

March 8, 2022

Martin Breuer, Ruff and Associates  
100 West Standley St  
Ukiah CA 95482

Re: File No.: **PLP19-0018**; River Road Mixed-Use Development  
Address: 15180 River Road, Guerneville  
APN(s): 070-130-033

Attached are the responses to the agency referral of your project. Please find below immediate items requiring your attention, pending materials identified from the referral process, and detailed descriptions of the pending materials. Please review this information and respond accordingly within 60 days as to how you wish to proceed.

#### Attention Required

- Permit Sonoma Planning does not support the current project due to the proposed service pump layout resulting in on-site access and circulation deficiencies, and encroachment of required site improvements and excessive exterior lighting levels onto the public right-of-way;
- The project site plan is deficient in providing adequate queuing depth at the River Road driveway entrances for safe vehicular access and circulation;
- Incorporating adequate queuing depth likely requires significant changes to the proposed service pump layout, and may affect other design features of the project.
- Be advised there are two options for moving forward at this time:
  - Should you proceed with the current proposal, Staff is prepared to forward to the BZA a recommendation for summary denial based on the findings above; or
  - Alternatively, you may withdraw the current proposal and resubmit a new application addressing all information identified herein.

#### Pending Materials

- LID worksheet for Standard Urban Storm Water Management Plan
- Focused traffic impact study, per DTPW scope of work
- Water District and State Water Board information
- Revised circulation, access, and parking plan with adequate driveway queuing depth.
- Updated lighting and photometric plan with canopy cross-section and fixture cut-sheets
- Updated landscaping and planting plan with irrigation and bioretention details.
- Reformatted noise, GHG, and hazardous materials report into individual sections.
- Revisions addressing design comments from the 2/16/22 DRC hearing.

## Detailed Description

1. **Standard Urban Storm Water Management Plan (SUSMP).** Project is subject to SUSMP requirements and requires a Preliminary Storm Water Mitigation Plan. Applicants are responsible for consulting Permit Sonoma's Engineering Division to discuss these requirements. Refer to the attached Engineering comments dated January 10, 2022.
2. **Focused traffic impact study.** Refer to the attached scope of work provided by the Department of Public Works and Transportation, dated February 8, 2022.
3. **Water District and State Water Board.** Refer to the enclosed email responses and associated attachment and respond accordingly to agency contact provided.
4. **Revised parking and circulation plan.** Resubmit the project plans addressing the multi-family covered parking space requirements under Article 86, and the queuing depth dimension shown in the Off-Street Parking Design Standards diagram under Article 82, including incorporation of two covered parking spaces and appropriate queuing depth between driveway entrances and the first interior point of vehicular circulation or parking space.

NOTE: A minimum 20-foot clearance depth to the first parking space is generally required to provide suitable maneuvering room so vehicles may enter the street in a forward direction.

5. **Complete landscaping plans.** Resubmit complete landscaping plans demonstrating the location, species, common name, and size of all proposed planting materials. Be advised a minimum of eight percent (8%) of all parking lot areas shall be landscaped pursuant to County Code Section 26-82-030 (k), and conforming to the Water-Efficient Landscaping Ordinance (WELO) per Chapter 7D3.

### *Right-of-way Encroachment*

NOTE: Landscaping within the public right-of-way may be considered with DTPW clearance, provided the proposed encroachment plans clearly demonstrate consistency with the following criteria:

- Will not interfere with the longevity, maintenance, or intended use and functionality of other public facilities within the right-of-way (i.e. structural roadway sections, bike lanes, etc);
  - Does not impede required sightline visibility for any project entrance or adjacent public roadway or private driveway intersection;
  - Does not cause or contribute to causing a potential traffic safety issue.
6. **Exterior lighting and photometrics.** Resubmit the lighting plan to include the following:
    - a. Manufacturer's specification sheet for each exterior light fixture proposed for the main building and the service canopy;
    - b. Canopy cross-section illustrating fixture height, recess depth and cut-off design, and its photometric relationship to adjacent property lines, proposed landscape improvements, and edge of furthest travel lane along both adjoining roadways.



- c. Updated photometric drawing identifying the canopy cross-section line referenced above, and demonstrating consistency with General Plan Policy OSRC-4a, -4b and -4c, and County Code Section 26-82-030 (n).
7. **Materials and colors.** Provide a diagram with material and colors details for the roof, siding, trim, and windows. Include proposed paint and finish as appropriate. Provide color photographs of the materials.
8. **Updated technical report format.** Reformat the submitted noise, greenhouse gas, and hazardous materials study to separate and reference by index each element as individual analysis sections.
9. **DRC Comments.** Refer to the attached DRC Record of Action, dated February 16, 2022.

#### Agency Responses

- Engineering Division - 1.20.22
- Transportation and Public Works - 2.8.22
- Sanitation Division - 1.3.22
- Sweet Springs Water District - 12.27.21
- State Water Board - 1.4.22
- County Parks - 3.4.22
- County Fire (pending)
- CalTrans (pending)

Please feel free to contact me at (707) 565-3095 or by e-mail at [derik.michaelson@sonoma-county.org](mailto:derik.michaelson@sonoma-county.org) should you have any questions.

Sincerely,



Derik Michaelson  
Project Planner

#### Attachment

Agency comments  
Record of Action, DRC 2/16/22

Cc: [Dhillon Mangal](#), property owner  
Scott Orr, Deputy Director  
District 5, Board of Supervisors



**Sonoma County Permit and Resource Management Department**  
2550 Ventura Avenue Santa Rosa CA 95403-2859 (707) 565-1900  
[www.PermitSonoma.org](http://www.PermitSonoma.org)



**MEMORANDUM**

**DATE:** February 25, 2022

**TO:** Planning File

**FROM:** Derik Michaelson, Project Planner

**SUBJECT:** File No.: PLP19-0018; Agency Referral Comments  
Address: 15180 River Road, Guerneville  
APN(s): 070-130-033

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Attached are the agency responses to the December 23, 2021 Completeness Referral of this project.

Responses (Attached)

1. Engineering Division - 1.20.22
2. Transportation and Public Works - 2.8.22
3. Sanitation Division - 1.3.22
4. Sweet Springs Water District - 12.27.21
5. State Water Board - 1.4.22
6. County Parks - 3.4.22

In-route (Pending)

County Fire  
CalTrans





**From:** [Steve Snow](#)  
**To:** [Derik Michaelson](#)  
**Cc:** [Patrick Dirden](#)  
**Subject:** PLP19-0018 Grading & Storm Water referral response  
**Date:** Monday, January 10, 2022 1:09:05 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[2017-LID-Determination-Worksheet.pdf](#)  
[PLP19-0018 Formal Referral Letter - GSW Response.pdf](#)  
[image008.png](#)

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Hi Derik,

I have reviewed the subject project referral & we will need more information before grading & storm water can provide conditions of approval.

This project is located within the NPDES phase I boundary, drains to the county MS4 & looks like it will add or replace over 10,000 square feet of impervious area, likely making it subject to low impact development (LID) requirements.

The applicant must complete & return the attached LID determination worksheet & if over 10,000 square feet of new or replaced impervious surface is indeed proposed, then an Initial Storm Water LID Submittal (ISWLIDS) will need to be provided for my review & discretionary approval. Otherwise the applicant must clearly demonstrate that the project is below the threshold by providing an exhibit of likely & reasonably foreseeable development which must show & identify the area of new & replaced impervious surfaces, in addition to the determination worksheet.

Additionally, the design appears to propose pervious pavers which are no longer allowed as LID features per recent directive from the North Coast Regional Water Quality Control Board.

More information about storm water LID regulations can be found at this site:  
<https://srcity.org/1255/Low-Impact-Development>.

The applicant or their design professional can contact me if they have any questions about the above requirements.

Let me know if any questions.

Thank you.

**Steve Snow, P.E.**

Engineer/Flood Plain Manager

[www.PermitSonoma.org](http://www.PermitSonoma.org)

County of Sonoma

Engineering Division | Grading, Drainage, Sanitation & Encroachment

2550 Ventura Avenue, Santa Rosa, CA 95403

Direct: 707-565-4443 | Office: 707-565-1900

**FOR OFFICE USE ONLY:**

Does this project require permanent storm water BMP's?

Y      N

Date Submitted: \_\_\_\_\_



|                     |          |
|---------------------|----------|
| File No:            | Quadrant |
| Related Files:      |          |
| Set:                |          |
| Department Use Only |          |

## 2017 Storm Water LID Determination Worksheet

**PURPOSE AND APPLICABILITY:** This determination worksheet is intended to satisfy the specific requirements of "ORDER NO. R1-2015-0030, NPDES NO. CA0025054 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT AND WASTE DISCHARGE REQUIREMENTS FOR DISCHARGES FROM THE MUNICIPAL SEPARATE STORM SEWER SYSTEMS." Additional design requirements imposed by Governing Agencies, such as local grading ordinances, CAL Green, CEQA, 401 permitting, and hydraulic design for flood control still apply as appropriate. Additionally, coverage under another regulation may trigger the requirement to design in accordance with the Storm Water LID Technical Design Manual.

### Part 1: Project Information

Project Name Applicant (owner or developer) Name

Project Site Address Applicant Mailing Address

Project City/State/Zip Applicant City/State/Zip

Permit Number(s) - (if applicable) Applicant Phone/Email/Fax

Designer Name Designer Mailing Address

Designer City/State/Zip Designer Phone/Email

### **Type of Application/Project:**

|               |                |                 |                      |               |
|---------------|----------------|-----------------|----------------------|---------------|
| Subdivision   | Grading Permit | Building Permit | Hillside Development |               |
| Design Review | Use Permit     | Encroachment    | Time Extensions      | Other : _____ |

### PART 2: Project Exemptions

1. Is this a project that creates or replaces *less than* 10,000 square feet of impervious surface<sup>1</sup>, including all project phases and off-site improvements?

Yes      No

1 Impervious surface replacement, such as the reconstruction of parking lots or excavation to roadway subgrades, is not a routine maintenance activity. Reconstruction is defined as work that replaces surfaces down to the subgrade. Overlays, resurfacing, trenching and patching are defined as maintenance activities per section VI.D.2.b.

## 2017 Storm Water LID Determination Worksheet

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2. Is this project a routine maintenance activity<sup>2</sup> that is being conducted to maintain original line and grade, hydraulic capacity, and original purpose of facility such as resurfacing existing roads and parking lots?

Yes            No

3. Is this project a stand alone pedestrian pathway, trail or off-street bike lane?

Yes            No

4. **Did you answer "YES" to any of the questions in Part 2?**

**YES:** This project will *not* need to incorporate permanent Storm Water BMP's as required by the NPDES MS4 Permit. **Please complete the "Exemption Signature Section" on Page 4.**

**NO:** Please complete the remainder of this worksheet.

### **Part 3: Project Triggers**

#### **Projects that Trigger Requirements:**

Please answer the following questions to determine whether this project requires permanent Storm Water BMP's and the submittal of a SW LIDs as required by the NPDES MS4 Permit order No. R1-2015-0030.

1. Does this project create or replace a combined total of 10,000 square feet or more of impervious surface<sup>1</sup> including all project phases and off-site improvements?

Yes            No

2. Does this project create or replace a combined total or 10,000 square feet or more of impervious streets, roads, highways, or freeway construction or reconstruction<sup>3</sup>?            Yes            No

3. Does this project create or replace a combined total of 1.0 acre or more of impervious surface<sup>1</sup> including all project phases and off-site improvements?            Yes            No

4. **Did you answer "YES" to any of the above questions in Part 3?**

**YES:** This project will need to incorporate permanent Storm Water BMP's as required by the NPDES MS4 Permit. **Please complete remainder of worksheet and sign the "Acknowledgement Signature Section" on Page 4.**

**NO:** This project will *not* need to incorporate permanent Storm Water BMP's as required by the NPDES MS4 permit. **Please complete the "Exemption Signature Section" on Page 4.**

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<sup>1</sup> Impervious surface replacement, such as the reconstruction of parking lots or excavation to roadway subgrades, is not a routine maintenance activity. Reconstruction is defined as work that replaces surfaces down to the subgrade. Overlays, resurfacing, trenching and patching are defined as maintenance activities per section VI.D.2.b.

<sup>2</sup> "Routine Maintenance Activity" includes activities such as overlays and/or resurfacing of existing roads or parking lots as well as trenching and patching activities and reroofing activities per section VI.D.2.b.

<sup>3</sup> "Reconstruction" is defined as work that extends into the subgrade of a pavement per section VI.D.2.b.



## 2017 Storm Water LID Determination Worksheet

**Acknowledgment Signature Section:**

As the property owner or developer, I understand that this project is required to implement permanent Storm Water Best Management Practices and provide a Storm Water Low Impact Development Submittal (SW LIDS) as required by the City's National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer Systems (MS4) Permit Order No. R1-2015-0030. \*Any unknown responses must be resolved to determine if the project is subject to these requirements.

\_\_\_\_\_  
Applicant Signature

\_\_\_\_\_  
Date

**Exemption Signature Section:**

As the property owner or developer, I understand that this project as currently designed does not require permanent Storm Water BMP's nor the submittal of a Storm Water Low Impact Development Submittal (SW LIDS) as required by the City's National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer Systems (MS4) Permit\*. I understand that redesign may require submittal of a new Determination Worksheet and may require permanent Storm Water BMP's.

\_\_\_\_\_  
Applicant Signature

\_\_\_\_\_  
Date

- \* This determination worksheet is intended to satisfy the specific requirements of "ORDER NO. R1-2015-0030, NPDES NO. CA0025054 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT AND WASTE DISCHARGE REQUIREMENTS FOR DISCHARGES FROM THE MUNICIPAL SEPARATE STORM SEWER SYSTEMS." Additional design requirements imposed by Governing Agencies, such as local grading ordinances, CAL Green, CEQA, 401 permitting, and hydraulic design for flood control still apply as appropriate. Additionally, coverage under another regulation may trigger the requirement to design in accordance with the Storm Water LID Technical Design Manual.

**Implementation Requirements:** All calculations shall be completed using the "Storm Water Calculator" available at: [www.srcity.org/stormwaterLID](http://www.srcity.org/stormwaterLID)

**Hydromodification Control/100% Volume Capture:** Capture (infiltration and/or reuse) of 100% of the volume of runoff generated by a 1.0" 24-hour storm event, as calculated using the "Urban Hydrology for Small Watersheds" TR-55 Manual method. This is a retention requirement.

**Treatment Requirement:** Treatment of 100% of the flow calculated using the modified Rational Method and a known intensity of 0.20 inches per hour.

**Delta Volume Capture Requirement:** Capture (infiltration and/or reuse) of the increase in volume of storm water due to development generated by a 1.0" 24-hour storm event, as calculated using the "Urban Hydrology for Small Watersheds" TR-55 Manual method. This is a retention requirement.

**From:** [Laurel Putnam](#)  
**To:** [Derik Michaelson](#)  
**Cc:** [Stevan Hunter](#)  
**Subject:** PLP19-0018 Referral - 15180 River Rd  
**Date:** Tuesday, February 8, 2022 1:40:42 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[PLP19-0018 Scope of Work \(2-8-22\).pdf](#)  
[PLP19-0018 Prelim grading plns DTPW cmnts \(2-8-22\).pdf](#)

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Hi Derik,

Attached is a scope of work for the required traffic impact study for the above referenced project. Please forward the study to DTPW for review once it's been completed.

Additionally the preliminary grading plans are attached with comments regarding proposed work within the right-of-way.

DTPW staff would also like planning's determination as to what will be considered baseline for this project with regards to CEQA. As the fuel pumps were shut down about the time this application was submitted, a clear understanding of whether or not the operating fuel station should be considered baseline or not would be helpful.

Please let me know if you have any questions.

Regards,

**Laurel Putnam | Engineering Technician IV**

County of Sonoma | Transportation and Public Works - Traffic Engineering & Land Development

2300 County Center Drive, Suite B100 | Santa Rosa, CA 95403

Tel. (707) 565-2231 | [Laurel.Putnam@sonoma-county.org](mailto:Laurel.Putnam@sonoma-county.org)

 **SAVE PAPER** - Please do not print this e-mail unless absolutely necessary

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**From:** Derik Michaelson  
**Sent:** Tuesday, February 8, 2022 1:27 PM  
**To:** Laurel Putnam <[Laurel.Putnam@sonoma-county.org](mailto:Laurel.Putnam@sonoma-county.org)>  
**Cc:** Stevan Hunter <[Stevan.Hunter@sonoma-county.org](mailto:Stevan.Hunter@sonoma-county.org)>  
**Subject:** RE: PLP19-0018 Referral - 15180 River Rd

The date of the upcoming DRC meeting for this project is next week on Feb. 16<sup>th</sup>. Again, the project is showing planter improvements within the ROW

Regards,



Integrated Waste  
Road & Bridge Operations  
Sonoma County Airport  
Sonoma County Transit

Johannes J. Hoevertsz, Director

Trish Pisenti, Deputy Director- Transportation & Operations

Janice Thompson, Deputy Director- Engineering & Maintenance

## Focused Traffic Study Scope of Work

**To:** Derik Michaelson – Project Planner, PRMD  
**From:** Stevan Hunter – Senior Engineer, DTPW  
**Cc:** Laurel Putnam – Engineering Technician IV, DTPW  
**Date:** February 8, 2022  
**File No:** PLP19-0018  
**Address:** 15190 River Road, Guerneville.  
**Subject:** TIS Scope of work

**Project Description:** Use Permit and Design Review proposal to allow reuse of an existing gas station property for mixed use development, including a new three-story building with parking on the ground floor and five (5) single-room occupancy (SRO) units and two (2) two-bedroom apartments above, a 2,000-square-foot of retail market, and a new canopy structure with replacement of existing pump dispensers, on a 0.32 acre commercial property fronting River Road near Guerneville.

### County Standards

1. A traffic impact study (TIS) shall follow and analyze all the requirements in the *Guidelines for Traffic Impact Studies* dated May 2016. A copy of the County guidelines can be found here: <http://sonomacounty.ca.gov/TPW/Roads/Services/Data-and-Resources/Traffic-Study-Guidelines/>
2. The traffic study title page shall include:
  - a. Project File Number
  - b. Project Address
  - c. Project APN
  - d. Project Name
  - e. Applicant Name
  - f. Property Owner Name
3. Include the file number in the subject line of all communications with DTPW.

### Traffic Counts

1. The Applicant shall collect traffic counts on Tuesdays, Wednesdays, or Thursdays for weekdays and Saturdays for weekends during weeks not containing a holiday, during the estimated peak period or time of year for the proposed project, during clear environmental conditions, during regular school session, with no adjacent construction activities or special events. If historical counts are used, they shall have not been taken during the winter season and not be more than 2 years old.
2. The Applicant shall clearly state the peak hour factor (PHF) for each peak hour and intersection. The

PHF for each intersection shall be based off the traffic counts. Show calculations supporting the chosen PHF used in the analysis.

### **Study Intersections**

The Applicant shall analyze the following locations for Level of Service (LOS), queuing, and safety impacts:

1. Orchard Rd/River Road
2. Orchard Rd/Old River Road
3. River Road/Project Entries
4. Old River Road/Project Entries

### **Analysis Conditions**

1. Existing
2. Existing + Project (weekday and weekend)
3. Future (2040 Horizon Year)
4. Future + Project (weekday and weekend)

The Sonoma County Transportation Authority (SCTA) model shall be used to determine the future 2040 horizon year baseline conditions.

The study shall analyze the weekday AM and PM and weekend peak periods.

### **Trip Generation**

1. The Applicant shall submit a trip generation analysis for DTPW review and approval before use in the TIS.
2. The Applicant shall summarize the projected daily and peak hour trips for the proposed project in a tabular format.
3. The Applicant shall include a calculation of the number of truck trips and break down the average truck traffic over their applicable activity months. Averaging over the entire year will not be acceptable. Include passenger car equivalencies where applicable.

### **Trip Distribution**

1. The Applicant shall provide a trip distribution for DTPW review and approval before use in the TIS.
2. The Applicant shall provide a figure illustrating the percentage of peak hour traffic going to and from various destinations along the transportation network. Trip distribution shall be based on existing travel patterns, locations of complimentary land uses, and SCTA model runs. A figure illustrating peak hour project only trips at the driveways, study intersections and roadway segments shall be provided based on the trip distribution.
3. The Applicant shall provide a figure for each different trip distribution with supporting discussion and justification, if the trip distribution is different between existing and future conditions.



4. The Applicant shall utilize the SCTA model to determine if the trip distribution assumptions are different under future conditions.

### **Vehicles Miles Traveled**

The Applicant shall provide analysis and discussion of Vehicle Miles Traveled (VMT) in accordance with the California Governor's Office of Planning and Research Technical Advisory on evaluating transportation impacts in CEQA, dated December 2018, and conclude whether the project is expected to have significant VMT impact.

1. Provide actual VMT data (a quantitative evaluation), in addition to a general statement (qualitative) as to whether or not the project's VMT meets the threshold for significance.
2. The SCTA methodology shall be used.

### **Analysis Methodologies**

Increased attention is called to the following analysis methods.

1. The Applicant shall analyze LOS using methodology in the most recent version of the Highway Capacity Manual.
2. The Applicant shall perform CA-MUTCD signal warrant analyses for any unsignalized study intersections operating at or impacted to an unacceptable LOS. Where signals are warranted, the Applicant will analyze and discuss the merits of installing a roundabout as an alternative to the signal.
3. The Applicant shall perform CA-MUTCD multi-way stop warrant analyses for any two-way/side-street stop-controlled intersections operating at or impacted to an unacceptable LOS.
4. The Applicant shall perform a parking demand analysis to determine the required parking spaces including ADA and bicycle parking as a result of project traffic for the scenario generating the largest amount of trips.
5. The Applicant shall determine and tabulate the 95th percentile queue length(s) at each study location for each analysis condition and compare the values to existing storage lane lengths.
6. The Applicant shall evaluate the need for a left-turn and right-turn storage lane at the proposed entrance to the project site from the adjacent public street.
7. The Applicant shall perform a five-year historical collision analysis at each study location and compare collision rates to the most recent published statewide averages. For locations showing a collision trend or above average collision rates, provide a safety discussion of the existing conditions and any correctable safety issues that can be implemented to address those collisions.

8. The Applicant shall perform a driveway(s) sight distance study based on the 85<sup>th</sup> percentile speed of free-flow traffic. Spot speed studies shall be taken during non-peak periods under clear environmental conditions and submitted with the traffic study.
9. The Applicant shall analyze the adequacy of emergency vehicle access.
10. The Applicant shall evaluate adequate clear space per AASHTO roadside design guide standards.
11. The Applicant shall provide analyses of existing and planned pedestrian and bicycle facilities including existing signs and markings and crosswalks, and bus route(s) and segment(s) tabulated and presented on diagrams. Class 2 bike lane shall be required along River Road frontage.
12. The Applicant shall provide a discussion of cumulative impacts by incorporating data from ongoing projects within the study area. Data regarding adjacent projects should be obtained from PRMD. Please cite and date correspondence with PRMD staff used to determine cumulative impacts.
13. The Applicant shall not assume any physical improvements are in place unless there is a Capital Improvement Project already identified and fully funded. If the improvement is identified in an impact fee program and the improvement is fully funded than that improvement can be assumed under Future Analysis scenarios.

**Mitigation Measures**

1. The Applicant shall:
  - a. Identify the significantly impacted facilities that exceed County significance criteria.
  - b. Provide potential mitigation measures and a potential funding source(s).
  - c. Provide an analysis of the proposed mitigation measures showing impacts mitigated to levels of non-significance.

**PERMIT AND RESOURCE MANAGEMENT DEPARTMENT**  
**SANITATION SECTIONS**  
**MEMORANDUM**

**TO:** Derik Michaelson, Associate Planner  
**FROM:** Keith Hanna  
**LOCATION:** 15190 & 15180 River Rd., Guerneville  
**APPLICANT:** Martin Breuer

**DATE:** 3 January 2022  
**PROJECT #:** PLP19-0018  
**APN:** 070-130-033

**Project description:**

Use Permit and Design Review proposal to allow reuse of an existing gas station property for mixed use development, including a new three-story building with parking on the ground floor and five (5) single-room occupancy (SRO) units and two (2) two-bedroom apartments above, a 2,000-square-foot of retail market, and a new canopy structure with replacement of existing pump dispensers, on a 0.32 acre commercial property fronting River Road near Guerneville.

Zoning of the site is: LC, F2 LG/116 LG/RRC SR VOH. a

**Sanitation Conditions**

1. Sonoma County Water Agency (Sonoma Water) operates Russian River County Sanitation District (District) under contract with District. References to District employees are understood to be Sonoma Water employees acting on behalf of District.
2. Prior to approval of this project by the Sonoma County Permit and Resource Management Department (Permit Sonoma), the Applicant shall provide the Sanitation Section of Permit Sonoma with a statement from the Sonoma Water, operators of the District, addressing the current and future levels of collection and treatment capacity within the District. If it is determined by Sonoma Water that a "Sewer Capacity Study" is warranted and required for the proposed project, the Applicant shall undertake to have this study prepared prior to final approval of the development.

If there is not adequate sewer capacity for the development, then the Applicant shall implement mitigation measures as directed by the Sonoma Water, including but not limited to sewer main pipe upsizing, sealing of manholes and/or mains, and sewer flow reductions in other parts of the sanitary sewer system.

3. Applicant shall obtain a Sonoma County Water Agency **Survey for Commercial/Industrial Wastewater Discharge Requirements** (WWDS) from the Permit Sonoma, and shall submit the completed Survey, along with copies of the project site plan, floor plan and plumbing plan to the Engineering Division of Permit Sonoma.

If additional sewer pre-treatment, separate process and domestic wastewater lines, and/or monitoring facilities are required by the Sonoma County Water Agency per this Survey, the Applicant shall comply with the requirements of the Survey prior to occupancy of the proposed mixed-use development. The issuance of building permits is contingent upon completion of the Survey, and incorporation of any Sonoma County Water Agency requirements into the building plans.

4. At the time of WWDS submittal, the Applicant shall provide the Sanitation Section of the Permit Sonoma with data related to the floor area of the building, including tables, chairs, kitchen, deli area, retail, residential units, vehicle bays, gas pumps, bathrooms, office, etc., for the purpose of correctly calculating sewer use fees, as defined by Sonoma County Water Agency Sanitation Codes. Sewer use fees (including Connection and Annual Service fees) shall be paid prior to building permit final, and temporary occupancy for the proposed mixed-use development. No building permit final, and temporary occupancy, for the proposed mixed-use development shall be allowed until the sewer use fees are paid.
5. The Applicant shall obtain a Sewer Disconnect Permit from the Sanitation Section of the Permit Sonoma disconnecting the existing structure, obtaining a Building Demolition Permit for the existing structure. Disconnection of the existing structure from the sewer shall be inspected by the Engineering Division of PRMD to ensure that disconnection is conducted in compliance with Health and Safety Codes, and to preserve any sewer connection credit that may currently be assessed to the property. Disconnection of the existing lateral shall be located at the sewer main unless special permissions are obtained to disconnect at a different location.
6. Prior to the start of construction within the County Right-of-Way of River Road, Old River Road, and Orchard Road, the Applicant shall have a licensed general contractor in possession of a valid Public Road bond obtain an Encroachment Permit from the Permit and Resource Management Department (PRMD).
7. The Applicant shall obtain a permit to construct sanitary sewer facilities prior to building permit issuance of the proposed development. The sewer design, and construction, shall comply with the Sonoma County Water Agency Design and Construction Standards for Sanitation Facilities and Russian River County Sanitation District Sanitations Code Ordinance. All sewer work shall be inspected and accepted by the County Inspector, before occupancy or temporary occupancy is approved for this project.

**Please note that review of the sanitary sewer design is a separate review from that of the buildings, drainage and frontage improvements, and shall be performed by the Sanitation Section of the Permit Sonoma under a separate permit.**

8. Sewer Use Fees for sewer service shall be calculated at the prevailing Sewer Connection and Annual Sewer Service Charge rates in effect at the time of sewer permit issuance.
9. All Sewer Fees per Russian River County Sanitation District Ordinances (latest revision) shall be paid to the Sanitation Section of the Sonoma County Permit and Resource Management Department (PRMD) prior to occupancy of the proposed mixed use development.
10. The Applicant shall be responsible for the restoration of existing conditions including, but not limited to surfacing, landscaping, utilities and other public improvements that have been disturbed due to the construction of sanitary sewer facilities. Restoration shall be completed prior to the final of the sewer construction permit, unless otherwise specifically approved in advance by the Permit Sonoma.
11. Sewer facilities that are constructed within the 100 year flood plan shall be constructed in accordance with flooding resistant details and standards contained in the Sonoma County Water Agency Design and Construction Standards for Sanitation Facilities (Sanitation Standards). All other sewer facilities outside of the buildings shall also be constructed in accordance with the Sanitation Standards.

12. A side sewer line shut-off valve shall be required for the mixed-use development. The owner shall be obligated to shut off the valve at times prior to flooding. The valve design, location, and shut-off requirements shall be approved by the Sonoma Water. Easements for the District to access the valve may be required at Sonoma Water's sole discretion.
13. No building shall be connected to the existing mainline sewer until the mainline sewer has been inspected and accepted by the Engineering Division of the Sonoma County Permit and Resource Management Department (PRMD), and a Sewer Connection Permit has been issued for the building. The sewer construction permit shall be finalized PRIOR to Occupancy or Temporary Occupancy.
14. All lateral connections in the District shall be made by the Sonoma Water. The contractor shall coordinate work with the Sonoma Water for instructions and the timing of the sewer connection. The contractor, applicant, and/or owner shall not cut, break, or disturb the existing sewer main in any way.

**From:** [Jack Bushgen](#)  
**To:** [Derik Michaelson](#)  
**Cc:** [jbushgen@sweetwatersprings.com](mailto:jbushgen@sweetwatersprings.com)  
**Subject:** FW: PLP19-0018 (15190 & 15180 River Rd., Guerneville) Formal Referral (Respond by January 10, 2022)  
**Date:** Monday, December 27, 2021 3:44:32 PM  
**Attachments:** [image003.png](#)  
[PLP19-0018 Formal Referral Letter.pdf](#)  
[construction investigation application.pdf](#)

---

## EXTERNAL

Good talking with you here are the points I was trying to get across

They will need to fill out a construction investigation form which is in this e-mail, this just lets us know what their intent is for this parcel

Also they will need to put our engineering firm (coastland) on retainer to pay for any fees that will come with this to see if they can be served with our water capacity to make sure we can serve them. What size lines they will need for fire and basic services and so forth

Jack Bushgen  
Field manager

---

**From:** Jack Bushgen  
**Sent:** Monday, December 27, 2021 10:02 AM  
**To:** Derik.Michaelson@sonoma-county.org; 'Ed Fortner' <efortner@sweetwatersprings.com>  
**Cc:** jbushgen@sweetwatersprings.com  
**Subject:** FW: PLP19-0018 (15190 & 15180 River Rd., Guerneville) Formal Referral (Respond by January 10, 2022)

Good morning Derik, I left a message on your phone so I figured I would give you an e-mail as well. I didn't see anything on the plans I got for what they would need for fire protection and what size water service they may need for the building /property. What we have feeding them at this point is a 5/8 metered commercial water service (for an upstairs apartment /and downstairs gas station) they may need to get with our engineering team coastland (at their cost) to make sure we have the water capacity to service them

One of the other concerns is that during flooding are the underground gas

tanks are flood-proof. because Guerneville's three main wells are right downstream from the gas station about 700 feet

Best regards

Field manager S.S.W.D.

Jack Bushgen

---

**From:** Ed Fortner

**Sent:** Monday, December 27, 2021 8:15 AM

**To:** Jack Bushgen <[jbushgen@sweetwatersprings.com](mailto:jbushgen@sweetwatersprings.com)>

**Subject:** FW: PLP19-0018 (15190 & 15180 River Rd., Guerneville) Formal Referral (Respond by January 10, 2022)

Jack,

Any comments or concerns about these properties and their changed use? I assume we serve the property now and can serve the new property?

Sincerely,

Ed Fortner

General Manager

Sweetwater Springs Water District

[efortner@sweetwatersprings.com](mailto:efortner@sweetwatersprings.com)

<http://www.sweetwatersprings.com/>

707-869-4000



---

**From:** Patrick Dirden <[Patrick.Dirden@sonoma-county.org](mailto:Patrick.Dirden@sonoma-county.org)>

**Sent:** Thursday, December 23, 2021 2:49 PM

**To:** Belén Grady <[Belen.Grady@sonoma-county.org](mailto:Belen.Grady@sonoma-county.org)>; Eric Koenigshofer

<[Eric.Koenigshofer@sonoma-county.org](mailto:Eric.Koenigshofer@sonoma-county.org)>; Leo Chyi <[Leo.Chyi@sonoma-county.org](mailto:Leo.Chyi@sonoma-county.org)>; Brian Oh

<[Brian.Oh@sonoma-county.org](mailto:Brian.Oh@sonoma-county.org)>; Cecily Condon <[Cecily.Condon@sonoma-county.org](mailto:Cecily.Condon@sonoma-county.org)>; Melody

Richitelli <[Melody.Richitelli@sonoma-county.org](mailto:Melody.Richitelli@sonoma-county.org)>; Scott Orr <[Scott.Orr@sonoma-county.org](mailto:Scott.Orr@sonoma-county.org)>;

Tennis Wick <[Tennis.Wick@sonoma-county.org](mailto:Tennis.Wick@sonoma-county.org)>; Robert Pennington <[Robert.Pennington@sonoma-county.org](mailto:Robert.Pennington@sonoma-county.org)>;

Leann Clark <[Leann.Clark@sonoma-county.org](mailto:Leann.Clark@sonoma-county.org)>; Rosalind Girard

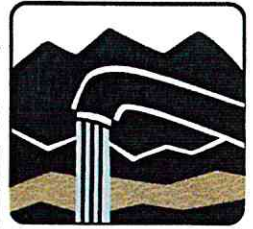
<[Rosalind.Girard@sonoma-county.org](mailto:Rosalind.Girard@sonoma-county.org)>; Robert Aguero <[Robert.Aguero@sonoma-county.org](mailto:Robert.Aguero@sonoma-county.org)>;

'David Royall' <[David.Royall@scwa.ca.gov](mailto:David.Royall@scwa.ca.gov)>; Leann Clark <[Leann.Clark@sonoma-county.org](mailto:Leann.Clark@sonoma-county.org)>;

Sweetwater  
Springs

WATER  
DISTRICT

*Ed Fortner, General Manager*



## CONSTRUCTION INVESTIGATION APPLICATION

Permit No. \_\_\_\_\_ Parcel No. \_\_\_\_\_

A TWENTY – FOUR HOUR NOTICE IS REQUIRED FOR INSPECTION

## PROPERTY INFORMATION

Owner \_\_\_\_\_ Phone No. (    ) \_\_\_\_\_

Email: \_\_\_\_\_

Property Address \_\_\_\_\_

Mailing Address \_\_\_\_\_

Type of  
Construction \_\_\_\_\_

\*Comments

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

A Non-Refundable Inspection Fee of \$100.00 must be submitted along with this application.

\_\_\_\_\_  
APPLICANT SIGNATURE

\_\_\_\_\_  
DATE

\_\_\_\_\_  
ISSUED BY



**From:** [Carter, Jason@Waterboards](mailto:Carter_Jason@Waterboards)  
**To:** [Derik Michaelson](mailto:Derik.Michaelson)  
**Cc:** [Earls, Lareina A.@Waterboards](mailto:Earls_Lareina_A.@Waterboards)  
**Subject:** RE: PLP19-0018 (15190 & 15180 River Rd., Guerneville) Formal Referral (Respond by January 10, 2022)  
**Date:** Tuesday, January 4, 2022 4:45:25 PM

---

## EXTERNAL

Hi Derik,

I do not see a proposal for water service in the documents provided. Is this site already served by a public water system, or will they be supplied by an alternative source?

Regards,

Jason Carter  
Environmental Scientist  
State Water Resources Control Board  
Division of Drinking Water – Santa Rosa  
707-576-2098  
[Jason.carter@waterboards.ca.gov](mailto:Jason.carter@waterboards.ca.gov)

---

**From:** Patrick Dirden <[Patrick.Dirden@sonoma-county.org](mailto:Patrick.Dirden@sonoma-county.org)>  
**Sent:** Thursday, December 23, 2021 2:49 PM  
**To:** Belén Grady <[Belen.Grady@sonoma-county.org](mailto:Belen.Grady@sonoma-county.org)>; Eric Koenigshofer <[Eric.Koenigshofer@sonoma-county.org](mailto:Eric.Koenigshofer@sonoma-county.org)>; Leo Chyi <[Leo.Chyi@sonoma-county.org](mailto:Leo.Chyi@sonoma-county.org)>; Brian Oh <[Brian.Oh@sonoma-county.org](mailto:Brian.Oh@sonoma-county.org)>; Cecily Condon <[Cecily.Condon@sonoma-county.org](mailto:Cecily.Condon@sonoma-county.org)>; Melody Richitelli <[Melody.Richitelli@sonoma-county.org](mailto:Melody.Richitelli@sonoma-county.org)>; Scott Orr <[Scott.Orr@sonoma-county.org](mailto:Scott.Orr@sonoma-county.org)>; Tennis Wick <[Tennis.Wick@sonoma-county.org](mailto:Tennis.Wick@sonoma-county.org)>; Robert Pennington <[Robert.Pennington@sonoma-county.org](mailto:Robert.Pennington@sonoma-county.org)>; Leann Clark <[Leann.Clark@sonoma-county.org](mailto:Leann.Clark@sonoma-county.org)>; Rosalind Girard <[Rosalind.Girard@sonoma-county.org](mailto:Rosalind.Girard@sonoma-county.org)>; Robert Aguero <[Robert.Aguero@sonoma-county.org](mailto:Robert.Aguero@sonoma-county.org)>; 'David Royall' <[David.Royall@scwa.ca.gov](mailto:David.Royall@scwa.ca.gov)>; Leann Clark <[Leann.Clark@sonoma-county.org](mailto:Leann.Clark@sonoma-county.org)>; Rosalind Girard <[Rosalind.Girard@sonoma-county.org](mailto:Rosalind.Girard@sonoma-county.org)>; Leann Clark <[Leann.Clark@sonoma-county.org](mailto:Leann.Clark@sonoma-county.org)>; Rosalind Girard <[Rosalind.Girard@sonoma-county.org](mailto:Rosalind.Girard@sonoma-county.org)>; TPW-LandDev-Referral <[TPW-LandDev-Referral@sonoma-county.org](mailto:TPW-LandDev-Referral@sonoma-county.org)>; Christine Sosko <[Christine.Sosko@sonoma-county.org](mailto:Christine.Sosko@sonoma-county.org)>; Jennifer Lyle <[Jennifer.Lyle@sonoma-county.org](mailto:Jennifer.Lyle@sonoma-county.org)>; Leslye Choate <[Leslye.Choate@sonoma-county.org](mailto:Leslye.Choate@sonoma-county.org)>; Lisa Steinman <[Lisa.Steinman@sonoma-county.org](mailto:Lisa.Steinman@sonoma-county.org)>; Tiffany Seder <[Tiffany.Seder@sonoma-county.org](mailto:Tiffany.Seder@sonoma-county.org)>; Mark Cleveland <[Mark.Cleveland@sonoma-county.org](mailto:Mark.Cleveland@sonoma-county.org)>; Steve Ehret <[Steve.Ehret@sonoma-county.org](mailto:Steve.Ehret@sonoma-county.org)>; Charles Rivers <[Charles.Rivers@sonoma-county.org](mailto:Charles.Rivers@sonoma-county.org)>; FirePrevention <[FirePrevention@sonoma-county.org](mailto:FirePrevention@sonoma-county.org)>; Robert ODell <[Robert.ODell@sonoma-county.org](mailto:Robert.ODell@sonoma-county.org)>; Steve Mosiurchak <[Steve.Mosiurchak@sonoma-county.org](mailto:Steve.Mosiurchak@sonoma-county.org)>; 'Cyndi Foreman' <[cforeman@cscfire.org](mailto:cforeman@cscfire.org)>; 'firechief@cscfire.org' <[firechief@cscfire.org](mailto:firechief@cscfire.org)>; Robert Johnson <[rjohnson@sonomacountyfd.org](mailto:rjohnson@sonomacountyfd.org)>; Calvin Sandeen <[Calvin.Sandeen@sonoma-county.org](mailto:Calvin.Sandeen@sonoma-county.org)>; Ethan Brown <[Ethan.Brown@sonoma-county.org](mailto:Ethan.Brown@sonoma-county.org)>; Lauren Cartwright <[Lauren.Cartwright@sonoma-county.org](mailto:Lauren.Cartwright@sonoma-county.org)>



SONOMA  
COUNTY  
REGIONAL  
PARKS

BERT WHITAKER  
DIRECTOR

2300

County Center Drive

Suite 120A

Santa Rosa

CA 95403

Tel: 707 565-2041

Fax: 707 579-8247

sonomacountyarks.org

## MEMORANDUM

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**DATE:** March 4, 2022  
**TO:** Derik Michaelson, Planner II  
Sonoma County Permit & Resource Management Department  
**FROM:** Ken Tam, Park Planner II *Kenneth Tam*  
**SUBJECT:** New Gas Station, Retail Market, and Residential Units  
15190 and 15180 River Road, Guerneville  
PLP19-0018  
APN: 070-130-033

---

The request for a Use Permit and Design Review proposal to allow a mixed use development including reuse of an existing gas station, retail market, and residential units is located near the planned Lower Russian River Trail which is a Class I bike path. The Trail project is identified as project number 208 in the 2010 Sonoma County Bicycle and Pedestrian Plan. The completed Lower Russian River Trail Feasibility Study (February 2020) identified a Class I bike path on the east side of River Road across the street from the proposed mixed use development. When developed, the Trail will provide recreational and non-motorized transportation (e.g. jogging, walking, and bicycling) opportunities for residents and visitors. Furthermore, the planned Trail will improve pedestrian and bicycle access to the new retail market.

Our response to the referral are listed below.

(1) Statement of any environmental concerns or uncertainties your agency may have with the project.

**Response:** From the site plan, it appears that some of the proposed site improvements encroach into the public road right of way. The County needs to retain the existing public road right of way and acquire additional right of way as needed to develop the Lower Russian River Trail. Pedestrian and bicycle facilities are absent along this section of River Road.

(2) Comments you wish to make regarding the merits of the project.

**Response:** None.

(3) Identification of any missing information or application submittals that will preclude you from providing conditions and mitigations for this project in the future.

**Response:**

Is there adequate on-site parking for the proposed mixed use? The proposed mixed use includes 5 single rooms, 2 two-bedroom apartments, gas station, and retail market. Sheet T1.01 of the improvement plan lists 11 residential parking spaces and 8 retail parking spaces (19 total); however, the drawing shows 4 parking stalls at the gas station, 4 parking stalls for the retail market, 8 parking stalls for the residential units for a total of 16 parking spaces.

Is off-street parking anticipated for overflow parking that could impact the public's use of the River Road shoulder as an informal walkway?

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SONOMA  
COUNTY  
REGIONAL  
PARKS

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BERT WHITAKER  
DIRECTOR

- (4) Your proposed conditions of approval and/or mitigations for this project.  
**Response:** TBD

[x] Conditions will be provided and additional information is necessary.

Thank you for the opportunity to comment on this referral. If you have any questions, please contact me at [ken.tam@sonoma-county.org](mailto:ken.tam@sonoma-county.org) or at 565-3348.

c: Sonoma County TPW Department: Stevan Hunter, Laurel Putnam  
Steven Schmitz, Sonoma County Transit, SCBPAC, CBPAC  
Sonoma County Regional Parks: Steve Ehret

2300

County Center Drive

Suite 120A

Santa Rosa

CA 95403

Tel: 707 565-2041

Fax: 707 579-8247

[sonomacountyparks.org](http://sonomacountyparks.org)

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## **DESIGN REVIEW RECORD OF ACTION COMMENTS & CONDITIONS**

|                   |                                     |                |                         |
|-------------------|-------------------------------------|----------------|-------------------------|
| <b>Applicant:</b> | Ruff & Associates c/o Martin Breuer | <b>Date:</b>   | February 16, 2022       |
| <b>Address:</b>   | 15180 & 15190 River Rd, Guerneville | <b>File:</b>   | PLP19-0018              |
| <b>APN:</b>       | 070-130-033                         | <b>Action:</b> | RETURN FOR FINAL REVIEW |

**NOTE:** Applicants shall submit project revisions for further consideration as specified below. A written response addressing each comment is required. Responses to final review comments shall be cleared by planning staff before issuance of the building permit.

---

### **GENERAL**

DRC generally supports preliminary project design provided matters below are resolved before BZA consideration, and return to DRC for final review.

- Proposed right-of-way encroachment of landscape design
- On-site vehicular and pedestrian circulation
- Exterior canopy lighting minimization
- Landscape planting details and LID features
- Covered parking integration into building design

### **SITE PLAN**

1. Consult Caltrans and County DTPW and confirm clearance of acceptable encroachment design for proposed landscape improvements within public right-of-way.
2. Ensure encroaching entry design supports adequate sightline visibility and safe circulation patterns for egress and interior commercial parking and gas service areas (see Parking and Circulation comments).
3. Revise site plan accordingly to provide safe pedestrian access between residential and commercial parking areas.

### **ARCHITECTURE**

4. Identify flood plain line on elevations
5. Modify building plan as necessary to ensure appropriate design integration of required covered parking spaces into architecture
6. Further articulate ground floor facade for consistency with 116 guidelines for downtown Guerneville

### **PARKING AND CIRCULATION**

7. Resubmit the project plans addressing the multi-family covered parking space requirements under Article 86, including incorporation of two covered parking spaces
8. Modify site plan as needed to ensure consistency with layout dimensions shown in the Off-Street Parking Design Standards diagram under Article 82, including appropriate queuing depth between driveway entrances and the first interior point of vehicular circulation or parking space.  
NOTE: A minimum 20-foot clearance depth to the first parking space is generally required to provide for suitable maneuvering and for vehicles entering the street in a forward direction

### **LANDSCAPING**

9. Submit complete and irrigation landscaping plans demonstrating the location, species, common name, and size of all proposed planting materials, and a minimum of eight percent (8%) of landscape coverage for all parking lot areas per Code Section 26-82-030 (k).
10. Consider more vertical screening, foreground landscaping, trellis work along building frontage

### **COLORS / MATERIALS**

11. Provide a diagram with material and colors details for the roof, siding, trim, and windows. Include proposed paint and finish as appropriate. Provide color photographs of the materials

### **LIGHTING**

12. Submit further analysis on lighting impacts from facility on neighboring properties and roadway.
13. Verify compliance with Darksky requirements for minimizing lighting levels at property line and fully shielded from view along roadway
14. Submit effective recessed cutoff fixtures for canopy design to ensure minimal lot line spillover

15. Submit a manufacturer's specification sheet for each exterior light fixture proposed for the main building and the service canopy;
16. Submit a canopy cross-section illustrating fixture height, recess depth and cut-off design, and its photometric relationship beyond property lines to edge of furthest travel lane on adjacent roadways.

**SIGNAGE**

17. Submit signage plan and elevation details as part of the service canopy and market station design for final review

**OTHER**

18. Consider scaling back size of retail space to further reduce parking requirements
19. Clarify PM hours of service station operation

**PUBLIC COMMENTS**

- N/A             Attached
- 

**ATTACHMENTS**

- |   |   |
|---|---|
| <input type="checkbox"/> N/A              | <input checked="" type="checkbox"/> Public Comments |
| <input type="checkbox"/> Final Conditions | <input type="checkbox"/> Correspondence             |
| <input type="checkbox"/> NOD / NOE        | <input type="checkbox"/> Other: _____               |

Mark Pedroia  
P.O. Box 1000  
Guerneville, CA 95446-1000

February 14, 2022

Derik Michaelson, Project Planner  
PERMIT SONOMA  
Via e-mail: Derik.Michaelson@sonoma-county.org

COMMENTS: File No.: **PLP19-0018**; River Road Mixed Use Applicant: Martin Breuer. Ruff & Associates Architects Address: 15180 River Road, Guerneville APN(s): 070-130-033

Mr. Michaelson,

I am providing the following comments on the upcoming Design Review of the 15180/15190 River Road project. My comments are divided into two sections: residential and fuel station.

RESIDENTIAL:

1. Sheet A-1.02 Second Floor. The entrance/egress to 2<sup>nd</sup> and 3<sup>rd</sup> Floor apartments is provided by two enclosed interior stairways which terminate at an interior 1<sup>st</sup> Floor hallway. This hallway has the trash room, the elevator lobby and an entrance/exit door on either end of the hallway. The location of this hallway is below the Base Flood Elevation (BFE) and has been under 8 feet of water multiple times. During a flood, occupants of the five 2nd floor apartments would be trapped in their apartment with no way out as their exits would be underwater. In comparison, the 3<sup>rd</sup> floor apartments have an exterior deck which would provide an opportunity for a rescue/removal during a flood.
  - a. Without a 2<sup>nd</sup> Floor common area, deck or an exterior staircase, there will be limited ability for anyone (Fire, Sheriff, National Guard) to affect a rescue of 2<sup>nd</sup> floor residents during the next flood. If the 2<sup>nd</sup> Floor facing River Rd were stepped-back to provide a deck or common area, it would also tier the building which would soften the proposed 3-story vertical block face adjacent the scenic corridor.
  - b. An exterior staircase would be a good solution. This would allow occupants to walk to the waterline while a rescue boat motors to the location so they could bring the flood victim(s) aboard.
  - c. While everyone believes, hopes and requests that individuals evacuate; not everyone complies. As all previous flood events have demonstrated, emergency services in the Lower Russian River are frequently overwhelmed rescuing flood victims, retrieving pets, belongings and medicines for anyone who has been trapped or displaced by flooding.
2. Sheet A-1.02 First Floor. The Trash Bins on the Old River Road side of the project are accessed by traveling down stairs, through a door and into the trash enclosure. One stair is fully enclosed, the other may be along the exterior of the building. In reverse, if there is a fire in the trash

enclosure, the fire and smoke will exit the trash enclosure and travel up the stairway which could impair egress and potentially spread fire into the building. While a fire rated door may be installed at the bottom of the stairs to delay smoke and fire, reports show that over 50% of fire-rated assemblies fail due to lack of maintenance so it is best practice to physically separate trash enclosures from vertical openings (stair shafts) of buildings.

3. The building is proposed to include an elevator. The elevator will operate below BFE. It is unclear how an electric traction or hydraulic elevator can withstand the flood impact upon the mechanism, especially the electronics of the elevator car and warning systems. Inclement weather, a precursor to flooding often results in power outages. If the idea of preemptory staging of the elevator car above the BFE flood plain were proposed it would require electricity that may not be available<sup>2</sup>. This condition reinforces that an exterior stairway, to include 2<sup>nd</sup> Floor occupant egress, should be mandated.

#### FUEL STATION:

1. Sheet C.1. The project proposes the use of "no left turn" signage to prevent drivers from entering River Road to travel eastbound. River Road is a busy main thoroughfare to the Lower Russian River to include connecting Hwy 101 to coastal Sonoma County. The posted speed limit is 40 mph. If the goal is to prohibit an eastbound entry to River Road, the two traffic regulatory signs requesting "no left turn" are likely insufficient to accomplish the intended goal.
  - a. As evidenced by other failed outcomes at retail properties, a sign by itself is not an effective control to prohibit the maneuver. A more effective control and one seen implemented regularly is the use of a raised median in the form of a triangle which aligns the drivers to the path they are to travel.
  - b. Another option would be to designate exclusive "inbound" and an "outbound" driveway. The eastern driveway would be the "in" and the western driveway the "out." Both driveways could have a turning bay, turn pocket or raised median to ensure the maneuver is proper.
  - c. I have included a few photographs at the end of the document from other locations in Sonoma County that have prevented this scenario with the provision of a bike lane too.
2. Project description includes "reuse of four existing gas pump dispensers." Per local historians, this property is believed to contain the oldest single wall fuel tanks in the Guerneville area. While possibly "upgraded" during their lifetime by "lining", these three existing 8,000-gallon fuel tanks are all single-wall tanks which must be removed from service by 2025<sup>3</sup>. The current dispensers were completely underwater in the last flood and possibly others. In the course of removing this old fuel tank system, it is very likely that petroleum contamination will be discovered. This type of contamination originates from the fuel tank itself and also from the fill pipes and the product lines running to the dispenser(s) and under the dispenser itself. To properly remediate petroleum contamination, it frequently requires over-excavation of soil which is likely to require the total removal (deconstruction) of all existing gas pump dispensers and piping. My point is to reinforce that "reuse" is highly unlikely rather it will be a "new" fuel system at effectively a brand-new fuel station. This presents the question "is it appropriate to site a fuel station within our flood plain and should this project be reviewed as a "new" use?"

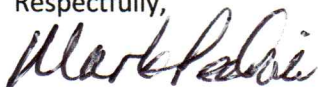


3. The fueling system at this location has been out of service for nearly three years. The pumps have been taped off and have not dispensed fuel since the flood of February 2019 <sup>Google Streetview Apr 2019</sup>. CA Health and Safety Code regulations for Underground Storage Tanks prescribe “temporary” and “permanent” closure requirements. A temporary closure of 12 months with a possible one-time 12-month extension for a total not to exceed 24 months. After 24 months, the fuel tanks are to be removed or closed in place. This February is the 36-month anniversary of not operating the fuel station. So, I propose that any existing grandfather provision, any existing non-conforming historical use (continuance) of “fueling” has long ceased and we are far past any opportunity to resurrect the old fuel system leading again to the question, should this review possibly be a “new” use?
4. This location is in the flood plain and subject to frequent flooding (see photos on last page) as it is about 600 feet from the river itself. The project is also within approximately 700 feet upstream of our community’s only domestic and fire protection water wells operated by the Sweetwater Springs Water District. These three wells have already been designated “under influence” of the river due to their location within the flood plain and subject to additional sampling and lab testing during and after flood events. These wells are the only district water supply for the communities of Rio Nido, Guerneville and Guerneville park to include subdivisions on the other side of the river from Drake Estates to the end of Neeley Road. Per the SSWD website “the Sweetwater Springs Water District serves approximately 3,600 accounts (95% residential) comprised of about 9,000 persons.” Specific to Guerneville proper, the district supplies 2680 residential and 170 commercial meters <sup>(phone call 2/14/22)</sup>. Meters equate to households so there are certainly multiple occupants in a household served by a single meter so several thousand people, numerous businesses and everyone’s fire protection would be impaired by any contamination of the water system.
5. The location in the flood plain, very close to the town water supply and to the river itself are all indicators of potential unnecessary and avoidable environmental and health risks. Is anyone evaluating if an old, outdated and closed fuel system “use” should be continued at this site given it has been out of service over three years?
  - a. The project is in a flood plain
  - b. The project is directly upstream and within 700 feet of the communities only water system intake.
  - c. The project is within 600 feet of a river, an ecosystem and a recreational amenity which is a primary attraction for our tourism economy.
  - d. The fuel system had existed far beyond it’s expected service life and is now subject to permanent closure in 2025 regardless of this project.
  - e. The Environmental Project Agency recognizes the risk of underground storage tanks (UST’s) in a flood plain with the following statements:
    - i. *“When flooding occurs, an UST system is susceptible to damage that may lead to a release of its contents into the environment”* <sup>Page 1</sup>

- ii. *"... prepare and respond to the catastrophic effects and environmental harm that may occur as a result of flooded UST systems"* <sup>Page 1</sup>
  - iii. *"Product Displacement. Floodwater or debris entering through UST openings can push product up and out of the UST into the Environment."* <sup>Page 3</sup>
6. There is some unfortunate irony that the February 2019 Flood was the event that took this "use" out of service despite all the special protective measures required for gas station within 1,000 feet of a drinking water supply. However, the significance of the most recent incident, the past flood event history and predictable future flooding do not appear to be components of the current land use review. Guerneville has flooded 38 times since 1940 and this specific location is described by FEMA as a Special Flood Hazard Area and underwriters classify it as "high-risk" and "extreme" relative to flooding. Are we creating yet another opportunity to experience the same failure(s)?
7. Our county has taken significant steps to mitigate the impacts of flooding to include elevating buildings, partnering with FEMA on a flood elevation mitigation program, offering low-interest loans and even grants. As a part of flood mitigation, elevated structures are not allowed to have a water heater, a washer, dryer or heating system within the underfloor areas subject to flooding. Given these parameters, it is difficult to comprehend how an entire fuel station and a convenience store are permitted to be sited in the same flood plain thereby subjecting the building contents, electrical, mechanical and plumbing systems to the very same risk and damage we have prohibited elsewhere. All with the bonus potential for an unauthorized release of hydrocarbons to a waterway that serves as the only water system for an entire community.

To close, some minor modification to the design of the residential component would alleviate trapping occupants during a flood, enhance their ability to withstand a trash enclosure fire and keep their elevator functional. Specific to the fuel station, I feel we need a hard-stop; step back from the entire fuel system proposal, pause and evaluate if the previous fuel station use has expired and given the flood potential and proximity to the community water system, should it be permitted at all?

Respectfully,



Mark Pedroia

Enc: Photographs of traffic controls and flooding at project site on Pages 5 & 6

Page 1 & Page 3 United States Environmental Protection Agency "Underground Storage Tank Flood Guide" EPA 510-B-20-001, August 2020. United States Environmental Protection Agency, 5401R, Washington, DC 20460.  
<https://www.epa.gov/sites/default/files/2014-03/documents/ustfloodguide.pdf>

<sup>2</sup> Elevator Installation for Buildings Located in Special Flood Hazard Areas in Accordance with the National Flood Insurance Program NFIP Technical Bulletin 4 / June 2019. [https://www.fema.gov/sites/default/files/documents/fema\\_elevator-installation-technical-bulletin\\_06072021.pdf](https://www.fema.gov/sites/default/files/documents/fema_elevator-installation-technical-bulletin_06072021.pdf)

<sup>3</sup> State Water Resources Control Board, Local Guidance Letter LG-171 7/24/2015  
[https://www.waterboards.ca.gov/ust/leak\\_prevention/lgs/docs/lg171.pdf](https://www.waterboards.ca.gov/ust/leak_prevention/lgs/docs/lg171.pdf)



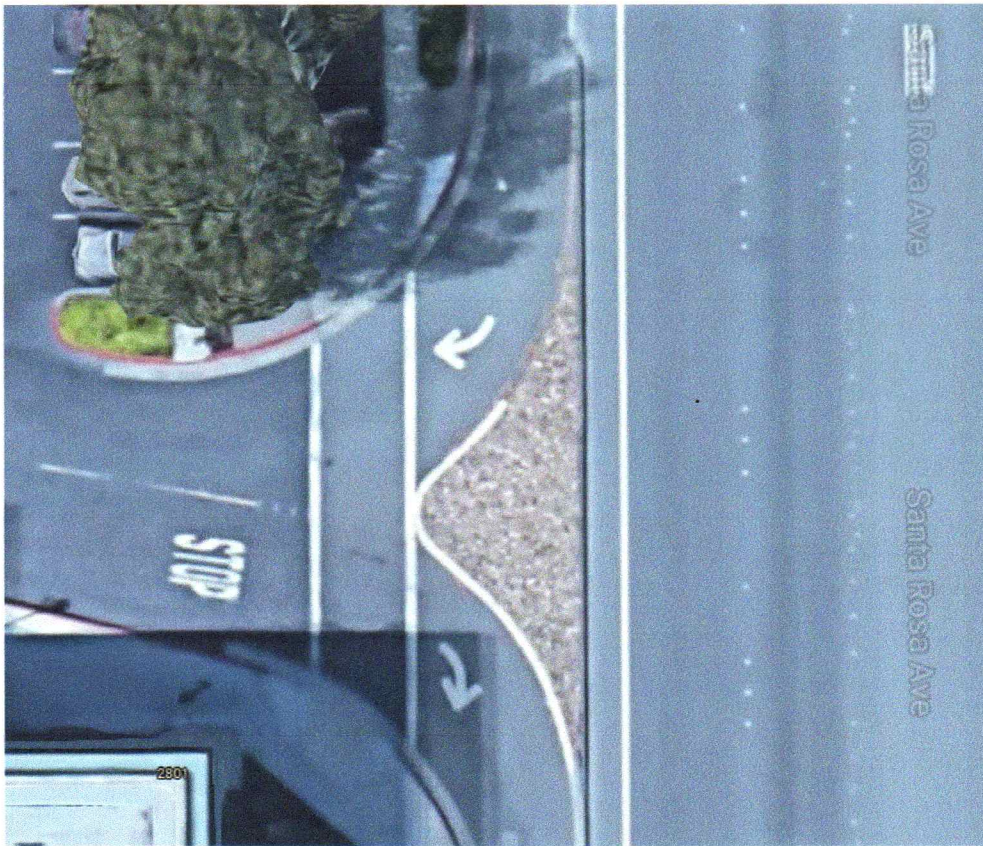






Photo Above, estimated 1993, fuel station in background



Feb 2019, water over dispensers and to near the roof of brown roofed building in previous photo