energy	FULL ft
Froude Number	FULL
Maximum Discharge	0.60 cfs
Full Flow Capacity	0.55 cfs
Full Flow Slope	0.010000 ft/ft

DATE: 11/11/72	PROJECT: COUNTY BRIDGE AND HIGHWAY IMPROVEMENT PROJECT C-22-1112	CLIENT: COUNTY BRIDGE AND HIGHWAY IMPROVEMENT PROJECT C-22-1112	SCALE: 1"=20'
DESIGNED BY: JAMES K. MONTGOMERY	CHECKED BY: JAMES K. MONTGOMERY	DATE: 11/11/72	PROJECT: COUNTY BRIDGE AND HIGHWAY IMPROVEMENT PROJECT C-22-1112
JAMES K. MONTGOMERY CONSULTING ENGINEERS, INC. 100 NORTH DAVENPORT AVE. WABASH, ILL. 62450 PHONE: (618) 338-1111			

019984

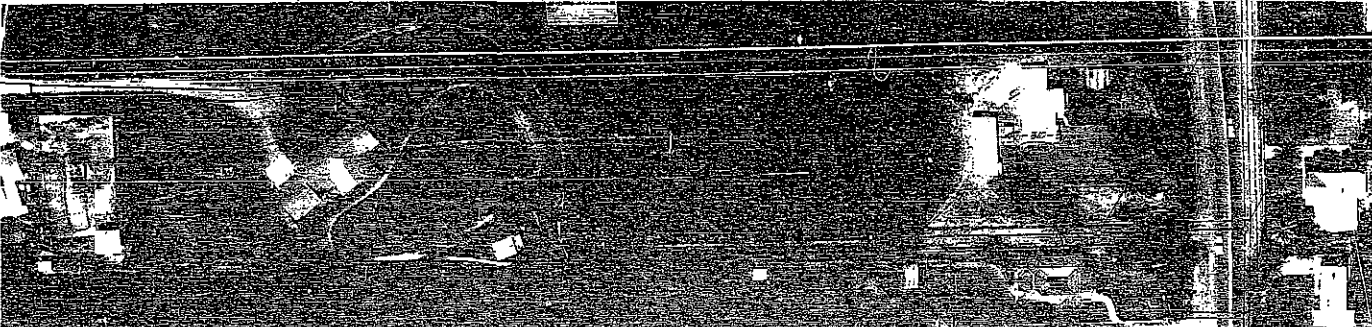
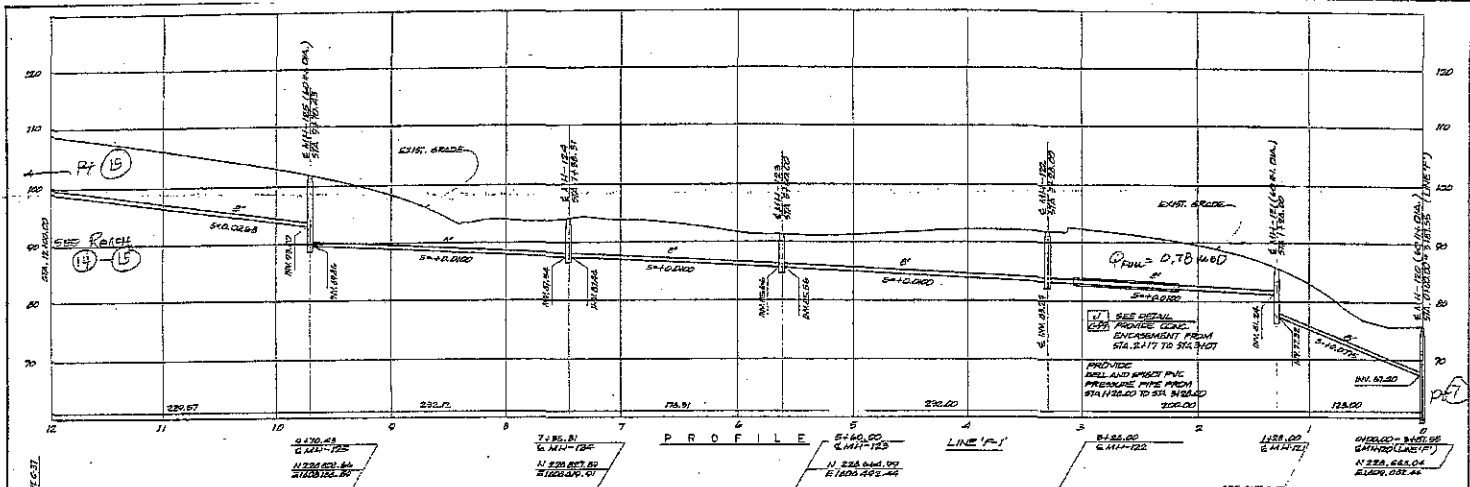


E
 Penngrove Reach 15-7
 Worksheet for Circular Channel

Project Description	
Project File	d:\haestad\im\project1.fim2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Full Flow Capacity

Input Data	
Manning's Coefficient	0.013
Channel Slope	0.010000 #/ft
Diameter	8.00 in

Results	
Depth	0.67 ft
Discharge	0.78 mgd
Flow Area	0.35 ft ²
Wetted Perimeter	2.08 ft
Top Width	8.00 ft
Critical Depth	0.52 ft
Percent Full	100.00
Critical Slope	0.010992 #/ft
Velocity	3.46 ft/s
Velocity Head	0.19 ft
Specific Energy	FULL ft
Froude Number	FULL
Maximum Discharge	1.30 cfs
Full Flow Capacity	1.21 cfs
Full Flow Slope	0.010000 #/ft



- ① STA 8+74 IN. 8" L=7'
- ② STA 0+70 IN. 8" L=22'
- ③ STA 1+65 IN. 12" L=17'

019988

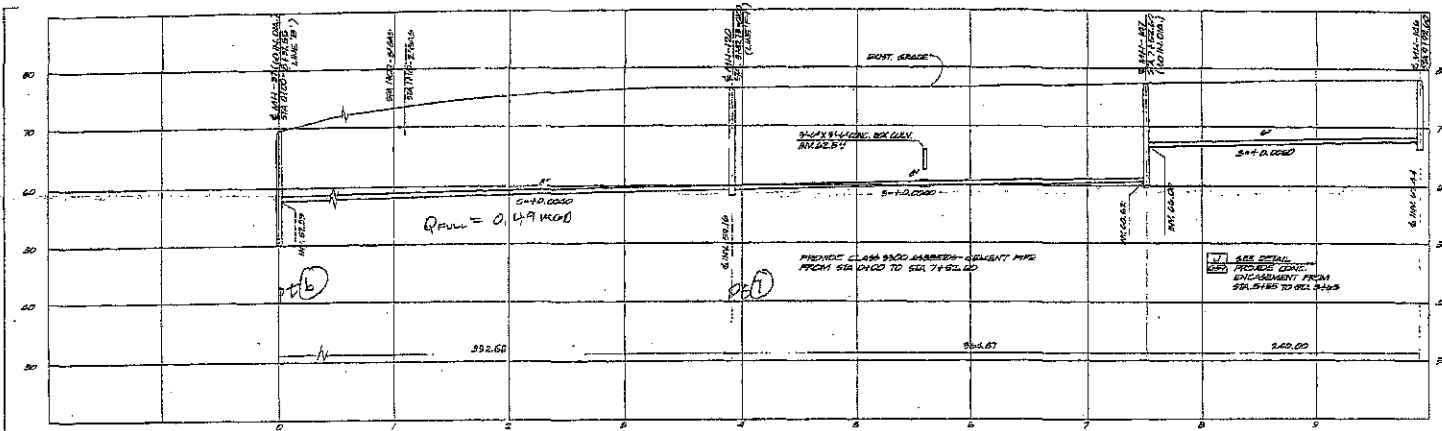
SCALE: HORIZ. 1"=40' VERT. 1"=4'		DESIGNED BY: [Signature] CHECKED BY: [Signature]		JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC. 100 NORTH CALIFORNIA BLVD. WALNUT CREEK, CALIFORNIA 94596		COUNTY SERVICE AREA 19, PENNSURVE WASTEWATER COLLECTION AND PLANT FACILITIES PROJECT C-36-1110		SHEET C-36 OF 74 SHEETS
APPROVED: [Signature] DATE:		APPROVED: [Signature] DATE:		APPROVED: [Signature] DATE:		APPROVED: [Signature] DATE:		LINE 1-1 STYL. 0.40 TO 0.40

K
 Penngrove Reach 7-6
 Worksheet for Circular Channel

Project Description	
Project File	d:\hesstadi\inw\project1.in2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Full Flow Capacity

Input Data	
Mannings Coefficient	0.013
Channel Slope	0.004000 ft/ft
Diameter	6.00 in

Results		
Depth	0.67	ft
Discharge	0.48	mgd
Flow Area	0.35	ft ²
Wetted Perimeter	2.08	ft
Top Width	0.60	ft
Critical Depth	0.41	ft
Percent Full	100.00	
Critical Slope	0.008027	ft/ft
Velocity	2.19	ft/s
Velocity Head	0.07	ft
Specific Energy	FULL	ft
Froude Number	FULL	
Maximum Discharge	0.82	cfs
Full Flow Capacity	0.76	cfs
Full Flow Slope	0.004000	ft/ft

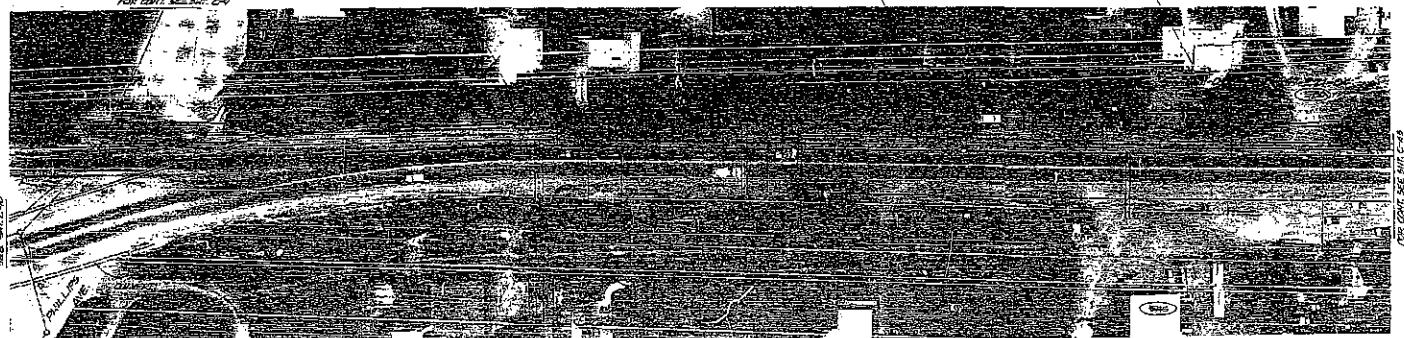


0+00 = 66.00 (LINE 10)
 6 1211-87
 11 1211-88 21
 11 1211-88 21
 11 1211-88 21

0+000 - 0+000 (LINE 10)
 0 1211-87
 11 1211-88 21
 11 1211-88 21

PROFILE

LINE 10



- 1) SEE PLAN C-0 1211-87 21 L=40'
- 2) SEE PLAN C-0 1211-88 21 L=62'
- 3) SEE PLAN C-0 1211-88 21 L=40'
- 4) SEE PLAN C-0 1211-88 21 L=62'
- 5) SEE PLAN C-0 1211-88 21 L=57'
- 6) SEE PLAN C-0 1211-88 21 L=77'
- 7) SEE PLAN C-0 1211-88 21 L=80'

019994

PLAN

SCALE: HORIZ. 1"=40' VERT. 1"=8' DATE: _____ BY: _____	SUBMITTED: _____ PROJECT: _____ DRAWN BY: _____ CHECKED BY: _____	JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC. 1520 SOUTH CALIFORNIA BLVD. WALNUT CREEK, CALIFORNIA 94596 PHONE: (925) 938-1100 FAX: (925) 938-1101	APPROVED: _____ DATE: _____ APPROVED: _____ DATE: _____	COUNTY SERVICE AREA 19, PENNGROVE WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT C-08-112 LINE 10 STA. 0+00 TO 9+52.80	SHEET C-42 OF 24 SHEETS
	PROJECT: _____ LOCATION: _____ DATE: _____			COUNTY SERVICE AREA 19, PENNGROVE WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT C-08-112 LINE 10 STA. 0+00 TO 9+52.80	

Penngrove Reach 6-13
Worksheet for Circular Channel

Project Description	
Project File	d:\hasstad\mwf\project1.fm2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Full Flow Capacity

Input Data	
Mannings Coefficient	0.013
Channel Slope	0.004000 ft/ft
Diameter	8.00 in

Results	
Depth	0.67 ft
Discharge	0.49 mgd
Flow Area	0.35 ft ²
Wetted Perimeter	2.09 ft
Top Width	0.00 ft
Critical Depth	0.41 ft
Percent Full	100.00
Critical Slope	0.008027 ft/ft
Velocity	2.19 ft/s
Velocity Head	0.07 ft
Specific Energy	FULL ft
Froude Number	FULL
Maximum Discharge	0.82 cfs
Full Flow Capacity	0.76 cfs
Full Flow Slope	0.004000 ft/ft

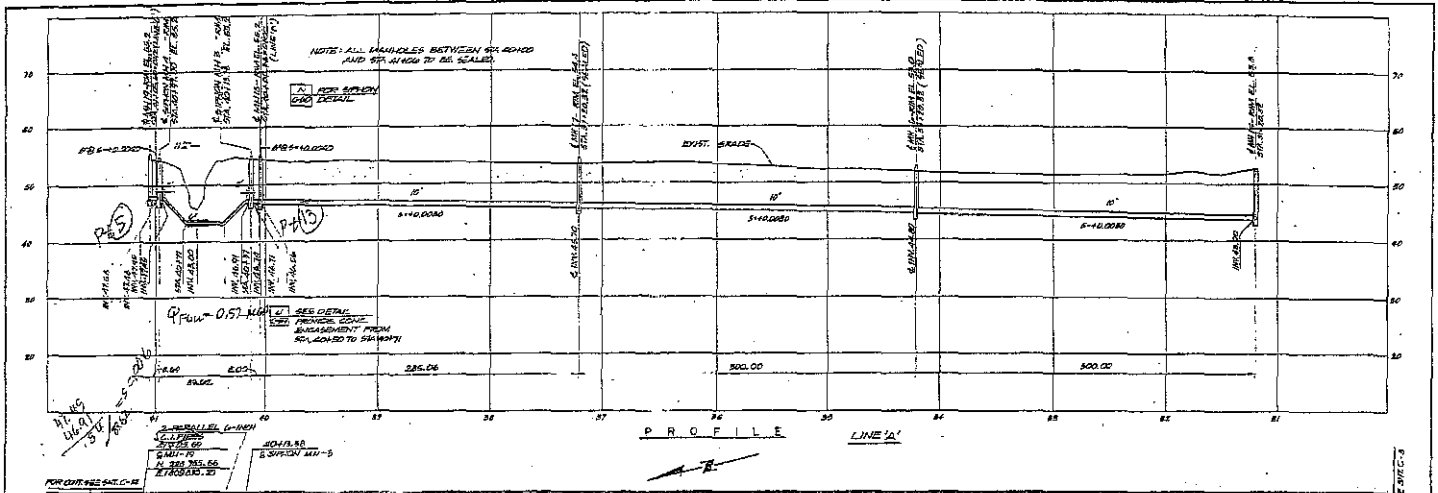
N
 Penngrove Reach 5-13
 Worksheet for Circular Channel

Project Description	
Project File	d:\hastad\mw\project1.fm2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Full Flow Capacity

Input Data	
Manning's Coefficient	0.014
Channel Slope	0.008000 ft/ft
Diameter	6.50 in

Results		
Depth	0.50	ft
Discharge	0.26	mgd
Flow Area	0.20	ft ²
Wetted Perimeter	1.57	ft
Top Width	0.00	ft
Critical Depth	0.32	ft
Percent Full	100.00	
Critical Slope	0.010553	ft/ft
Velocity	2.05	ft/s
Velocity Head	0.07	ft
Specific Energy	FULL	ft
Froude Number	FULL	
Maximum Discharge	0.43	cts
Full Flow Capacity	0.40	cts
Full Flow Slope	0.008000	ft/ft

FOR ONE SIAHON
 FOR 2 PIPE. $Q_{TOTAL} = 0.52 \text{ MGD}$



019954

SCALE: HORIZ. 1"=40' VERT. 1"=4'		DESIGNED BY: <i>[Signature]</i> CHECKED BY: <i>[Signature]</i> DATE: 11/17/72	PROJECT NO.: 22372 SHEET NO.: 111/112	APPROVED: _____ CHECKED: _____ DATE: _____	COUNTY SERVICE AREA 10, PENNSBORO WASTEWATER COLLECTION AND PUMPED FACILITIES PROJECT C-08-1112 LINE A STA. 3140.32 TO 4146.41	SHEET C-4 OF 14 SHEETS
PROJECT: JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC. 1001 18TH CALIFORNIA BLVD. MALDEN, CALIFORNIA 95958 916-436-1111				SHEET NO. 111/112 DATE: 11/17/72		SHEET NO. 112/112 DATE: 11/17/72

P
 Penngrove Reach 13-9
 Worksheet for Circular Channel

Project Description	
Project File	d:\haestad\inw\project1.fm2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Full Flow Capacity

Input Data	
Manning's Coefficient	0.013
Channel Slope	0.003000 ft/ft
Diameter	10.00 in

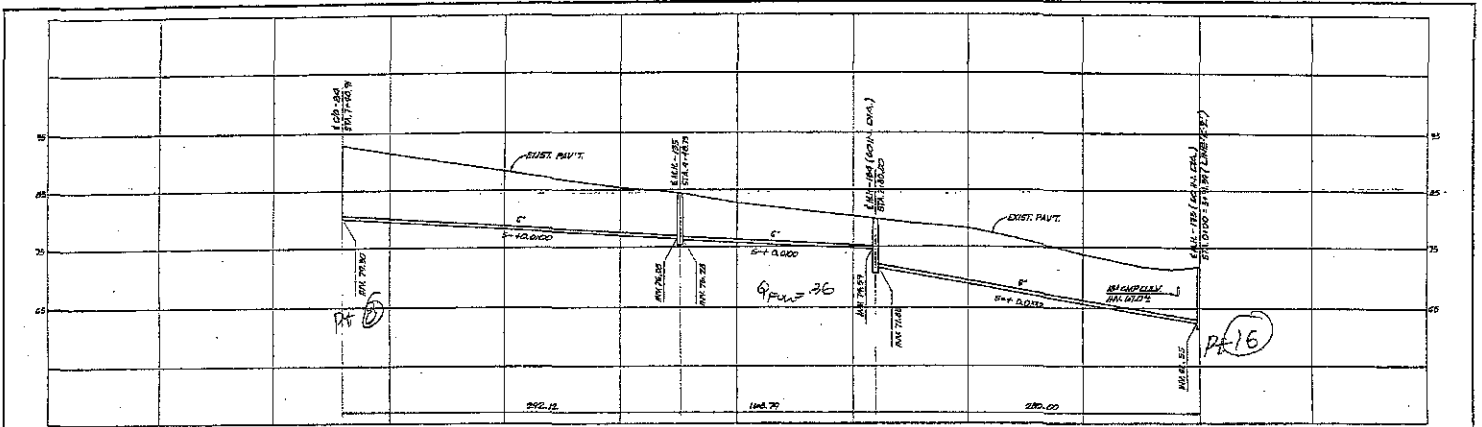
Results	
Depth	0.83 ft
Discharge	0.78 mgd
Flow Area	0.55 ft ²
Wetted Perimeter	2.62 ft
Top Width	0.00 ft
Critical Depth	0.49 ft
Percent Full	100.00
Critical Slope	0.007133 ft/ft
Velocity	2.20 ft/s
Velocity Head	0.08 ft
Specific Energy	FULL ft
Froude Number	FULL
Maximum Discharge	1.29 cfs
Full Flow Capacity	1.20 cfs
Full Flow Slope	0.003000 ft/ft

F
 Penngrove Reach E-16
 Worksheet for Circular Channel

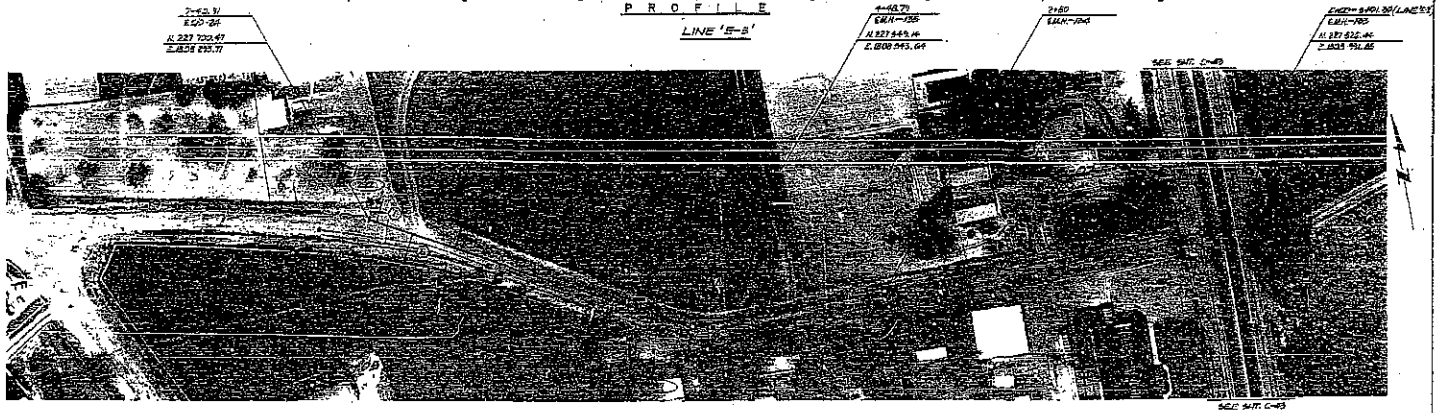
Project Description	
Project File	d:\haestad\mwp\project1.m2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Full Flow Capacity

Input Data	
Manning's Coefficient	0.013
Channel Slope	0.010000 ft/ft
Diameter	6.00 in

Results	
Depth	0.50 ft
Discharge	0.36 mgd
Flow Area	0.20 ft ²
Wetted Perimeter	1.57 ft
Top Width	0.00 ft
Critical Depth	0.38 ft
Percent Full	100.00
Critical Slope	0.011653 ft/ft
Velocity	2.86 ft/s
Velocity Head	0.13 ft
Specific Energy	FULL ft
Froude Number	FULL
Maximum Discharge	0.60 cfs
Full Flow Capacity	0.56 cfs
Full Flow Slope	0.010000 ft/ft



PROFILE
LINE "B-B"




- ① STA. 7+00 ELEV. 78.00
- ② STA. 7+25 ELEV. 78.00
- ③ STA. 7+50 ELEV. 78.00
- ④ STA. 7+75 ELEV. 78.00
- ⑤ STA. 8+00 ELEV. 78.00
- ⑥ STA. 8+25 ELEV. 78.00
- ⑦ STA. 8+50 ELEV. 78.00
- ⑧ STA. 8+75 ELEV. 78.00
- ⑨ STA. 9+00 ELEV. 78.00

019991

P L A N

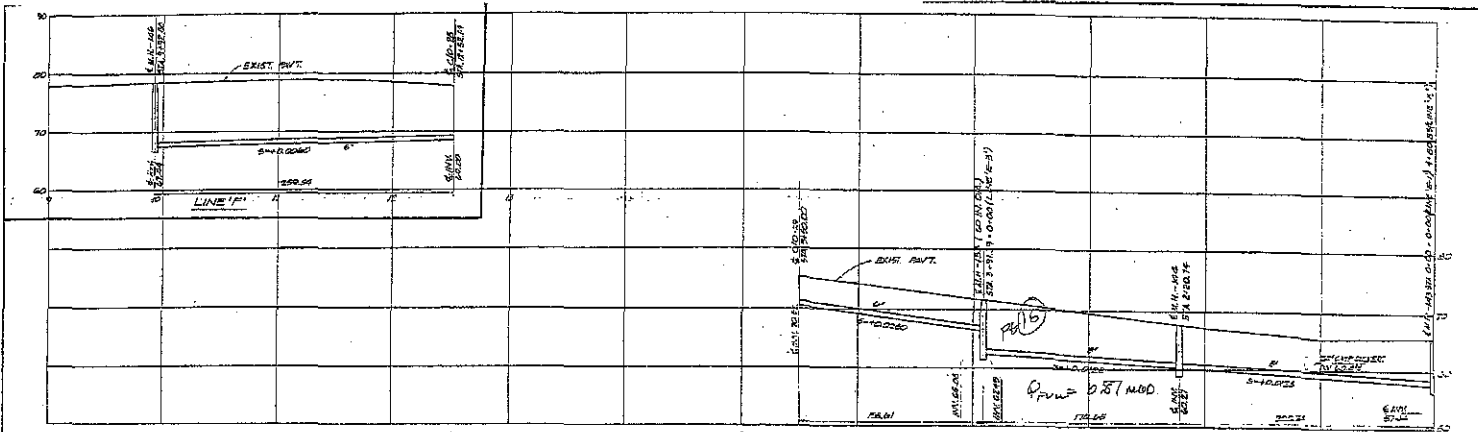
SCALE: HORIZ. 1"=40' VERT. 1"=4'		DESIGNED BY: [Signature] DRAWN BY: [Signature] CHECKED BY: [Signature]		PERMITTED BY: [Signature] DATE: [Date]		APPROVED BY: [Signature] DATE: [Date]		COUNTY SERVICE AREA 10, BOUNTYVILLE WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT C-08-112 LINE B-B STA. 6+00 TO 7+00		SHEET C-39 OF 34 SHEETS
JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC. 180 NORTH CALIFORNIA BLVD. PALM BEACH, CALIFORNIA 33480				COUNTY SERVICE AREA 10, BOUNTYVILLE WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT C-08-112 LINE B-B STA. 6+00 TO 7+00				SHEET C-39 OF 34 SHEETS		


 Penngrove Reach 16-9
 Worksheet for Circular Channel

Project Description	
Project File	d:\haestad\imw\project1.fn2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Full Flow Capacity

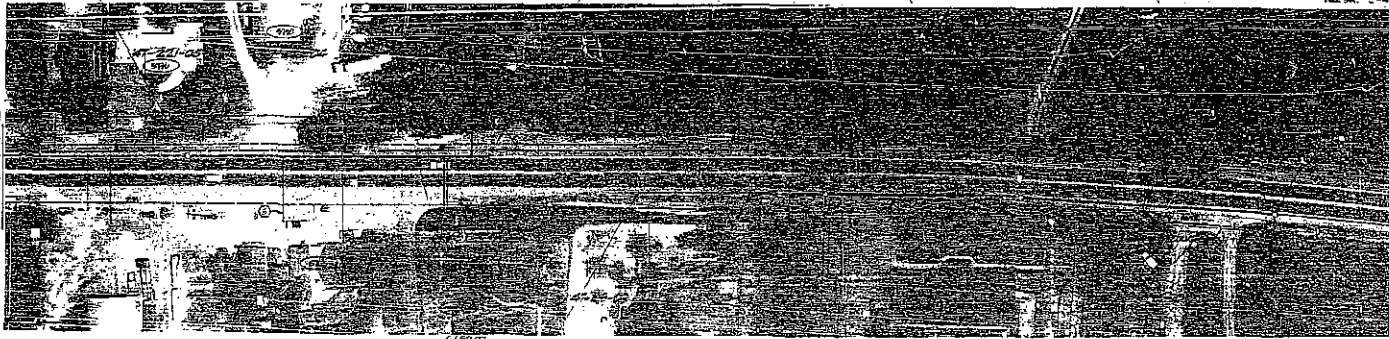
Input Data	
Manning's Coefficient	0.013
Channel Slope	0.012500 ft/ft ✓
Diameter	3.00 in

Results		
Depth	0.67	ft
Discharge	0.87	mgd
Flow Area	0.35	ft ²
Wetted Perimeter	2.09	ft
Top Width	0.00	ft
Critical Depth	0.55	ft
Percent Full	100.00	
Critical Slope	0.012437	ft/ft
Velocity	3.87	ft/s
Velocity Head	0.23	ft
Specific Energy	FULL	ft
Froude Number	FULL	
Maximum Discharge	1.45	cms
Full Flow Capacity	1.35	cms
Full Flow Slope	0.012500	ft/ft



PROFILE

3+52.50
 E.M.M. - 140
 LINE 'E-1'
 1+00.00
 1+50.00
 1+80.00
 2+20.70
 E.M.M. - 140
 LINE 'E-2'
 2+00.00
 2+50.00
 2+80.00
 3+00.00
 3+52.50
 E.M.M. - 140
 LINE 'E-3'
 3+00.00
 3+50.00
 3+52.50

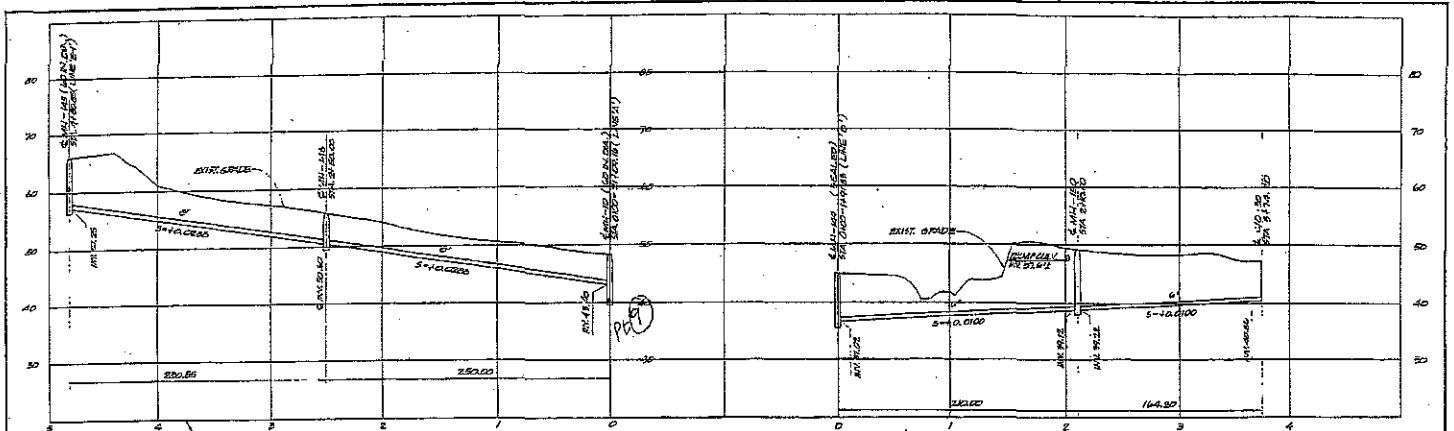


NOTE: MANHOLE DELETED FROM CONTRACT

019995

SCALE: HORIZ. 1" = 40' VERT. 1" = 5'	DESIGNER: CHECKED: DATE:	APPROVED: DATE:	COUNTY SERVICE AREA 10, PENNSYLVANIA WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT C-04-112 LINE 'E' STA. 1+00.00 TO 3+52.50 LINE 'E-1' STA. 1+00.00 TO 1+50.00	SHEET C-43 OF 74 SHEETS
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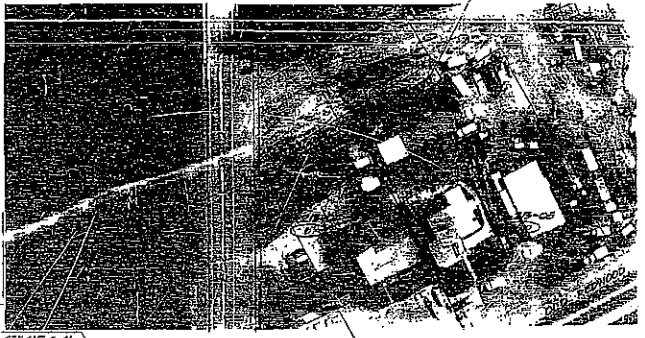
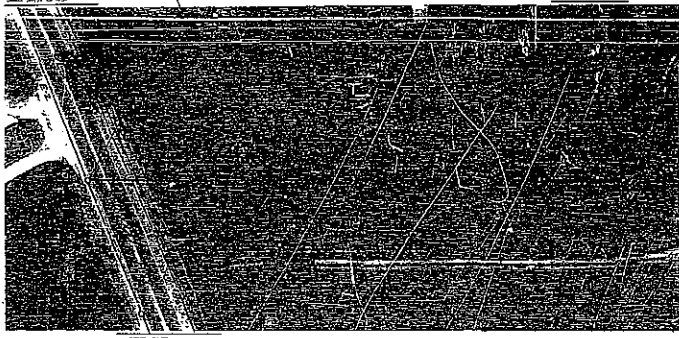
JAMES M. MONTGOMERY
CONSULTING ENGINEERS, INC.
 100 NORTH GREENBANK BLVD. WARREN, OHIO 44122
 PHONE: (440) 343-1000 FAX: (440) 343-1001



41445-0000 (LINE 'E')
 2.44% SLOPE
 11 225 000.00
 2 100 000.00

PROFILE

LINE 'D'



2 100 000.00
 1 100 000.00

P L A N

0100-11000 (LINE 'D')
 2.44% SLOPE
 11 225 000.00
 2 100 000.00

719996

2 100 000.00
 1 100 000.00
 11 225 000.00
 2 100 000.00

- ① 24" DIA. 11-225 L=10'
- ② 24" DIA. 11-225 L=10'
- ③ 24" DIA. 11-225 L=10'

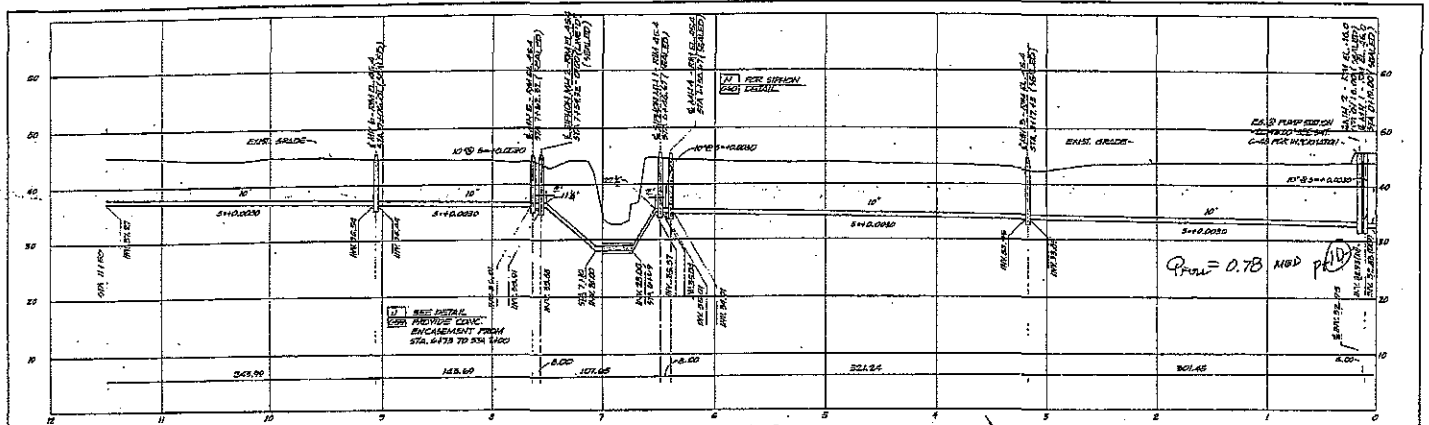
SCALE: HORIZ. 1"=40' VERT. 1"=4'		CONTRACT NO. 11-225 PROJECT NO. 11-225 SHEET NO. 11-225	JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC. 180 NORTH CALIFORNIA BLVD. SUITE 200, CALIFORNIA PARK FORT WORTH, TEXAS 76104	COUNTY SERVICE AREA 19, FENNERVILLE WASTEWATER COLLECTION AND PUMPING FACILITIES PROJECT C-44-1132 LINE E STA. 8400 TO 8400.25 LINE D STA. 8400 TO 8421.25	SHEET C-44 OF 14 SHEETS
--	--	---	---	---	--------------------------------------

Penngrove Reach 9-10
Worksheet for Circular Channel

Project Description	
Project File	d:\haestad\imw\project1.fm2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Full Flow Capacity

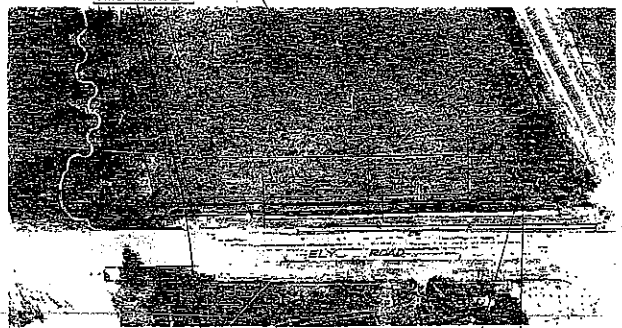
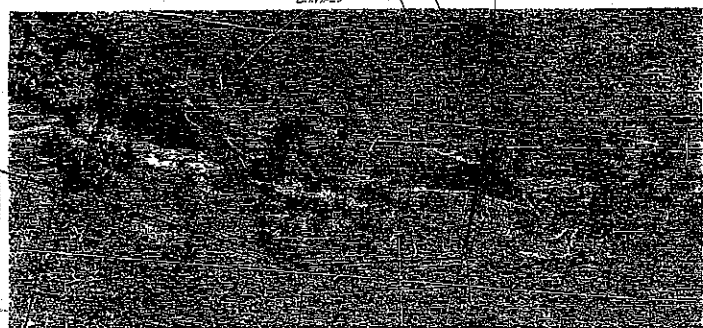
Input Data	
Manning's Coefficient	0.013
Channel Slope	0.003000 ft/ft
Diameter	10.00 in

Results	
Depth	0.83 ft
Discharge	0.78 mgd
Flow Area	0.55 ft ²
Wetted Perimeter	2.62 ft
Top Width	0.00 ft
Critical Depth	0.49 ft
Percent Full	100.00
Critical Slope	0.007133 ft/ft
Velocity	2.20 ft/s
Velocity Head	0.08 ft
Specific Energy	FULL ft
Froude Number	FULL
Maximum Discharge	1.29 cfs
Full Flow Capacity	1.20 cfs
Full Flow Slope	0.003000 ft/ft



PROFILE

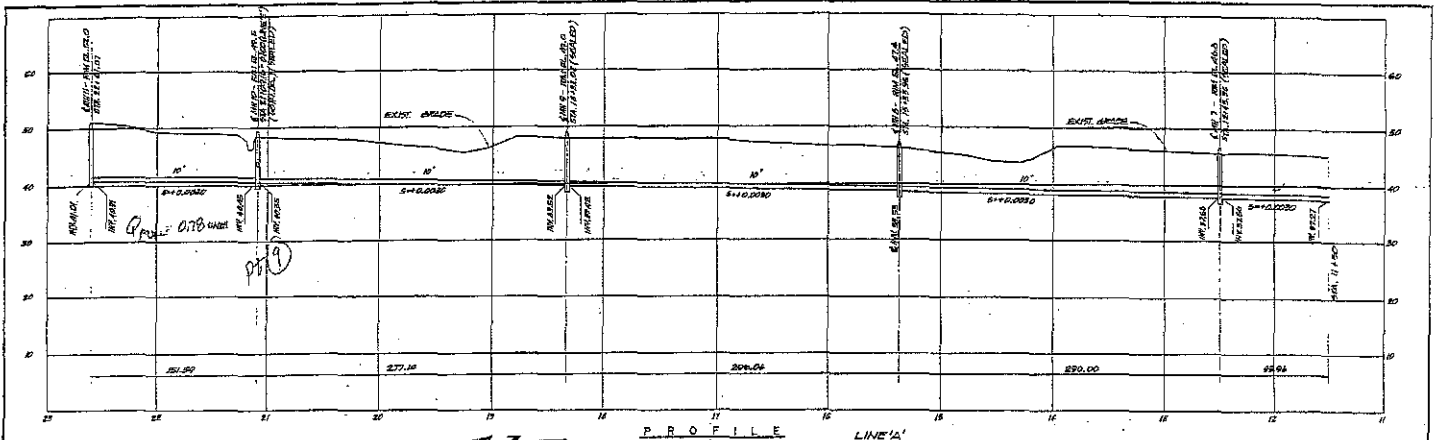
LINE 'A'



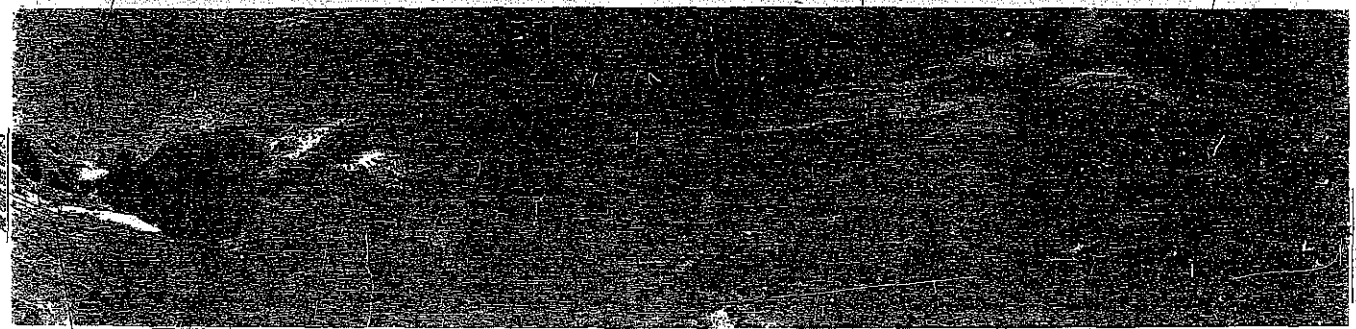
PLAN

019951

SCALE: HORIZ. 1"=40' VERT. 1"=4'	PROJECT: COUNTY SERVICE AREA 18, PENNSBORO WASTEWATER COLLECTION AND PUMPED FACILITIES PROJECT C-06-1118	SHEET: C-1 OF 11 SHEETS
DRAWN BY: J.M.M.	CHECKED BY: J.M.M.	DATE: 11/17/17
JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC. 1202 NORTH CALIFORNIA BLVD., WALNUT CREEK, CALIF. 94596 (925) 938-1100 FAX (925) 938-1101 WWW.JMMONLINE.COM		



PROFILE LINE A



STATION	ELEVATION	REMARKS
10+00	41.50	EXIST. GRADE
11+00	42.50	EXIST. GRADE
12+00	43.50	EXIST. GRADE
13+00	44.50	EXIST. GRADE
14+00	45.50	EXIST. GRADE
15+00	46.50	EXIST. GRADE
16+00	47.50	EXIST. GRADE
17+00	48.50	EXIST. GRADE
18+00	49.50	EXIST. GRADE

PLAN

719952

SCALE: HORIZ. 1"=40' VERT. 1"=4'		REVISIONS: NO. DATE BY DESCRIPTION		APPROVED: _____ DATE: _____ APPROVED: _____ DATE: _____		COUNTY SERVICE AREA 4, MONTGOMERY WASTEWATER COLLECTION AND FURNISH FACILITIES PROJECT C-04-1112 LINE A STA. 10+00 TO 18+00		SHEET C-2 12 1/4" X 18"
--	--	---------------------------------------	--	--	--	---	--	-------------------------------

JAMES M. MONTGOMERY CONSULTING ENGINEERS, INC.
 200 NORTH CALDWELL BLVD. SUITE 2000, DALLAS, TEXAS 75201
 PHONE: (214) 443-8800 FAX: (214) 443-8801

PENNGROVE ADWF							bulldout
Area	Zoning Plan	Area Acres	No. of Units	Flow	Ultimate ADWF gpd	Remarks	
A	UR1	27.0	27	7009			
	UR2	21.4	42	10903			
	UR4	11.7	44	11422			
		60.1			29335		
B	UR1	42.8	42	10903			
					10903		
C	UR1	5.2	5	1298			
	UR2	14.5	8	2077			
	Lim Ind	16.5		13200			
	annex 92	UR1	4.6	5	1298		
		40.8			17873		
D	UR1	21.6	21	5452			
					5452		
E	UR1	7.8	7	1817			
	UR2	4.7	8	2077			
		12.5			3894		
F	UR1	1.2	1	260			
	UR2	26.5	52	13499			
	Gen. Comm	2.8		11680			
		30.5			25439		
G	UR2	14.4	28	7269			
	Lim Comm	8.5		5100			
		22.9			12369		
H	UR1	8.4	8	2077			
	UR6	13.2	78	20249			
	UR2	4.3	8	2077			
	Quasi	7.3	6	1320			
	Gen. Comm	2.2		1320			
	Lim Comm	3.4		2040			
	38.8			29082			
I	UR1	18.2	18	4673			
	UR2	21.3	42	10903			
	Lim Comm	4.3		2580			
	Lim Ind	2.0		1600			
	Quasi	2.3	1	220			
		48.1			19976		
J	RR2	4.8	2	519			
					519		
K	RR2	1.5	1	260			
	Gen. Comm	0.9		540			
		2.4			800		
L	UR2	6.5	12	3115			
	RR2	21.2	10	2598			
		27.7			5711		
M	UR4	11.4	44	11422			
	Lim Comm	1.6		960			
	Quasi	6.5	3	660			
		18.5			13042		
N		0.0			0		
P	RR2	36.7	18	4673			
Totals		408.2	541		4673		
					179068		
	Flow per ESD =	236	gpd/ESD per 1992 readings				
		24	Factor of safety = (1) 0.10				
		260	total. Use this for all calculations				
	(1) Enter the factor of safety						

PENNGROVE ADWF							bulldout + DHE
Area	Zoning Plan	Area Acres	No. of Units	Flow	Ultimate ADWF gpd	Remarks	
A	UR1	27.0	27	7009			
	UR2	21.4	42	10903			
	UR4	11.7	44	11422			
		60.1	add. units 26	6490	36825	ID#52	
B	UR1	42.8	42	10903			
			add. units 0	0	10903		
C	UR1	5.2	5	1298			
	UR2	14.6	8	2077			
	Lim Ind	16.5		13200			
annex 92	UR1	4.6	6	1298			
		40.8	add. units 0	0	17873		
D	UR1	21.6	21	5452			
			add. units 0	0	5452		
E	UR1	7.8	7	1817			
	UR2	4.7	8	2077			
		12.5	add. units 0	0	3894		
F	UR1	1.2	1	260			
	UR2	26.5	52	13499			
	Gen. Comm	2.8		11680			
		30.5	add. units 0	0	25439		
G	UR2	14.4	28	7269			
	Lim Comm	8.5		5100			
		22.9	add. units 0	0	12369		
H	UR1	8.4	8	2077			
	UR6	13.2	78	20249			
	UR2	4.3	8	2077			
	Quasi	7.3	6	1320			
	Gen. Comm	2.2		1320			
	Lim Comm	3.4		2040			
	38.8	add. units 9	2336	31419	ID#85		
I	UR1	18.2	18	4673			
	UR2	21.3	42	10903			
	Lim Comm	4.3		2580			
	Lim Ind	2.0		1800			
	Quasi	2.3	1	220			
	48.1	add. units 0	0	19976			
J	RR2	4.8	2	519			
			add. units 0	0	519		
K	RR2	1.5	1	260			
	Gen. Comm	0.9		540			
		2.4	add. units 0	0	800		
L	UR2	6.5	12	3115			
	RR2	21.2	10	2586			
		27.7	add. units 0	0	5711		
M	UR4	11.4	44	11422			
	Lim Comm	1.6		960			
	Quasi	5.5	3	660			
		18.5	add. units 0	0	13042		
N		0.0		0			
			add. units 0	0	0		
P	RR2	36.7	18	4673			
			add. units 0	0	4673		
Totals		408.2	575		183221		
Flow per ESD =		236 gpd/ESD per 1992 readings					
		24 Factor of safety = (1) 0.10					
		260 total. Use this for all calculations					

Penngrove Reach 5-13 two 6-inch
Worksheet for Circular Channel

Project Description	
Project File	d:\haestad\fmw\project1.fm2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Discharge

Input Data	
Mannings Coefficient	0.014
Channel Slope	0.006000 ft/ft
Depth	0.50 ft
Diameter	6.00 in

Results	
Discharge	0.26 mgd
Flow Area	0.20 ft ²
Wetted Perimeter	1.57 ft
Top Width	0.15e-7 ft
Critical Depth	0.32 ft
Percent Full	100.00
Critical Slope	0.010653 ft/ft
Velocity	2.06 ft/s
Velocity Head	0.07 ft
Specific Energy	0.57 ft
Froude Number	1.0e-4
Maximum Discharge	0.43 cfs
Full Flow Capacity	0.40 cfs
Full Flow Slope	0.006000 ft/ft
Flow is subcritical.	

X 2 PIPES = 0.52 mgd

Penngrove Reach 5-13 two 6-inch
Worksheet for Circular Channel

Project Description	
Project File	d:\haestad\fmw\project1.fm2
Worksheet	check
Flow Element	Circular Channel
Method	Manning's Formula
Solve For	Discharge

Input Data	
Mannings Coefficient	0.013
Channel Slope	0.010000 ft/ft
Depth	0.50 ft
Diameter	6.00 in

*WRONG FOR CIP
DOES NOT MATCH PLANS*

Results	
Discharge	0.36 mgd
Flow Area	0.20 ft ²
Wetted Perimeter	1.57 ft
Top Width	0.15e-7 ft
Critical Depth	0.38 ft
Percent Full	100.00
Critical Slope	0.011553 ft/ft
Velocity	2.86 ft/s
Velocity Head	0.13 ft
Specific Energy	0.63 ft
Froude Number	0.14e-3
Maximum Discharge	0.60 cfs
Full Flow Capacity	0.56 cfs
Full Flow Slope	0.010000 ft/ft
Flow is subcritical.	

X 2 PIPES = 0.72 MGD

From: davdoty@comcast.net
To: [PermitSonoma-Housing](#)
Subject: Draft EIR Comments: Housing Element Update Forestville
Date: Monday, February 13, 2023 4:54:51 PM

EXTERNAL

Hi Eric,

I have concerns about the number of New Dwelling units proposed for Forestville, 635. Apparently all of the units are multi story apartment units. Why must the units be 1/2 mile from the Forestville town center? Why are units not proposed for Healdsburg or Sebastopol? Why aren't the number of housing units and potential new residents not capped at a reasonable percentage of the current Forestville population? Forestville currently has 405 residential units on the sewer system. Building 635 additional residential units will require a doubling of the current sewer plant and some of the proposed housing locations are on land that would be needed for the sewer plant expansion.

My address is: 8894 Trenton Rd
Forestville, CA 95435

Sincerely,

Dave Doty

Sent from my iPhone

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From: [Rebecca Mateja](#)
To: [PermitSonoma-Housing](#)
Subject: How and Why?
Date: Wednesday, December 28, 2022 12:56:36 PM

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

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

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

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

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

From: [Greg Tatarian](#)
To: [PermitSonoma-Housing](#)
Subject: Comments on Housing Element Update
Date: Tuesday, January 03, 2023 12:06:12 PM



Hello,

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

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

2. Prior to construction, a qualified biologist shall conduct a survey of existing buildings to determine if bats are present. The survey shall be conducted during the nonbreeding season (November through March). The biologist shall have access to all structures and interior attics, as needed. If a colony of bats is found roosting in any structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.).

COMMENT - BIO-7, Measure 2:

As written, Measure 2 presumes bats are active throughout the year, which is not true, so will make surveys ineffective. Measure 2 also requires additional surveys only if a colony is present, but this is insufficient. Also, Measure 2 does not account for the likely presence of maternity colonies in buildings during maternity season, and does not address other habitat types and features used by bats, such as trees, bridges, and culverts.

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

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

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

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

3. If bats are roosting in the building during the daytime but are not part of an active maternity colony, then exclusion measures must include one-way valves that allow bats to get out but are designed so that the bats may not reenter the structure. Maternal bat colonies shall not be disturbed.

COMMENT - BIO-7, Measure 3:

As currently written, Measure 3 does not account for the likely presence of maternity colonies in buildings during maternity season, and does not address other habitat types and features used by bats, such as trees, bridges, and culverts.

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

4. A qualified biologist shall conduct pre-construction clearance surveys within 14 days of the start of construction (including staging and mobilization). The surveys shall cover the entire disturbance footprint plus a minimum 200-foot buffer, and shall identify all special status animal species that may occur on-site. All nonlisted special status species shall be relocated from the site either through direct capture or through passive exclusion. The biologist shall submit a report of the preconstruction survey to the County for their review and approval prior to the start of construction.

COMMENT - BIO-7, Measure 4:

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

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

Regards,

Greg Tatarian

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

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

--

Greg Tatarian Conservation Lecture Series Archive:
Conserving California's Bats Through Environmental Review and Permitting:
<https://www.youtube.com/watch?v=QFXLRa5mClI&feature=youtu.be>

CNDDDB News: <https://www.wildlife.ca.gov/Data/CNDDDB/News/cnddb-contributor-spotlight-trish-greg-tatarian>

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From: [brian bollman](#)
To: [PermitSonoma-Housing](#)
Subject: draft Environmental
Date: Wednesday, January 11, 2023 4:47:18 PM

Response to [draft Environmental Impact Report for the Housing Element Update](#)

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

- 1) Housing needs in this document focus on vacancy rates, but vacancy rates are only a snapshot of availability, and not reflective of actual housing stocks.
- 2) Sonoma county is in its sixth year of population decline.
- 3) Until recently, the U.S. and California experienced an increase in the size of units for decades, resulting in much larger square footage per person.
- 4) The number of persons per unit has decreased steadily in the United States for decades, and has been decreasing in Sonoma County for some time as well.
- 5) Vacancy rates always drop during periods of prosperity because people who were previously sharing accommodations with friends or family find that they can afford to have there own units. By contrast, when the economy worsens, people often move in together to save money. (It is understandable that people want their own units, but it is a much better use of resources and better for the environment for people to share.)
- 6) A recent audit by the state found that the state's methodology for calculating housing needs grossly exaggerates actual housing needs.
- 7) The Association of Bay Area Governments (ABAG) bases its housing allocations on (exaggerated) regional needs, not on local housing needs. This is not a functional or realistic practice, because outlying areas like Sonoma County that are losing population can't appropriately provide housing for communities in the core of the Bay Area that are growing. The last thing we need in the Bay Area is people commuting 100 miles to work. The RHNA process that ABAG uses effectively shifts the burden of housing incurred by growth and bad planning in the core of the Bay Area onto outlying areas like Sonoma County that have not shared in that growth.

Conclusion:

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

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From: [Josette Brose-Eichar](#)
To: [PermitSonoma-Housing](#)
Subject: DEIR Housing element
Date: Wednesday, January 11, 2023 11:24:38 AM

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

"Of the 64,807 housing units in the Unincorporated County in 2019, 10,769 units (16.6 percent) were vacant (DOF 2019). There were 1,904 permitted vacation rentals in the County as of June 23, 2020 (County of Sonoma 2020c)."

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

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

To Permit Sonoma
11-18-2022

In reading your draft report it is stated:

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

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

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

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

accurate count of what this vacant housing really is.

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

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

Here are some of the census definitions:

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

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

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

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

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

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

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

Thank you and sincerely,

Josette Brose-Eichar

Boyce Hot Springs

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From: [Jim Bell](#)
To: [PermitSonoma-Housing](#)
Subject: County's Housing Element Update
Date: Saturday, January 14, 2023 12:11:58 PM

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

James Bell

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From: [ashleyyyyyy C](#)
To: [PermitSonoma-Housing](#)
Subject: Rezoning for Forestville
Date: Monday, January 23, 2023 10:51:58 AM

EXTERNAL

I am not supporting the rezoning for Forestville. We do not have a high school here anymore, a small grocery store. The town of Forestville can not support 1600 more people. We do not need to be a big city like Santa Rosa, we are a small friendly community. We already have enough people visiting from all over for the Russian river. We do not need apartments in the town of Forestville

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January 25, 2023

PermitSonoma-Housing@sonoma-county.org

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

RE: Comments on

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

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

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

For example, Site GUE 4 is on Fife Creek in the riparian zone, which is not stated in the document. The San Francisco Bay Joint Venture EcoAtlas (<https://www.ecoatlas.org/regions/adminregion/sfbjv?project=5630&site=5469>) shows associated habitats and sensitivities per area. With climate change Fife Creek will likely be an area of flooding and appropriate setbacks should be applied to riparian areas to encompass climate change. The 35- to 50-foot setbacks required by PRMD for small streams will likely be inadequate.

Site GRA-2 is situated *in* riparian habitat, adjacent to Atascadero Creek, as stated on

Pitkin marsh lily (*Lilium pardalinum* ssp. *pitkinense*) as the climate changes. The lily once occurred in three different area and now is considered to occur in only one area in Sonoma County

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

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

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

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

Regards,



Trish Tatarian, Conservation Co-Chair

Milo Baker Chapter of the California Native Plant Society

From: [Matt O'Donnell](#)
To: [PermitSonoma-Housing](#)
Subject: Re: Public Comment on Graton Housing Element
Date: Thursday, January 26, 2023 10:41:39 AM

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

Dear Permit Sonoma,

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

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

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

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

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

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

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

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

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

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

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

consideration.

Sincerely,

Matt O'Donnell

On Wed, Jan 25, 2023 at 3:23 PM Matt O'Donnell <odmatt@gmail.com> wrote:

Dear Permit Sonoma,

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Matt O'Donnell

--

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

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Matt O'Donnell
3220 Hicks Rd.
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From: [Kon Zaharoff](#)
To: [PlanningAgency](#)
Subject: Housing Element Update draft EIR
Date: Friday, January 27, 2023 11:03:08 AM

Dear Staff,
please distribute this article to the Planning Commissioners.

<https://www.marinij.com/2023/01/25/marin-county-adopts-plan-to-permit-thousands-of-homes/amp/>

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From: [Rick Maifeld](#)
To: [PermitSonoma-Housing](#)
Subject: Zoning proposal in Forestville
Date: Friday, January 27, 2023 7:39:51 PM

Dear Eric Gage,

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

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

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

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

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

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

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

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

Thank you,

Richard Maifeld
9440 Rio Vista Road
Forestville, CA 95436

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From: [Stacie Gradney](#)
To: [PermitSonoma-Housing](#)
Subject: Forestville re zoning for housing
Date: Friday, January 27, 2023 12:22:31 PM

EXTERNAL

Forestville is a small town. I am not sure who's idea it is to develop housing tracks in forestville. I believe you are the people who closed our high school. Our town has been through enough. How are the schools suppose to teach if there is already issues with overcrowded classrooms and NO high school.

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

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

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

Thank you

Concerned forestville resident

Sent from my iPhone

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From: [Colin Baptie](#)
To: [PermitSonoma-Housing](#)
Subject: Housing Element Draft EIR
Date: Saturday, January 28, 2023 11:25:25 AM

Dear Sir,

Re: Draft EIR on the Draft Housing Element Update

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

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

Yours faithfully,

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

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From: [Elissa Rubin-Mahon](#)
To: [PermitSonoma-Housing](#)
Subject: Proposed units in Forestville
Date: Saturday, January 28, 2023 10:58:48 AM

Hello

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

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

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

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From: [Becky Boyle](#)
To: [Eric Gage](#); [district5](#)
Cc: [Lynda Hopkins](#); [Leo Chyi](#); [David Rabbitt](#); [Susan Gorin](#); [district4](#); [Jenny Chamberlain](#)
Subject: Permit Sonoma / Planning - FOR-1 - Alternative: fewer rezoning sites.
Date: Monday, January 30, 2023 6:01:51 PM
Attachments: [Screen Shot 2023-01-30 at 12.44.54 PM.png](#)
[Screen Shot 2023-01-30 at 5.12.40 PM.png](#)
[Screen Shot 2023-01-30 at 12.53.34 PM.png](#)

EXTERNAL

Dear Sonoma County,

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

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

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

Environmental Impact Analysis
Public Services and Recreation

Sites. As shown therein, the Rezoning Sites could be accessed from the nearest fire stations within the response time goal for the respective district, and would not increase the total population served by more than 10 percent, with the exception of the Forestville sites. Because the sites are located throughout the County, and in urbanized areas where local departments already respond to

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

Total population allowed under current designation: 167

Total population under proposed designation: 1,652

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

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

LAR-8	LOW	LO-Dominant	Less than significant	AES-3
FOR-1	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
FOR-2	Moderate	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
FOR-3	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
FOR-4	Moderate	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
FOR-5	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
FOR-6	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5

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

The streets encircling FOR-2 (Guisti/Nolan/Mirabel) are not built to withstand this type of

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

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

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

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

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

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

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

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

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

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

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

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

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

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

logistical egress perspective.

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

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

Respectfully,
Becky Boyle
Forestville, California

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Draft EIR Comments: Housing Element Update

Attn: Eric Gage, Permit Sonoma

January 24, 2023

The DEIR is an extensive amount of work to say the least.
A superficial glance would barely enlighten one of its full scope and content.
To make a full reading of it and have a good grasp of its content would likely be overpowering for most individuals.

It seems unfortunate that we are forced to push towards the limit of our Petri dish even further, due to our inabilities, it seems, to relieve in some more reasonable way, our population pressures.
And while we simultaneously try to preserve and enhance our community character and quality of life.

A razor's edge?

As to the DEIR—I can easily admit that I did not read the entire document.
I did read as much of it as I could that does have a direct bearing on compromising the esthetic and economic value of my rural residential property through the ultimate effect of the DEIR and its potential following plan implementations.

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

My family has owned this land we reside on, our 3 acres zoned RR3, since the days when it had an Agricultural zoning—we moved here in 1955.
I am almost 72 years old and have spent a large portion of my life on this property.
We have lived with the slow encroach of light industrial/commercial development along the Santa Rosa Avenue corridor and its attendant noise, light, and visual pollution which has, in the last 20 years or so, accelerated on the parcel directly NW of us—SAN-10, APN# 134-192-016.
We hoped that due to zoning and historical values and ideas that it would creep no further.
And that while we concurrently live with the increase of traffic and speed on what we sometimes refer to, along with some Highway Patrol members, as *Mountain View Speedway*...

On page 1-4 of the DEIR, under point 1.6 is stated: "*The County received letters from two agencies and one person in response to the NOP during the public review period.*"
In Table 1-1 on page 1-5 these comments are summarized on half a page.
I believe that this questions how well the public, certainly less the specifically affected individuals/parcels, were *advance noticed*.

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

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

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

"1.6 Public Review and Participation Process

... The County received letters from two agencies and one person in response to the NOP during the public review period. ..."

--page 1-4 of DEIR

"1.7 Scope and Content

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

--page 1-5 of DEIR

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

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

1. SAN-10 is not the only parcel in the area that could have been considered for this iteration of the Housing Element Update—reasons for which follow.

Others, or groups of others, including it seems the group SAN-11 to SAN-17 could make up most of the difference leaving SAN-10 out would entail (Map Graphic 2).

They are already located in higher density residential areas for the most part.

More specifically, and to our point, APN 044-141-045 (3614 Brooks Avenue), located at the intersection of E. Todd Road and the unfinished extension to the south of Brooks Avenue (or alternatively at Brooks Avenue and Bucks Road) seems a much better candidate for inclusion.

It appears from a parcel report to have almost identical characteristics to SAN-10 with the positive reasons for inclusion in the following points.

Another potential inclusion in the area is APN 044-141-005, 3548 Brooks Avenue.

See below Map Graphic 1 for large scale detail area for this and the following points.

2. On page 2-4 of the DEIR is the following:

"2. Site must be located within an established Urban Service Area where public sewer and water service is available."

"Available" is the key word here.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

“Community Separators enhance the identities of individual cities and communities.”

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

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

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

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

Perhaps the Planning Commission, Zoning Board, and Local Agency Formation Commission could, or should re-visit the Urban Boundary in our area, already existent with incongruities, and consider a lot-split of SAN-10, and the Water Agency’s APN 134-192-014 along their RR boundaries re-drawing the Urban Boundary along that line. With those two inclusions, and APN 134-192-015, which needs no lot split, the Community Separator between the Santa Rosa Avenue commercial corridor and the Mountain View Avenue rural residential area will have much more continuity, be much more complete, and will follow logically.

This idea is clearly presented in the following map (Map Graphic 3).

4. SAN-10, as said, already has zoning suggestive of an idea to keep a space between the existing RR3 development on Mountain View Avenue and the Santa Rosa Avenue commercial corridor. It is one of the few in the area with such split zoning, and for apparently the same reason. A comparison of the County GIS zoning mapping and satellite imaging shows a question that should be resolved before any consideration of including SAN-10 in this Update iteration. It seems clear that the *permit Sonoma GIS* mapping shows a distinct idea that the RR3 zoning that includes a portion of SAN-10, extends more less south from the northeast corner of APN 134-192-010, more or less south across Water Agency’s APN 134-192-014, to the point that is the northern coincidence of APN 045-021-003 and APN 045-021-004 and continues more or less south along their joint border. The attached graphic (Map Graphic 4) shows both the GIS section and the satellite image. SAN-10’s commercial development and use appears to have encroached up to 100’ into the RR3 zoning of its eastern portion.
Whether this seemingly apparent issue is due to the users of the parcel, or some issue of interpretation due to the zoning board or other agency, it seems to bear resolving before any consideration of SAN-10’s inclusion in inventory of the housing element.

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

As to further comments: I have mostly only cursorily looked over the DEIR—except where specific to me.

Errors, both typographical and in substance certainly occur in such expansive works.

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

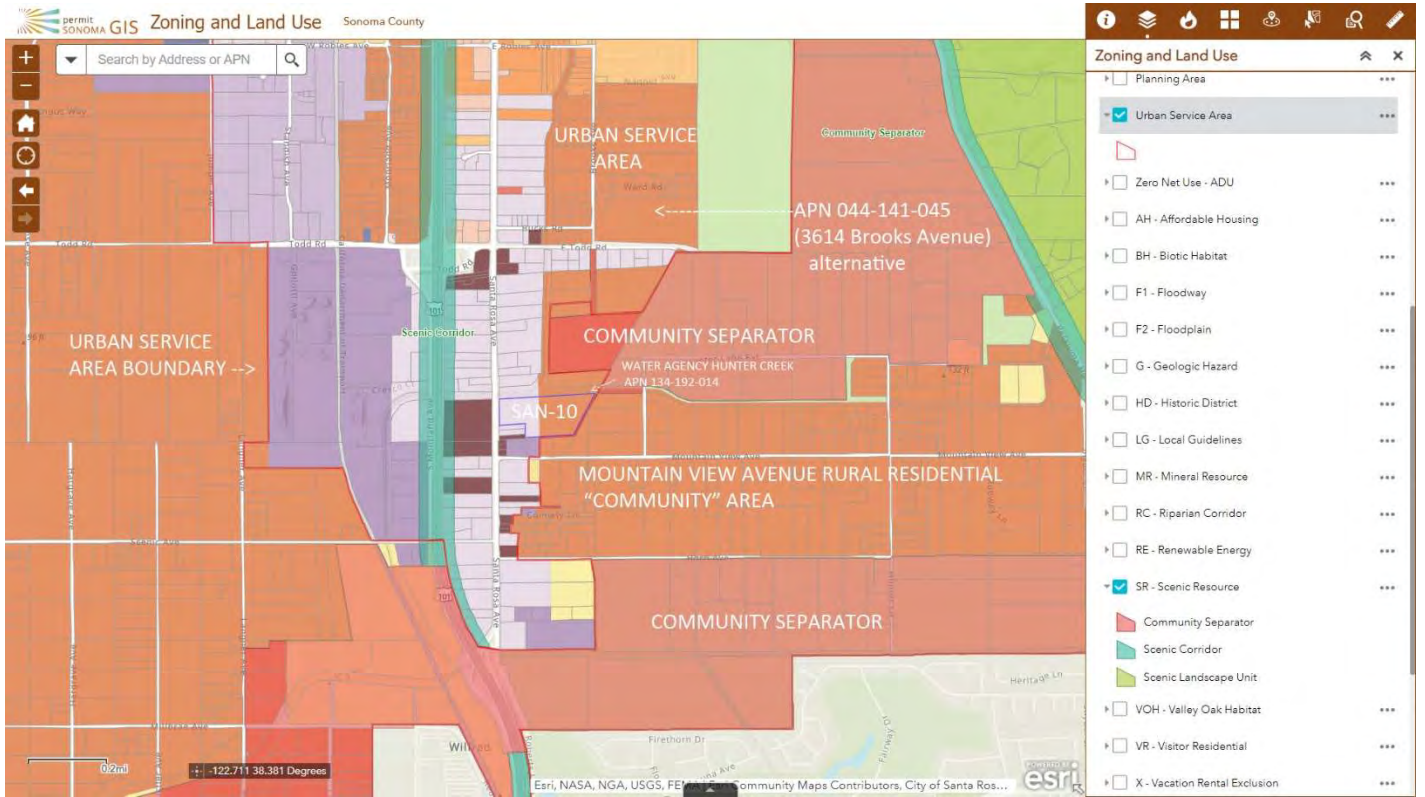
In that relatively small area of the Report, which has direct impact on me and my family, I have noted apparent errors, confusion, or omission:

- a. The caption on Figure 4.1-36 is wrong. *The view is East*. The same as Figure 4.1-35.
- b. In *Table 2-2 Inventory Site Information*, beginning on page 2-7, these entries seem to not match the “Sonoma County Parcel lookup” website, assuming the APN shown is correct:
SAN-10, *shown as 4020 SR Ave.*, is 4028 (APN 134-192-016)
SAN-13, *shown as 3847 SR Ave.*, is 3855 (APN 134-181-046);
SAN-14, *also shown as 3847 SR Ave.*, is 3845 (APN 134-181-047);
SAN-16, *shown as 3445 Brooks Ave.*, is 3453 (APN 134-132-067).
I only checked SAN-10 to SAN-16 due to the duplicate 3847 entries— *4 out of 7 do not match*.
The issue no doubt permeates the entire list and a shortcoming of it is that it makes it a bit difficult to locate the parcels on a Google map using that address.
- c. The following may be an error of omission:
In *Table ES-1*, pages ES-5 and 6, and *Table 4.1-6*, beginning on page 4.1-50, reference is made to *Mitigation Measure AES-5*.
Beginning on page 4.1-54, *c. Project Impacts and Mitigation Measures* contains no definition or reference to *AES-5*, and I cannot find it anywhere else except the tables.

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

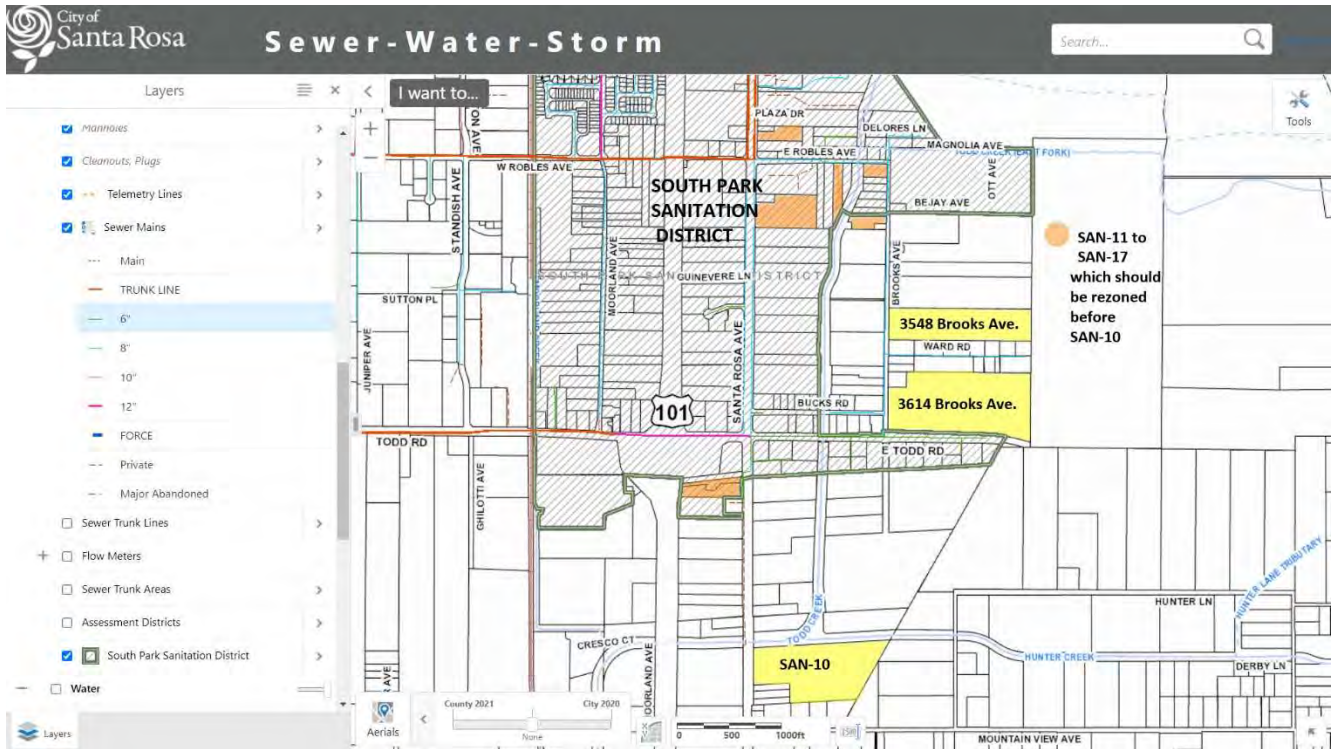
Respectfully,
Jim Severdia
105 Mountain View Avenue
Santa Rosa, CA 95407
nvmtnman@yahoo.com

Map Graphic 1



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

Map Graphic 2

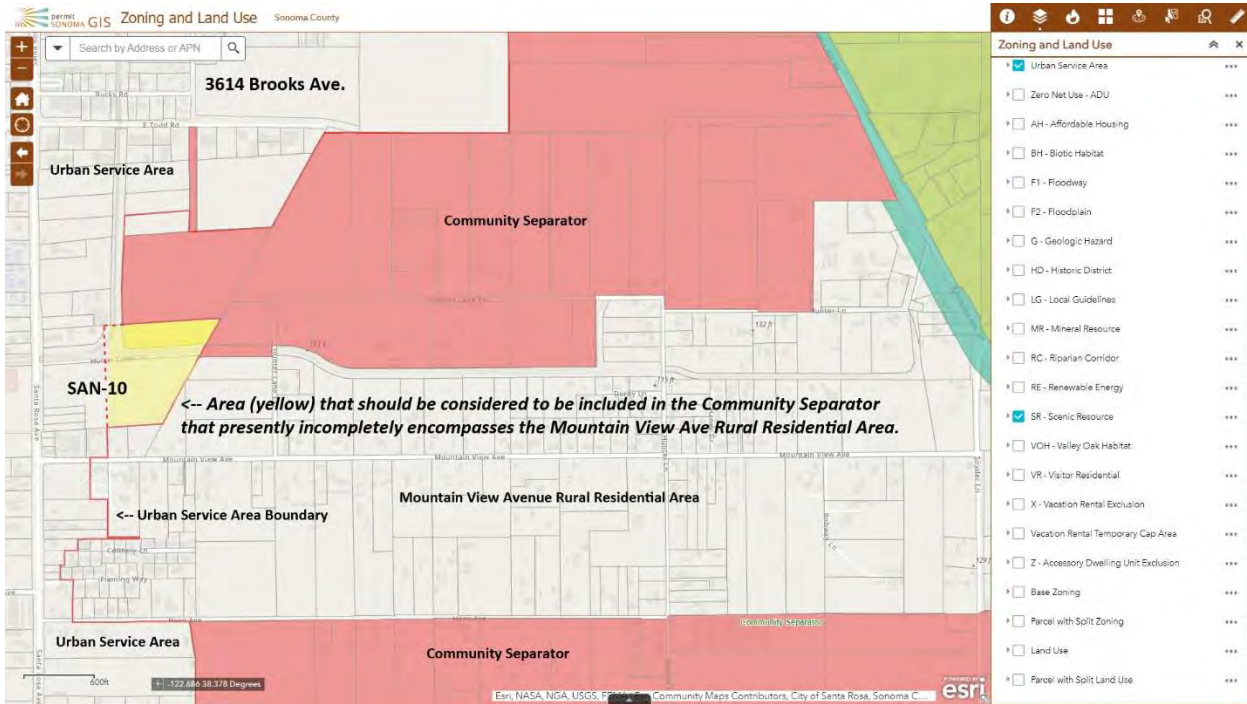


South Park Sanitation District sewer map referred to in point (2) above.

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

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

Map Graphic 3



Map referred to in point (3) above.

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

Map Graphic 4



Map referred to in point (4).

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

From: [kim.thatcher](#)
To: [PermitSonoma-Housing](#)
Subject: 635 new dwellings in Forestville
Date: Monday, January 30, 2023 10:09:54 PM

To Eric Gage

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

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

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

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

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

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

Please let me know how my voice can be heard in regards to this matter.

I would also like to know the results of the zoom meeting scheduled on February 2nd. How do I find those results?

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

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

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Date: [January 31, 2023](#)

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

Dear Mr. Gage,

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

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

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

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

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

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

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

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

Name: [Jonathan Teel](#)

Address: [14735 Carrier Lane](#)
[Guerneville, CA 95446](#)

Date: [January 31, 2023](#)

Signature:

January 30, 2023

Linda Hopkins
Sonoma County Supervisor, 5th District
2550 Ventura Ave.,
Santa Rosa, California 95403

Dear Linda Hopkins,

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

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

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

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

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

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

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

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

Sincerely,



Elizabeth Herberg
16560 Laughlin Road
Guerneville, CA 95492
Lmherberg70@gmail.com

Sonoma County Planning Department

Santa Rosa, Ca

ATTENTION:: Nina

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

There are fire rules (Fire Safety Ordinance 6184) that restrict building on a dead end road, a cul-de-sac

Our road is one way in some spots plus there has been increased traffic because of several VRBO's on Laughlin and Cutten Drive.

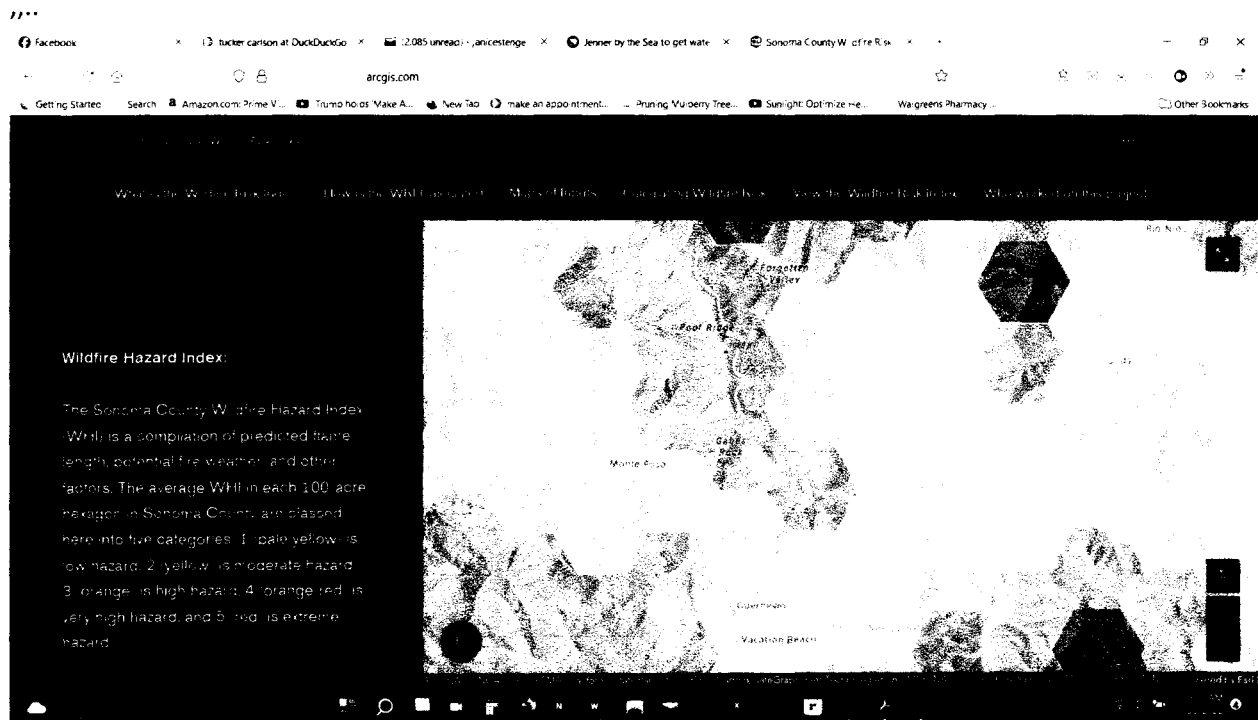
With the unflattering pictures in the Guerneville part, the picture of our parcel doesn't even appear.

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

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

“Developers can’t just brush aside fire risk anymore”
Press Democrat Jan.21

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



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

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

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

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

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

• *Jamie Jensen*
16050 Laughlin Rd.
owner.

Date: 1-30-23

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

Dear Mr. Gage,

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

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

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


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

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

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

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

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

Name: S. Maley
Address: 14390 Laughlin Rd. / Guerneville
Date: 1-30-23
Signature: 

From: [Eric Gage](#) on behalf of [PermitSonoma-Housing](#)
To: [PermitSonoma-Housing](#)
Subject: FW: Housing Element Forestville FOR-2
Date: Tuesday, January 31, 2023 8:39:26 AM

From: Sue Zaharoff <sue.zaharoff@comcast.net>
Sent: Saturday, January 28, 2023 6:53 PM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: Housing Element Forestville FOR-2

Jan 29, 2023

Eric Koenigshofer,

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

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

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

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

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

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

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

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

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

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

Sue Zaharoff
6875 Nolan Road
Forestville

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From: [Arlene Warner](#)
To: [PermitSonoma-Housing](#)
Subject: Draft EIR Comments: Housing Element Update
Date: Wednesday, February 01, 2023 11:19:02 AM

February 1, 2023

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

Mr. Gage,

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

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

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

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

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

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

reasons.

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

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

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

Sincerely,

Arlene Warner
16375 Cutten Dr.
Guerneville, CA

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From: [Leila Allen](#)
To: [PermitSonoma-Housing](#)
Subject: "Upzoning" objection
Date: Wednesday, February 01, 2023 9:52:35 PM

Dear BOS,

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

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

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

Thank you,
Leila Allen
(Forestville)

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From: [Meagan Nolan](#)
To: [PermitSonoma-Housing](#)
Subject: Property at 6934 Mirabel
Date: Wednesday, February 01, 2023 4:44:41 PM

To whom it may concern,

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

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

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

Regards,
Meagan Nolan (nee Pulley)

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From: [Neil Shevlin](#)
To: [PermitSonoma-Housing](#)
Subject: Draft EIR Comments: Housing Element Update
Date: Wednesday, February 01, 2023 9:42:58 AM

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

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

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

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

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

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

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

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

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

Name: Neil Shevlin

Address: 16477 Cutten Dr, Guerneville, CA 95446

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Dear Sirs.

12/1/22

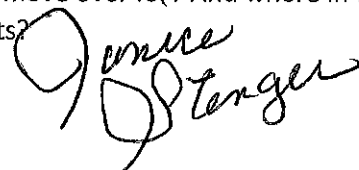
I wanted to protest this property infringement, that is just one in a long list since zoning began here in the early sixties, when most of us native bumpkins had no idea that it was malicious incremental takings with a never-ending list of tiny-printed new rules. Being educated in the middle of the 20th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

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

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

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

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

A handwritten signature in black ink that reads "Denise Stenger". The signature is written in a cursive, flowing style.

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

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.

What I put on Russian river Municipal committee site.

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

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

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

Knowledgeable Representatives from the RR Sanitation, and the limited bus system with an emphasis on West County should have been at a meeting in person with the stakeholders able to answer questions about the true viability of the transit and sewage capacity. I emphasize knowledgeable. Ever tried to find the ridership of the Guerneville buses? Impossible. Crime statistics from the buses? Fires started by arsonists? Emergency ambulance rides?

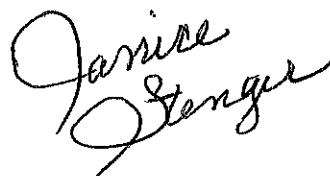
This plan is causing my family uncalled for trauma an Only the two other property owners on Laughlin Rd. had been notified (as of late December.) of the profound change coming to our little neighborhood

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

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

At a time when the governor calls for more local control, the county seems willing to off load planning/zoning to people who don't know our county at all. Considering this, do we need a planning department? Does 50 years of fairly consistent zoning mean nothing?

Our property was chosen on the basis of being in the RR sewer district, where millions of dollars from the Federal govt were spent, (and corners were cut) based on a the sanitation district's promise that "we" would not build the collection system or the plant for any growth. The feds eventually sued us for millions of dollars for just that expansion and I don't believe there was anywhere in that settlement that put an expired clause for the original promises. Can you assure me that the district has learned their lesson and now obeys the Federal Governments sensible mandates? We already have about 1000 more hook ups than the collection system was built for. We, by the way, tried to get out of the sewer district, being on the farthest borders. But the district needed every hook up they could get because they underestimated the final cost and needed more ratepayers.. That Sewer debacle EIR was also quite un-fact filled. What was promised as a sewer charge of about \$40 a month to begin with. Now raised, this year, from \$1774 to \$1932. A 8.9% raise.

A handwritten signature in black ink that reads "Janice Stenger". The signature is written in a cursive, flowing style.

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

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

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

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

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

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

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

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

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

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

- •

Reply

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From: [Kelly](#)
To: [PlanningAgency](#)
Cc: [Omar Percich](#)
Subject: For todays housing meeting
Date: Thursday, February 2, 2023 11:36:45 AM

EXTERNAL

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

Good afternoon, my name is Kelly Joyce and I am a resident of Forestville. My family moved from Windsor three years ago to Conor court which is located off Highway 116 and across the street from the proposed development on packinghouse Road. I have sent several emails over the years to both Caltrans and county officials pertaining to the extreme safety concerns I have for this location as my daughter is not able to even cross the street to go 20 feet to school in the morning safely. When we drive her to school in the morning, it typically takes five minutes just to turn left to go straight across the street.

Additionally, Highway 116, right in front of the proposed Packing House Road development, floods, multiple times a year completely cutting off access in both directions. Does California need more housing? Yes. However; It is highly concerning that the carts being put before the horse by proposing a 37% increase in Forestville's population with obviously minimal thought/planning put into the feasibility given current infrastructure. How does the county move forward with rezoning proposals without even having a plan for the required infrastructure changes? Our town is not setup to accommodate thousands more people and at the same time be able to safely evacuate in the event of a natural disaster. People that actually live here understand how far off this proposal is to the current reality of our country existing infrastructure.

Thank you,

Kelly Joyce

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From: [MARY MOUNT](#)
To: [PermitSonoma-Housing](#)
Subject: Regarding additional Guerneville Low Income housing
Date: Thursday, February 02, 2023 12:14:03 PM

As usual, the county wants to dump their "shit" in the lower river basin of Forestville and Guerneville.

This time in the form of low income housing in an *already blighted area*. Laughlin and Cutten are narrow roads with no ability to widen either one. Laughlin, especially, being on the cusp of Fife Creek and a Highway. Laughlin is a dead end road, as is Armstrong Woods Road, leading into a National Park.

Armstrong Woods Road floods.

Evacuation would be a disaster, not to mention the incurring insurance rates from recent nearby flood and fire.

Our sewer system is outdated and would need a complete overhaul.

What are we thinking, here ?

That's right, we are thinking, dump it onto the lower river.

Won't work, take it back to Santa Rosa and Windsor and Healdsburg. Plenty of open space there.

M.E. Mount

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From: [Nick Pulley](#)
To: [PermitSonoma-Housing](#)
Subject: FOR-2 rezoning response
Date: Thursday, February 02, 2023 11:42:33 AM

Eric,

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

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

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

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

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

Nick Pulley - Bassman.pulley@gmail.com

Kristen Krup - Klynnkrup@gmail.com

Karyn Pulley (off site, owner) - kdpmick@aol.com

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

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

From: [Tim Patriarca](#)
To: [PlanningAgency](#)
Cc: [James Wang](#)
Subject: Re: Public Comment on Sonoma County Housing Element Update, GRA-4
Date: Thursday, February 2, 2023 8:29:21 AM

To Permit Sonoma,

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

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

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

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

Regarding the rural aspects of the area, the properties surrounding this parcel are open and natural. Three of the four sides of the site share a border with large parcels of open space, two of which include historical apple orchards, and there are many more similar parcels along Hicks Rd and Mueller Rd. These rural properties provide an environment that promotes wildlife and a healthy ecosystem. We regularly see foxes, deer and other wild animals, which is a major draw for those of us who live here. The proposed site has heritage oaks and Gravenstein apple trees within its open space; not only would these

historic trees be torn down, the disruption will have hazardous effects on the wildlife and natural ecosystem. The residents here are attracted to the area because of the open space and rural nature, and a dense housing development is the antithesis of that spirit. How is the proposed development appropriate for this site?

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

Thank you for your time and consideration.

Sincerely,

Tim Patriarca and James Wang

On Thu, Feb 2, 2023 at 8:28 AM Tim Patriarca <tim.patriarca@gmail.com> wrote:

To Permit Sonoma,

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

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From: [Tim Patriarca](#)
To: [PlanningAgency](#)
Cc: [James Wang](#)
Subject: Public Comment on Sonoma County Housing Element Update, GRA-4
Date: Thursday, February 2, 2023 8:28:35 AM

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Date:

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

Dear Mr. Gage,

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

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

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

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

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

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

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

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

Name: ADELE WESTLING

Address: 16160 LAUGHLIN RD. GUERNEVILLE, CA 95446

Date: FEB. 1, 2023

Signature: Adele Westling

Date: January 31, 2023

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

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Name: Daniel O'Leary

Address: 14735 Carrier Lane
Guerneville, CA 95446

Date: January 31, 2023

Signature:



Date:

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

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Name: Denise Mabley
Address: 14746 Rio Nido Rd

Date: 2-1-23

Signature: 

Date: 02/01/2022

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

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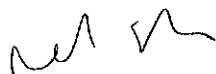
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Name: Neil Shevlin

Address: 16477 Cutten Dr, Guerneville, CA 95446

Date: 01/02/2022

Signature:



Date: 02/01/2022

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Permit Sonoma, Project Planner
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Santa Rosa, California 95403

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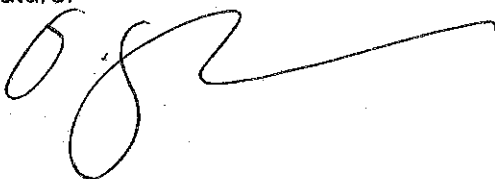
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Name: Oscar Ayala

Address: 16477 Cutten Dr, Guerneville, CA 95446

Date: 02/01/2022

Signature:

A handwritten signature in black ink, appearing to read 'Oscar Ayala', written over a white background.

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Inbox

Sonoma county housing element, Eric Gage

M Michael

To: Permitsonoma-housing@sonoma Sat 2/4/2023 1:16 PM

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Drafts 2

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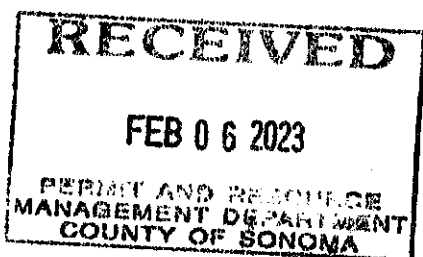
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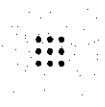
Conversatio...

Groups

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Reply Forward





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Inbox



Add favorite



Folders



Inbox



Junk Email



Drafts 2

Sent Items

Deleted I... 67

Archive

Notes

Conversatio...



Create new f...

Groups

Sonoma county housing element, Eric Gage

M Michael

To: Permitsonoma-housing@sonoma Sat 2/4/2023 1:16 PM

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Reply

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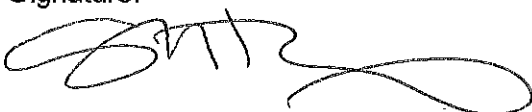
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Name: CINDY ROMERO

Address: 16424 CUTTEN DR Guerneville CA 95446

Date: 2/1/23

Signature:



Date: 2/16/23

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

Dear Mr. Gage,

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Name: Mary Helt

Address: 16542 Laughlin Rd Guerneville CA 95446

Date: 2/3/23

Signature: MBHelt

Date: 02/05/2023

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

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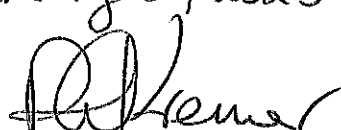
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Name: Patricia Kremer

Address: 16445 Cutten Drive

Date: February 5, 2023

Signature:



Date: 2.3.23

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

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Name: *Roberta Schepps Roberta Schepps*
Address: *16403 cutten dr. guerneville ca 95446*
Date: *feb 3, 2023*
Signature: *RSchepps*

Date: 2/4/2023

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

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Name: Sandra Reilly
Address: 14755 Janet Lane, Guerneville
Date: 2/4/23
Signature: Sandra Reilly

Date: 2/6/23

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

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Name: William Heit

Address: 16542 Laughlin rd. Guerneville Ca.

Date: 2-2-23

Signature: William Heit

Date: 2/7/23

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

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Name: Grable W. Duvall

Address: 16300 Cutten Dr.

Date: 2/7/23

Signature: 

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

February 4, 2023

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

Re: "Draft EIR Comments: Housing
Element Update"
Unincorporated Areas Housing
State Clearinghouse ID:
2022060323: Forestville, CA

Dear Mr. Gage

In response to a letter dated December 28, 2022, I am sending my comments. I have concerns for our little town of Forestville if these housing projects are allowed to continue.

Forestville has maintained its small town quaintness for as long as I have been a resident, which has now been almost 55 years. Its my forever home and I would hate to see it change its unique charm and hometown flavor.

Here is a list of some reasons that I feel these project should be halted:

Environmental impact on the communities - wetlands, creeks (Jones creek), water run-off and natural habitat life.

Public Safety for residents and visitors coming and going into our little town.

Transportation issues - County bus services limitations already set in place will become burdened with increased resident populations

Traffic numbers on Hwy 116, Covey Road, Mirabel Road, River Road and side streets leading onto and off of these main roads will be greatly affected in adverse ways.

Gas station is limited to just one in town.

Public Schools: Since the closing El Molino student body numbers have already increased at Analy. And the single elementary/middle school will become overcrowded as well.

Parking issues already in Forestville is very tight and frustrating at best. Increasing the number of residents will only impact what little we have already.

Our water and sewer systems will become overtaxed and burdened by additional housing in our communities.

Lack of any real grocery store within town proper is a concern. The one store already in place will become over burdened by excess consumers.

Safety from a lack of upgraded side walks and cross walks will be a major issue as more people will use our little town. At times, Forestville has an issue of cars not stopping for people crossing our streets and what streets we do have have pot holes and uneven pavement at cross walks.

Limits on UpZoning for RV parking and "ADUs" will need to be addressed.

These, Mr. Gage, are, I'm sure, just the beginning of the list of concerns I have can think of why Forestville should not be considered an unincorporated neighborhood for constructing 440+/- units of affordable housing.

Sincerely

Robin Bens

Date:

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

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Name: Susan Ament

Address: 14742 Marys Lane

Date: Guerneville, CA 95446

Signature: 2/5/23



Date:

2/8/23

Mr. Eric Gage

Permit Sonoma, Project Planner

2550 Ventura Ave.,

Santa Rosa, California 95403

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Name:

ARLEEN L. Zuniga

Address:

16399 WATSON Rd Guerneville CA 95446

Date:

Feb 8, 2023

Signature:

Arleen L Zuniga

Date:

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

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Name: *FRANK ZANCA*

Address: *14725 JANET LANE, GUERNEVILLE*

Date: *2/8/2023*

Signature:



Date: January 31, 2023

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

Dear Mr. Gage,

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Name: Jonathan Teel

Address: 14735 Carrier Lane
Guerneville, CA 95446

Date: January 31, 2023

Signature: 

February 7, 2023

Marilyn and David Kinghorn
P.O. Box 949
Forestville, Ca. 95436

To Whom It May Concern:

We are writing in regards to the rezoning that is planned in Forestville. The rezoning has just recently come to our attention.

We have been told that everyone living within 300 feet of the areas to be rezoned received a notice of intention. We probably live 301 feet away so we were not notified. Everyone in the Forestville zip code should have received this information because everyone who lives in the area will be affected when and if development occurs.

We also realize that rezoning areas for affordable housing is State mandated. What we don't understand is why this seems to have taken our Board of Supervisors by surprise, and now there seems to be a rush to get it done ASAP. We elected our supervisors to anticipate and be prepared for just such occurrences.

There is no question that there is a need for affordable housing. Growth is inevitable. However, knowing that growth is inevitable doesn't mean that our supervisors get to engage in a haphazard scatter shot to decide where that growth should be. The argument that Supervisor Hopkins makes that we should quickly rezone and worry about potential problems when the development takes place is not only ridiculous, but it's irresponsible.

We would like to direct your attention to Forestville site FOR 1, the Electro Vector site. It is a hazardous waste site. While the location seems ideal for growth it is a HAZARDOUS WASTE site. It should not be rezoned until it is safely cleaned up. That clean up, incidentally, has been put off for too long and needs to be dealt with. We have lived on Hughes Road for 39 years and the site has never been taken care of despite the fact that a school sits right under it.

FOR 4 is another potential rezoning site which is directly east from site FOR 1. To rezone an area for dense housing so close to a hazardous waste site is unthinkable and irresponsible. There are several other environmental concerns with regards to site For 4. At least one creek runs directly through the area and overflows its banks in heavy rain. The access to this property is nothing but a narrow, dirt driveway that runs off of Van Keppel on a steep curve. With the resulting increase in traffic, this would result in a dangerous situation for cars, bikes, and pedestrians.

Again, we think it is negligent and irresponsible to rezone and expect developers to take care of or even be concerned with the complex issues that face a growing community.

Possible problems and environmental issues need to be addressed prior to rezoning.

Some concerns:

- 1) Utility wires – underground
- 2) Water – more storage
- 3) Sewer – is there adequate capacity. Many residents have septic tanks
- 4) Roads – the obvious is that they are not designed for an increased population

A question: several years ago there was discussion about making a bypass around the town of Forestville. Is that being discussed along with the housing rezoning?

And a final question: Why is Forestville set to increase population by 25% rather than the 10% of other neighboring areas.

Final thoughts:

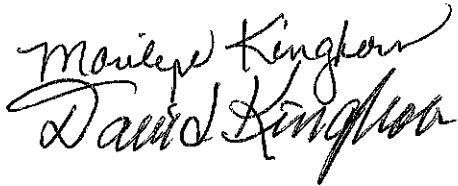
Along with increased housing there are quality of life concerns. We need some open space and parks. A neighbor has been working to develop a skatepark for the youth of our community.

Affordable housing should take into account those that are actually going to live in our area. With that in mind we feel that organizations like Habitat for Humanity needs to be a part of the conversation.

Our request of the Board of Supervisors is that you put some thought and planning into what you are trying to accomplish. Do not push through a set of haphazard rezoning sites because you have not done your homework and you have not involved the community in a responsible, meaningful way.

Sincerely,

Marilyn and David Kinghorn

Handwritten signatures of Marilyn and David Kinghorn in cursive script.

Sonoma County Planning Commission

Feb 10, 2023

This submittal is in regards to the Draft Environmental Impact Report for the Sonoma County Area countywide housing element update.

For the following reasons, and in no particular order, I submit and strongly feel the parcel designated as **LAR-9** in the **Draft Environmental Impact Report for the Sonoma County Area countywide housing update**, should be excluded. This parcel is 5200 Fulton Rd Santa Rosa, Ca in the Larkfield area and designated a flood zone

- a) This property not only flooded in 1995 and 2005 but was under mandatory evacuation in the 2017 Fire in the Larkfield area. It is in a flood zone. **FEMA** flood map included with this submission.
- b) The Mark West Creek setback, alone, would wipe out nearly the entire property from development either on the driveway or the private easement north of the driveway.
- c) This property exits off Fulton Rd, to the east, onto a 25' wide, approx. 800' long dead in, with no turn around, on this private driveway easement. No parking is allowed on the easement driveway for emergency vehicle access. All parking, including guest parking, **MUST** be provided onsite of each parcel. Parking is NOT ALLOWED ON FULTON RD. Fulton Rd, during the morning and evening commute times, has a tremendous amount of traffic blocking this aforementioned driveway/intersection making ingress and egress onto this private driveway extremely difficult. This private driveway currently serves a population of 34. The proposed addition of a population of 66 would have a **significant impact** on this intersection!

Thank you

Mike Bojanowsk

PO Box 756

Healdsburg, Ca 95448

bbojanowsk@comcast.net

Office 707 433 5243 Cell 707 292 1690

NORTH
↑



SUBJECT SITE

Date:

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

Dear Mr. Gage,

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

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

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

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

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

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

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

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

Name: Ashley Nolan

Address: 16300 Cutten Drive

Date: 2.9.2020

Signature: Ashley P Nolan

Date: 2/3/2023

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

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Name: GERRY DO

Address: 14756 MARYS LANE, GUERNEVILLE CA 95446

Date: 2/3/2023

Signature:



Date:

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

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Name:

John T. Ryan

Address:

14712 Janet Lane

Date:

2-6-23

Signature:

John T. Ryan

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

RECEIVED
FEB 14 2023
PERMIT AND RESOURCE
MANAGEMENT DEPARTMENT

RE: Draft EIR Comments: Housing Element Update

From: The FOR-2 Neighborhood

Date: February 10, 2023

Dear Mr. Gage,

This letter is intended to specifically address the significant impacts and insufficient analyzation found in the Sonoma County Planning Update Draft EIR as it relates to the FOR-2 site, a 13.5 acre parcel located at 6898 Nolan Road in the town of Forestville beginning on Page 4.

As neighbors of the FOR-2 site, the 222 residents who signed this letter believe that before the HCD, Sonoma County Planning Commission and the Sonoma County Board of Supervisors make any decisions on rezoning the parcels in Forestville they must first understand what the community of Forestville does and doesn't have to offer in the way of resources, services, transportation and infrastructure.

Forestville California 95436

Forestville is a small rural town in West Sonoma County about 11 miles and a 20 minute drive from Santa Rosa, the nearest job center. The population of Forestville is considered to be about 3300 people following the general boundaries of the Urban Service Area. The Sonoma County Land Use Element, Policy LU-15g, states that the boundary of Forestville is that of the Elementary School District or approximately 6700 people. If all 6 sites, designated for rezoning in the General Plan Housing Element Update, were built to capacity the population of Forestville would increase by 1652 people according to the Sonoma County Update DEIR. This is 25% to 50% increase in population depending on which boundary is used. The proposed cumulative dwelling units added to the town of Forestville is 635. This is the largest number of proposed units and population increase, for any community, in the unincorporated area of the County, with the exception of the unincorporated area around the City of Santa Rosa.

The main road thru Forestville is HWY116 which becomes Front Street for the 3 blocks where most businesses are located. Front Street/HWY 116 is a narrow two lane State Highway built around the turn of the century. All of the side streets in this area are residential.

There are few formal, private business maintained parking lots on Front Street/Hwy 116. Street parking consists of parallel parking on the south side and a combination of parallel and diagonal

parking on the north side of the 3 block downtown area. Parking spaces are limited here and thus Downtown Park Open Space site is often used for overflow parking. The Downtown Park is located at the termination of the Joe Rodota Trail and is privately owned and maintained by a non-profit 501c3.

Sidewalks in the 3 block area of Front Street/HWY 116 are either nonexistent, non-contiguous or in extremely poor condition and dangerous. Limited sidewalks do exist from the intersection of Mirabel Road to the Forestville Youth Park. There are no other sidewalks in the neighborhoods that surround the downtown area. Walking the neighborhoods of Forestville requires walking on the narrow shoulders or in some cases in the middle of the road.

With the exception of the Joe Rodota Trail there are no bike lanes in the town of Forestville or surrounding neighborhoods.

Pedestrian or bicycle crossing Front Street/HWY 116, is facilitated by 2 uncontrolled crosswalks. One in the center of town and the other at Covey Road. The Forestville School District provides a crossing guard at the Covey Road intersection to facilitate the safe crossing of Front Street/Hwy 116 by school children. Crossing with or without a crosswalk or exiting a parallel parked car is dangerous on Front Street/HWY 116 due the road width, heavy traffic volume, including gravel trucks from the two local quarry's, as well as most vehicles traveling faster than the posted speed limit.

There is one informal southbound bus stop in the downtown area. The bus stops in the Front Street/HWY 116 southbound traffic lane, to load and unload passengers. Sonoma County Transit provides bus service to Forestville. Bus Route 20, Russian River/Santa Rosa Route, makes one pickup and one drop off a day in downtown Forestville. Bus Route 26, Forestville/Sebastopol/Cotati/Rohnert Park Route, also makes one pickup and one drop off a day in downtown Forestville.

For all intents and purposes the commercial area of downtown Forestville is built out. There are two commercial/industrial parcels available for development within or contiguous to the downtown area. The first parcel, 3.4 acres zoned PC, is located at the intersection of south side of HWY 116 at the Mirabel Road intersection. The other parcel, located at 6555 Covey Road, is currently being considered in the Draft Housing Element for rezoning (FOR-1). Also known as Electro Vector, the parcel is 2.86 acres and zoned MP, AH. This site is subject to unknown groundwater contamination from a previous industrial business on this site. Mitigations have been underway for quite some time and this site should be fully evaluated before it is removed from the Housing Element Update rezoning inventory (Alternative-3). One additional site with Industrial zoning, although not contiguous with Front Street/HWY 116, does exist. This site is also being considered for rezoning under the Draft Housing Element Update and is currently zoned M1. Designated as FOR-6 in the plan, it is 4.94 acres.

Street lighting in Forestville is limited to the 3 blocks of the downtown area along Front Street/HWY 116. This allows the surrounding neighborhoods to very good Night Sky Viewing Areas with minimal light emissions.

New jobs in Forestville are few and far between. Those that do exist are generally minimum wage service industry jobs. This is largely due to the lack of sufficient commercial and/or industrial business. Forestville is a rural bedroom community.

Government Services in Forestville consist of:

- Sewer and Water - Forestville Water District
- Schools - Forestville Union Elementary School District K-8
- Fire and EMS - Sonoma County Fire District Forestville Station
- Police Services – Sonoma County Sheriff’s Department
- Roads – Sonoma County Road Department

Notable business/retail services are limited in the downtown area of Forestville, off street parking is either non-existent or limited at all of these sites, very little future commercial growth is possible:

The following business can be found in Forestville:

A package store, pharmacy, hardware store, bakery, coffee shop, post office, laundromat, real estate office, hair salon, gas station, bar, liquor store, dog groomer, antique store, winery, bicycle shop, auto repair shop and five eating establishments.

The following human services are available in Forestville:

A dentist office, a church, food bank, and a pharmacy.

There are no social services, medical facilities or broadband and very limited cell service within a ½ mile of downtown Forestville. The closest grocery store to downtown Forestville is 1.25 miles away.

The following Land Use and Housing statements, policies and objectives are relative to the discussion of all future development in the town of Forestville.

Reference: Sonoma County Land Use Element - Page Lu-81

Another issue in this area is growth and development in Forestville. Specific issues that need to be addressed include the amount of additional development that could be absorbed without changing the rural character or straining public services, how to make available commercial and industrial opportunities to provide local employment, and how to preserve the desirable environmental qualities of the area.

Objective LU-15.4

Maintain the “rural village” character of Forestville through design development standards that support small-scale development with substantial open space and native landscaping.

Reference: Sonoma County Land Use Element - Page Lu-82

Policy LU-15a: Policy LU-15a: Phase residential and commercial development within the Forestville Urban Service Boundary to allow the community facilities and services adequate time to absorb new growth, and to maintain the community character. For any project of 10 or more housing units, require a precise development plan or master plan that specifies the maximum number of new residential units to be built per year.

Policy LU-15b: Require design review for major subdivisions within the Forestville Urban Service Boundary. Design review approval shall assure that:

(1) Project scale and design is consistent with existing rural village character.

(6) The project includes pedestrian access connecting new homes in a nearby commercial area.

Reference: Sonoma County Draft Housing Element

Policy HE-2a: Enhance opportunities for affordable housing production on all appropriate sites with adequate infrastructure and proximity to services ...

Policy HE-3g: “Strive to focus affordable housing development in moderate and high resource areas well-served by public transportation, schools, retail, and other services.

...

Policy HE-5d: Strive to provide for senior housing needs. Focus senior housing projects in areas well-served by transit, accessible sidewalks, and amenities...

Policy HE-6f: Provide high quality and equitable public services, including public transportation, fire and police safety, crime prevention, parks, sidewalks, street lighting, and recreational facilities and programs in lower-resource areas through the use of place-based strategies and master plans.

Response to DEIR - FOR-2 - 6898 Nolan Road

FOR-2 Neighborhood

There are three main streets that directly surround FOR-2, Mirabel Rd, Nolan Rd and Giusti Rd. There are 5 additional streets that are accessed from either Giusti Road or Nolan Road and are also considered part of the FOR-2 Neighborhood; Nolan Ct., Niki Lane, Poplar Drive, Ohaire Lane and Chope Lane. There are approximately 85 homes and 180 residents living in this neighborhood.

FOR-2 is a 13.5 acre parcel. All 4 sides of the parcel abuts the backyards of well-established single family, single story homes along Nolan and Giusti Roads. The maximum proposed density on the FOR-2 site is 283 dwelling units and 736 new residents. The FOR-2 site is currently zoned for 7 homes.

The FOR-2 Neighborhood is a walking neighborhood and not just for its residents, people come from other areas just to walk here. There are no sidewalks or on street parking in the FOR-2 Neighborhood. The FOR-2 Neighborhood is an excellent place to view the night sky due to the lack of any streetlights in the area.

There are 3 designated existing entrances/exits to FOR-2. One on the East side of the property on Mirabel Road, one on the south side of the property on Nolan Road and one on the West side of the property also on Nolan Road.

FOR-2 is a heritage apple orchard established by the current owner's family in 1911. The family has shared with the Neighborhood and the County, in person and in writing, they have no intentions of selling the property and wish to pass it down to future generations. See Attachment 1

Question:

- The County will require a minimum of 2 entrances/exits to the FOR-2 site if it is developed. The 3 lots that make up the entrance/exits to FOR-2 have their own unique APN's (completely separate lots) and appear to be owned by the owner of FOR-2. If the County rezones FOR-2 without the owner's permission, what stops the owner from selling one or more of the 3 entrance/exit lots thereby land locking the property?

Reference: Executive Summary

Alternative 3 (Fewer Rezoning Sites) – ES-3 Page 24

The Sonoma County Housing Element DEIR lists the FOR-2 site as one of the six rezoning sites that "have greater than average environmental constraints compared to the other Rezoning Sites. In particular, these sites would require off-site infrastructure water and sewer improvements to serve future development." The DEIR offers to remove these six sites, including FOR-2 as an alternative to the Plan. The following significant impacts are also associated with the FOR-2 site and not listed in the DEIR.

1. The parcel is considered by the California Department of Housing and Community Development (HCD) as being too large, over 10 acres, for an affordable housing development. (Page 6)
2. It is the largest project, 283 units/7736 residents, of all 59 sites proposed for rezoning in the unincorporated area of Sonoma County and it will increase the population size of the FOR-2 Neighborhood by 400%.

3. There are significant sewer pipeline size and capacity issues associated with the FOR-2 Site. (Pages 19-20)
4. School crossing traffic signal(s), traffic signal(s), left turn channelization, road widening and site distance and setback mitigations will be needed, on Mirabel Road, Giusti Road and Nolan Road as a result of this project. (Pages 14-19)
5. The FOR-2 site is approximately 100' from a Moderate Wildfire FHSZ and approximately 1000' from a High Wildfire FHSZ. (Pages 20-21)
6. Substantial water runoff from this project flows thru seasonal creeks and riparian corridors, causing flooding in the homes on Mirabel Road and the backyards of homes along Sunridge Lane and Trenton Road before flowing into the Russian River without any filtration or other mitigations. (Pages 12-13)
7. There is no broadband and limited cell coverage at the FOR-2 site.
8. The property owner has repeatedly assured the FOR-2 Neighborhood, verbally and in writing, that the Family has no intentions of selling the property and intend to pass it down to future generations. (Page 22 and Attachment #1)
9. California No Net Loss Laws discourage Jurisdictions from considering inadequate or unsuitable sites as adequate or available to achieve RHNA quotas.

Question:

- Given the above information, and further justifications to follow, would it be appropriate for the HCD, Sonoma County Planning Commission or the Sonoma County Board of Supervisors to remove FOR-2 from the list of sites to be rezoned?
- If no please explain how the County of Sonoma plans to assume legal responsibility for traffic accidents, storm water runoff pollution, damage to biological resources, flooding and sewerage backups as a result of permitting this project without analyzing these issues and developing appropriate mitigations?

Reference: Project Description

Comment: HCD Requirements

The DEIR identifies FOR-2, 6898 Nolan Road, 13.5 acres, as one of the 59 urban sites in the unincorporated area of Sonoma County for by-right, medium-density housing.

The California HCD, Realistic Development Capacity, Analysis of Sites and Zoning – Size of Sites States:

To achieve financial feasibility, many assisted housing developments using state or federal resources are between 50 to 150 units. Parcels that are large may require very large projects, which may lead to an over concentration of affordable housing in one location, or may add cost to a project by requiring a developer to purchase more land than is needed, or render a project ineligible for funding. A parcel smaller than one half acre or over 10 acres is considered inadequate to accommodate housing affordable to lower income households,

unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible. Please note, for purposes of this requirement, “site” means that portion of the parcel designated to accommodate lower income housing needs. The housing element must consider and address the impact of constraints associated with small or large lot development on the ability of a developer to produce housing affordable to lower income households. To demonstrate the feasibility of development on this type of site, the following analysis is required.

An analysis demonstrating that sites of equivalent size were successfully developed during the prior planning period with an equivalent number of lower income housing units as projected for the site.

Evidence that the site is adequate to accommodate lower income housing. Evidence could include developer interest, potential for lot consolidation for small sites or lot splits or subdivision for large sites...

A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.

Question:

- The site designated as FOR-2, APN 083-120-062, according to information provided in the DEIR, is 13.5 acres. According to the HCD any parcel over 10 acres is considered inadequate to accommodate housing affordable to lower income households. Has the County of Sonoma prepared sufficient documentation for the HCD to demonstrate the County’s history of successfully developing sites of similar size, its potential for lot splits or subdivision or the existence of a proposal to develop the site in accordance with HCD requirements?

Reference: Sewer and Water

Comment: Urban Service Area Boundary

The Urban Service Area indicated on Figure 2-6 Forestville Inventory Sites – Page 2-14 would lead the reader to assume that both sewer and water are on site or adjacent to the FOR-2 site. This is not entirely true and the map is misleading. Existing domestic secondary water supply lines do run to the site and the surrounding streets of Nolan Road and Giusti Road. They are serviced by a water main on Mirabel Road. However, the existing sewer pipeline stops approximately 1100’ south of the Mirabel Road entrance to the FOR-2 Site. Should the site be

developed the existing sewer pipeline would have to be extended, from its current location, approximately 1100', to the existing right of way to the site off of Mirabel Road.

Question:

- It would be appropriate for the County of Sonoma to place a footnote on the map to clarify this situation?

Reference: Environmental Impact Analysis

Comments: Forestville, Page 4.1-18

FOR-2 is a large parcel west of Mirabel Road surrounded by single-family homes on large lots and zoned LG/116 but outside the SR designation. Views of the ridgelines and open spaces are not visible from the streets looking across the lot due to existing residential development, flat topography, and mature vegetation on all sides (Figure 4.1-14). On Giusti Road, residences are large, single-story, and designed in a vernacular suburban ranch style. They are situated close to the roadway and are landscaped in a varied but unified manner. On Mirabel Road, a school is directly across the street from FOR-2. The residential development on Mirabel Road features a less unified design than that on Giusti Road, with fewer trees and some intermittent fencing. Residential development on both sides of Nolan Road is like that on Giusti Road, but with less unified design and landscaping. Overall, the area around the site exhibits visual unity as the homes are large and consistently feature mature landscaping. While the unity is high, the level of vividness is lower because the neighborhood does not offer expansive views or feature notable architecture. The site has moderate sensitivity and, depending on density and height, new development could be dominant.

Comments and Questions:

1. Any multi story, medium density development would be inconsistent with and pose a significant impact on the surrounding neighborhood where the majority of homes are single family/single story. In addition any construction over one story, would become the dominant feature in the neighborhood.
 - The last sentence in the paragraph should be corrected to read: Any construction over one story will be a dominant feature in the neighborhood.
2. The report is incorrect in stating that there are no ridgelines or opens spaces viewable from the neighborhood. There are expansive views of Mount St. Helena, the Santa Rosa foothills and portions of Trenton Hill and other closer ridgelines are visible from the upper areas of Nolan Road and Giusti Roads surrounding the site.

- The EIR should be corrected to include the areas in which expansive views are available.
3. The site is not flat as stated above but has a slope of 2 to 9 (generally 3 to 5 percent) percent as stated elsewhere in this report.
 - This statement should be corrected in accordance with the slope data provided elsewhere in the DEIR.
 4. There are mature redwood trees on the property but they do not block views of the surrounding hillsides from all locations.
 - This statement should be corrected.
 5. The FOR-2 site is not directly across the street from a school. The Forestville Youth Park, a privately owned 501c3 park, is directly across Mirabel Road from FOR-2 and was mistaken for a school.
 - This item should be corrected in the EIR.

Reference: Site Impacts and Recommended Mitigation Summary

The DEIR, Page 4.1-52 - The FOR-2 Site is listed with the following Impacts:

- Site Sensitivity – Moderate
- Project Potential Dominance – Dominant
- Potential Impact – Significant

Comment: Site Sensitivity Impact

The density of this project is 200% greater than the surrounding neighborhood. The vast majority of homes in the neighborhood are single story/single story on ½ acre lots. Any building 2 stories or taller, with a density of up to 20 units per acre, will become the Dominant feature in the neighborhood and the Site Sensitivity rating in the EIR should reflect that impact on the neighborhood.

Question:

- Based on the above information, the Site Sensitivity rating for FOR-2 should be changed from Moderate to Significant.

Reference: Aesthetics

Significance after Mitigation, Page 4.1-58

With implementation of Mitigation Measure AES-2, impacts from light and glare would be reduced to less than significant.

Comment: Significance after Mitigation

This statement is not sufficient and does not adequately represent or analyze the current night sky conditions in this area. The FOR-2 Neighborhood, Nolan Road, Giusti Road, Niki Lane, Poplar Drive and Nolan Court do not have street lights as does most of the Forestville area. This area is considered by its residents as a Night Sky Viewing Area with minimal light emissions and our visitors often comment on the beautiful night sky that we have. Any construction over a single story will impact the Night Sky Viewing in this area simply from uncontrolled and unmitigated light emitted second or third story units and a dramatic increase in night time vehicle traffic (headlights). Further analysis should be conducted to determine the effects of light emission in the FOR-2 Night Sky Viewing area.

Question:

- In accordance with General Plan Goal OSRC-4, Preserve and maintain views of the nighttime skies and visual character of urban, rural and natural areas, while allowing for nighttime lighting levels appropriate to the use and location. The EIR should acknowledge the significance and existence of night sky viewing areas and the impact of significantly altering those existing sights by developing FOR-2. The current analysis is insufficient. What additional mitigations are necessary to maintain the existing levels of Night Sky Viewing in the FOR-2 Neighborhood?

Reference Agriculture and Forestry Resources

Impact AG-1, Page 4.2-15: NONE OF THE REZONING SITES OCCUR ON LAND DESIGNATED AS PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE. THEREFORE, DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT CONVERT THESE TYPES OF LANDS TO NON-AGRICULTURAL USE.

All Rezoning Sites occur in County-designated Urban Service Areas, defined in the 2020 General Plan as geographical areas within the urban growth boundary of a city that are designated for urban development. Many of the identified parcels and their adjacent uses are currently zoned for rural residential or limited density, which in some cases means agricultural cultivation is currently underway; nonetheless, none of these lands are considered prime or important farmlands, as designated by the FMMP mapping program. The Rezoning Sites were selected out of dozens of possible sites in part specifically because rezoning them for higher density residential development would not convert productive, prime agricultural lands

The Sonoma County General Plan Goals:

Goal AR-3: Maintain the maximum amount of land in parcel sizes that a farmer would be willing to lease or buy for agricultural purposes.

Objective AR-3.1: Avoid the conversion of agricultural lands to residential or nonagricultural commercial uses.

Goal LU-9: Protect lands currently in agricultural production and lands with soils and other characteristics that make them potentially suitable for agricultural use. Retain large parcel sizes and avoid incompatible non-agricultural uses.

Objective LU-9.1: Avoid conversion of lands currently used for agricultural production to nonagricultural use.

It is a false statement to say that rezoning FOR-2 for higher density residential development would not convert productive, prime agricultural lands. The landowners have stated that this agriculturally important parcel has been used by the family since 1911. The California Department of Conservation's Interactive Map of Important Farmlands lists FOR-2 as Farmland of Local Importance. It was most likely excluded from the higher designations because it was not irrigated at some time during the four years prior to the mapping date of 2018. In fact, the property was listed as Prime Farmland up until 2004. The current owner wishes to rehabilitate the parcel into a more productive apple orchard.

Question:

- The above information requires the EIR to address the mitigation issues and impacts of rezoning FOR-2, a Farmland of Local Importance, to higher density residential housing.

Reference: Biological Study Area

Comment: Biological Study Boundaries, Page 4.4-5, Figure 4.4-4

The Biological Study Area – Forestville boundaries are not accurate in relation to the FOR-2 site, Figure 4.4-4 Biological Study Area - Page 4.4-5.

The majority of storm water runoff from FOR-2 that potentially affects biological resources flows north from the FOR-2 site and makes its way to the Russian River via unmaintained drainages ditches, seasonal creeks and riparian corridors to the Russian River. The effect to the biodiversity of these seasonal creeks, riparian corridors and the Russian River must be considered and investigated for Critical Habitat and Sensitive Communities.

Question:

- The Biological study area for FOR-2 should be expanded to include the ditches, seasonal creeks, riparian corridors from the site to the Russian River due to the increase runoff as a result of the development of FOR-2.

Reference: Biological Resources

Comment: Correction

The DEIR statement, Forestville - Page 4.4-13, does not mention that the FOR-2 site is connected to the Russian River via the storm water runoff from the site.

Question:

- This should be corrected so sufficient analyzation can occur and mitigation measures identified in the EIR.

Reference: Cultural Resources

Comment: Cultural Sites

The FOR-2 site is located within a half a mile of a known Native American cultural site where an ancient lake existed and Native American Community existed. Archaeological reviews are required on development projects in the area. Native American artifacts have been found on the FOR-2 Site and in the surrounding area.

Question:

- The EIR should state that this site is in proximity to a Native American cultural site and the possibility that artifacts and possibly human remains may be found on the site?

Reference: Hydrology and Water Quality

Comment: Storm Water Runoff

The FOR-2 site, is 13.5 acres with a slope of approximately 4.3% (52' in 1256') from the highest point on its western boundary (Nolan Road) to its lowest point at the intersection of Mirabel and Giusti Roads. Currently water runoff during heavy rainfall floods the crawl spaces and garages on the homes below the site and along Mirabel Road. One homeowner has installed a French drain to divert flows to the unmaintained drainage ditch on the west side of Mirabel Road. None of the current runoff is collected into storm drains. All runoff is uncontrolled and the vast majority flows along the west side of Mirabel Road downhill in a generally northerly

direction. The water from the FOR-2 site is collected in a concrete open collector between 7522 and 7566 Mirabel Road. The water then flows west in an open seasonal ditch/creek until it meets a "blue line creek" and riparian corridor also known as Sunridge Creek. This blue line creek crosses Trenton Road and runs behind the homes between Sunridge Avenue and Trenton Road. During heavy rains this creek inundates Trenton Road and the backyards and first floors of homes along Trenton Road and Sunridge Avenue. This runoff then makes its way to the Russian River without filtration or settling ponds.

The effect to the biodiversity of these seasonal creeks, riparian corridors and the Russian River must be considered and investigated for Critical Habitat and Sensitive Communities. Significant hard surfaces, incapable of absorbing water, will be created thru development on the FOR-2 site. 15 acres of land generates 407,000 gallons of rainwater per one inch of rain. Forestville receives an average of 41 inches of rain per year, non-drought years. That accounts for over 16 million gallons of water flowing from this site to the Russian River annually. Failure to identify the significant impacts and mitigation measures related to the storm water runoff from FOR-2 will impact biological resources and result in additional flooding of roadways and properties in the area

Question:

- The storm water runoff condition was not sufficiently analyzed in the DER to reflect the significant downstream effects of additional storm water runoff from the development of FOR-2. Further analysis and identification of mitigation measures must occur and be included in the EIR to avoid damage to the environment, biological resources and personal and public property.

Reference: Public Facilities and Services

Comment: Park Space and Funding

Page 4.15-8 - Policy PF-2c:

Use the following standards for determination of park needs: Twenty acres of regional parks per 1,000 residents countywide and five acres of local and community parks per 1,000 residents in unincorporated areas. A portion of State parklands may be included to meet the standard for regional parks.

Page 4.15-8 - Policy PF-2g:

Require dedication of land or in-lieu fees as a means of funding park and fire services and facilities.

Questions:

- There are no publically funded parks in Forestville. Please clarify if the full buildout in Forestville (1652 new residents) would require the addition of new public park space, how many acres and where it would be located, or if the existing two privately owned parks would qualify for the Policy PF-2c standard?
- The Forestville Youth Park is 7.93 acres and the Forestville Downtown Park is 4.26 acres and both are owned by non-profit organizations and available for public use. What population boundaries would be used to calculate population (PF-2c) and if in-lieu fees are obtained from the developer for parks do the existing privately owned parks receive that funding (PF-2g)?

Comment: Park Degradation

Impact PS-4, Page ES-38

The FOR-2 site is directly across Mirabel Road from the Forestville Youth Park. The FOR-2 Neighborhood is concerned that the Forestville Youth Park would see a considerable increase in use that would lead to a physical deterioration of the facility.

Question:

- What mitigation measures are in place if existing parks, Forestville Youth Park and the Forestville Downtown Park suffer degradation due to overuse? Both parks are privately funded and exist solely on donations. The addition of over 1600 new residents within a half mile of downtown Forestville will have an impact on these existing parks. An additional section could be added to the DEIR that address privately owned Parks and how new development could support them?

Reference: Traffic and Parking

Comment: Traffic Study

According to the County of Sonoma Traffic Counts (arcgis) there are 6909 total trips per day on Mirabel Road, in both directions. The speed limit on Mirabel Road, in the area of FOR-2 is 45 mph although vehicles drive faster than the posted speed limit in this area. Due to speed limit and vehicle traffic volume, including large gravel truck traffic, Mirabel Road is likely a Major Collector when compared to other roadways defined in the DEIR Existing Street Network.

Question:

- DEIR, Existing Street Network – Page 4.16-1 thru 4.16-5 - Mirabel Road is not listed in the Existing Street Network. This should be corrected in the DEIR.

Comment: Mirabel Road/HWY 116 Intersection

At a conservative calculation of 5 trips per day per residence, including the existing FOR-2 Neighborhood and the proposed addition of 283 residences at FOR-2, the total trips per day coming and going from the FOR-2 Neighborhood would be approximately 4000, almost doubling the trips per day currently observed on Mirabel Road and significantly affecting the LOS rating of the Mirabel/HWY 116 intersection.

According to the DEIR:

Peak Hour Traffic at the Mirabel/Hwy 116 intersection is 1040. The cumulative total, including other River area rezoning projects is estimated to be 1782. This a 70% increase Peak Hour Traffic for that intersection.

According to the County of Sonoma Guidelines for Traffic Impact Studies-Page 4,

If the project is located in a study area where one or more intersections are currently or projected to operate LOS E or Worse a Traffic Study is required.

Since the County has already determined that the intersection is failing, any development should be responsible for upgrades to the intersection due to increased Peak Hour Traffic. The last estimate available for a round-about at this intersection is 7.2 million dollars. The County has also considered a traffic signal at the intersection of River and Mirabel.

Questions:

- The DEIR is not clear whether traffic mitigations caused by the FOR-2 development, including the round-a-bout at Mirabel and HWY 116, as well as those on Mirabel Road and in the FOR-2 Neighborhood would be fully or partially the responsibility of the developer?
- The DEIR should require the need for a Traffic Study as a traffic mitigation requirement based on FOR-2's proximity to the Mirabel/HWY116 intersection due to the significant increase in trips per day that will be generated from the FOR-2 site and the substantial increase vehicle trips per day on Mirabel Road.

Comment: General Traffic Concerns

There are three existing access/right of ways to the FOR-2. One is directly off of Mirabel Road and two are off Nolan Road. Mirabel Road runs between River Road on the north end, a County Road, and HWY 116 on the south end, a State Highway.

There are two 4 way intersections between the northern border and the southern border of FOR-2. The intersection on the north side of FOR-2 is Giusti Road and Davis Road at Mirabel Road. The intersection on the south side of FOR-2 is Nolan Road and Speer Ranch Road at Mirabel Road. There are stop signs on Davis, Giusti, Nolan and Speer Ranch Road that control traffic entering Mirabel Road. Historically there have been serious accidents at the Giusti/Mirabel/Davis road intersections.

There are no are no turn lanes, at either of the four way intersection on Mirabel Road and traffic site distances are limited at both intersections. Site distances are also limited at the Mirabel entrance to FOR-2. The distance, along Mirabel Road between the two 4 way intersections, Giusti/Davis and Nolan/Speer Ranch, is about 1000'. The Mirabel Road entrance to FOR-2 lies roughly in the middle of the two intersections.

As residents of the FOR-2 Neighborhood we would like to share how difficult it can be to enter and exit Mirabel Road safely via either Giusti Road or Nolan Road. With the absence of turn lanes, the current speed limit, limited sight distances and high vehicle and gravel truck traffic, movements onto and off of Mirabel Road are currently dangerous. We anticipate entering FOR-2 from the designated right of way off of Mirabel Road will be equally dangerous.

In addition the County of Sonoma Guidelines for Traffic Impact Study Thresholds provide some references to possible mitigation measures that will be needed as the result of the planned development of the FOR-2 site. (Thresholds, PG 10)

A project would have a significant traffic impact if it results in any of the following conditions:

1. On-site Roads and Frontage Improvements: Proposed on-site circulation and street frontage would not meet the County's minimum standards for roadway or driveway design, or potentially result in safety hazards, as determined by the County in consultation with a registered Traffic Engineer or Civil Engineer.
6. Vehicle Queues: Project causes or exacerbates 95th percentile turning movement queues exceeding available turn pocket capacity.
7. Signal Warrants: The addition of the project's vehicle or pedestrian traffic causes an intersection to meet or exceed Caltrans or CA-MUTCD signal warrant criteria.
8. Turn Lanes: The addition of project traffic causes an intersection to meet or exceed criteria for provision of a right or left turn lane on an intersection approach.
9. Sight Lines: The project constructs an unsignalized intersection (including driveways) and/or adds traffic to an existing unsignalized intersection approach that does not have adequate sight lines based upon Caltrans criteria for State highway intersections and AASHTO criteria for County roadway intersections.
10. County Intersection Operations: The County level of service standard for County intersection operations is to maintain a Level of Service D or better pursuant to General

Plan Policy CT-4.2. The project would have a significant traffic impact if the project's traffic would cause an intersection currently operating at an acceptable level of service (LOS D or better) to operate at an unacceptable level (LOS E or worse). If the intersection currently operates or is projected to operate below the County standard, the project's impact is considered significant and cumulatively considerable if it causes the average delay to increase by five seconds or more. The delay will be determined by comparing intersection operations with and without the project's traffic for both the existing baseline and projected future conditions.

11. County Roadway Operations: The County level of service standard for County roadway operations is to maintain a Level of Service C pursuant to General Plan Policy CT-4.1; or, for specific roadway segments, the level of service standard adopted in the General Plan Figure CT-3. The project would have a significant traffic impact if the project's traffic would cause a road currently operating at an acceptable level of service (LOS C or better) to operate at an unacceptable level (LOS D or worse).

Sonoma County Standards for Traffic Impact Studies, Page 15

The project applicant shall retain a registered Traffic Engineer who is licensed to practice in the State of California. A TIS may be prepared by a registered Civil Engineer that has demonstrated appropriate expertise to the satisfaction of DTPW and is licensed to practice in the State of California. Said Engineer shall conduct objective qualitative and/or quantitative analysis, and submit a written traffic impact study that includes each of the following areas that apply to the proposed project. Please note that when a concern is identified, the Engineer shall propose a solution and identify funding for the solution.

Vehicle Queues: Identify situations where either the addition of project traffic causes or exacerbates 95th percentile turning movement queues exceeding available turn pocket capacity.

Signal Warrants: Identify situations where the addition of project vehicles or pedestrian traffic will cause an intersection to meet or exceed Caltrans or CA-MUTCD signal warrant criteria.

Turn Lanes: Identify situations where the addition of project traffic at an intersection, including project driveways, causes an intersection to meet or exceed criteria for provision of a right or left-turn lane on an intersection approach.

Questions:

- The DEIR does not sufficiently analyze the effects of traffic mitigation measures relative to FOR-2 and their impacts the County's plans to extend the Joe Rodota Trail Bike Path

along Mirabel Road between Hwy116 and Davis Road. How could traffic impact mitigations effect the plan construction of the Joe Rodota Trail in the area of FOR-2?

- The FOR-2 site adds 736 new residents and approximately 500 cars to the FOR-2 Neighborhood. In the EIR will traffic signal(s), turn lane(s), improved intersection setbacks, improved sight distances, and or controlled crosswalks be required mitigations, on Mirabel Road and the in the FOR-2 Neighborhood streets?
- Are there any potential mitigations that are likely to increase traffic on Giusti Road and Nolan Road at the other two entrances to FOR-2?

Comments: Crosswalks

The DEIR insufficiently analyzes the need for a controlled crosswalk at or near FOR-2 that will allow adults and children cross Mirabel Road to access the Youth Park, walk or bike to town, walk to school or access bus stops.

See Caltrans or CA-MUTCD Page 835 Section 4C.06 Warrant 5, School Crossing

Support: 01 The School Crossing signal warrant is intended for application where the fact that schoolchildren cross the major street is the principal reason to consider installing a traffic control signal. For the purposes of this warrant, the word “schoolchildren” includes elementary through high school students.

Standard: 02 The need for a traffic control signal shall be considered when an engineering study of the frequency and adequacy of gaps in the vehicular traffic stream as related to the number and size of groups of schoolchildren at an established school crossing across the major street shows that the number of adequate gaps in the traffic stream during the period when the schoolchildren are using the crossing is less than the number of minutes in the same period (see Section 7A.03) and there are a minimum of 20 schoolchildren during the highest crossing hour.

Also See Permit Sonoma – Pedestrian Facilities

Policy 4.05 - Where discretionary projects in Urban Service Areas and unincorporated communities are found to create additional demand for pedestrian travel, require the project to directly provide or participate in the funding of pedestrian improvements such as sidewalks, gap closures, steps, safety improvements, and/or trails that will improve pedestrian access to destinations located within ½ mile of the project site.

Policy 4.08 - Provide high-visibility crosswalk marking at all intersections in Urban Service Areas, unincorporated communities, and wherever feasible countywide. Wherever possible, avoid mid-block pedestrian crossings, and where mid-block crossings are necessary, install signalization, refuge islands and signage warning vehicles to stop for pedestrians and watch for cyclists.

Question:

- The FOR-2 Neighborhood would like to know what mitigations should be added to the EIR to allow the 736 new residents of FOR-2, including school children to safely cross Mirabel Road to attend school, visit parks, bike, and walk or obtain services including public transportation?

Comments: Parking

There is a trend in the County to reduce parking spaces per developed unit in order to increase density and force occupants to use other forms of transportation (reduce VMTs). This option may work in urbanized areas with robust public transportation or within walking distances to essential services and work. Forestville is a rural community, there are few jobs available within walking distance of FOR-2. There is no industry, no available commercial land for future development, minimal public transportation and no legal on street parking in the FOR-2 Neighborhood.

DEIR – Impact WFR-2, Page 4.19-26

Access to Rezoning Sites FOR-2, FOR-4, GRA-2, AGU-1, and AGU-2 currently does not meet County road standards of 20 feet in width or greater. Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways could be required. Those improvements would require a County encroachment permit if on a public right-of-way; however, widening County roads would not exacerbate fire risk.

Questions:

- The DEIR does not sufficiently analyze the lack of on street parking in the FOR-2 Neighborhood. Onsite parking should not be reduced for the FOR-2 development. How will the EIR mitigate the issue of assuring that there is sufficient parking on the FOR-2 site for a minimum 2 cars per unit due to the lack of robust public transportation?
- Residents of the FOR- Neighborhood are concerned about overflow traffic parking on our streets. What mitigations are included in the DEIR that will address this issue and who will enforce it?

Reference: Utilities and Service Systems

Comment: Sewer

The DEIR insufficiently analyzes the condition and size of the sewer pipeline serving FOR-2. The 8” sewer line that would service FOR-2 currently ends approximately 1000’ south of the access easement at the Mirabel Road entrance to the FOR-2 site. This 8” line runs from this termination location to the corner of Mirabel Road and Hwy 116. It then transitions to a 6” line, running under the north side of HWY 116 for approximately 1000’ to First Street, where it

connects to the main line to the sewer treatment plant. This line is gravity flow and not pumped. The EIR does not sufficiently analyze whether the 1000' of 6" sewer line has the capacity to handle the increased output from the FOR-2 project. A 6" sewer line carries one half the capacity of 8" sewer line. The FOR-2 Neighborhood is also aware that there have been problems with this 6" line clogging at or near 6661 Front Street/HWY 116 due to a low spot in the line. Failure to adequately estimate the capacity of the 6" sewer line with the increase demand associated with the addition of the FOR-2 development could result in the failure of the system or significant sewer spills at low points in the system.

The Sonoma County Water Agency – Design and Construction Standards for Sanitation Facility, Page 20

B. Minimum Pipe Sizes - The minimum pipe size for main sewers shall be eight (8) inches except as noted below. The minimum pipe size for side sewers shall be four (4) inches or the same size as the building drain plumbing stub whichever is greater.

Questions:

- Good planning for this project should include providing sewer access to the remainder of the FOR-2 Neighborhood which lies within or adjoining the boundaries of the Sewer District, does the DEIR adequately address this planning outlook?
- The FOR-2 Neighborhood should be added to the flow calculation when determining capacity of the, 1000' long 6" sewer pipeline, on Front Street/HWY 116. Has the County of Sonoma contacted the Forestville Water District to advise them of this planning issue and to assure it is included in any pipeline capacity calculations?
- If it is found that there are capacity issues related to the reduce size of the sewer line between Mirabel Road and First Street this should be included with mitigations in the EIR.
- If sewer line does need replacing who will be responsible for replacing 1000' of sewer line under HWY 116 for a distance of 1000'?

Reference: Wildfire

Comment: Threshold, Page 4.19-24

Threshold:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact WFR-1 THE PROJECT INCLUDES REZONING SITES THAT ARE IN OR NEAR AN SRA OR VERY HIGH FHSZS, BUT DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT SUBSTANTIALLY IMPAIR AN ADOPTED EMERGENCY RESPONSE OR EVACUATION PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

During our recent wildfire evacuations traffic has backed up on Mirabel Road south bound from the intersection of Mirabel Road/HWY 116 to Davis Road, approximately ½ mile. There are only 3 exits from FOR-2. Two of the exits are onto Nolan Road which is the closest proximity, west facing and south facing, of a wildland fire burning in the SRA. Using these exits would hamper the existing residents ability evacuate as well as put the evacuees of FOR-2 closer to proximity of the oncoming fire.

Question:

- The DEIR does not adequately analyze or provide sufficient mitigation measures relative to how an evacuation would occur, from the FOR-2 Neighborhood, with nearly 900 residents attempting to exit onto Mirabel Road at the same time while also attempting to merge with other evacuees. This certainly doesn't seem like a Less than Significant situation? These are issues that must be addressed in the EIR and not left to be dealt with after the project has been completed.

Comment: Wildfire Threshold, page 4.19-26

Threshold:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

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

When it comes to public safety, SIGNIFICANT AND UNAVOIDABLE do not belong in the same sentence, ever! There are always mitigations including not going forward with a project. The EIR should evaluate wildfire risk and mitigation options considering the knowledge gleaned from the recent devastating fires in Sonoma County.

The drainages directly west of FOR-2 are in a Moderate FHZ but are identical to those below Giusti Road designated a High FHSZ. A fire moving uphill from Martinelli Road will not differentiate between these two FHSZ's. It will run its course up slope seeking drainages where

rates of spread and intensity will increase. It is just as likely to arrive at Nolan Road as it is to arrive at Giusti Road. In this case a single ember could easily cross Nolan Road and ignite properties or landscaping in FOR-2. (Dan Northern, Forestville Fire Chief RET.)

Question:

- Given that Unavoidable is not an acceptable answer to a significant public safety issue what other wildfire mitigations are appropriate for the FOR-2 site, including removing the site from the Housing Element Update List?

Comment: Fire Hazard Severity Zone

FOR-2 is located 100 feet from a Moderate Fire Hazard Severity Zone and 1000' from a High Fire Hazard Severity Zone. The site is across the street from State Responsibility land on the West side of the site. The EIR, Page 4.19-26 States:

Access to FOR-2 ... does not meet County road standards of 20 feet in width or greater. Prior to approval of development on- and off-site improvements to County and/or private roadways could be required. Those improvements would require a County encroachment permit if on a public right-of-way; however, widening County roads would not exacerbate fire risk.

Question:

- Who would fund the on and off site road improvements and traffic mitigation measures, to meet County and Cal Trans standards should the FOR-2 site be developed?

Comments: Removing FOR-2 from the Rezoning List

A copy of the owner's letter to the County asking that the FOR-2 site be removed from the rezoning list is attached. The family clearly states that they have no intention to sell the property and in fact have other plans for it. The family has owned the property since 1911 and it has become their legacy. It is a heritage property that they intend to pass down to future generations. Rezoning this property would be against their wishes and ruin their ability to use in a manner for which it is currently zoned.

Question:

- Is it in the County's best interest to continue to rezone a property, against the owners wishes, knowing full well that the owner has no intention of selling the property that has been in their family since 1911 and that they intend to keep it in the family for future generations?

- Is there a process or policy to remove a property from the Housing Element Update at the owners request or if the County is aware that they have no intention of selling the property?
- If so who will make this decision and when will it be made?

Respectfully Submitted by the FOR-2 Neighborhood,

Susan and Kon Zaharoff
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707-800-2177

Sunoma and Dan Northern
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Forestville, CA 95436
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707-536-8991

Karen and Steve McDonald
6987 Nolan Road
Forestville, CA 95436
smcdonald205@comcast.net
707-495-7371

Contacts:

CC: Sonoma County Board of Supervisors
Sonoma County Planning Commissioners

Attachment 1:

FOR-2, potential rezoning site

From: kdpnick@aol.com
To: eric.gage@sonoma-county.org; dsnorthern@sbcglobal.net
Cc: bassman.pulley@gmail.com; klyonkrup@gmail.com
Date: Tuesday, February 7, 2023 at 10:16 PM PST

Good Morning,

Thank you for the opportunity to once again reach out to share my concerns regarding the proposed changes in property zoning for Sonoma County. I listened with intent, the zoom meeting held last week. I retreated from that meeting with mixed feelings, but felt that for the greater good, active listening and participation was done by those gathered and members present. This brings us forth, to this upcoming meeting, February 13th. Once again, it is imperative that I advocate for the land so wisely purchased and established by my Grandfather in 1911, from the original land owners of Forestville.

I must agree and ask like that of Mr. Carr, have committee members availed themselves by visiting the potential rezoning sites. What seems necessary to ask oneself and that of the committee, were the wisest sites selected, and based on criteria that might bring forth additional questions and concerns, prior to the Feb. 13th meeting. An example of question, in knowing that many of the sites do not have easy accessible water, sewer, roads, transportation, all of which would cost thousands, and yet within a few feet, yards, even a mile, there is viable land that would have easy access to those needed items. In examining the sites, were these questions asked as they pertained to each site.

I have read the lengthy report, and would like to share why I believe that the site I hold known as FOR-2 is not a desirable rezoning site.

Priority to all of the following reasons is the clear fact that I, as the owner of FOR-2, and subsequent generations to follow, have no interest in selling the land we own. As mentioned, we have owned this land since 1911, and while over time it has had great crop growth and production, low growth and production, and *mediocre growth and production*, what is constant is the fact that we have owned the land, worked the land, and it remains, a working Gravenstein apple orchard and vegetable farm. Currently, as previously stated in my first email, we are in the process of regenerating this land, a process begun in excess of five years ago.

Secondly, this land serves as water shed for the areas directly surrounding the proposed property. This is needed to maintain the existing permaculture, house wildlife, and maintain the ecosystem. The lack of respectfully interfacing with the permaculture, will increase and indeed incrementally damage the ecosystems and environment causing irreparable damage and significant effects to the ecosystem.

We have reason to believe and know, through the artifacts and mapping done, that our land at one time was home to several Native Americans who would travel along the coast as they passed from southern Sonoma County up the coast to Fort Bragg.

Fourth, the report mentions that if FOR 2 were to be rezoned, that due to the density factors, it would be a useful site only if mitigated use of appliances, plumbing, land use and landscaping, limited growth on each site, etc. were to be followed. Is this a wise use of land, and good land management? I don't believe so. How does

the committee measure greenhouse gases, emission hazards, unavoidable aesthetic cultural resources, for an unknown date in the future. Further, if to be developed, how is that managed and by what agency?

Fifth, which is now becoming a long list of concerns and reasons why not to rezone my land, is where it is located...or more accurately, where it is not located. Currently, there is limited regional transit, no SMART, etc. If allowed to be rezoned, and subsequently if the property were to be deemed needed, there would be increases in pollutants, significant changes in air quality, needs for increased infrastructure which would include water, sewer, garbage, police/sheriff, fire, road enhancements, traffic increases, and this is the short list. Impacts and indeed far-reaching unknown changes do not allow for informed or adequate decision making to be made.

Sixth, in studying the charts, analysis, more suggested outcomes, I have not been able to determine that there are any valuable gains to have my land rezoned. What I have learned through the studying of that data, is that it is apparent that FOR-2 is not a viable or useful piece of property to be rezoned. I fail to see positive outcomes. Why I would embrace the rezoning of my property is currently lacking, hence why I do not support this suggested rezone plan for FOR-2. Instead, the report continually uses the phrase significant impact. Does that translate to the unknown reality of what significant impact is, and would the county only stop growth once reached, which often and sadly means that significant impact was reached long before it is deemed time to stop development.

In summary, please reconsider the potential rezoning of FOR-2, my land and that of my family. We again humbly ask, to remove our land from the list. Thank you again for your committee work and the opportunity to have this communication.

Sincerely,

Karyn Pulley

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

DIANE GALIARDI

10675 CANYON RD.

Signature

Diane Galardi

Forestville CA. 95436

Print Name

Address:

Myron Thorman

10670 Canyon Rd

Signature

Myron Thorman

Forestville Ca 95436

Print Name

Address:

SCOTT STRONG

10829 CANYON RD FORESTVILLE CA

Signature

Scott Strong

Print Name

Address:

DON CARMAN

10641 CANTON ROAD, FORESTVILLE

Signature

Don Carman

Print Name

Address:

ANN CARMAN

10641 CANTON ROAD, FORESTVILLE

Signature

Ann Carman

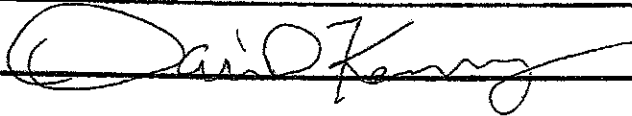
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Print Name

Address:

DANIEL KENNEY 11133 CANYON RD FORESTVILLE 95436

Signature

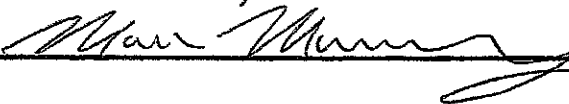


Print Name

Address:

MARK MURPHY 11133 Canyon Rd Forestville 95436

Signature

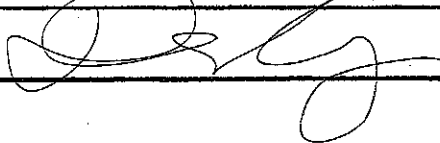


Print Name

Address:

DAVID WAIKELF 10821 CANYON RD. FORESTVILLE 95436

Signature



Print Name

Address:

MAARON SMITH 10821 Canyon Rd Forestville 95436

Signature



Print Name

Address:

Lorraine Libubb 10670 Canyon Road Forestville 95436

Signature



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Print Name

Address:

MARCO CALAVETTA

9489 ARGONNE WAY

Signature



Print Name

Address:

Edward Burtner

7024 Trenton Road

Signature



Forestville, CA

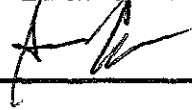
Print Name

Address:

Abrian Mangano

6508 Mirabel Rd

Signature



Forestville CA 95436

Print Name

Address:

Rick Coyston

9315 CHAMPA DE ELIZABETH

Signature



FORESTVILLE CA 95436

Print Name

Address:

CHRISTOPH VOSS

6972 GIOVANNETTI RD

Signature



FORESTVILLE CA 95436

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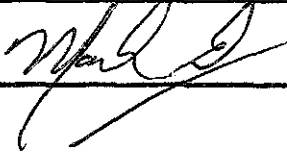
Print Name

MARK ARYA

Address:

6764 Ellen Ln.

Signature



Forestville CA

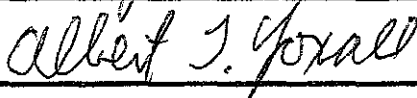
Print Name

Albert J. Yoxall

Address:

7383 Hidden Lake

Signature



Forestville CA 95436

Print Name

Christa Brallo

Address:

7397 hidden lake rd.

Signature



Forestville, 95436

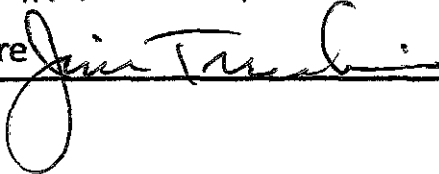
Print Name

JIM TRANCHINA

Address:

7404 HIDDEN LAKE RD

Signature



FORESTVILLE, CA

Print Name

MARY RAND

Address:

7404 Hidden Lake Road

Signature



Forestville, CA 95436

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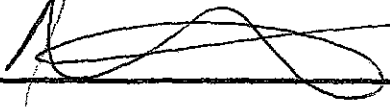
Print Name

Address:

DAN BANTECOU

5720 PRIDE RD

Signature



FORESTVILLE, CA 95430

Print Name

Address:

PAUL PEARSON

7200 CORY RD

Signature



FORESTVILLE, CA

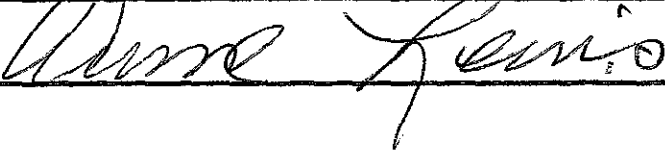
Print Name

Address:

Anne Lewis

P.O. Box 670 Forestville

Signature



Print Name

Address:

Ken McLEAN

8365 TEMPLEMAN Rd.

Signature



Print Name

Address:

RICHARD HICKMAN

8066 MARTINELLI RD

Signature



FORESTVILLE

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Print Name

Address:

Megan Doble

4450 Guerneville Rd 95401

Signature



Print Name

Address:

Matt Edgus

5980 Anderson Rd 95436

Signature



Print Name

Address:

Cynthia Johnson

6088 Front St Forestville 95436

Signature



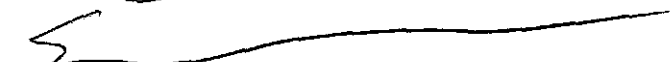
Print Name

Address:

ETAC J DOBLE

4450 GUERNEVILLE RD

Signature



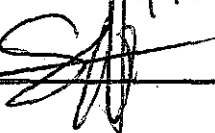
Print Name

Address:

Spencer Henderson

7400 Malone Rd

Signature



Forestville CA 95436

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Print Name

Address:

RANDOLPH W NELSON 11550 Sunnyside Ave

Signature



Forestville CA 95434

Print Name

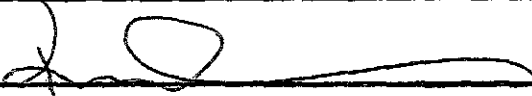
Address:

8693 GREEN VALLEY RD.

Ron Anderson

SECASTRO, CA 95472

Signature



Print Name

Address:

Molly Brown

4450 Guerneville Rd

Signature



Santa Rosa CA 95401

Print Name

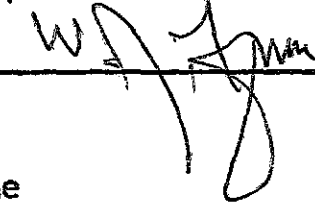
Address:

BILL FERGUSON

8383 Hwy 116

Forestville CA

Signature



95436

Print Name

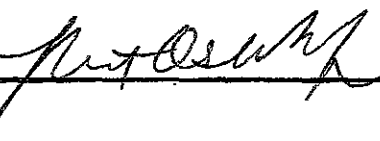
Address:

Robert O. Baba Jr.

7444 Parker Ave

Guerneville Ct. 95446

Signature



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Print Name

Address:

JOEY BURTNER

7024 TRENTON RD

95436

Signature



Print Name

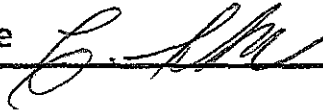
Address:

Claude Schroeder

8739 Marianna

Forestville, CA

Signature



Print Name

Address:

GERALD D'ELIA

7429 BUNGLEY AV

Signature



FORESTVILLE, CA

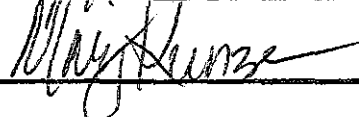
Print Name

Address:

Mary Kunze

7520 Niki Ln

Signature



Forestville

Not enough room for town needs.

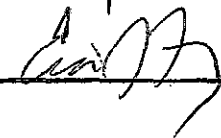
Print Name

Address:

Eric Fry

8330 1st Street, Forestville

Signature



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Print Name

Address:

ROBERT O. BABA III

6631 15th ST. FORESTVILLE, CA

Signature

Robert O. Baba III

Print Name

Address:

Christopher Smith

8645 Trenton Road, Forestville, CA 95427

Signature



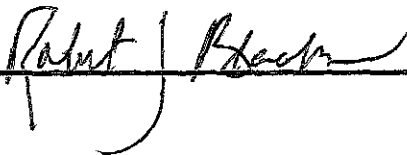
Print Name

Address:

ROBERT J BLACKER

7423 Poplar Drive

Signature



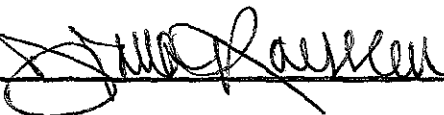
Print Name

Address:

DIANA ROUSSEAU

6830 Ellen Lane, Forestville

Signature



Print Name

Address:

JILL BABA

7444 PARKER, GUERNEVILLE

Signature



We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

Laura Almada

5809 Vine Hill Rd

Signature

Laura Almada

Sebastopol

Print Name

Address:

Marc McLean

Signature

Marc McLean

Print Name

Address:

NATHAN Butta

5660 Hwy. 116 N -

Signature

Nathan Butta

Print Name

Address:

Jumli Smirnic 8501 Hwy 116

Signature

Jumli Smirnic

Print Name

Address:

ROGER BETTA

6303 Hendricks St

Signature

Roger Betta

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name Diana L. Stuart Address: 6815 Giusti Rd, Forestville
CA 95436
Signature Diana L. Stuart

Print Name Carly Downs Address: 6815 Giusti Rd.
Signature Carly Downs Forestville CA 95436

Print Name Johnathon Downs Address: 6815 Giusti Rd Forestville CA
95436
Signature [Signature]

Print Name Barbara Wishard Address: 7521 Niki Lane
Signature Barbara Wishard Forestville, CA 95436

Print Name CHRISTINE HUEMER Address: 6740 Lavon Ct.
Signature Christine Huemer FORESTVILLE, CA 95436

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

Sally Olson

6537 Wayne Ct., Forestville, CA 95436

Signature

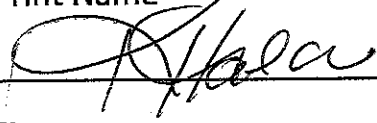


Print Name

Address:

Ken Harlan

6515 Wayne Ct



Signature

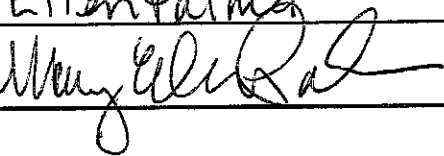
Print Name

Address:

Mary Ellen Palmer

8000 Speer Ranch Rd

Signature



Forestville, CA 95436

Print Name

Address:

Marshall John Palmer

8000 Speer Ranch Rd

Signature



Forestville, CA 95436

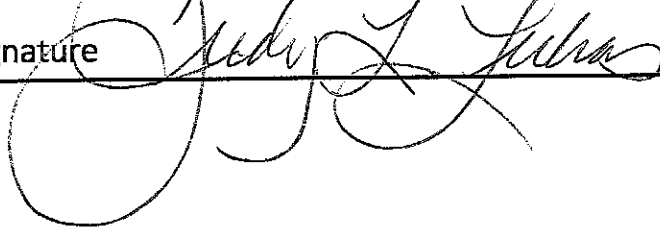
Print Name

Address:

Judy L. Lubas

6505 Wayne Ct.

Signature



Forestville, CA 9505

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Print Name

SANDRA FARKAS

Address: 6845 GIUSTI RD.

FORESTVILLE, CA 95436

Signature

SANDRA FARKAS

Print Name

Colleen O'Neill

Address:

8065 Speer Ranch Rd Forestville CA
95436

Signature

Colleen O'Neill

Print Name

Jennifer Alwood

Address:

6733 Lavon Ct Forestville, CA
95436

Signature

Jennifer Alwood

Print Name

Mike Alwood

Address:

6733 Lavon Ct Forestville, CA 95436

Signature

Mike Alwood

Print Name

Peggy Gramala

Address:

6725 Lavon Court
Forestville, CA 95436

Signature

Peggy Gramala

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Print Name

Address:

RONALD WININGAR

6900 ELLEN LANE FORESTVILLE CA

Signature

Ronald M. Winingar

Print Name

Address:

Amy Ferguson

6718 Laron Ct. Forestville

Signature

Amy Ferguson

Print Name

Address:

C.L. Tree

C.L. Tree

6610 JIM CT, FORESTVILLE

Signature

Print Name

Address:

LARRY LOEBIG

6610 Jim CT Forestville

Signature

Larry Loebig

Print Name

Address:

MARY CLARE CAWLEY

6632 Jim CT Forestville

Signature

Mary Clare Cawley

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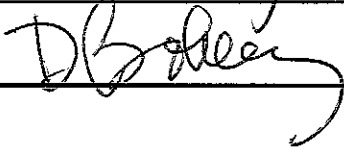
Print Name

Debra Bohling

Address:

6632 Jim Ct

Signature



Print Name

Ian Welsh

Address:

6644 Jim Ct

Signature



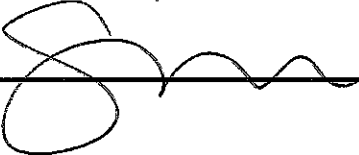
Print Name

Sarah Hoffmann

Address:

6644 Jim Court

Signature



Print Name

Leone Manri

Address:

6506 Wayne Ct

Signature



Print Name

Mel Manni

Address:

6506 Wayne CT

Signature



We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name: Kent Wilson Address: 6536 Wayne Ct. Forestville, CA 95436
Signature: Kent Wil

Print Name: Nancy Dempster Address: 6730 1st St Forestville Ca, 95436
Signature: Nancy Dempster

Print Name: Vikki Miller Address: 7491 Mirabel Rd cottage 1 Forestville 95436
Signature: Vikki Miller

Print Name: Rebecca Boye Address: 10825 Canyon Rd Forestville CA 95436
Signature: [Handwritten Signature]

Print Name: Donna Winger Address: 6900 Ellen Lane Forestville, CA 95436
Signature: Donna Winger

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Print Name

Address:

Richard Benyo

7050 Giustini Rd, Fontville CA 95426

Signature

Print Name

Address:

Chris Mullins

8065 S Pours Ranch Rd Fontville

Signature

Print Name

Address:

Allen Adams

8111 Speer Ranch

Signature

Print Name

Address:

Melody Adams

8111 Speer Ranch

Signature

Print Name

Address:

CHARLENE PETERSON

8123

SPEER RANCH RD

Signature

Charlene Peterson

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Print Name

Address:

Maria Birch 7446 Niki Lane

Signature

Maria Birch

Print Name

Address:

Richard Birch 7446 Niki Lane

Signature

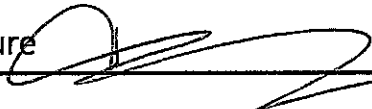
Richard Birch

Print Name

Address:

Tami Barrick 7485 Niki Lane Forestville CA

Signature



95436

Print Name

Address:

MICHAEL BAUMAN

6875 GIUSTI RD

Signature

Michael Bauman

Print Name

Address:

Carol Singleton 6000 Highway 116

Signature

Carol Singleton

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Print Name Rebecca Wessling Address: 6020 Hwy 116
Signature Rebecca Wessling Forestville, CA
95436

Print Name Karen Denise Langford Address: 5995 Hwy. 116
Signature Karen Denise Langford Forestville, CA 95436

Print Name Greg Gallemore Address: 8135 Speer Ranch Road
Signature [Signature] Forestville, CA 95436

Print Name Kristen Gallemore Address: 8135 Speer Ranch Rd Road
Signature KMGallemore Forestville, CA 95436

Print Name Frances Oliver Address: 8368 Trenton Rd.
Signature Frances Oliver Forestville CA 95436

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Print Name

Address:

Laurie Schefer 8147 Speer Ranch Rd. Forestville Ca 95436

Signature

Laurie B Schefer

Print Name

Address:

Thomas Schefer 8147 Speer Ranch Rd Forestville Ca 95436

Signature

Thomas R Schefer

Print Name

Address:

Christine Bell 8168 Speer Ranch Rd Forestville CA 95436

Signature

CA Bell

Print Name

Address:

Richard Phillips 8132 Speer Ranch Rd

Signature

Richard Phillips

Print Name

Address:

Jacqueline Keywood 8132 Speer Ranch Rd.

Signature

Jacqueline Keywood

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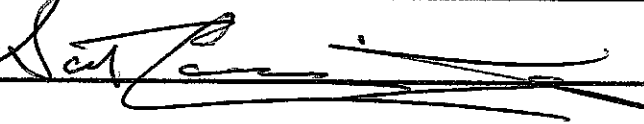
Print Name

Address:

SCOT COVINGTON

8031 SPEER RANCH ROAD

Signature



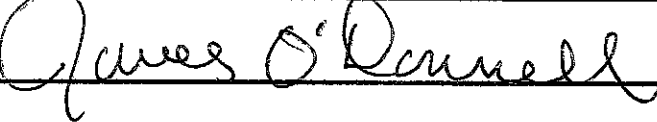
Print Name

Address:

JAMES O'DONNELL

8024 Speer Ranch Rd

Signature




Print Name

Address:

Barbara O'Donnell

8024 Speer Ranch Rd

Signature



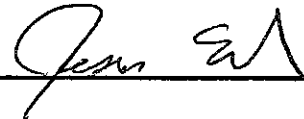
Print Name

Address:

Jessica Earl

8012 Speer Ranch

Signature



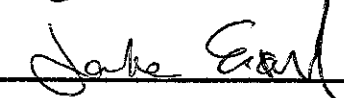
Print Name

Address:

Jake Earl

8012 Speer Ranch

Signature



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Print Name

JAMES W. MACLURE

Address:

7453 Poplar Dr.

Signature



FORESTVILLE, CA 95436

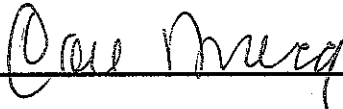
Print Name

Corinne Domela

Address:

7455 Poplar Dr

Signature



Forestville, CA 95436

Print Name

Dan Kenner

Address:

7455 Poplar Dr

Signature



Forestville, CA 95436

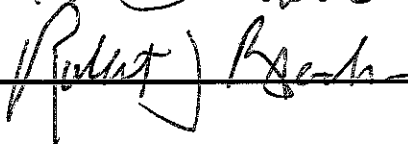
Print Name

ROBERT J. BLOCKER

Address:

7423 Poplar

Signature



FORESTVILLE CA

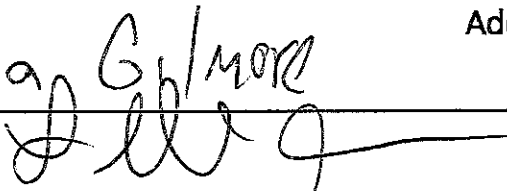
Print Name

Lisa Gilmore

Address:

7518 Mirabel Rd

Signature



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Print Name

Address:

Mona Behan

6867 Nolan Rd., Forestville 95436

Signature Mona A Behan

1/28/23

Print Name

Address:

ALAN CRISP

6867 NOLAN RD, FORESTVILLE 95436

Signature Alan Crisp

1/28/23

Print Name

Address:

Regan Crisp

6867 Nolan Rd. Forestville

Signature Regan Crisp

95436

Print Name

Address:

TONY BRITTON

7420 POPLAR DRIVE, FORESTVILLE

Signature Tony Britton

Print Name

Address:

ANDRÉ JACKSON

7480 POPLAR DR. FORESTVILLE, CA 95436

Signature Andre Jackson

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Print Name

Address:

James Kay

7492 Poplar Dr

Signature

James Kay

Forestville, CA 95436

Print Name

Address:

Molly Kay

7492 Poplar Drive

Signature

[Signature]

Forestville CA 95436

Print Name

Address:

Kevin Williams

7498 Poplar Drive

Signature

Kevin Williams

Forestville, CA 95436

Print Name

Address:

Ron Ruiz

7500 Poplar Drive

Signature

Ron Ruiz

Forestville, CA 95436

Print Name

Address:

Sandra McClure

7463 Poplar Dr.

Signature

Sandra E McClure

We the undersigned believe the FOR-2 rezoning project has greater than average environmental constraints compared to the other Rezoning Sites. In particular, this site would require off-site infrastructure, water, sewer traffic and wildland mitigations that would make the project financially impossible for a developer to overcome at the current density and that it would be unwise to ignore these issues in order to meet the RHND allocation needs.

Print Name

Address:

TERRY ANDREACCHI, 7785 GIUSTI RD

Signature



Print Name

Address:

DANIEL A. LOW JR 7767 GIUSTI RD.

Signature

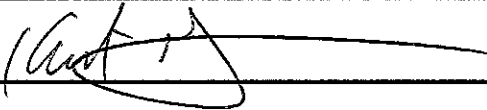


Print Name

Address:

KURT GIUSTI 7750 GIUSTI RD

Signature

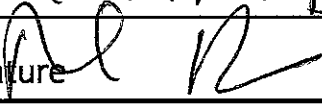


Print Name

Address:

RICHARD BIRCH 7446 NIKI LN

Signature



FEBRUARY

Print Name

Address:

Ruth Wilson 6536 Wayne Ct. Forestville

Signature



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Print Name Alice Shoffet Address: 6830 Giusti Rd
Signature Alice Shoffet

Print Name Mike Barats Address: 6996 Mirabel RD
Forestville Ca 95436
Signature Mike Barats

Print Name Janet Bauman Address: 7366 Mirabel Rd
Signature Janet Bauman Forestville, Ca 95436

Print Name Linda Barker Perkins Address: 6835 Giusti Rd Forestville
Signature Lil B Perkins

Print Name Michael D. Perkins Address: 6835 Giusti Rd Forestville
Signature [Signature]

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Print Name

DAN MORI

Address:

6970 Giusti Rd.

Signature



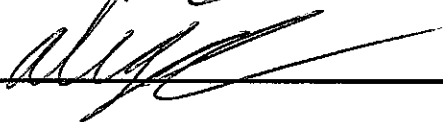
Print Name

Alex Cruz

Address:

6875 Giusti Rd

Signature



Print Name

Heather Dale Best

Address:

6986 Mirabel Rd.

Signature



Print Name

Robert Best

Address:

6986 Mirabel Rd

Signature



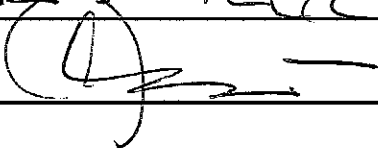
Print Name

Gina Lopez

Address:

7445 - Nike Forestville

Signature



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Print Name

Address:

John Franceschi 6874 Nolan Rd Forestville CA

Signature John Franceschi

Print Name

Address:

Thomasine A. Franceschi 6995 Giusti Rd. Forestville, CA.

Signature Thomasine A. Franceschi

Print Name

Address:

Lloyd Franceschi 6995 Giusti Rd Forestville CA.

Signature Lloyd Franceschi

Print Name

Address:

Cece Gannon 6955 Giusti Rd, Forestville CA

Signature Cece Gannon 707 887 7223

Print Name

Address:

C. Taylor Brown 6935 Giusti Rd.

Signature [Signature] Forestville, CA 95436

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Print Name

Address:

Steve McDonald 6985 Nolan Rd. 1/27/23

Signature

Steve McDonald

Print Name

Address:

Karen McDonald 6987 Nolan Rd. 1-27-23

Signature

K McDonald

Print Name

Address:

Elisa Baker 7423 POPLAR DR. 1/28/23

Signature

Elisa Baker

Print Name

Address:

ROGER STANCLIFF Forestville 129 NOLAN CT 1/28/23

Signature

Roger Stancliff

Print Name

Address:

Valerie Standliff 129 Nolan Ct Forestville, 1/28/23

Signature

Valerie Standliff

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Print Name Chase Reece

Address: 7445 Niki Lane

Signature 


Print Name Thomas Gregory

Address: 7485 Niki Ln

Signature 

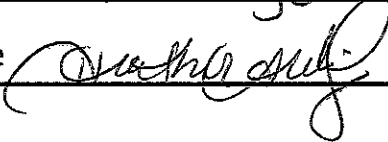
Print Name MARK ALDRIDGE

Address: 7484 NIKI LN

Signature 

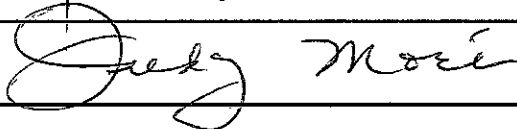
Print Name Heather Aldridge

Address: 7484 Niki Ln.

Signature 

Print Name Judy Mori

Address: 7495 Niki Ln.

Signature 

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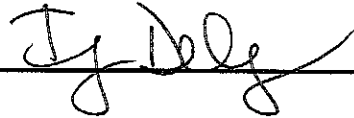
Print Name

TIMOTHY DELLINGER

Address:

135 NOLAN CT FORESTVILLE, CA

Signature



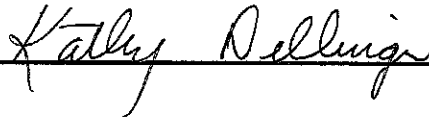
Print Name

Kathy Dellinger

Address:

135 Nolan Ct. Forestville, CA

Signature



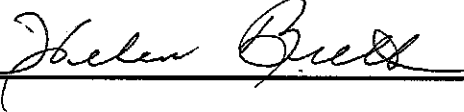
Print Name

Helen Butt

Address:

122 Nolan Ct. Forestville Ca 95432

Signature



Print Name

Kirsten Franceschi

Address:

6874 Nolan Rd. Forestville, CA

Signature

Kirsten Franceschi

95436

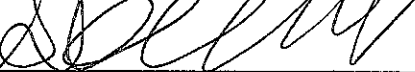
Print Name

Starlee Rownd

Address:

Nolan Rd. Forestville, CA

Signature



95436

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Print Name

Address:

1/28/2023

MARY K. DAUGHERTY

7107 GIUSTI RD.

Signature

Mary K. Daugherty

FORESVILLE, CA
95436

Print Name

Address:

EKaterina Bleeker

7600 Giusti Rd. Forestville, CA 95436

Signature



Print Name

Address:

Melody Clark

7680 Giusti Rd

Signature

Melody Clark

Print Name

Address:

Adele Turk

7680 Giusti Rd

Signature

Adele Turk

Print Name

Address:

Dana Riven

7635 Giusti Road

Signature

Dana Riven

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Print Name

Address:

Robin Trimble

6955 Nolan Rd.

Signature

R. Trimble

Forestville, CA

95436

Print Name

Address:

Jim Kline

6955 Nolan Rd

Signature

Jim Kline

Forestville, CA 95436

Print Name

Address:

Mark Collischoun

6955 Nolan RD Forestville, CA 95436

Signature

Mark Collischoun

Print Name

Address:

JON STURTEVANT

6955 Nolan Rd. Forestville, CA 95436

Signature

Jon Sturtevant

Print Name

Address:

Shirley Quady

7635 Giusti Rd, Forestville CA 95436

Signature

Shirley Quady

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Print Name

Edward Mori

Address:

7495 N.K. Ln

Signature

[Handwritten Signature]

Print Name

Kora Northern

Address:

7682 Giusti Rd

Signature

[Handwritten Signature]

Print Name

GARRETT NORTHERN

Address:

7682 GIUSTI RD.

Signature

[Handwritten Signature]

Print Name

Sunoma Northern

Address:

6925 Nolan Rd

Signature

[Handwritten Signature] Forestville, CA

Print Name

DAN NORTHERN

Address:

6925 NOLAN RD

Signature

[Handwritten Signature] FORESTVILLE

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Print Name

Address:

Nick Comaich

6831 Nolan RD

Signature

Nick Comaich

Print Name

Address:

Amara Danzart

6829 Nolan RD

Signature

Amara Danzart

Print Name

Address:

Karl Hallstrom

6815 Nolan Rd

Signature

Karl Hallstrom

Print Name

Address:

Erin Hallstrom

10815 Nolan rd.

Signature

Erin Hallstrom

Print Name

Address:

Rhonda Provost

7050 Giusti ROAD

Signature

Rhonda Provost

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Print Name Kon Zaharoff Address: 6875 Nolan Rd
Forestville, CA

Signature K. Zaharoff 1-27-2023

Print Name Susan Zaharoff Address: 6875 Nolan Road 1-27-2023
Forestville, CA 95436

Signature Susan Zaharoff 1-27-2023

Print Name Karen Krell Address: 6860 Nolan Rd Forestville CA 95436

Signature Karen Krell 1-27-2023

Print Name Florentino Garcia Address: 6854 Nolan Rd Forestville CA 95436

Signature Florentino Garcia 1-27-2023

Print Name Dewitt Blackman Address: 6854 Nolan Rd Forestville CA 95436

Signature D. Blackman 1-27-2023

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Print Name Nancy L. Jones Address: 6975 Giusti Rd, Forestville

Signature Nancy L. Jones 1-27-2023

Print Name Ken Jones Address: 6975 Giusti Rd, Forestville

Signature Ken Jones 1-27-2023

Print Name DOLORES VOIGHT Address: 8000 SPEER RANCH RD, FORESTVILLE

Signature Dolores Voight 1-27-2023

Print Name Douglas Mark Dutina Address: 6884 Nolan Road Forestville

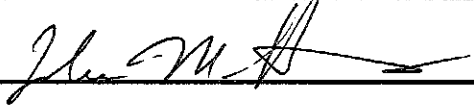
Signature Mark Dutina 1-27-2023

Print Name Dawn Dutina Address: 6824 Nolan Rd. Forestville CA

Signature Dawn Dutina 1-27-2023

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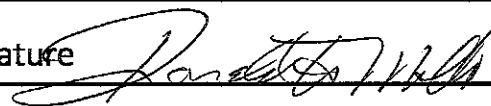
Print Name Address:
Johannes HENNEBERGUE 6844 Nolan Road, Forestville, CA 95436

Signature  1/27/23

Print Name Address:
Ryan Hennebergue 6844 Nolan Rd. Forestville, CA 95436

Signature  1/27/23

Print Name Address:
Ren Mollo 6857 Nolan Rd Forestville 95436

Signature  1-27-23

Print Name Address:
Barbara Schwoerer 6815 Nolan Rd, Forestville, CA

Signature  1-27-23

Print Name Address:
Michael Schwoerer 6815 Nolan R Forestville

Signature  1-27-23

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Print Name

Address:

Jeannette Smith

1780 Giusti Rd Forestville

Signature

Jeannette Smith

Print Name

Address:

Diane Nelson

6341 Van Keppel Rd.

Signature

Diane Nelson Forestville, CA

Print Name

Address:

Tim Nelson

6341 Van Keppel Rd.

Signature

Tim Nelson Forestville, CA

Print Name

Address:

Debra Rypka

7096 O'Hare Lane

Signature

Debra Rypka

Forestville, CA 95436

Print Name

Address:

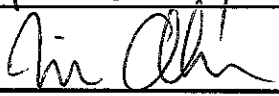
Dyana Foldvary


7381 Hidden Lake rd 95431


Signature


Dyana

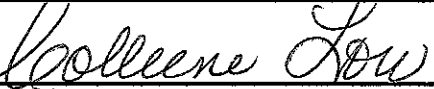
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Print Name Timothy Allen Address: 7581 Giusti Rd Forestville
Signature 

Print Name Leila Allen Address: 7581 Giusti Rd. Forestville
Signature 

Print Name GLENN Trowbridge Address: 7000 Nolan Rd
Signature 

Print Name CRAIG R. LEVITT Address: 7685 Giusti Rd. Forestville
Signature 

Print Name COLLEENE LOW Address: 7767 Giusti Rd. Forestville
Signature  95436

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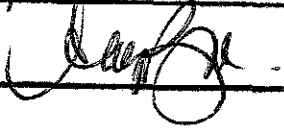
Print Name

Address:

Gary Beyrouhi

11140 Canyon Rd, Forestville, CA 95436

Signature



Print Name

Address:

Daryl Spryter

11140 Canyon Rd Forestville, CA 95436

Signature



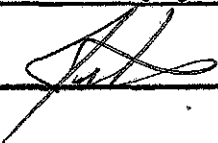
Print Name

Address:

Joel Woodbury

10905 Canyon rd.

Signature



Print Name

Address:

Signature

Print Name

Address:

Signature

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Print Name

Address:

Margaret Katta

7430 Hidden LAKE Rd.

Signature

Margaret L Katta

Print Name

Address:

Ellen Farina

6400 Hidden Lake Rd.

Signature

Ellen Farina

Print Name

Address:

Signature

Print Name

Address:

Signature

Print Name

Address:

Signature

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and wildland mitigations that would make the project financially impossible for a developer to overcome
a current density and that it would be unwise to ignore these issues in order to meet the RHND allocation
needs.

Print Name

Gillian Hayes

Address:

7385 Hidden Lake Rd
Forestville, CA 95134

Signature

Gillian Hayes

Print Name

tyler Haen

Address:

7385 Hidden Lake Rd
Forestville, CA 95134

Signature

Tyler Haen

Print Name

Address:

Signature

Print Name

Address:

Signature

Print Name

Address:

Signature

February 13, 2023

Eric Gage
Permit Sonoma
2550 Ventura Ave.
Santa Rosa, CA 95403
Permitsonoma-housing@sonoma-county.org

REC'D
FEB 14 2023
PERMIT AND RESOURCE
MANAGEMENT DEPARTMENT

Subject: Draft EIR Comments: Housing Element Update

Dear Mr. Gage,

My comments and concerns relate directly to FOR-2 APN, located in Forestville, and more generally to the Forestville sites proposed for increased housing. I am a 25-year resident of Forestville, own a home which backs on FOR-2, and am most familiar with this parcel and the vicinity in which it is located. My concerns include wildfire danger, impacts relative to climate change (GHG's), lack of water and sewers, egress and ingress, traffic, and the lack of local amenities.

I have reviewed a portions of the Draft Program EIR and was pleased that some of my concerns were addressed in the document. I do, however, want to emphasize that there are concerns that warrant consideration.

It appears that Alternative #3 (ref. ES-4 and Section 6—Alternatives) is in the best interest of the community, the county and the environment, as opposed to the Draft as written. Consider as it relates to FOR-2:

- The potential for and the actual significant adverse impacts that will result (ref. Table ES-1);
- The environmental constraints;
- Unknowns not yet explored for FOR-2 (e.g. water supply and wastewater generation impacts—page ES-42 - 43, and pages 6-13 - 6-16);
- There was no “Alternatives” discussion of “Alternative locations” (see below for further discussion and CEQA Guidelines Section 15126.6).
- “Based on the alternatives analysis provided ..., Alternative 3 would be the environmentally superior alternative (ref. page 6-18).”

There are other sites outside those discussed in the Draft PEIR that would seem less impactful from an environmental standpoint. They would be less costly from an infrastructure standpoint, would reduce the potential for wildfire impacts and other significant adverse impacts identified. It is important that although the County has a state mandate to fill, and is under a timeline to fulfill that mandate; the environmental impacts identified for the sites chosen must be considered and the resulting adverse impacts should outweigh the mandate requirement. It is imperative to identify housing sites, but it is also imperative that the county does its due diligence to identify housing that won't result in significant environmental damage, and put the residents and the community in a potentially harmful situation.

Based on the CEQA Guidelines Section 15126.6 (see below), it appears that “Alternative Locations” must be considered in the PEIR and evaluated given the significant adverse impacts that will result as described in the current document. How were the sites for analysis chosen? Was this a methodical endeavor? Are the sites chosen for this EIR the least impactful sites in the county? Are these the only feasible sites in all of

Sonoma County for rezoning? These questions are important when considering alternatives to the project as proposed.

It should be noted that in the last couple of weeks, landowners adjacent to FOR-2 were given a letter by the FOR-2 landowners that included: "Let us be clear in no uncertain terms: **WE ARE NOT SELLING THE ORCHARD.** We plan on continuing to restore and expand the agricultural and environmental function of the land, with hopes of selling food to local stores and individuals in the near future, and eventually retiring here. This property has been in the family for 5 generations and will continue to be so." They have verbalized this for the last few years to various neighbors. I have not attached the letter, as the FOR-2 landowners indicated they would also be submitting a letter to you. Given the landowner's desire, and the significant adverse effects identified relative to rezoning the parcel as described, it does not seem that realistically this parcel will be available for the 283 houses the rezoning Draft PEIR identifies, or would it result in a realistic number for the county to submit to the state.

Given the size of Sonoma County, it appears that there may be many sites in Sonoma County that would not result in significant adverse impacts, compared to the impacts described for some of the sites in this draft PEIR.

Pursuant to the CEQA Guidelines Section:

"15126.6. CONSIDERATION AND DISCUSSION OF ALTERNATIVES TO THE PROPOSED PROJECT.

- (a) **Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project** (my emphasis), which would feasibly attain most of the basic objectives of the project **but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives** (my emphasis). An EIR need not consider every conceivable alternative to a project. **Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation** (my emphasis). An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.
- (b) **Purpose.** Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), **the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly** (my emphasis).
- (c) **Selection of a range of reasonable alternatives.** The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

(d) Evaluation of alternatives. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

Continuing, (f) defines Rule of reason, feasibility, and alternative locations

“(f) **Rule of reason. The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project (my emphasis).** Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

(1) Feasibility. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives. (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553; see Save Our Residential Environment v. City of West Hollywood (1992) 9 Cal.App.4th 1745, 1753, fn. 1).

(2) **Alternative locations (my emphasis).**

(A) **Key question. The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location (my emphases).** Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

(B) **None feasible. If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR (my emphasis).** For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location.

(C) **Limited new analysis required.** Where a previous document has sufficiently analyzed a range of reasonable alternative locations and environmental impacts for projects with the same basic purpose, the lead agency should review the previous document. The EIR may rely on the previous document to help it assess the feasibility of potential project alternatives to the extent the circumstances remain substantially the same as they relate to the alternative.

(3) An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. “

Based on the CEQA Guidelines listed above, it seems unreasonable to not have included “Alternative Locations” in the Draft PEIR. I submit that this must be addressed so that all who are reviewing the proposal have adequate information to make an informed decision, and sites are chosen for rezoning that lessen and/or remove significant adverse impacts.

FOR-2 is located in an “urban service area,” of an unincorporated area. The community of Forestville, in which it is located, is several miles from most of the amenities that people require, compared with most of the other parcels being considered under the EIR. There is a small grocery store, one dentist, a small medical clinic, and very little to no opportunity for permanent employment nearby.

FOR-2 would add approximately 783 people (there would be 1652 people added considering all Forestville sites), and it’s my understanding that other site(s) within the urban service area of Forestville have already been rezoned for additional houses (e.g. the property across from Rotten Robbie’s?). According to information obtained on “Google” the 2020 census showed ~3,800 people living in Forestville. This (granted over time) would result in a sharp rise in population; and would result in most of the population commuting several miles to jobs, the larger grocery stores, and medical appointments. This does not appear to be the best solution for addressing ghg’s, impact on the community itself, or the other needs of the population. Would public services (e.g. the Sheriff’s office staffing) be increased in the community?

As mentioned above, the increased population will add to environmental impacts by adding traffic congestion and CO2 to the air. In addition, it will increase impacts to the road surfaces. I appreciate that some mitigation was suggested (e.g. added bus lines and bike paths), however, it’s unclear whether this will be a requirement. Additionally, these means will not generally get people to their desired destination in a timely manner; and most people will continue to drive.

The increased density in housing (635 houses in Forestville, and an added population of 1,652 people—ref. Table 2-4, pages 2-25 – 2-26) will have a significant adverse impact on traffic on Mirabel Rd. and Front St., in particular. These roads are already heavily impacted, and at times congested by the heavy use of gravel trucks (traveling at 45 mph on Mirabel Rd.), along with the “normal” traffic traveling these roads.

Referencing 4.16 Transportation, I was unable to find any reference to Mirabel Rd. which would be an important artery for FOR-2. I was surprised that Mirabel Rd. and Front St. are not described as “Minor Collectors” of traffic (ref. page 14.16-4 – 14.16-5); or analyzed for significant impacts (unless I missed it). If development of FOR-2 occurs, Mirabel Rd. will be the road that those residents will “collect on”. Front St. will be a “collector” for the other FOR parcels, in addition to FOR-2.

These two-lane roads, which have little to no shoulder are dangerous to walk or ride bicycles on now. There are no sidewalks, bike paths, traffic lights or other measures to slow traffic, or accommodate pedestrians or bicycles particularly on Mirabel Rd., and Front St. is not much better. Mirabel Rd. has a stop sign where it intersects River Rd., and a stop sign where it intersects Front St./Hwy 116. The current conditions would not provide safe passage to the downtown area, to the Youth Park, Speers (our small local grocery store), or the river. In addition to the gravel truck traffic, vehicles have to back onto Front St. when they are leaving some of the businesses located there.

Forestville’s high school—El Molino—is no longer an option for the general high school public. As a result high school students are required to bus, or be driven to Sebastopol (or elsewhere) for school, and associated events. This adds to traffic concerns and congestion, and added ghg. With the added population, the situation will be exacerbated.

Referencing page 4.1-18: "On Mirabel Road, a school is directly across the street from FOR-2." This is not accurate. The Forestville Youth Park is located across the street from FOR-2. School locations are: El Molino, located on Covey Rd., and The Forestville Elementary School and Academy located at 6321 Hwy 116.

The Draft PEIR indicates that transportation would result in significant and unavoidable impacts (ref. 4.16 and page 5-3). Nevertheless, it seems that Mirabel Rd. and Front St., given their current use and that proposed, would be important roads to discuss, analyze for significant adverse impacts, and mitigation measures; and disclosed for the purpose of thoughtful decision making.

Referencing pages 2-25 and 4.16.14. According to Table 2-4 the population buildout will be highest in FOR-2 compared to other parcels listed. Table 4.8-6 #4 indicates the project is consistent with reducing travel demand through focused growth. Although this may be true for some of the housing sites, it doesn't appear to be true for FOR-2, in that travel demand to work, grocery stores, high school, etc. will be greater than if located closer to the amenities needed for a large number of people. As noted above, Forestville has very few amenities and working opportunities.

As indicated in the Draft PEIR, the FOR-2 parcel does not have sewer hook-ups. The homes that surround the parcel are on septic, as there is no sewer system available. Additionally, water availability is scarce. With the drought, and the prediction by some, that this will continue into the future, I question whether there will be water available to accommodate another 783 people (1652 for all of Forestville) even with the mitigation proposed in the Draft PEIR. How and where will additional water be obtained? Where will the sewage be transported? Will additional sewage ponds be required?

Referencing page 2-4, "...the County narrowed its list to 59 Potential Sites based on meeting these four basic requirements: ... 2. Site must be located within an established Urban Service Area where public sewer and water service is available". As indicated in the DEIR: sewer is not available in FOR-2; and water availability and wastewater treatment are unknowns, and would require further study. It appears FOR-2 should have been eliminated from consideration in the DEIR, as were other sites. Why was it not?

Has FOR-2 been analyzed relative to hydrology, comparing the recharge that it currently provides (an area where water can absorb into the soil, and not have to be transported) to the area covered with houses, cement and asphalt? During large rain storms there is minor flooding along Mirabel Rd. as it descends towards the river, and flooding at the junction of Nolan and Mirabel and to a lesser extent at Giusti and Mirabel, particularly when drainage structures have not been cleaned. It appears a housing development has the potential to exacerbate the situation. Where will the drainage from the housing development be directed? Will it further impact potential for flooding?

Regarding wildlife, FOR-2 provides habitat for a number of species: deer, coyotes, bobcats, foxes, racoons, opossums, snakes, lizards, skinks, rats, mice, gophers, moles, and native bees, just to mention the obvious. It also provides roosting opportunities and hunting ground for owls, a variety of hawks—red shoulder hawks teach their young how to hunt in the orchard, sometimes a merlin in the winter, great blue herons, egrets, and a huge variety of other birds. Granted none of these species are "threatened" or "endangered", however, putting housing in, at the density proposed, will reduce habitat for these species.

Impacts from wildfire are a major concern relative to the housing development being considered for FOR-2. Forestville is located in and/or adjacent to a wildland urban interface (WUI). With our changing climate and increased droughts, the danger of wildfires increases. This community has been evacuated twice in the last few years because of threat of fire. Substantially increasing the population will add to the difficulty of evacuation, particularly considering the 2-lane exit roads; and also increase the concern for a catastrophic outcome for those people who are unable to get out in time.

Referencing 4.19—Wildfire—page 4.19-1, includes a projection that extreme wildfire events are expected to increase in frequency by 20 percent by 2050 and 50 percent by the end of the century. The county recognizes that, “although high-density structure-to-structure loss can occur, structures in areas with low- to intermediate-density housing were most likely to burn, potentially due to intermingling with wildland vegetation or difficulty of firefighter access.” On page 4.19-2 (Table 4.19-1), FOR-2 is described as having 2-9% slopes on site with 0-75% slopes nearby. On page 4.19-4, vegetation is said to be less than Guerneville sites but more than Larkfield’s. On page 4.19-5, FOR-2 is shown to have a Very High FHSZ in less than one mile. Page 4.19-26 includes: “Development facilitated by the project would increase the potential buildout of the Rezoning Sites, concentrating this population growth in designated urban service areas of the Unincorporated County, where the risk of wildfire is generally less than in more rural areas where fuels are more abundant. However, as evidenced by recent wildfires in the County, urban areas, particularly those on the outer edges of urban development, are also susceptible to wildfires, despite the (sic) having less abundant typical wildfire fuels. Page 4.19.26 goes on to state, “Access to Potential Sites FOR-2, FOR 4...currently does not meet County road standards of 20 feet in width or greater. Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways could be required. Those improvements would require a County encroachment permit if on a public right-of-way; however, widening County roads would not exacerbate fire risk.” Why is it “could be required”? It seems the document should say “must be required”.

As it pertains to the statements made in the Draft PEIR, some of which I referenced above, it appears that in and near WUI’s housing density is “inherently” less. Putting high density housing in or near WUI’s, where drought and wildfires will only increase over time does not appear to be a good idea. It sets up a situation of potential disaster. I’m remembering the Tubbs fire. Fountain Grove was built in an area that actually had burned in the past. In 2017 the area burned again--this time with houses, and it appears the wind carried the added fuel from Fountain Grove across the freeway to Coffey Park. Although the orchard in FOR-2 may not be dense and contain a high fuel load now, even with the mitigations proposed to reduce fire in the proposed structures, the fuel overall will be increased, and increase a wildfire burning through. As stated on page 4.19-28, “However, it is not possible to prevent a significant risk of wildfires or fully protect people and structures from the risks of wildfires, despite implementation of mitigation. Thus, this impact would remain significant and unavoidable.” Considering the location of FOR-2, compared to many of the other proposed sites, it appears that there is an even greater significant risk relative to wildfire, and locating housing here only increases the risk for the community as a whole.

I wonder if there are studies that have been done which evaluate the best location for housing relative to climate change, drought and the danger of wildfires. It seems that these should be studied, and decisions made for the benefit of Sonoma county and the individuals and communities located in the county. I appreciate and agree with keeping open space between communities, however, when it comes to housing people in areas which would result in significant cumulative impacts as opposed to an area where impacts are minimal, I think it important to reconsider some areas currently “off-limits” to housing (e.g. areas near amenities, and areas where no significant adverse impacts would result).

Referencing page 4.8-22, it appears that the Cumulative Impacts focuses on GHG emissions generated by development of the project. I was unable to find (I could have missed) what impacts are projected once the housing development is in place and the people who occupy the 283 dwellings (FOR-2), or 635 dwellings (Forestville as a whole), are traveling on a daily basis.

Referencing page 5.2.1, “CEQA requires decision makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. The analysis contained in this EIR concludes that the proposed project would result in significant and unavoidable aesthetic, cultural resources, greenhouse gas emissions, hazards, transportation, utilities, and wildfire impacts. Although

development facilitated by the project would be required to implement mitigation measures, impacts would remain significant and unavoidable due to this irreversible loss.”

It is unclear how it is a greater good to continue on with a Draft PEIR that will result in significant adverse impacts for the people, the community and the county, as opposed to exploring areas of the county that will result in lesser impacts than the current proposal, with the consideration to rezoning those areas. Another indication that this document must address “Alternative Locations” as described under CEQA 15126.6

Given this is a Draft PEIR, the Impact Analysis speaks to the impacts of the housing sites in more general terms, and does not show the impacts relative to each parcel proposed for housing. There is a wide variety of parcels being considered in a variety of locations. Presumably, before some of the parcels are developed an additional EIR will be required. However, it is unclear how a zoning change can be decided when enough facts are still unavailable to determine whether the proposal is even feasible. How can you propose to change the zoning and allow up to 283 housing units on FOR-2, when there are still many environmental and feasibility unknowns?

As presented in the Draft PEIR and the Impact Analysis for Alternative #3, it clearly appears Alternative #3 is the superior environmental alternative, specifically as it relates to FOR-2, and is in the best interests of the community and Sonoma County. However, above and beyond this, other locations should be evaluated in the PEIR pursuant to the CEQA Guidelines Section 15126.6.

Thank you for considering my comments.

Sincerely,



Leslie Markham
6975 Nolan Rd.
Forestville, CA

Date:

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

Dear Mr. Gage,

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

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

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

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

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

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

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

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

Name: Patrick Reesink
Address: 14733 Janet Ln.
Date: 2-4-23
Signature: Patrick Reesink

Date:

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

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Name: Jill Reesink
Address: 14733 Janet Lane
Date: 2-4-2023
Signature: Jill Reesink

Date:

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

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Name: *RICHARD EVANGELISTI*

Address: *16387 MELODY LANE P.O. BOX 213 GUERNEVILLE CA.*

Date: *2/11/23*

Signature: *Richard Evangelisti*

February 1, 2023

County of Sonoma Planning Commission

RE: Draft EIR Comments Housing Element Update

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

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

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

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

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

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

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

Sincerely,

Sally Percich
Robert Percich
7486 Poplar Drive
Forestville, CA 95436

Date: Feb 9, 2023

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

We strongly oppose the rezoning of properties mentioned in the letter below and agree with all the serious concerns stated in this letter.

Dear Mr. Gage,

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

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

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

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

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

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

Name: Susan and Ron Reed

Address: 16341 Valley Lane Guerneville, CA 95446

Date: 2/9/23

Signature:

Susan Reed, Ron Reed

Hello Eric,

It was nice to put a face to your name and thank you so much for attending the recent meeting on Thursday evening regarding The Housing Element!

I very much understand there is a real need to build low income housing in the county including in unincorporated areas and have hopes people will come forward with more appropriate locations. I also understand it is an uphill battle and I applaud your efforts and commitment to get it right.

I have lived on Mirabel Road in Forestville for a decade. There are a number of pressing issues that already continue to go unaddressed here in our small community. I was surprised to read the proposed increase to the population of Forestville is, by far, the highest of any of the proposed sites and would include well over 1600 new residents to our small community. Krista raised a point in the meeting, and I too am interested and am asking how Forestville locations were selected as they would have the most impact to our population? Our residents here would be, by far, impacted more than any other location. I also want to speak to some of the resources already lacking in our small community such as water, sewage, accessibility to transportation, lack of sidewalks, poor road quality, insufficient access to police and shopping, traffic congestion. Mirabel Road, like so many others in the Russian River area already presents a real danger. Many roads, including Mirabel Road are in poor condition largely from lack of maintenance and exacerbated by recent storms and constant traffic. On Mirabel Road the conditions are already quite dangerous due to degraded road surface which poses an ongoing threat to bicyclists and pedestrians including our school aged children.

I help moderate a site called Next Door and another ongoing concerns voiced by local residents in Forestville is the drug and alcohol abuse plaguing our neighborhoods.

Of paramount concern for our residents is to have a safe and expedient evacuation plan in the event of a natural disaster. Having experienced this firsthand on several occasions, our ability to safely evacuate during an emergency is a concern of many, if not all, of my neighbors.

Eric, Forestville, as well as some of the other proposed locations, clearly lacks adequate infrastructure to move forward with the planned proposal. The issues I spoke of above, in my humble opinion, should all be addressed prior to the inception of any endeavor of that magnitude, especially here in Forestville due to our already inadequate infrastructure and safety concerns.

It is my understand that residents of a housing project, such as the one proposed in Forestville on Mirabel Road and the 116, would do much better in a more urban setting primarily due to lacking infrastructure and proximity to services.

In closing, I want to thank you for taking time to read this. I am aware many of the concerns have already been noted. I want to voice my concerns as well and wish I had more suggestions for more appropriate locations in this area.

I wish you the best in helping to resolve this in an equitable manner, one that would work for all of us. You can reach me via email or my landline if you have any questions.

My phone number is 707 887-1068.

Best to you,

Vikki Miller
Forestville, CA

I'll email a duplicate in the event this doesn't arrive by the deadline.

Alice Horowitz
P.O. Box 1045
Glen Ellen, CA 9542
oneallicat@gmail.com

Feb. 11, 2023

DELIVERED VIA EMAIL

Please distribute copies of this letter to all concerned County staff & Decision Makers.

RE: Comments on Sonoma County Housing Element Draft EIR, specifically regarding Glen Ellen parcels, # 054-290-057 and # 054-290-084 (GLE-1 and GLE-2)

Dear PRMD Staff:

I am writing to voice my concerns about the Draft EIR for the Sonoma County Housing Element, specifically regarding the two properties referenced above owned by Mr. Marty Winters and located on the corner of Carquinez and Arnold Drive in the heart of downtown Glen Ellen. These parcels were identified as potential sites for upzoning during the "Rezoning Sites for Housing Project" and were included in the Draft EIR. During the Draft EIR public comment period, many people submitted comments with valid concerns regarding the inappropriateness of substantially upzoning these parcels, which are outside of the urban growth boundary in the tiny village of Glen Ellen at an unsignalized intersection.

As a 29-year-resident of downtown Glen Ellen, I have no objection to Mr. Winters improving his properties (they certainly are in great need of improvement)! However, the rezone sites represent a large part of the downtown core (all two blocks of it!) and will dramatically change the core by tripling the existing number of housing units allowed. The Workforce Housing (WH) zone district **REQUIRES** a minimum number of units (16), so the property owner will have no choice but to overdevelop the property. The proposal is **clearly inconsistent with the intent of**

the Glen Ellen policies established in the General Plan and Glen Ellen Development and Design Guidelines.

Furthermore, the DEIR cumulative impact analysis does not consider two huge projects in close proximity to the proposed rezoning sites in Glen Ellen and Sonoma Valley – the adopted SDC Specific Plan and the Hanna Center housing, hotel, and commercial development a few miles down Arnold Drive. How can it be that these two large-scale developments were apparently NOT considered in the **cumulative impact analysis** for transportation, land use policy consistency, GHG, visual resources, public services (water, wastewater), or wildfire evacuation and emergency response? How on earth is Arnold Dr. supposed to accommodate so much increased traffic on a daily basis, not to mention during an emergency evacuation?

Please consider:

1. Removing the two Glen Ellen parcels from the rezoning list due to significant impacts identified in the EIR; and/or
2. Assigning an alternative zone district that reduces the number of allowed units on the site and does not require a minimum number of units, as required by the WH zone.

In closing, with the large scale SDC development, it is clear that Glen Ellen and the surrounding semi-rural area (without adequate infrastructure or transit) will be taking on more than its fair share of housing and should not be required to accommodate even more housing that will contribute to the significant and unmitigatable traffic impacts identified for the SDC Specific Plan.

Respectfully,



Alice Horowitz

2-13-2023

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

Dear Mr. Gage,

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

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

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Mike Gray and Susan Ryan
16215 Laughlin Road
Guerneville, California 95446

Susan Ryan

Mike Gray

From: [Tim Patriarca](#)
To: [PlanningAgency](#)
Cc: [James Wang](#)
Subject: Re: Public Comment on Sonoma County Housing Element Update, GRA-4
Date: Thursday, February 2, 2023 8:29:21 AM

EXTERNAL

To Permit Sonoma,

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

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

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

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

Regarding the rural aspects of the area, the properties surrounding this parcel are open and natural. Three of the four sides of the site share a border with large parcels of open space, two of which include historical apple orchards, and there are many more similar parcels along Hicks Rd and Mueller Rd. These rural properties provide an environment that promotes wildlife and a healthy ecosystem. We regularly see foxes, deer and other wild animals, which is a major draw for those of us who live here. The proposed site has heritage oaks and Gravenstein apple trees within its open space; not only would these

historic trees be torn down, the disruption will have hazardous effects on the wildlife and natural ecosystem. The residents here are attracted to the area because of the open space and rural nature, and a dense housing development is the antithesis of that spirit. How is the proposed development appropriate for this site?

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

Thank you for your time and consideration.

Sincerely,

Tim Patriarca and James Wang

On Thu, Feb 2, 2023 at 8:28 AM Tim Patriarca <tim.patriarca@gmail.com> wrote:

To Permit Sonoma,

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

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Thank you for your time and consideration.

Sincerely, Tim Patriarca and James Wang

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From: [Tim Patriarca](#)
To: [PlanningAgency](#)
Cc: [James Wang](#)
Subject: Public Comment on Sonoma County Housing Element Update, GRA-4
Date: Thursday, February 2, 2023 8:28:35 AM

To Permit Sonoma,

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

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Sincerely, Tim Patriarca and James Wang

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From: [Leila Allen](#)
To: [PermitSonoma-Housing](#)
Subject: "Upzoning" objection
Date: Wednesday, February 01, 2023 9:52:35 PM

Dear BOS,

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

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

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

Thank you,
Leila Allen
(Forestville)

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From: [Meagan Nolan](#)
To: [PermitSonoma-Housing](#)
Subject: Property at 6934 Mirabel
Date: Wednesday, February 01, 2023 4:44:41 PM

To whom it may concern,

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

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

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

Regards,

Meagan Nolan (nee Pulley)

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From: [Arlene Warner](#)
To: [PermitSonoma-Housing](#)
Subject: Draft EIR Comments: Housing Element Update
Date: Wednesday, February 01, 2023 11:19:02 AM

EXTERNAL

February 1, 2023

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

Mr. Gage,

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

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

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

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

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

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

reasons.

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

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

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

Sincerely,

Arlene Warner
16375 Cutten Dr.
Guerneville, CA

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From: [Neil Shevlin](#)
To: [PermitSonoma-Housing](#)
Subject: Draft EIR Comments: Housing Element Update
Date: Wednesday, February 01, 2023 9:42:58 AM

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

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

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

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

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

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

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

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

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

Name: Neil Shevlin

Address: 16477 Cutten Dr, Guerneville, CA 95446

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From: [Kelly](#)
To: [PlanningAgency](#)
Cc: [Omar Percich](#)
Subject: For todays housing meeting
Date: Thursday, February 2, 2023 11:36:45 AM

EXTERNAL

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

Good afternoon, my name is Kelly Joyce and I am a resident of Forestville. My family moved from Windsor three years ago to Conor court which is located off Highway 116 and across the street from the proposed development on packinghouse Road. I have sent several emails over the years to both Caltrans and county officials pertaining to the extreme safety concerns I have for this location as my daughter is not able to even cross the street to go 20 feet to school in the morning safely. When we drive her to school in the morning, it typically takes five minutes just to turn left to go straight across the street.

Additionally, Highway 116, right in front of the proposed Packing House Road development, floods, multiple times a year completely cutting off access in both directions. Does California need more housing? Yes. However; It is highly concerning that the carts being put before the horse by proposing a 37% increase in Forestville's population with obviously minimal thought/planning put into the feasibility given current infrastructure. How does the county move forward with rezoning proposals without even having a plan for the required infrastructure changes? Our town is not setup to accommodate thousands more people and at the same time be able to safely evacuate in the event of a natural disaster. People that actually live here understand how far off this proposal is to the current reality of our country existing infrastructure.

Thank you,

Kelly Joyce

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From: [MARY MOUNT](#)
To: [PermitSonoma-Housing](#)
Subject: Regarding additional Guerneville Low Income housing
Date: Thursday, February 02, 2023 12:14:03 PM



As usual, the county wants to dump their "shit" in the lower river basin of Forestville and Guerneville.

This time in the form of low income housing in an *already blighted area*. Laughlin and Cutten are narrow roads with no ability to widen either one. Laughlin, especially, being on the cusp of Fife Creek and a Highway. Laughlin is a dead end road, as is Armstrong Woods Road, leading into a National Park.

Armstrong Woods Road floods.

Evacuation would be a disaster, not to mention the incurring insurance rates from recent nearby flood and fire.

Our sewer system is outdated and would need a complete overhaul.

What are we thinking, here ?

That's right, we are thinking, dump it onto the lower river.

Won't work, take it back to Santa Rosa and Windsor and Healdsburg. Plenty of open space there.

M.E. Mount

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From: [Nick Pulley](#)
To: [PermitSonoma-Housing](#)
Subject: FOR-2 rezoning response
Date: Thursday, February 02, 2023 11:42:33 AM

Eric,

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

A little history...Nick's great grandfather, Cornelius Van Keppel, started planting Gravenstein, Golden Delicious, Red Rome and Bartlett Pear trees in 1911. His daughters, Joyce and Barbara and their husbands, Hoyt Bockes and Herman Wiebe, lived on the orchard until their passing. The property is still owned by Nick's family, but the orchard was left unmaintained aside from yearly disking until we moved in spring 2018. We have been pruning trees, planting new trees and other annually producing plants, building vegetable beds, and clearing blackberries, poison oak and other overgrowth since we moved in. Since we are both fully employed as educators and performers we do as much work as we can on the property during weekends/summer vacation so while progress has been slower than we would like, we are very proud of what we've been able to accomplish so far.

We recently became aware of the rezoning plan this past week. While this information was startling in terms of the scale that the county wishes to use the land (283 new houses?!), to us it's nothing new that people want to use the land for housing. City planners and housing project managers have been contacting our family for decades. Thankfully there has been no mention of eminent domain in any of their recent communication.

Let us be clear in no uncertain terms: **WE ARE NOT SELLING THE ORCHARD.** We plan on continuing to restore and expand the agricultural and environmental function of the land, with hopes of selling food to local stores and individuals in the near future, and eventually retiring here. This property has been in the family for 5 generations and will continue to be so. **We also hope that this rezoning doesn't impede on our ability to use the land for agriculture.**

If you have any questions you can email any of us listed below.

Nick Pulley - Bassman.pulley@gmail.com

Kristen Krup - Klynnkrup@gmail.com

Karyn Pulley (off site, owner) - kdpmick@aol.com

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From: [Rebecca Mateja](#)
To: [PermitSonoma-Housing](#)
Subject: How and Why?
Date: Wednesday, December 28, 2022 12:56:36 PM

Currently we are being told to cut our water usage, and the government is telling us that we need more housing. How and Why? Just asking...

I understand the need for more housing - I just don't understand the how and why of it. If we build these home for the next 8 years, what happens when we reach that point.

I guarantee that we will be trying to accommodate more people then. The reason that we are a small town is because we don't just build more housing as soon as it's needed.

Because we do not have the water that these homes will be using. That's the why....

We already supply Marin County and Rohnert Park with water from the Russian River through the caissons. So we are giving away our water there.

From: [Greg Tatarian](#)
To: [PermitSonoma-Housing](#)
Subject: Comments on Housing Element Update
Date: Tuesday, January 03, 2023 12:06:12 PM



Hello,

I am providing the following comments to Section BIO-7 of the Housing Element Update Draft Environmental Report (Rincon Consultants, Inc. 2022).

As a bat specialist consultant for 32 years with particular expertise with bats in human-made structures (1), I find that Mitigation Measures 2 and 3 are insufficient to prevent direct mortality of roosting bats, and could result in loss of large number of bats that could potentially roost in buildings, trees or other features contained within the properties considered in this document. Additionally, the current measures could result in costly delays to construction schedules if roosting bats are found to be present during the recommended seasonal period. Also, Measure 4 requiring pre-construction surveys could be misconstrued to be effective for roosting bats. More concerns are specified below the currently proposed language:

2. Prior to construction, a qualified biologist shall conduct a survey of existing buildings to determine if bats are present. The survey shall be conducted during the nonbreeding season (November through March). The biologist shall have access to all structures and interior attics, as needed. If a colony of bats is found roosting in any structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.).

COMMENT - BIO-7, Measure 2:

As written, Measure 2 presumes bats are active throughout the year, which is not true, so will make surveys ineffective. Measure 2 also requires additional surveys only if a colony is present, but this is insufficient. Also, Measure 2 does not account for the likely presence of maternity colonies in buildings during maternity season, and does not address other habitat types and features used by bats, such as trees, bridges, and culverts.

The first step in a project involving potential bat roosting activity is a habitat assessment by a qualified bat biologist, followed by project-specific recommendations which could include humane eviction (blockage of potential openings along with installation of one-way exits on active openings), partial dismantling under direct supervision of a qualified bat biologist, two-step tree removal also under supervision, or other action - all to be conducted only during seasonal periods of bat activity.

Bat breeding and roosting ecology is more complex than that of other taxa, such as birds.

Unlike birds, breeding in bats may occur in fall, winter or spring months depending on the species. Bats have two seasonal periods each year when some or all bats are not active - maternity season when young remain in the roost until dispersal in fall, and winter months when many bats that remain in structures enter torpor (light form of hibernation). Winter torpor or hibernation occurs because bats are affected by external temperatures, so when temperatures drop below about 40-45F for many species, they become inactive. During the months of November through March as shown in the DEIR, bats in this region are likely to be in torpor and mostly inactive throughout the winter. As a result, surveys are unlikely to be effective unless bats are roosting in open spaces accessible to biologist. Enclosed, inaccessible roost features common in many structures would require night emergence surveys to determine presence or absence, and since bats are only occasionally active during winter months, false negative results would result from conducting surveys between November and March. Also, visitation of more open roosts during winter months may disturb bats when they are conserving energy and cause them to abandon the roost during winter months when they may be much less active and capable of flying to alternative roost sites. Both of these actions would result in unintended and unnecessary mortality.

Instead, surveys should be conducted only when bats are active, which in this region would be from approximately April 1 through mid-October. If a maternity colony is suspected, particularly for species such as pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*) or other California Species of Special Concern (SSC), additional mitigation other than just preventing direct mortality may be required. This would require more accurate surveys to identify bats by species and quantify population. Night emergence surveys are generally the most accurate method and, conducted properly, the least negatively impactful to the colony.

3. If bats are roosting in the building during the daytime but are not part of an active maternity colony, then exclusion measures must include one-way valves that allow bats to get out but are designed so that the bats may not reenter the structure. Maternal bat colonies shall not be disturbed.

COMMENT - BIO-7, Measure 3:

As currently written, Measure 3 does not account for the likely presence of maternity colonies in buildings during maternity season, and does not address other habitat types and features used by bats, such as trees, bridges, and culverts.

Bats that roost in buildings in colonies during maternity season are almost always maternity colonies, although a few individual bachelors may roost together in a building. As a result, it is rare that an aggregation of bats in a building, tree, bridge, culvert, etc. during maternity season is not a maternity colony. Therefore, humane eviction as detailed in Measure 3 (or other suitable measures), would need to occur only during seasonal periods of bat activity, which means; after winter torpor and just before maternity season (in this region, about March 1 to April 15), and after young are self-sufficiently volant - flying to and from the natal roost and no longer relying on milk from their mothers (September 1 - about October 15). These seasonal periods are conservative to protect all bat species in the region, and account for different typical dates in birth of pups, development, and volancy.

4. A qualified biologist shall conduct pre-construction clearance surveys within 14 days of the start of construction (including staging and mobilization). The surveys shall cover the entire disturbance footprint plus a minimum 200-foot buffer, and shall identify all special status animal species that may occur on-site. All nonlisted special status species shall be relocated from the site either through direct capture or through passive exclusion. The biologist shall submit a report of the preconstruction survey to the County for their review and approval prior to the start of construction.

COMMENT - BIO-7, Measure 4:

Pre-construction surveys for roosting bats should be considered only as confirmation that all previous efforts to assess the potential habitat and conduct project-specific measures to prevent direct mortality of roosting bats have been effective. If pre-construction surveys are conducted during winter months for example, presence of roosting bats may go undetected and direct mortality of bats could occur. If surveys are conducted during maternity season and bats not previously found are present, construction delays would result. The complex life history and roosting activity patterns of bats requires a careful habitat assessment by a qualified bat biologist early in the project, with subsequent recommendations to be implemented during the appropriate seasonal periods. These actions often occur many months in advance of construction activities.

Finally, it is generally ineffective and inappropriate, not to mention in violation of wildlife laws and regulations, to capture and relocate native wildlife species without project-specific permits issued by the California Department of Fish and Wildlife (CDFW). There are currently 13 special-status bat species in California (CDFW Special Animals List, October, 2022), and direct capture and relocation is not appropriate, effective or legal. Further, the County is not the Trustee Agency for wildlife translocation decisions, particularly with special-status species. Approval for such actions would be issued by CDFW.

Regards,

Greg Tatarian

[1] Greg Tatarian is an independent bat specialist wildlife consultant with 32 years of experience with bats in human-made structures. He has held a Scientific Collection Permit from the California Department of Fish and Wildlife (CDFW) for approximately 27 years with Additional Authorizations for Research on Bats, including radio-tracking, banding, genetic sampling, mist-netting, and hand-capturing of various species, including California Species of Special Concern (SSC), including pallid bat (*Antrozous pallidus*) and Townsend's big-eared bat (*Corynorhinus townsendii*). Mr. Tatarian is an expert in conducting habitat assessments, species surveys (bioacoustic, visual and capture) for both day and night roost habitat and has extensive experience with anthropogenic roosts. Has performed inspections of over 4,100 structures, including bridges and buildings, to satisfy CEQA requirements for demolition, development, retrofit and rehabilitation projects. He has personally performed ca. 350 bat evictions from residential, commercial, and institutional structures, and designs, implements, and supervises mitigation strategies including humane bat eviction from bridges, culverts, large buildings, and other settings. Mr.

Tatarian has unique and extensive expertise with artificial replacement bat roosts, creating first known successful maternity bat house in California *A. pallidus* in 1995, culminating in successful designs of on and in-structure bridge bat habitat.

--

Greg Tatarian Conservation Lecture Series Archive:
Conserving California's Bats Through Environmental Review and Permitting:
<https://www.youtube.com/watch?v=QFXLRa5mClI&feature=youtu.be>

CNDDDB News: <https://www.wildlife.ca.gov/Data/CNDDDB/News/cnddb-contributor-spotlight-trish-greg-tatarian>

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From: [brian bollman](#)
To: [PermitSonoma-Housing](#)
Subject: draft Environmental
Date: Wednesday, January 11, 2023 4:47:18 PM

Response to [draft Environmental Impact Report for the Housing Element Update](#)

The purpose of the update may be to comply with state law, and it may do so. However, there are a few observations that I think really should be included in the document:

- 1) Housing needs in this document focus on vacancy rates, but vacancy rates are only a snapshot of availability, and not reflective of actual housing stocks.
- 2) Sonoma county is in its sixth year of population decline.
- 3) Until recently, the U.S. and California experienced an increase in the size of units for decades, resulting in much larger square footage per person.
- 4) The number of persons per unit has decreased steadily in the United States for decades, and has been decreasing in Sonoma County for some time as well.
- 5) Vacancy rates always drop during periods of prosperity because people who were previously sharing accommodations with friends or family find that they can afford to have there own units. By contrast, when the economy worsens, people often move in together to save money. (It is understandable that people want their own units, but it is a much better use of resources and better for the environment for people to share.)
- 6) A recent audit by the state found that the state's methodology for calculating housing needs grossly exaggerates actual housing needs.
- 7) The Association of Bay Area Governments (ABAG) bases its housing allocations on (exaggerated) regional needs, not on local housing needs. This is not a functional or realistic practice, because outlying areas like Sonoma County that are losing population can't appropriately provide housing for communities in the core of the Bay Area that are growing. The last thing we need in the Bay Area is people commuting 100 miles to work. The RHNA process that ABAG uses effectively shifts the burden of housing incurred by growth and bad planning in the core of the Bay Area onto outlying areas like Sonoma County that have not shared in that growth.

Conclusion:

The draft environmental Impact Report doesn't address the potentially catastrophic environmental consequences of the flawed RHNA process. And it really should.

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From: [Josette Brose-Eichar](#)
To: [PermitSonoma-Housing](#)
Subject: DEIR Housing element
Date: Wednesday, January 11, 2023 11:24:38 AM

EXTERNAL

I of course could not read this entire voluminous DEIR. But, I continue to be puzzled by your assessment of what is really vacant property and how you came up with this data. Here is what I find in the DEIR as it relates to vacant developed property (not vacant undeveloped land).

"Of the 64,807 housing units in the Unincorporated County in 2019, 10,769 units (16.6 percent) were vacant (DOF 2019). There were 1,904 permitted vacation rentals in the County as of June 23, 2020 (County of Sonoma 2020c)."

First question is: are the 1,904 permitted vacation rentals included in the 10,769 vacant housing units? And if they are, why? These are not vacant. Vacation rentals are occupied by short term renters.

Then I go back to the housing element itself. Where I state that how census data was not used correctly to identify vacant housing units. Here is what I wrote concerning that back on 11-18-2022:

To Permit Sonoma
11-18-2022

In reading your draft report it is stated:

In 2019 there were 11,500 vacant units in Unincorporated Sonoma County, a significantly higher ratio of vacant units than in the County as a whole (including the 9 cities) or in the Bay Area region (see Figure 9). Of the Unincorporated County's vacant units, 63% (7,300) were held for seasonal, recreational, or occasional use. This is a significantly higher rate than the County as a whole or the Bay Area. Only 7% of the Unincorporated County's vacant units were held for rent, and only 4% for sale.

Then in reading the graphs I see that 17% of housing units are listed as vacant. Of this 17% 63% are listed as seasonal, recreational or occasional use. 24% are listed as other vacant. For a total of 87% of all vacant units.

You pointed me to the census website that provides definitions for these terms, seasonal etc. I find that you are not really following all the definitions laid out in the census, where your figures are derived from.

As many consider the high vacancy rate one of the primary reasons for lack of housing and specifically affordable housing, I think you must find a better and more

accurate count of what this vacant housing really is.

As a vacation rental owner I have been subject to constant negative opinions and ideas based on what people perceive, and some of this is because of the county's inability to really define in specific numbers what makes up vacant housing.

You have an accurate count of how many homes are vacation rentals, from the number of valid permits in place. You have already concluded, but not publicized that vacation rentals have little or no impact on housing prices or rents. But we have no real data on what percentage of vacant units are vacation rentals. It seems the census data is used in an inaccurate way, where we are given no idea the actual make up of vacant housing units. I would suggest the county undertake a real survey and not manipulate census data in this less than accurate way, as you go forward in assessing the state of housing in the county.

Here are some of the census definitions:

For occasional use. If the vacant unit is not for-rent or for-sale-only but is held for weekends or occasional use throughout the year, the unit is included in this category. Time-shared units are classified in this category if the vacant unit is not for-rent or for-sale-only, but held for use for an individual during the time of interview.

Units Occupied by Persons with Usual Residence Elsewhere. A housing unit which is occupied temporarily by persons who usually live elsewhere is interviewed as a vacant unit provided that a usual place of residence is held for the household which is not offered for rent or for sale. For example, a beach cottage occupied at the time of the interview by a family which has a usual place of residence in the city is included in the count of vacant units. Their house in the city would be reported "occupied" and would be included in the count of occupied units since the occupants are only temporarily absent. Units occupied by persons with usual residence elsewhere (URE) are further classified as seasonal vacant or year round vacant units.

Other vacant. Included in this category are year-round units which were vacant for reasons other than those mentioned above: For example, held for settlement of an estate, held for personal reasons, or held for repairs.

Seasonal Vacant Units. Seasonal housing units are those intended for occupancy only during certain seasons of the year and are found primarily in resort areas. Housing units held for occupancy by migratory labor employed in farm work during the crop season are tabulated as seasonal

So by reading your graph, I am unsure of where second homes are in the equation. In an e-mail you told me that vacation rentals are included in the 63% of seasonal, recreations or occasional use. As you know the actual number of vacation rentals, why don't you just break them out and show us what the real percentage of vacant units they are? And as it would seem that second home owners should really be filling out the census to be as, "Units Occupied by Persons with Usual Residence Elsewhere", you would have much more accurate data.

As for the 24% listed as other vacant, I find it hard to believe this percentage is really as the census describes it.

Last, by relying on what people report on the census, may not be the most accurate way to define what all these vacant units really are, leading the county to make erroneous judgments on our housing picture and why we have so many "vacant" housing units.

Thank you and sincerely,

Josette Brose-Eichar

Boyes Hot Springs

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From: [Jim Bell](#)
To: [PermitSonoma-Housing](#)
Subject: County's Housing Element Update
Date: Saturday, January 14, 2023 12:11:58 PM

I do not understand how the Planning Commission can consider a Plan at this time that will have far reaching impacts on transportation issues like traffic and road upkeep, "water supply", power, sanitation, potential wildfires, schools, aesthetics, hazardous waste, law enforcement, fire protection, homeless, and much more. Many of the issues above have not been abated to this day so how do you expect to abate more future issues?????

James Bell

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From: [ashleyyyyyy C](#)
To: [PermitSonoma-Housing](#)
Subject: Rezoning for Forestville
Date: Monday, January 23, 2023 10:51:58 AM

EXTERNAL

I am not supporting the rezoning for Forestville. We do not have a high school here anymore, a small grocery store. The town of Forestville can not support 1600 more people. We do not need to be a big city like Santa Rosa, we are a small friendly community. We already have enough people visiting from all over for the Russian river. We do not need apartments in the town of Forestville

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January 25, 2023

PermitSonoma-Housing@sonoma-county.org

Eric Gage – Planner III, Sonoma County PRMD (Eric.Gage@sonoma-county.org)

RE: Comments on

On behalf of the Milo Baker Chapter (Sonoma County) of the California Native Plant Society, thank you for the opportunity to share our comments on the upcoming Sonoma County . The Milo Baker Chapter is dedicated to protecting native plants and their habitats in Sonoma County and we are very interested in advancing the County's protection measures for them. To that end, we are requesting that Sonoma County address several issues in the DEIR for the Housing Element Update.

We understand that the purpose of the Draft EIR is to allow for rezoning for new housing. However, we feel that not enough scrutiny has occurred for these rezoning areas in this initial evaluation. The delay of specific analysis per site may allow for an overlook of special status species, for which a site has been pre-approved by issuing the EIR. It is a fault with the CEQA process, but it should be addressed by Sonoma County PRMD.

There are several areas that have been identified in the document as needing further analysis, but once an area has identified for development, such as in the DEIR, then there is little chance that development will not go through despite the site constraints. The following is not a detailed analysis of each site, but a quick overview of the lack of biological evaluation that was conducted for this DEIR.

For example, Site GUE 4 is on Fife Creek in the riparian zone, which is not stated in the document. The San Francisco Bay Joint Venture EcoAtlas (<https://www.ecoatlas.org/regions/adminregion/sfbjv?project=5630&site=5469>) shows associated habitats and sensitivities per area. With climate change Fife Creek will likely be an area of flooding and appropriate setbacks should be applied to riparian areas to encompass climate change. The 35- to 50-foot setbacks required by PRMD for small streams will likely be inadequate.

Site GRA-2 is situated *in* riparian habitat, adjacent to Atascadero Creek, as stated on

Pitkin marsh lily (*Lilium pardalinum* ssp. *pitkinense*) as the climate changes. The lily once occurred in three different area and now is considered to occur in only one area in Sonoma County

of Pitkin Marsh lily is loss and disturbance of habitat resulting from nearby residential development. The development along Atascadero Creek could remove habitat that the lily could move into. Even if development does not directly affect occupied habitat, it could cause changes in hydrology and enable encroachment by invasive species. The development along Atascadero Creek could further cause invasive plants to move into Pitkin Marsh. Developing rural residences, driveways, and agricultural operations such as vineyards could also lead to increases in runoff, nutrient loading, erosion, sedimentation, and changes in soil pH. This should be addressed in the DEIR.

Sites SAN 9 and 10 are in areas that supports California tiger salamander and likely support wetlands and vernal pools that have not been delineated, despite being fallow fields. This should be addressed in the DEIR.

Site AGU 2 is located in Sonoma Creek, as stated on page 223 of 601. Although housing currently exists within the riparian zone of Sonoma Creek it is inappropriate to put more development along the creek that will remove riparian habitat and potentially compromise the flood plain of Sonoma Creek. This should be addressed in the DEIR.

In short, we feel that not enough scrutiny has occurred for the DEIR and additional evaluation is required before promoting these areas for rezoning for additional housing. We look for to reading the answers to these concerns in the final EIR.

Regards,



Trish Tatarian, Conservation Co-Chair

Milo Baker Chapter of the California Native Plant Society

From: [Matt O'Donnell](#)
To: [PermitSonoma-Housing](#)
Subject: Re: Public Comment on Graton Housing Element
Date: Thursday, January 26, 2023 10:41:39 AM

Correction: I incorrectly put the wrong address in the letter. The correct address is 3280 Hicks Rd. Here is the updated public comment:

Dear Permit Sonoma,

I am writing to express my strong opposition to the proposed rezoning of 3280 Hicks Rd. in unincorporated Sonoma County near Graton. The proposed development of this property would have a detrimental impact on the rural nature of our community, as well as the safety and well-being of its residents.

First and foremost, the development would destroy the rural nature of the area by introducing more urban-style housing into a community that values its natural setting. Additionally, the houses in the surrounding area rely on wells for their water supply, and the construction of new homes would put a strain on this limited resource.

Furthermore, the street on which the property is located is narrow and does not have sidewalks, making it dangerous for pedestrians, especially children walking to school. The lack of street parking also poses a problem for residents and visitors alike. The infrastructure of the surrounding area simply cannot handle this type of development without a major investment from the county which has never been a priority in this area. Hicks Road is in major disrepair with a patchwork of partially filled potholes. There is no shoulder on the road and cars do not have the space to drive side by side down the road.

The intersection of Hicks Road and Graton Road is already problematic with cars coming around a blind turn at high rates of speed. In order for students to cross to get to Oak Grove Elementary School or to a bus stop they must navigate a 3-way intersection where cars cannot see people walking in the faded crosswalk. This gets much worse in the afternoon with the lower sun which creates blinding conditions where drivers cannot see pedestrians. I was almost hit in the crosswalk once and the driver exclaimed that he could not see me due to the light. I did not allow my kids to walk to school because of the danger of this intersection. Once you get across the street there are no sidewalks on the other side to get to the school or to get to the bus stop. Nor is there a shoulder so you are forced to walk in the street. Pedestrians would have to walk on the street which is extremely dangerous. The county cannot allow for a large increase in housing at this site if they are not willing to make massive

infrastructure improvements to the whole area which they do not have the funding to do. Making this choice would put new residents, especially children at high risk.

Since there is no street parking in the area and no walkable grocery stores the inhabitants of high-density housing will be automobile dependant. This will lead to a series of detrimental outcomes for the area. Firstly, there will need to be parking for at least two cars per housing unit which will mean pavement and concrete over the majority of the lot. This will remove most of the tree cover and will cause warming to the area and will destroy wildlife habitat. Secondly, the lot is at the top of a hill and there is already a large amount of runoff from the property in big rain storms. This runoff floods the backyards of houses on Jannette Avenue. With more concrete and housing there will be a massive amount of new runoff leading to flooding of houses and pollution into the Atascadero Creek. In addition, the development would contribute to light pollution and the natural rural feel of the area. The construction noise would also be disruptive to the peacefulness of the area.

Hicks Rd already is impacted by county development with the moving of the Graton Fire Station to Hicks Road. Residents already have to endure extra traffic due to the Christmas Tree Farm associated with the fire station and have to endure the very loud fire siren at high decibels. The county may also put sewer access for trucks to bring wastewater from Occidental to the end of Hicks Road.

During the recent storms, this property and adjacent ones lost power and the power was not restored for 6 days. When the area was evacuated during the fires the gas was turned off for two weeks before it was restored. This is part of living in a rural area but not something that works well for big housing projects.

With the narrowness of the road and nearby evacuation routes, adding this much population to the area would be dangerous during an evacuation. It took people hours to get out of West County during the last evacuation and this would increase the time.

This property is already zoned for 8 additional housing as well as 8 ADU and can help increase the housing stock in Sonoma County. with 16 new dwelling, much more than currently sit on surrounding properties. The current zoning will keep some of the rural feel of the area and limit the negative effects of a large housing development on the property. There are plenty of better areas for this type of development like the area of the empty Redwood Shopping Center in Sebastopol that is much more pedestrian friendly and has the infrastructure already in place.

I urge Permit Sonoma to consider the negative impact that this development would have on the community and deny the rezoning request. Thank you for your time and

consideration.

Sincerely,

Matt O'Donnell

On Wed, Jan 25, 2023 at 3:23 PM Matt O'Donnell <odmatt@gmail.com> wrote:

Dear Permit Sonoma,

I am writing to express my strong opposition to the proposed rezoning of 3430 Hicks Rd. in unincorporated Sonoma County near Graton. The proposed development of this property would have a detrimental impact on the rural nature of our community, as well as the safety and well-being of its residents.

First and foremost, the development would destroy the rural nature of the area by introducing more urban-style housing into a community that values its natural setting. Additionally, the houses in the surrounding area rely on wells for their water supply, and the construction of new homes would put a strain on this limited resource.

Furthermore, the street on which the property is located is narrow and does not have sidewalks, making it dangerous for pedestrians, especially children walking to school. The lack of street parking also poses a problem for residents and visitors alike. The infrastructure of the surrounding area simply cannot handle this type of development without a major investment from the county which has never been a priority in this area. Hicks Road is in major disrepair with a patchwork of partially filled potholes. There is no shoulder on the road and cars do not have the space to drive side by side down the road.

The intersection of Hicks Road and Graton Road is already problematic with cars coming around a blind turn at high rates of speed. In order for students to cross to get to Oak Grove Elementary School or to a bus stop they must navigate a 3-way intersection where cars cannot see people walking in the faded crosswalk. This gets much worse in the afternoon with the lower sun which creates blinding conditions where drivers cannot see pedestrians. I was almost hit in the crosswalk once and the driver exclaimed that he could not see me due to the light. I did not allow my kids to walk to school because of the danger of this intersection. Once you get across the street there are no sidewalks on the other side to get to the school or to get to the bus stop. Nor is there a shoulder so you are forced to walk in the street. Pedestrians would have to walk on the street which is extremely

dangerous. The county cannot allow for a large increase in housing at this site if they are not willing to make massive infrastructure improvements to the whole area which they do not have the funding to do. Making this choice would put new residents, especially children at high risk.

Since there is no street parking in the area and no walkable grocery stores the inhabitants of high-density housing will be automobile dependant. This will lead to a series of detrimental outcomes for the area. Firstly, there will need to be parking for at least two cars per housing unit which will mean pavement and concrete over the majority of the lot. This will remove most of the tree cover and will cause warming to the area and will destroy wildlife habitat. Secondly, the lot is at the top of a hill and there is already a large amount of runoff from the property in big rain storms. This runoff floods the backyards of houses on Jannette Avenue. With more concrete and housing there will be a massive amount of new runoff leading to flooding of houses and pollution into the Atascadero Creek. In addition, the development would contribute to light pollution and the natural rural feel of the area. The construction noise would also be disruptive to the peacefulness of the area.

Hicks Rd already is impacted by county development with the moving of the Graton Fire Station to Hicks Road. Residents already have to endure extra traffic due to the Christmas Tree Farm associated with the fire station and have to endure the very loud fire siren at high decibels. The county may also put sewer access for trucks to bring wastewater from Occidental to the end of Hicks Road.

During the recent storms, this property and adjacent ones lost power and the power was not restored for 6 days. When the area was evacuated during the fires the gas was turned off for two weeks before it was restored. This is part of living in a rural area but not something that works well for big housing projects.

With the narrowness of the road and nearby evacuation routes, adding this much population to the area would be dangerous during an evacuation. It took people hours to get out of West County during the last evacuation and this would increase the time.

This property is already zoned for additional housing and can help increase the housing stock in Sonoma County. The current zoning will keep the rural feel of the area and limit the negative effects of a large housing development on the property. There are plenty of better areas for this type of development like the area of the empty Redwood Shopping Center in Sebastopol that is much more pedestrian friendly and has the infrastructure already in place.

I urge Permit Sonoma to consider the negative impact that this development would have on the community and deny the rezoning request. Thank you for your time and consideration.

Sincerely,

Matt O'Donnell

--

Matt O'Donnell
3220 Hicks Rd.
Sebastopol, CA 95472
(707) 332-9220 (cell)
(707) 528-4654 (home)

--

Matt O'Donnell
3220 Hicks Rd.
Sebastopol, CA 95472
(707) 332-9220 (cell)
(707) 528-4654 (home)

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From: [Kon Zaharoff](#)
To: [PlanningAgency](#)
Subject: Housing Element Update draft EIR
Date: Friday, January 27, 2023 11:03:08 AM

Dear Staff,
please distribute this article to the Planning Commissioners.

<https://www.marinij.com/2023/01/25/marin-county-adopts-plan-to-permit-thousands-of-homes/amp/>

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From: [Rick Maifeld](#)
To: [PermitSonoma-Housing](#)
Subject: Zoning proposal in Forestville
Date: Friday, January 27, 2023 7:39:51 PM

Dear Eric Gage,

I am writing in regard to the proposed multi-unit, high density housing under review by the Sonoma County Permit Board.

As a resident of Forestville, I am very concerned for several reasons.

Adding that many residents at once would seem to overwhelm a small community such as Forestville. A 20% increase in population, essentially overnight, would put a strain on law enforcement, the fire department, garbage collection, water, and a massive strain on traffic flow.

The intersections of Hwy 116 and Mirabel, and Mirabel and River Road will become a congested mess without massive changes in traffic flow.

Presumably, this large influx of new residents will also come with several hundred new children, which will need to be transported to schools, further congesting roads in the morning and afternoon.

From a purely selfish standpoint, I would be curious to know how property values of existing residents will be impacted if this zoning change is allowed to proceed.

I see very few positives for the current residents of Forestville should this project proceed.

I would welcome any information you have to share, but I hope the negative impact on current residents is a major factor as this project is considered.

Thank you,

Richard Maifeld
9440 Rio Vista Road
Forestville, CA 95436

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From: [Stacie Gradney](#)
To: [PermitSonoma-Housing](#)
Subject: Forestville re zoning for housing
Date: Friday, January 27, 2023 12:22:31 PM

EXTERNAL

Forestville is a small town. I am not sure who's idea it is to develop housing tracks in forestville. I believe you are the people who closed our high school. Our town has been through enough. How are the schools suppose to teach if there is already issues with overcrowded classrooms and NO high school.

Why isn't Sebastopol on your list??
Why not build farther East ?
Who's idea is this?

Have you visited our town? West county area? Guerneville ?? The drive is beautiful. Our towns are beautiful. Developing will ruin it all.

There is no crime here building is an invitation to crime and riff raff.

Thank you

Concerned forestville resident

Sent from my iPhone

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From: [Colin Baptie](#)
To: [PermitSonoma-Housing](#)
Subject: Housing Element Draft EIR
Date: Saturday, January 28, 2023 11:25:25 AM

Dear Sir,

Re: Draft EIR on the Draft Housing Element Update

I am writing regarding the draft EIR mentioned above. On page 4.4-21 in Table 4.5-5, the report fails to mention that, within five miles of the proposed Guerneville housing sites, there is federally designated critical habitat for the Northern Spotted Owl. In fact, in August 2020, a pair of nesting Northern Spotted Owls were discovered less than three miles from the Guerneville BSA during a survey conducted as part of the Silver Estates Timber Harvest Plan (THP#1-20-00084SON). This omission is concerning and leads one to question the accuracy of information within the draft report.

I am also confused why, on page 2-7 Table 2-2, there are six housing sites listed for Guerneville while the Guerneville Biological Study Area only includes four sites. Why was the BSA not extended to include GUE-5 and GUE-6?

Yours faithfully,

Colin A. Baptie, Psy.D.
PO Box 503
Guerneville
CA 95446

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From: [Elissa Rubin-Mahon](#)
To: [PermitSonoma-Housing](#)
Subject: Proposed units in Forestville
Date: Saturday, January 28, 2023 10:58:48 AM

Hello

I am opposed to the proposed amount of increase in housing in Forestville.

Forestville is unincorporated without adequate services to support the influx of new residents.

Elissa Rubin-Mahon
209 Armentieres Rd
Forestville, CA 95436
mofungi@comcast.net

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TIME RECEIVED
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PAGES
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STATUS
Received

To: Linda Hopkins

Page: 1 of 2

2023-01-29 16:39:16 PST

14153291951

From: Nancy Rodriguez

FAX COVER SHEET

TO	Linda Hopkins
COMPANY	
FAX NUMBER	17075653778
FROM	Nancy Rodriguez
DATE	29/01/2023 16:38:50 PST
RE	Rezoning

COVER MESSAGE

See Attached

Date: 1-29-23

Mr. Eric Gage
Permit Sonoma, Project Planner
2550 Ventura Ave.,
Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.


The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

Name: Sean Maley
Address: 16390 Laughlin Rd, Guerneville
Date: 1-29-23
Signature: 

From: [Becky Boyle](#)
To: [Eric Gage](#); [district5](#)
Cc: [Lynda Hopkins](#); [Leo Chyi](#); [David Rabbitt](#); [Susan Gorin](#); [district4](#); [Jenny Chamberlain](#)
Subject: Permit Sonoma / Planning - FOR-1 - Alternative: fewer rezoning sites.
Date: Monday, January 30, 2023 6:01:51 PM
Attachments: [Screen Shot 2023-01-30 at 12.44.54 PM.png](#)
[Screen Shot 2023-01-30 at 5.12.40 PM.png](#)
[Screen Shot 2023-01-30 at 12.53.34 PM.png](#)

Dear Sonoma County,

I have been looking through the Housing Element Update Draft Environmental Impact Report and have some grave concerns as it pertains to the future of Forestville, were these plans to go through in full as is. Thank you for welcoming community feedback and taking the various community's character into account. I'm sending in the same letter for each parcel in case they end up in different files down the line pertaining to each property and end up going to different developers. Thank you for your understanding.

In section: Environmental Impact Analysis Public Services and Recreation (aka: 4.15-11), I see that it states, in the first paragraph, that it "would not increase the total population served by more than 10 percent, with the exception of the Forestville sites. This is pertaining to Fire Districts. There are a few issues here. Forestville is being put forth to take on an undo burden of the state's quota in comparison to other unincorporated areas. While others are looking at 10% or less (per your document) Forestville is looking at 25%. This is unsettling to say the least. Please see section 2-26 for the info:

forestville max build out is projected to increase by 25% while other communities are no more than 10%

Environmental Impact Analysis
Public Services and Recreation

Sites. As shown therein, the Rezoning Sites could be accessed from the nearest fire stations within the response time goal for the respective district, and would not increase the total population served by more than 10 percent, with the exception of the Forestville sites. Because the sites are located throughout the County, and in urbanized areas where local departments already respond to

Growth of: FOR-1, FOR-2, FOR-3, FOR-4, FOR-5 and FOR-6: Draft impact report 2-26 on page 101 of the document.

Total population allowed under current designation: 167

Total population under proposed designation: 1,652

Rezoning Site	Total Allowable Dwelling Units Under Current Designation	Total Allowable Dwelling Units Under Proposed Designation	Change in Total Allowable Dwelling Units (Buildout Potential)	Total Population Under Current Designation ¹	Total Population Under Proposed Designation ¹	Change in Buildout Population Potential
LAR-4	4	6	2	10	16	5
LAR-5	72	99	27	187	257	70
LAR-6	0	12	12	0	31	31
LAR-7	10	45	35	26	117	91
LAR-8	0	11	11	0	29	29
FOR-1	46	70	24	120	182	62
FOR-2	7	283	276	18	736	718
FOR-3	3	33	30	8	86	78
FOR-4	2	71	69	5	185	179
FOR-5	6	58	52	16	151	135
FOR-6	0	120	120	0	312	312

The current population of Forestville, as defined by the boundaries of the Grammar School is 6,771. The addition of 1652 residents would be a population increase of nearly 25%. Forestville would have the greatest number of proposed new occupancies/population in the County with the exception of the city of Santa Rosa which is much better equipped for such a drastic influx vs the small community of Forestville who still have the same sized roads they did when I grew up there back in 1971. There is not the infrastructure nor the services in place to accommodate this kind of growth and it is not right to put such a burden on one community in contrast with what is being put on others. The difference of 10 vs 25 percent is not insignificant, it isn't small and unlike the EIR states -- it would be dominant vs "could be dominant". There is simply no way to believe it would not be dominant given the unit #'s proposed vs what the landscape actually is. Unless the proposed developments are single story ranch like homes, there is no "could" about it. See table 4.1-6 in section 4.1-51 for further comparisons.

Rezoning Site	Impact	Significance	AES-3
FOR-1	High	Dominant	Significant
FOR-2	Moderate	Dominant	Significant
FOR-3	High	Dominant	Significant
FOR-4	Moderate	Dominant	Significant
FOR-5	High	Dominant	Significant
FOR-6	High	Dominant	Significant

Also of note regarding errors in the document is the statement on 4.1-18 (page 127) in the first paragraph about FOR-2 is "On Mirabel Road, a school is directly across the street from FOR-2." This is simply not the case. There is no school across Mirabel from FOR-2. The only schools in Forestville are the now-defunct El Molino High School @ 7050 Covey Rd. and the Elementary School, now known as Forestville School & Forestville Academy, down the hill off 116 @ 6321 Hwy 116, ironically by some of the other proposed locations.

The streets encircling FOR-2 (Guisti/Nolan/Mirabel) are not built to withstand this type of

quantitative developing. They are the same streets I played with childhood friends on in the early 1970's. They are one lane each way, no space for going around, not good for emergency evacuation situations, not built for dense populations. These are small country roads built to sustain neighborhood housing, at most, single family homes suburban in nature. They are not built nor would logic say they are prudent for a development the likes of rezoning specified as FOR-2 units. There is no mention that these are small country roads, where pedestrians and bicyclists often very little room for error. That description seems glaringly omitted for a project of such large changes discussed. That point actually goes for the parcels throughout much of Forestville as well as many others.

I've seen nothing in the document that speaks to what would be done with respect to urban renewal effects for the people displaced to enact these potential build-outs, displacing locals, loss of character, threat to local business and the introduction of community conflicts, pollution-related health conditions, around town parking needs and sanitization challenges. This feels omitted, as does any mention of an infrastructure plan to accommodate the potential influx such as roads that are simply not built to accommodate such a large increase.

Where is the mention of how the county plans on widening roads, adding left turn lanes, roundabouts and crosswalks for public safety on roads that are used by commuters, visitors, pedestrians and gravel trucks all coming through town in an environment that is only 1.7 miles to get through town (Speer's Market @ one end of Mirabel Road to the Elementary School on the other side of town).

Where is the study for the safety of it's citizens just trying to get through the day without a horrible accident when there's an extra thousand or so cars and pedestrians jaywalking, risking their lives, with such a large increase of traffic on such a small stretch of travel. I am gravely concerned about the implications. These are urban services as much as sewer and water are per: page xviii yet there is no study about this as far as I'm able to tell.

There's the discussion of no feasible mitigation measures available for the elements that would damage the scenic route along FOR-1, FOR-3, FOR-5. They would create detrimental significant and unavoidable impacts whereas other areas would be far less significant along the 101 corridor.

FOR-1, FOR-5 and FOR-6 are all listed as being on "Existing Hazardous Material Contamination". Tables 4.9-1 and 4.9-2 on pages 4.9-1 thru 4.9-3. I have not been able to find a study in this EIR as to what the health risks to pending future potential residents, students located .1-.2 miles from the sites, and to the surrounding community during the excavation and build would at risk to. If I'm not mistaken, some of these properties were once considered by the Elementary School nearby and decidedly declined due to their toxic nature (and possibly the cost of remediation).

I also am not seeing any study of the risk of these hazardous elements ending up in the watershed in Forestville (all sites) for Lower Russian River and sub-watershed to Green Valley Creek and ground water basins - especially in an area notorious for flooding when rains really kick in as they did in 1940, 1955, 1964, 1986, 1995, 1997, 2006, 2019, 2023 - this isn't an unknown problem nor is it going away drought or no drought.

It's noteworthy that in section 4.15.1a: Fire Protection for the EMT call response times are prior to the now combined departments. Guerneville, Larkfield and Forestville have all consolidated into Bennett Valley, Bodega Bay, Mountain Volunteer, and Windsor FPDs. I don't see any study pertaining to the ratio of calls per capita and if what the combining of districts as well as the increase of population would mean for that ratio.

With respect to greenhouse gas emissions, page 556 of section 5.2.1 correctly calls out "Additional vehicle trips associated with the proposed project would incrementally increase local traffic and regional air pollutant and greenhouse gas emissions." "These are considered irreversible environmental effects." The last paragraph of that section goes on to say, "CEQA requires decision makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. The analysis contained in the EIR concludes that the proposed project would result in significant and unavoidable aesthetic, cultural resources, greenhouse gas emissions, hazards, transportation, utilities and wildfire impacts. Although development facilitated by the project would be required to implement mitigation measures, impacts would remain significant and unavoidable due to the irreversible loss." With all these potential rezone projects in what are zoned as Rural Residential and Low Density, does it not make more sense to seek locations for housing that is more directed to areas and communities that are not so car dependent? In particular for the low income population, does it not make more sense for them to have housing opportunities in communities that have better price points in urban/suburban areas with things around them? In implementing the proposal as it is, we are also pushing the people that need it the most into situations where they have to drive further when gas prices are among the highest levels the last few years.

The EIR calls out that Forestville has stores and restaurants. It does not call out that it offers one small-family type grocery store, one Mexican grocery store that has a sitting area/restaurant, one pharmacy, one gas station, one expensive fancy restaurant coupled with a couple casual spots being the local drive in, a coffee shop with sandwiches and a pizza joint. There's a bakery, there's a wine tasting place, there's one hardware store and all these places are great but they're not built to sustain the kind of growth that Forestville is now being considered for. Where are an additional 1,600 people going to park? How are they going to go to one of the 3 restaurants that might be open to serve them (one is closed at 2pm). That growth, that population needs more support than is currently able to be offered in this town. It's a half hour drive to: Costco, Target. It's a 15 minute drive to Safeway, Walgreens, Coddington.

This community is built for people to pick up those last little things on their to-do list, it is not, nor has it ever been the community that serves to support a day to day way of life where you can get everything you need in the one mile that goes from one end of town to the other.

I understand that implementing this plan is not a choice you made and that it is being dictated to you. I know this is not an easy process and I don't want to see things get worse than they already are. Nobody wants the County to be sued by the State, nor does anyone want another builder frenzy free for all to occur in Sonoma County as it has in other places where the governing body did not meet the State's demands, we do respectfully request equality within the obligations and to not have a tiny town like Forestville to be pushed beyond the brink of what it is realistically able to handle. If all of these build outs were to occur, it would be too much for the area and the community to absorb. It is only 1.7 miles from one end of 'town' to the other, it's akin to me trying to stuff my post-pandemic size 12 body into my old size 6 jeans... the math just isn't there.

I implore you to opt for your Alternative choice where do not choose to rezone all 6 parcels for Forestville, and I implore you to consider doing the same for the ones that have documented historical toxic hazardous situations especially as they are so close to the Elementary School when children are clearly proven to be more at risk to lung problems as they are still growing.

Please give due consideration to avoiding FOR-1, FOR-2, FOR-3 FOR-5, FOR-6 at the minimum and move those project's potential population to a part of the unincorporated county that is better for the people in need of more affordable housing as well as the small communities that aren't prepared to accept the inflow from a practical, geographical, economical, services and

logistical egress perspective.

Please set out to find parcels that can meet the counties needs that the State has put your feet to the fire for and find territories that fall in the "Less than Significant", "Less than Significant with Mitigation" or "No Impact" vs the very many "Significant and Unavoidable". Not an easy task but detrimental otherwise.

Thank you for your time in reading this and giving consideration to the macro of the micro picture of a massive endeavor. Much appreciated..

Respectfully,
Becky Boyle
Forestville, California

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Draft EIR Comments: Housing Element Update

Attn: Eric Gage, Permit Sonoma

January 24, 2023

The DEIR is an extensive amount of work to say the least.
A superficial glance would barely enlighten one of its full scope and content.
To make a full reading of it and have a good grasp of its content would likely be overpowering for most individuals.

It seems unfortunate that we are forced to push towards the limit of our Petri dish even further, due to our inabilities, it seems, to relieve in some more reasonable way, our population pressures.
And while we simultaneously try to preserve and enhance our community character and quality of life.

A razor's edge?

As to the DEIR—I can easily admit that I did not read the entire document.
I did read as much of it as I could that does have a direct bearing on compromising the esthetic and economic value of my rural residential property through the ultimate effect of the DEIR and its potential following plan implementations.

I am a co-owner, with family members, of one of the adjacent parcels to your DEIR parcel SAN-10.
To the best of our knowledge, we have not received, until now, nor have we been made specifically aware of, any potential idea, request, plan, or execution of any rezoning of APN# 134-192-016 known in the DEIR as "SAN-10".

My family has owned this land we reside on, our 3 acres zoned RR3, since the days when it had an Agricultural zoning—we moved here in 1955.
I am almost 72 years old and have spent a large portion of my life on this property.
We have lived with the slow encroach of light industrial/commercial development along the Santa Rosa Avenue corridor and its attendant noise, light, and visual pollution which has, in the last 20 years or so, accelerated on the parcel directly NW of us—SAN-10, APN# 134-192-016.
We hoped that due to zoning and historical values and ideas that it would creep no further.
And that while we concurrently live with the increase of traffic and speed on what we sometimes refer to, along with some Highway Patrol members, as *Mountain View Speedway*...

On page 1-4 of the DEIR, under point 1.6 is stated: "*The County received letters from two agencies and one person in response to the NOP during the public review period.*"
In Table 1-1 on page 1-5 these comments are summarized on half a page.
I believe that this questions how well the public, certainly less the specifically affected individuals/parcels, were *advance noticed*.

We certainly don't seem to have been given any notice, until now, even though we will be directly affected by portions of the Housing Element Update represented by the DEIR.

It certainly seems that during whatever nomination of parcels went on leading up to this DEIR, those parcels directly affected by the nominated parcels should have openly and clearly been made aware of what was happening.

Public outreach, particularly to those potentially directly affected, by your consultants apparently was less than comprehensive.

"1.6 Public Review and Participation Process

... The County received letters from two agencies and one person in response to the NOP during the public review period. ..."

--page 1-4 of DEIR

"1.7 Scope and Content

... An NOP was prepared and circulated (Appendix NOP), and responses received on the NOP were considered when setting the scope and content of the environmental information in this Program EIR. ..."

--page 1-5 of DEIR

Three responses, with only one from the public, over a 30-day period, seem hardly enough to adequately address "scope and content".

The legal issues and public policy underlying this Project notwithstanding, I and my family object to the adoption of this Project, with such apparent little involvement of the public, particularly those of us who stand to be directly harmed, due perhaps to insufficient outreach, and further we object, if the plan is carried out, specifically to the inclusion of APN 134-192-016 (SAN-10) due to its excessive impact upon our own enjoyment of our own property and for the following reasons:

1. SAN-10 is not the only parcel in the area that could have been considered for this iteration of the Housing Element Update—reasons for which follow.

Others, or groups of others, including it seems the group SAN-11 to SAN-17 could make up most of the difference leaving SAN-10 out would entail (Map Graphic 2).

They are already located in higher density residential areas for the most part.

More specifically, and to our point, APN 044-141-045 (3614 Brooks Avenue), located at the intersection of E. Todd Road and the unfinished extension to the south of Brooks Avenue (or alternatively at Brooks Avenue and Bucks Road) seems a much better candidate for inclusion.

It appears from a parcel report to have almost identical characteristics to SAN-10 with the positive reasons for inclusion in the following points.

Another potential inclusion in the area is APN 044-141-005, 3548 Brooks Avenue.

See below Map Graphic 1 for large scale detail area for this and the following points.

2. On page 2-4 of the DEIR is the following:

"2. Site must be located within an established Urban Service Area where public sewer and water service is available."

"Available" is the key word here.

The most common meaning here would imply that the connections for sewer and water are available *at the existing parcel*.

Not that it is "available" on the other side of the Urban Service Area, for instance.

The map of the existing sewer connections in the area leading to the Laguna Treatment Plant is attached below (Map Graphic 2).

The closest any main line is apparent leading in SAN-10's direction is about 2000' feet away, north on Santa Rosa Avenue.

An 8" sewer main appears to go north from parcel 044-141-045, 3614 Brooks Avenue, and a 6" sewer main on E. Todd Road passes along the south side of it, both no more than 30-40' feet from the parcel.

Immediately available without major work to extend a sewer main, and two directions to send sewage.

And, if any work for sewer or water was needed, E. Todd Rd. is much more in need of repair work on its surface than is Santa Rosa Avenue.

Neither parcel is located in the South Park Sanitation District, however, the 3614 Brooks Avenue parcel borders on it, while SAN-10, as said, is as much as 2000' feet from its border.

3. SAN-10 has a "fence line" border of approximately 1000' (out of a total of ~3500 feet) that is part of the Urban Growth Boundary, and is directly adjacent to 4 parcels (5 if the Water Agency's Hunter Creek parcel is included) that presently contain minimal density housing, are zoned RR3, and are constrained to the limitations of that zoning and will have no benefits from the Urban Service Area.

And yet directly adjacent to them the DEIR and potential following implementations will upset the bucolic nature of their rural residential zonings.

During the nascent years of the Sonoma County General Plan in the 1970s, it was a common idea that this area around Mountain View Avenue would remain a "green belt" between the cities of Santa Rosa and Rohnert Park—and the Santa Rosa Avenue commercial corridor.

As the attached map sections of the GIS shows (Map Graphics 1 & 3), the oddly excluded portion of the Urban Service Area, APN 134-182-063, seems an attempt, in this RR area, along with the 045-131-016 County Water Agency parcel along Hunter Creek, to complete as much as possible that idea from Petaluma Hill Road to Santa Rosa Avenue and encompassing the Mountain View Avenue environs.

The only elements not included in that "completion" are the eastern portion of APN 134-192-014 (owned by the County Water Agency as part of Hunter Creek Trail), APN 134-192-015 (privately held?), and the eastern section of APN 134-192-016 (SAN-10).

These actions and mappings would imply that, instead of a somewhat abrupt and haphazard inclusion of SAN-10 under this Update iteration, it should be passed over for now so that serious consideration to this last extension of the Community Separator in the area can be considered.

Or, at the very least, the RR3 designation of the roughly eastern half of the parcel should remain in place to perhaps *functionally keep a separator intact* until it can be decided.

To drop a 20—22 unit per acre development into the eastern portion of SAN-10 would hardly seem to keep with the earlier ideas, especially when other alternatives clearly exist.

From: *Sonoma County General Plan 2020 OPEN SPACE AND RESOURCE CONSERVATION ELEMENT:*

“Community Separators enhance the identities of individual cities and communities.”

“Lands within Community Separators generally meet the following designation criteria:

- (1) Lands shall be located outside an Urban Service Area designated in the General Plan.*
- (2) Lands shall have a General Plan land use designation of Timber Production, Resources and Rural Development, Land Intensive Agriculture, Land Extensive Agriculture, Diverse Agriculture, Rural Residential, or Agricultural Residential.*
- (3) Lands should logically separate cities or unincorporated communities or extend or complete an existing Community Separator to provide continuity.”*

The Mountain View Avenue RR area is a community in itself that deserves a complete Separator.

It would seem that the parcels mentioned above absolutely fit with points 2 and 3 and are merely a short Urban Boundary line move from being consistent with point 1.

Perhaps the Planning Commission, Zoning Board, and Local Agency Formation Commission could, or should re-visit the Urban Boundary in our area, already existent with incongruities, and consider a lot-split of SAN-10, and the Water Agency’s APN 134-192-014 along their RR boundaries re-drawing the Urban Boundary along that line. With those two inclusions, and APN 134-192-015, which needs no lot split, the Community Separator between the Santa Rosa Avenue commercial corridor and the Mountain View Avenue rural residential area will have much more continuity, be much more complete, and will follow logically. This idea is clearly presented in the following map (Map Graphic 3).

4. SAN-10, as said, already has zoning suggestive of an idea to keep a space between the existing RR3 development on Mountain View Avenue and the Santa Rosa Avenue commercial corridor. It is one of the few in the area with such split zoning, and for apparently the same reason. A comparison of the County GIS zoning mapping and satellite imaging shows a question that should be resolved before any consideration of including SAN-10 in this Update iteration. It seems clear that the *permit Sonoma GIS* mapping shows a distinct idea that the RR3 zoning that includes a portion of SAN-10, extends more less south from the northeast corner of APN 134-192-010, more or less south across Water Agency’s APN 134-192-014, to the point that is the northern coincidence of APN 045-021-003 and APN 045-021-004 and continues more or less south along their joint border. The attached graphic (Map Graphic 4) shows both the GIS section and the satellite image. SAN-10’s commercial development and use appears to have encroached up to 100’ into the RR3 zoning of its eastern portion. Whether this seemingly apparent issue is due to the users of the parcel, or some issue of interpretation due to the zoning board or other agency, it seems to bear resolving before any consideration of SAN-10’s inclusion in inventory of the housing element.

Further, I have a few comments—on both substance and error in addition to the objections to the specific inclusion in the “inventory” already presented.

As to further comments: I have mostly only cursorily looked over the DEIR—except where specific to me.

Errors, both typographical and in substance certainly occur in such expansive works.

The question that is begged is what level of error causes serious lack of trust in the work.

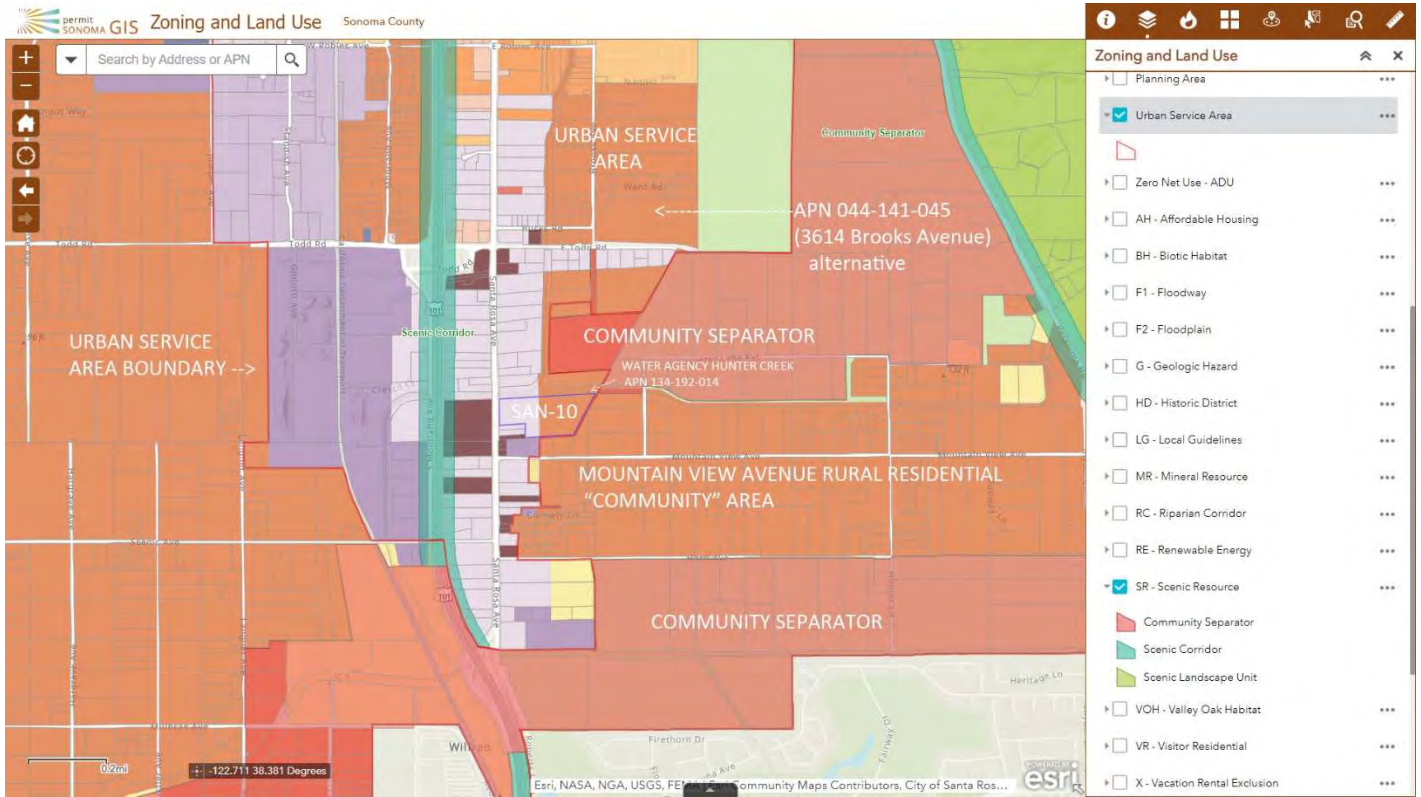
In that relatively small area of the Report, which has direct impact on me and my family, I have noted apparent errors, confusion, or omission:

- a. The caption on Figure 4.1-36 is wrong. *The view is East*. The same as Figure 4.1-35.
- b. In *Table 2-2 Inventory Site Information*, beginning on page 2-7, these entries seem to not match the “Sonoma County Parcel lookup” website, assuming the APN shown is correct:
SAN-10, *shown as 4020 SR Ave.*, is 4028 (APN 134-192-016)
SAN-13, *shown as 3847 SR Ave.*, is 3855 (APN 134-181-046);
SAN-14, *also shown as 3847 SR Ave.*, is 3845 (APN 134-181-047);
SAN-16, *shown as 3445 Brooks Ave.*, is 3453 (APN 134-132-067).
I only checked SAN-10 to SAN-16 due to the duplicate 3847 entries— *4 out of 7 do not match*.
The issue no doubt permeates the entire list and a shortcoming of it is that it makes it a bit difficult to locate the parcels on a Google map using that address.
- c. The following may be an error of omission:
In *Table ES-1*, pages ES-5 and 6, and *Table 4.1-6*, beginning on page 4.1-50, reference is made to *Mitigation Measure AES-5*.
Beginning on page 4.1-54, *c. Project Impacts and Mitigation Measures* contains no definition or reference to *AES-5*, and I cannot find it anywhere else except the tables.

One is left to wonder how many other errors, confusions, or omissions occur in the whole document.

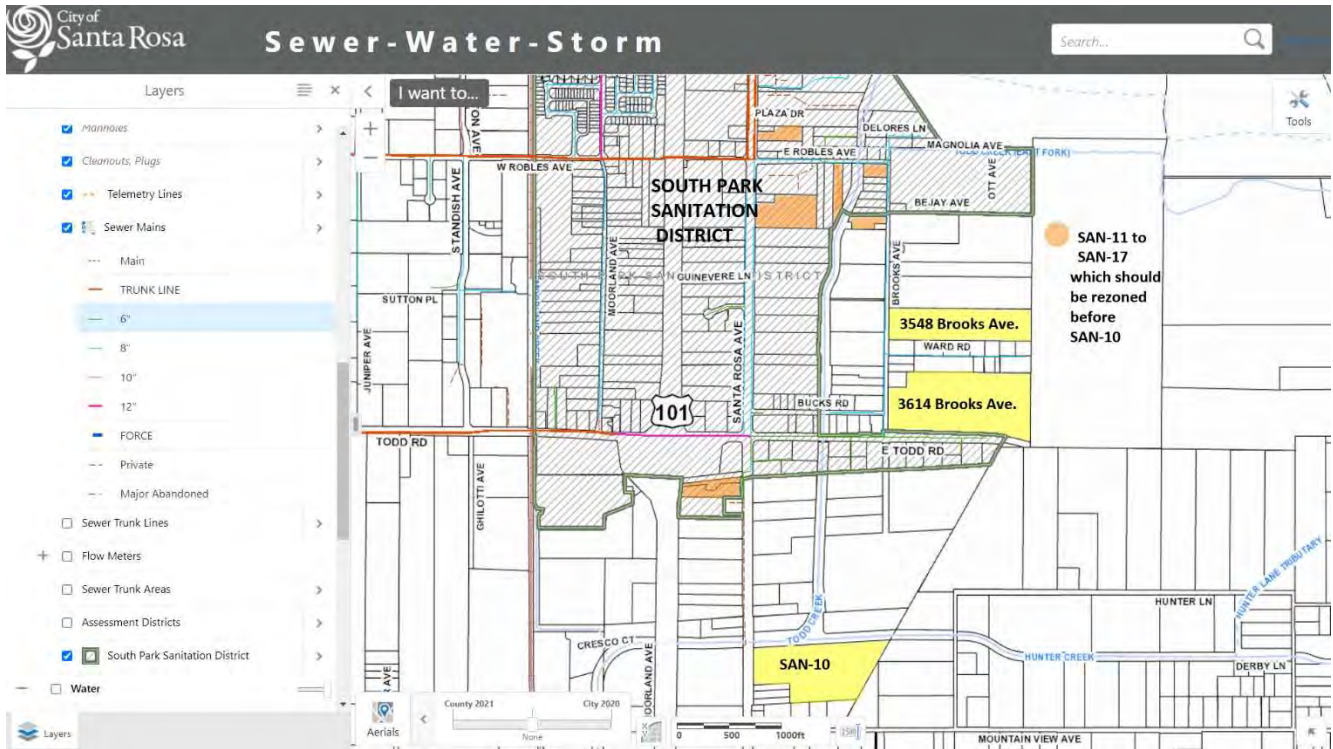
Respectfully,
Jim Severdia
105 Mountain View Avenue
Santa Rosa, CA 95407
nvmtnman@yahoo.com

Map Graphic 1



Map of general area of South Santa Rosa Avenue and Mountain View Avenue showing major land use and zoning

Map Graphic 2

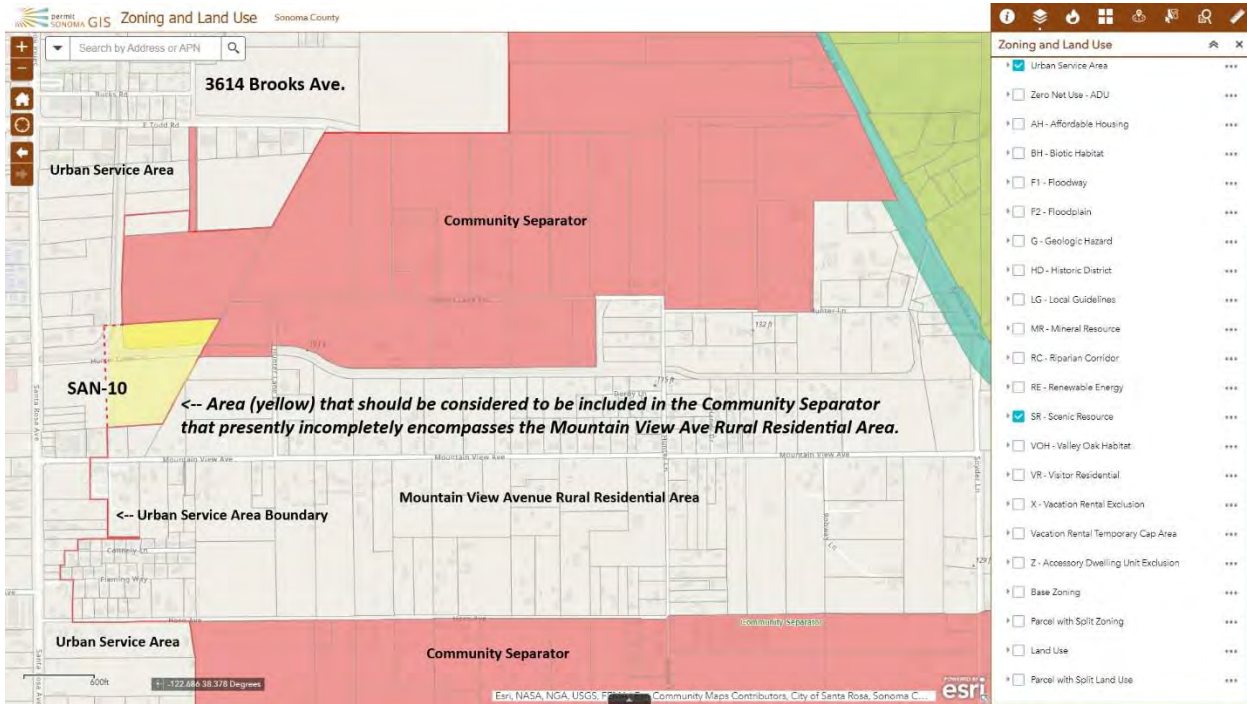


South Park Sanitation District sewer map referred to in point (2) above.

Sewer is not now “available” at SAN-10 (APN 134-192-016).

It is clearly “available” now, from two directions, at 3614 Brooks Avenue (APN 044-141-045) as well as the other alternative inclusion on Brooks Avenue.

Map Graphic 3



Map referred to in point (3) above.

Yellow area (part of SAN-10 plus two other parcels) should be considered as logically for inclusion into the Community Separator instead of for medium density housing

Map Graphic 4



Map referred to in point (4).

Red X refers to northmost common point of APN 045-021-003 (55 Mountain View Ave.) and APN 045-021-004 (79 Mountain View Ave.) as mentioned above

From: [kim.thatcher](#)
To: [PermitSonoma-Housing](#)
Subject: 635 new dwellings in Forestville
Date: Monday, January 30, 2023 10:09:54 PM

To Eric Gage

Hi there my name is Kimberly Thatcher and I have been a resident of Forestville for the past 26 years.

I'm writing in response to the proposed 635 new apartments that would potentially be added to this very small town of Forestville, California.

Firstly, I do not understand why more building is being allowed in this county.

Water issues are huge problem and growing more dire every year. That is 1,652 new residents using irrigation and water usage for daily consumption which will greatly strain our ongoing water issues!

I know that low income folks have as much right to be here as any other but building that many dwellings for that many people is just simply unacceptable! We have to figure out another way.

Secondly, how are the residents of Forestville going to be involved in this kind of decision making process when the times chosen are during normal work days and hours?? I very much want to be part of this discussion but cannot take the time off in the middle of the work day to join this zoom meeting.

Please let me know how my voice can be heard in regards to this matter.

I would also like to know the results of the zoom meeting scheduled on February 2nd. How do I find those results?

Thank you for your time and consideration of my thoughts around this issue.

Kimberly Thatcher
Forestville, California
Sent from my LG Phoenix 5, an AT&T 5G Evolution capable smartphone

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From: [Eric Gage](#) on behalf of [PermitSonoma-Housing](#)
To: [PermitSonoma-Housing](#)
Subject: FW: Housing Element Forestville FOR-2
Date: Tuesday, January 31, 2023 8:39:26 AM

From: Sue Zaharoff <sue.zaharoff@comcast.net>
Sent: Saturday, January 28, 2023 6:53 PM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: Housing Element Forestville FOR-2

Jan 29, 2023

Eric Koenigshofer,

I am writing to inform you of my opposition to the rezoning of Forestville FOB-2. The rezoning of FOB-2 would be a catastrophe.

There is no infrastructure in Forestville to support a 'medium density 3 story high 283 dwelling with 736 people'!

The impact of rezoning would adversely affect traffic flow, gravel truck routes, sewer, water, wildlife and overall quality of life in Forestville.

The EIR draft goes against everything that this community is built on. Our residential streets would be clogged with cars. We would be at risk for

escaping fires with stopped traffic flow. The sewer capacity would have to be increased. Water pulled from the Russian River would have further

damaging effects on our limited River supply. Traffic lights, sidewalks and street lights would need to be installed. Our already limited Fire and

Sherriff services would be taxed beyond their limits. Our small local expensive grocery store Speers can not provide for the influx of people that

rezoning would create. The building of multiple structures and the parking water runoff would add to drainage problems.

I made the decision to move to Forestville 33 years ago because it is in a rural setting zoned Agricultural/Residential.

I was required by zoning to build my house on 2 acres which I did. Any zoning changes made to FOB-2 would end Forestville as we know it.

Sue Zaharoff
6875 Nolan Road
Forestville

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January 30, 2023

Linda Hopkins
Sonoma County Supervisor, 5th District
2550 Ventura Ave.,
Santa Rosa, California 95403

Dear Linda Hopkins,

The community surrounding Laughlin Road in Guerneville California opposes the rezoning of properties listed in the Housing Element and Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional 588 residents permissible by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions including during floods and power outages.

The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D which is the most severe. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan.

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

I as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and opposes the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

Sincerely,



Elizabeth Herberg
16560 Laughlin Road
Guerneville, CA 95492
Lmherberg70@gmail.com

Date: [January 31, 2023](#)

Mr. Eric Gage & Lynda Hopkins / Board of Supervisors
Permit Sonoma, Project Planner
2550 Ventura Ave.,
Santa Rosa, California 95403

Dear Mr. Gage,

The community surrounding Laughlin Road in Guerneville, California opposes the rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

There are many specific adverse effects noted in DEIR report that will impact the health and safety of current residents as well as the additional prospective 588 residents allowed by the proposed rezoning.

GUE 2 and GUE 3 are accessible via one lane roads that will need utility upgrades. The needed upgrades and road closure/s will severely impact the emergency egress for residents.

The potable water and sewer system are inadequate for the proposed growth. The sewer line located next to GUE 2 and 3 currently has a pump station that runs on propane and has malfunctioned on many occasions, including during floods and power outages.

The GUE 2,3 and 4 properties are within areas documented as high wild fire danger, flood plains, and earthquake prone. They are all zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D, which is the most severe category. They are either in the flood zone or completely surrounded by the flood zone. On an almost annual basis, residents have been on evacuation status for long periods of time requiring relocation due to flood, fire, and/or no electricity. Building in flood and high fire zones is contrary to the County General Plan for clear safety reasons.

Scenic resources will be adversely impacted in an economic area that depends on revenue from tourism. Old growth redwoods and valley oak habitat will be destroyed to allow for the infrastructure upgrades and additional land needed for high density housing. As stated in the DEIR, "development on the site would be dominant if significant numbers of trees were removed."

The rezoning of GUE 2, 3 and 4 are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policy.

I, as an individual, and we, as a concerned community, sincerely express discontent for the lack of notification and inclusion in the early processes and we oppose the proposed rezoning of properties listed in the Sonoma County Draft Environmental Impact Report (DEIR), specifically, GUE 2- 16450 Laughlin Road, GUE 3- 16500 Cutten Ct, and GUE 4- 16050 Laughlin Road, located off of Armstrong Woods Road, Scenic Corridor in Guerneville, California.

Name: [Jonathan Teel](#)

Address: [14735 Carrier Lane](#)
[Guerneville, CA 95446](#)

Date: [January 31, 2023](#)

Signature: