



August 1, 2022

Sent Via e-mail

Re: West County Transportation Agency – DRH22-0008

Dear Design Review Committee Members,

I am the Executive Director of West County Transportation Agency, (WCTA). WCTA, is a joint exercise of powers agency created on June 27, 1988 pursuant to Article 4, Chapter 5, Division 7, Title 1 of the California Government Code and a Joint Powers Agreement (JPA) by and among 17 local school districts within the County of Sonoma. These 17 public school districts have positioned responsibility within my position as the Executive Director to advocate, operate, and direct transportation services for thousands of students attending public school, which include students with disabilities, at risk, and disadvantaged.

As a public agency and steward of tax payers' dollars it is within my responsibility to avoid waste and misuse. This is why we started our conversations with the Planning Division about the preliminary design and process required for this project in 2018. We did not approach this project with malice, disregard, or avoidance of the requirements within the Condition of Approval. In fact, we were upfront with our intentions and approached this project openly and with a very thorough process. For example, documents for obtaining permits to construct the parking lot were submitted in July 2020. After 21 months and as many as 9 rounds of comments and updates required from multiple divisions within the County and City of Santa Rosa Permit Departments, we finally received necessary documents to begin grading, only to be revoked 1 month later. While some work has continued with underground utilities in effort to mitigate a possible negative impact to surrounding properties in the event of rain, it does not come without additional cost due to inefficiencies of equipment and personnel on the jobsite as well as lost days of work.

While I cannot provide a rational reason to why it has taken over 20 years to develop this parcel, other than availability of necessary funding, it has always been the Agency's intention to construct a parking lot. Since the 1999 Conditions of Approval there has been many changes to laws, codes, technology, environmental conditions related to drought and fires, and many others within the scope of service for WCTA. One of the most impactful and legal responsibility is to our students with disabilities. Since February 1999, the scope of transportation services provided to public school students by WCTA has changed drastically and has great potential to change in the future.

Beginning in the 2003-2004 School Year the Sonoma County Special Education Local Plan Area (SELPA) discontinued providing transportation services to all special needs students who have

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educational related services within their Individualize Education Plan (IEP). Students with transportation listed as a related service within their IEP are required to receive free and appropriate services under Federal and State law. As a result of SELPA discontinuing transportation services, each school district was legally required to assume/provide these services.

As you can imagine, hiring drivers, procuring school buses, providing maintenance, and finding a physical location to operate from was and still is difficult. Fortunately, for many of the school districts, they were and remain members of the JPA and placed the burden of this task onto WCTA to accomplish. This unforeseen change in service resulted in a significant increase in the number of bus routes from the original 1999 growth plan when the PLP 98-0050 Condition of Approval was created. It is important to note that the typical special needs school bus route is very different than the large 80 passenger general education bus route. The average ridership on a special needs bus is approximately 8 students per bus from the curbside of their residence to the school. It takes approximately 10 times the number of buses to transport special needs students compared to the general education school bus. The decision for SELPA's discontinued services increased the number of school bus routes WCTA provided by 67%, increasing the buses required to provide this service and spare fleet to support proper vehicle maintenance and repairs.

While this change in service and initial increase in bus routes was challenging and required more employees, equipment, and space, it started a chain reaction and panic within the Sonoma County school districts. Between the years of 2003 – 2006 WCTA added 5 new school district members to the JPA. In 2007, Cotati Rohnert Park Unified School District became a member and doubled the size of the WCTA provided services. In 2016 WCTA doubled in size once more when Santa Rosa City Schools, the largest school district in Sonoma County, became a member. Since 2001 WCTA has increased the number of students transported from 4,000 to approximately 8,000 students daily and from 80 buses to 203 buses.

I have provided the above increase in scope of service for WCTA not as a reasoning/justification to undermine the initial intent of the 1999 Conditions of Approval, but as information for the Design Review Committee to consider when reviewing the proposed plans. As you will see in the Staff Report, proposed plans, and past preliminary plans, the overall development of the site remains substantially the same. The preliminary plans provided a suggestion of potential use of the westerly parking lot based on conditions/scope of service of the Agency from 20+ years ago. However, when looking at the footprint of the westerly site it is important to keep in mind the above scope of service as it relates the sites total usage. The preliminary plans suggested large, 78-80 passenger vehicles that measure 40' long. The current proposed plans provide space for vehicles that are much smaller in size and are more than 2 to 1 in length from the initial conceptual plans provided many years ago. Nevertheless, WCTA has made adjustments to the site plan to accommodate no more than 80 vehicles on the westerly parking at any given one time as required within the 1999 Conditions of Approval.



I will be available during the August 3, 2022 Design Review Committee Meeting as well as the Construction Management Team, and Architectural professionals relative to the project for any questions and comments. Within the following attachment I have taken the time to address some of the Staff Comments/Recommendation, Draft Resolution, and neighbor concerns.

Sincerely,

Chad Barksdale

Chad Barksdale
Executive Director,
West County Transportation Agency



524 Oasis Avenue – Concerns

Site Parking

While it is being suggested that WCTA has been disingenuous or proposing gamesmanship, our intentions were never hidden or not presented to the appropriate Sonoma County Permit staff for their input and evaluations. As mentioned earlier within this public comment document, communication relative to our plans and intentions began in 2018 and received 20 months of evaluation between July 2020 and March 2022. A full set of plans and pending permits were available for public review prior to the April 2022 purchase of 524 Oasis Avenue by the current residents. Furthermore, communication with the prior owner of 524 Oasis Avenue was ongoing for the past several years which included our intentions and I personally notified this owner of submitted plans in July 2020.

Nevertheless, to provide context to our original submittal of 188 spaces on the westerly parking lot we used language within the resolution and conditions of approval as guidance. For example, within 4., h) of the resolutions language it states, 80 vehicles on APN 134-074-022, entire project to 110 buses, and allow for a limited expansion of 20 to 30 percent to keep up with growing student population in the future. Furthermore, on page 4, Planning, item 32 of the Condition of Approval adds more clarifying language that includes, “APN 134-074-022 shall be restricted to a maximum of 80 vehicles on it at any one time” and total of all three parcels to a “maximum of 110 buses on it at any given one time”. There are key words/phases taken from this language that applied to our original submittal.

Firstly, “80 vehicles at any one time” does not restrict the use of the westerly property to buses only. Secondly, “110 buses” on all three properties at any one time” appears to set a differentiation that “vehicles” and “buses” are not the same definition within context of the restricting language. Otherwise, why does the Board of Supervisors’ specifically call out vehicles and separately call out buses in the same sentence in two separate locations within the 1999 documentation. Furthermore, on page 2, item 14 of the Conditions of Approval outlines requirements for a smooth and safe movement of passenger vehicles entering and exiting the public road that provides access to the property.

Thirdly, “at **any** given one time” has a much different interpretation than the quoted language provided by the resident at 524 Oasis Avenue of “at one time”. Based on our interpretation it is clear that the Board of Supervisors understood that vehicles/buses would flow on and off of all properties identified within the 1999 resolution and conditions of approval.

Lastly, the phrase “and allow for a limited expansion of 20 to 30 percent to keep up with growing student population in the future”. This language was used in our original site plan submitted as if the Board of Supervisors was allowing for 20 to 30 percent expansion from the time these conditions were set being that it called out future student population growth. However, it was brought to our attention by the Planning Division that they later interpreted this

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language differently and 20-30 percent expansion in student population was already accounted in the development of the 1999 resolution and conditions of approval. Therefore, WCTA has already changed and resubmitted documentation to reduce parking on the westerly parcel to conform to the 1999 documentation and interpretation.

WCTA has operated for 20 years without an employee parking lot. Employees have used West Robles Avenue as the primary parking space for all employees who currently operate out of the eastern property. However, when reviewing the 1999 resolution and conditions of approval you will see that the intent was always for a consolidated facility. With a consolidated facility it will naturally bring an increased number of employees, requiring more parking space than is currently available on the existing easterly property and West Robles Avenue.

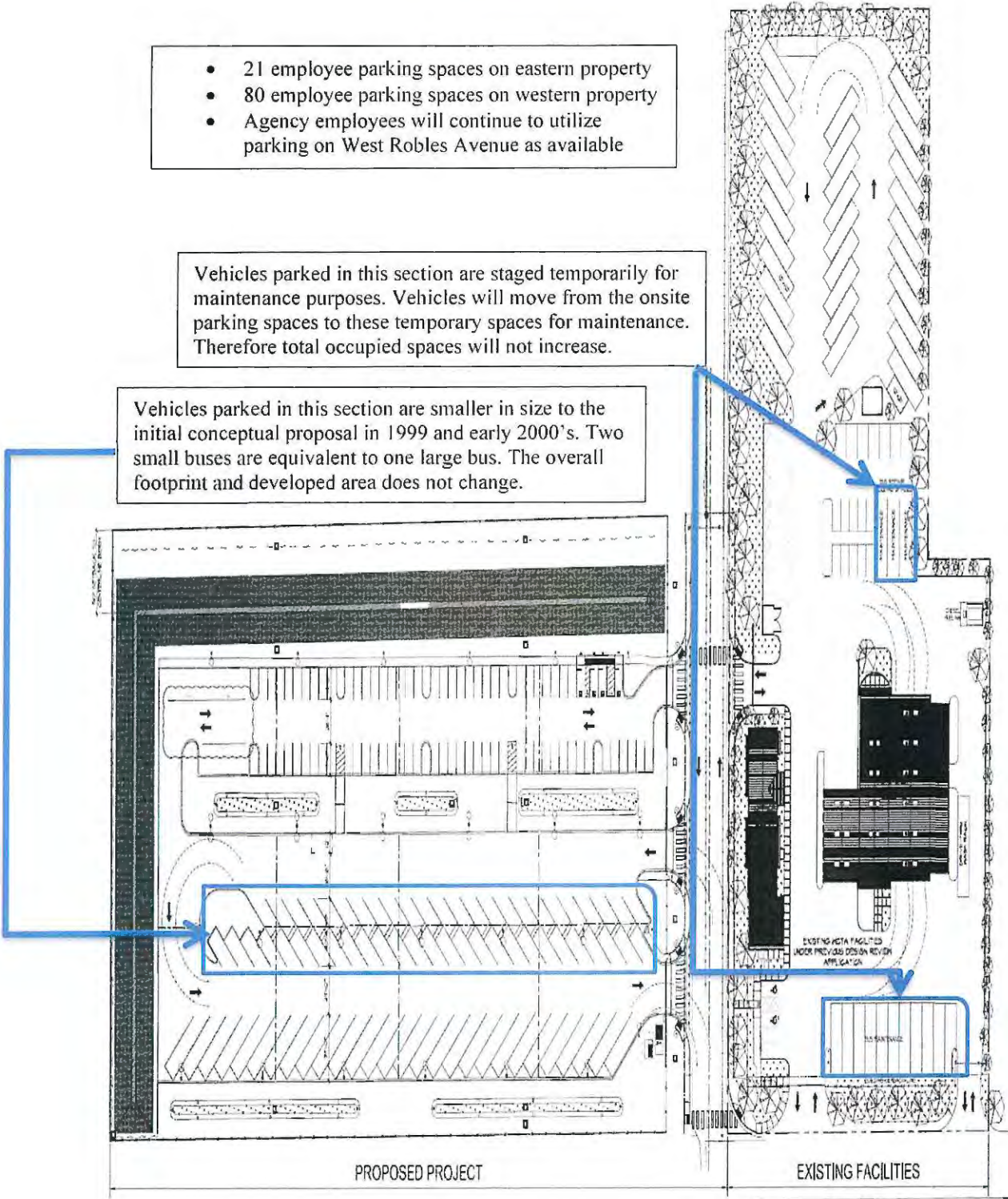
At present time, our employees are in competition for parking space on West Robles with employees from Sonoma County Transit. Over the past few years, due to the orders by the Sonoma County Board of Supervisor on homeless, our employees have had to compete for parking along West Robles with several homeless campers. Not only do the campers take up space available for parking, there is a significant physical and health safety concerns for our employees walking by these campers. We will continue to utilize West Robles Avenue for parking when there is availability. As for parking on Juniper Avenue, this is prohibited by the 1999 condition of approval on page 4, item 35.



- 21 employee parking spaces on eastern property
- 80 employee parking spaces on western property
- Agency employees will continue to utilize parking on West Robles Avenue as available

Vehicles parked in this section are staged temporarily for maintenance purposes. Vehicles will move from the onsite parking spaces to these temporary spaces for maintenance. Therefore total occupied spaces will not increase.

Vehicles parked in this section are smaller in size to the initial conceptual proposal in 1999 and early 2000's. Two small buses are equivalent to one large bus. The overall footprint and developed area does not change.





Lighting

It should be noted that the lighting conditions provided in 1999 are severely outdated and not within the current technological standards of today's codes and expectations. Nevertheless, as stated more than once within condition 46, the lighting plan will be submitted and approved by the Permit Department. The initial and current light plan has been submitted and approved based on the lighting cut sheets, photometric plan, and current expectations to provide employees with a safe environment to perform necessary function of their job and security of the site. Flood lights will not be installed and shall be internal only and not wash out onto adjacent properties. This condition does not prohibit lighting within the property, only that the lighting shines on the internal areas and not wash out onto adjacent properties

In addition, it would be remiss of me not to suggest lighting that would also provide security of the Agency's property and staff. The vehicles parked on this facility and equipment installed within them is worth several millions of dollars and provide transportation for our local public-school students. We have a responsibility to establish a deterrent to protect this equipment and staff from potential vandals looking for fuels, electronics, catalytic converters, wanderers looking for a place to sleep, or someone looking to harm staff or students.

Berm, Setbacks, and Landscaping

The berms and setbacks have been properly designed and redesigned to meet the requirements in the 1999 resolution and conditions of approval. Both the resolution and conditions of approval require the centerline of berm be setback at least 50' from adjacent properties to the north. The proposed plans meet this requirement and does not change the overall footprint of the property's conceptual intension in 1999 or early 2000's.

Landscaping has been a topic of discussion many times over the past several months. While it has been brought to our attention that the Agency's contractor has removed several trees from the northwest corner of the property, it was not within the demolition plan or at the direction of any Agency personnel. The berm has been designed to allow for proper planting relative to the slope and confirmed by a licensed Geotech. Furthermore, our Agency has utilized a licensed Landscape Architect to create the current landscaping plan. Our Landscape Architect has taken special care to ensure that all areas are addressed relative to current drought condition and fire code recommendation based on the most recent devastating fires in Sonoma County. The proposed 43 trees located on the berm have been strategically placed to allow for proper screening and reduce possible fire hazards.

On several occasions we have asked for assistance from the Planning Division relative to determining acceptable or interpreting the phrase "densely landscaped". Unfortunately, we have not been able to receive an answer and based on our berm and landscape plan submittals by licensed professionals, we believe the berm is adequately landscaped with evergreen trees.



Drainage / Erosion Plans

Drainage and erosion plans have been submitted to accommodate onsite watershed and accommodate for offsite watershed with the connection to underground storm drains as well as bio swells to collect water and return it to the current underground water tables. Furthermore, all of the bio swells have overflow connection to the storm water system in the event it is needed. The bio swell located on the north side of the berm will likely improve the current watershed conditions.

Fence

The 1999 conditions of approval clearly require perimeter fencing with slats at least 6' tall. Our current proposal provides an 8' fence with slats. We are not opposed to placing the fence on the internal toe of the north and west berm if helps provide a more appealing look to the property.

EV Charging

When the 1999 resolution and conditions of approval were created EV Charging was not an option. California has had a huge push to electrify automobiles and has implemented requirements to provide EV Charging stations. Nevertheless, these charging stations are currently proposed on the north side of the parking lot where the employee vehicles will park. These spaces, if used, will only be used during the identified hours of operation within the resolution and conditions of approval.

Wetland Mitigation

All necessary wetland mitigation has been purchased and approved by the necessary agencies. Documentation is available and has been available on the Permit Sonoma website at <https://prmd.sonomacounty.ca.gov/CitizenAccess/Default.aspx?CurrentURL=https%3A%2F%2Fprmd.sonomacounty.ca.gov%2FCitizenAccess%2FCap%2FCapHome.aspx?module=Building&TabName=Home> using GRD20-0207 as the permit number.



Staff Review / Design Review Committee Memorandum & Draft Resolution

Page 1, Background – It is presented that grading and site improvement plans were issued in error citing the lack of Final Design Review Approval. While this interpretation has recently been identified, it was not WCTA's intentions to avoid this process. Like I mention previously within this public comment, communication about the scope and requirements of the project began in 2018 and the permitting process received approval through several rounds of evaluation and comments over a course of 20 months.

Page 2 Project Description

It is noted that several changes have been made by WCTA based on staff concerns regarding condition compliance. However, this section also notes that the applicant has not responded to staff's recommendation to increase landscaping screening at the northwest corner of the site. This is stated in contrary, as I have requested multiple times for guidance on what would be acceptable density of the berm in this location without response. Although several redwood trees were removed from this location, it was not at the direction of WCTA staff or within the demolition plan.

Page 3, 32 Staff Response & Draft Resolution 4. e., condition 32

It is recommended that the proposed pavement be eliminated from the area where 16 striped employee parking spaces were previously proposed, but where striping was eliminated. The elimination of pavement in this area could cause drainage issues and potentially have a negative impact on our storm water flow as well as compliance with SWPPP. Furthermore, this change will require that Agency to accept a change order from the General Contractor, causing unnecessary increases in cost. The Conditions of Approval have in place Mitigation Monitoring to ensure compliance with this requirement.

Page 5 Fencing & Draft Resolution 4. d.

As mentioned earlier, the resolution and conditions of approval clearly require fencing with slates at the perimeter of the property. However, we are not opposed to placing the fence on the interior toe of the north and west berms to improve the sites presentation. Adding vines to the fence will increase irrigation, costs, and water usage during a significant drought.

Draft Resolution Health: 25

This condition is stated differently than provided in the 1999 conditions of approval. The 1999 conditions state Toilet facilities shall be provided for employees. The proposed language in the draft resolution states, Toilet facilities shall be provided at the existing facility for employees. This is a proposed change in the 1999 conditions of approval and will limit our ability to provide

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our employees with quick access to toilets on the far west of the proposed site after several hours of driving. We frequently provide access to toilets within a yard this size due to the needs of our employees. Our bus staff members are unable to stop and utilize the toileting facilities while on route due to the care needed for the students on their buses.