

**From:** [Rebecca Mateja](#)  
**To:** [PermitSonoma-Housing](#)  
**Subject:** How and Why?  
**Date:** Wednesday, December 28, 2022 12:56:36 PM

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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

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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.

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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

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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

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## 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

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

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

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

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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,

A handwritten signature in black ink that reads "Trish Tatarian". The signature is written in a cursive, flowing style.

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

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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](mailto: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

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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.  
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

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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

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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

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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

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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

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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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To: Linda Hopkins

Page: 1 of 2

2023-01-29 16:39:16 PST

14153291951

From: Nancy Rodriguez

## FAX COVER SHEET

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TO	Linda Hopkins
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COMPANY	
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FAX NUMBER	17075653778
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FROM	Nancy Rodriguez
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DATE	29/01/2023 16:38:50 PST
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RE	Rezoning
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## COVER MESSAGE

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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](#)

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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 <sup>1</sup>	Total Population Under Proposed Designation <sup>1</sup>	Change in Buildout Population Potential
LAR-4	4	6	2	10	16	5
LAR-5	72	99	27	187	257	70
LAR-6	0	12	12	0	31	31
LAR-7	10	45	35	26	117	91
LAR-8	0	11	11	0	29	29
FOR-1	46	70	24	120	182	62
FOR-2	7	283	276	18	736	718
FOR-3	3	33	30	8	86	78
FOR-4	2	71	69	5	185	179
FOR-5	6	58	52	16	151	135
FOR-6	0	120	120	0	312	312
<b>TOTAL</b>	<b>135</b>	<b>671</b>	<b>536</b>	<b>229</b>	<b>1,000</b>	<b>771</b>

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	Low	Co-Dominant	Less than significant	AES-5
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
<b>TOTAL</b>	<b>High</b>	<b>Dominant</b>	<b>Significant</b>	<b>AES-1, AES-2, AES-3, AES-4, AES-5</b>

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.

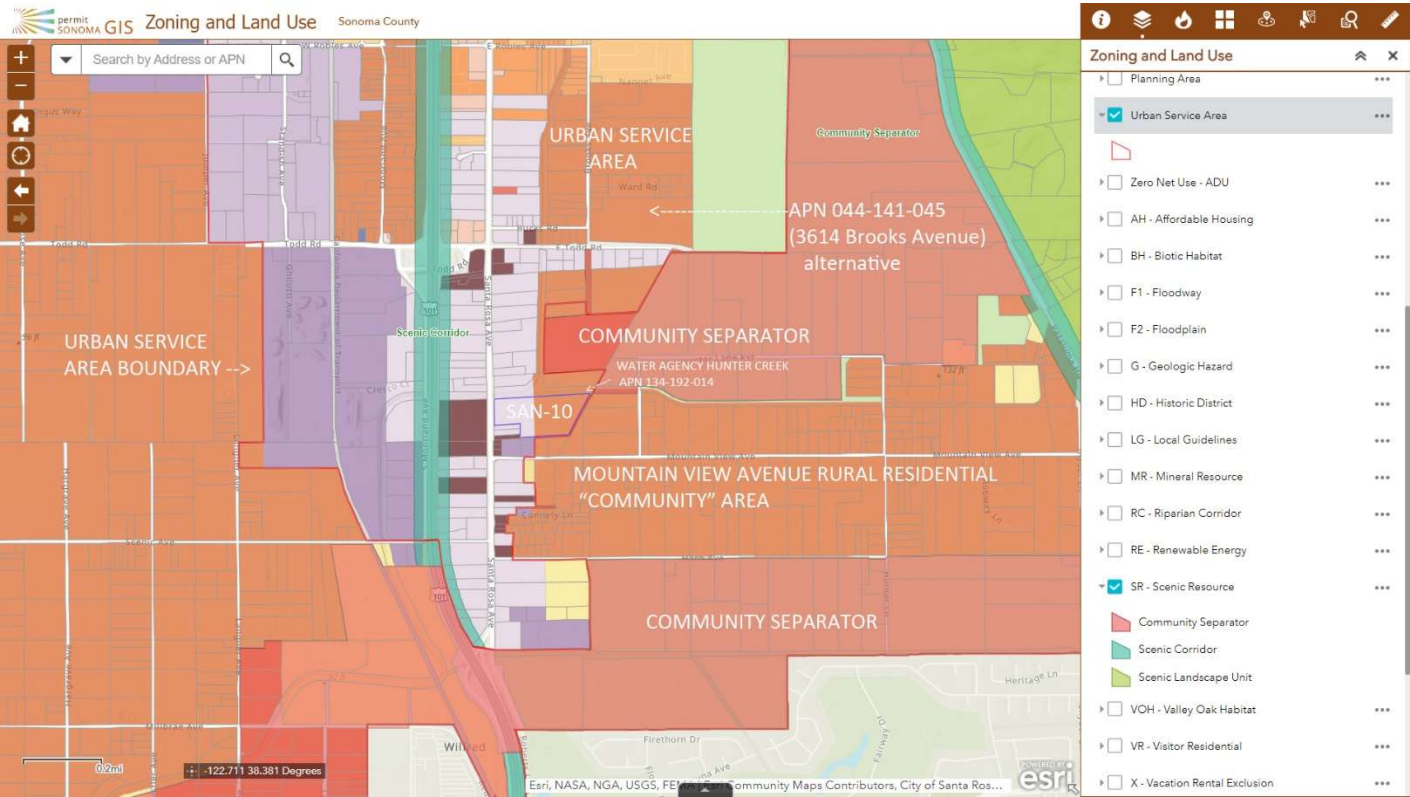
In that relatively small area of the Report, which has direct impact on me and my family, I have noted apparent errors, confusion, or omission:

- 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.

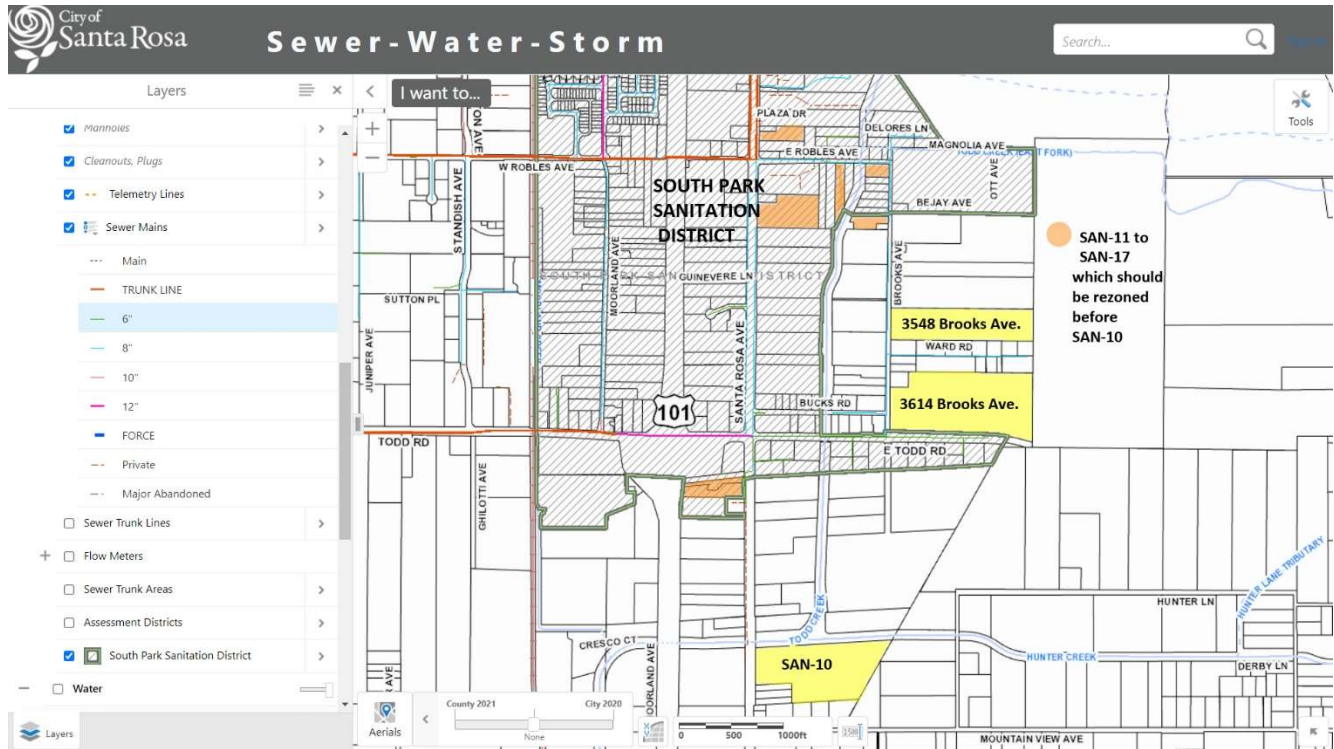
Respectfully,  
Jim Severdia  
105 Mountain View Avenue  
Santa Rosa, CA 95407  
nvmtnman@yahoo.com

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

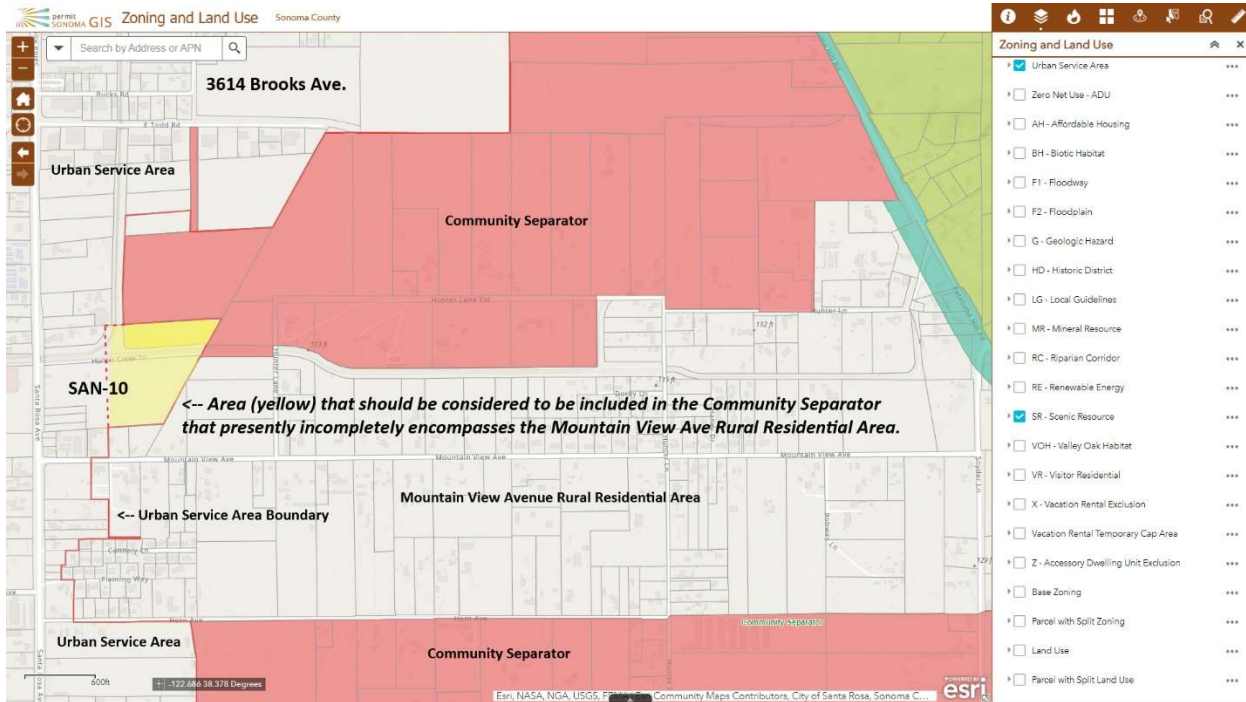


South Park Sanitation District sewer map referred to in point (2) above.

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

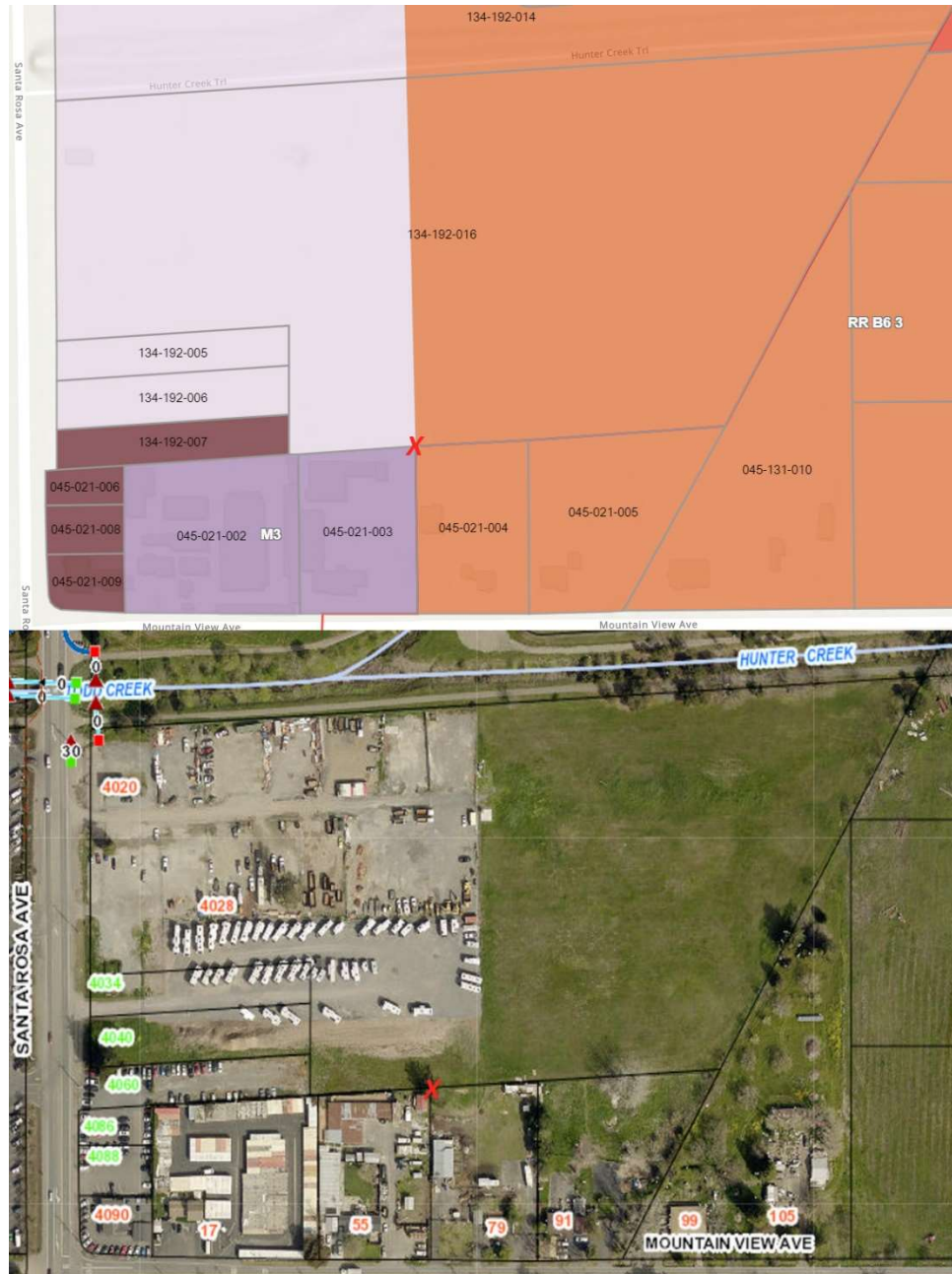


Map referred to in point (3) above.

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

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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

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**From:** Sue Zaharoff <[sue.zaharoff@comcast.net](mailto:sue.zaharoff@comcast.net)>  
**Sent:** Saturday, January 28, 2023 6:53 PM  
**To:** PlanningAgency <[PlanningAgency@sonoma-county.org](mailto: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, 5<sup>th</sup> 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: