

May 18, 2021

Sonoma County Planning Commission
575 Administration Drive
Room 102-A
Santa Rosa, CA 95403

VIA EMAIL

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

Summary of Comments:

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

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

Dear Sonoma County Planning Commission,

Greenbelt Alliance urges the Sonoma County Planning Commission to consider and take action on these public comments on the Draft Environmental Impact Report and County of Sonoma’s proposed Scattered Housing Rezone of parcels for by-right medium density housing that are currently zoned for other types of uses including agricultural, residential, commercial, and industrial. We have been making comments on the proposed Scattered Housing Rezone dating back to 2018, several key letters attached.

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

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

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

In fact, as of 2018 after the wildfires, there were 21,000 housing units in the pipeline across the county and cities, mostly in the UGBs and Priority Development Areas, according to an analysis by the Sonoma County Transportation Authority. See attached power points. This includes the rebuild of 5,300 homes that were lost in the 2017 wildfires and are getting reconstructed. If you consider the build out of all the General Plans in the county as of 2012, there is adequate capacity to accommodate new housing within the city centers and Priority Development Areas already. This DEIR does not touch on these facts anywhere, but makes broad assumptions and conclusions, and speculates on the need for this project to meet RHNA.

For these reasons, and more details below, Greenbelt Alliance urges the Planning Commission to halt further process on the Housing Rezone and the DEIR due to the “significant and unavoidable” negative environmental impacts to Wildfire Risk and Transportation VMTs and the questionable need for the project at all given that the DEIR does not analyze existing housing parcels that could be rezoned for higher density to meet housing needs.

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

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

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

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

A. WILDFIRE RISK

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

The Office of Planning and Research has recognized that although high-density structure-to-structure loss can occur, structures in areas with low- to intermediate-density housing were most

likely to burn, potentially due to intermingling with wildland vegetation or difficulty of firefighter access. Fire frequency also tends to be highest at low to intermediate housing density, at least in regions where humans are the primary cause of ignitions (California Natural Resources Agency 2018).

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

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

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

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

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

B. Transportation and VMTS

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

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

Like with the wildfire risk above, it seems unthinkable that the County of Sonoma would move forward with the Housing Rezone when it contributes to the worst environmental threat that we have ever faced: climate change. Given that driving is the number one cause of GHG emissions in the county and in

California, the Housing Rezone should be denied or halted until the Housing Element is updated. At that time, if more housing sites are needed, then appropriate parcels identified in the Rezone that are connected to public water and sewer and close to firefight services could be considered.

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

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

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

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

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

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

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

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

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

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

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

THIS WOULD EXCEED ESTABLISHED POPULATION AND HOUSING FORECASTS, BUT THE COUNTY HAS ESTABLISHED THE NEED FOR ADDITIONAL HOUSING BEYOND THAT ALLOWED IN THE COUNTY'S GENERAL PLAN, DUE TO SHORTAGES IN WORKFORCE HOUSING, OVERCROWDING, AND RESIDENCE DESTRUCTION BY RECENT WILDFIRES AND OTHER EMERGENCIES. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT. [Emphasis added.]

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

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

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

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

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

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

Does the EIR account for the fact that the population displaced by the wildfires and other disasters will either return or be replaced? Are they added to the population increase numbers?

How will rezoning parcels in scattered locations address overcrowding? Will people living in overcrowded homes be given first choice to move into new housing? What is the correlation or any analysis or evaluation of this assertion that rezoning parcels will relieve overcrowding?

How does a Housing Rezone for Medium Density Housing address a shortage of High-Density Housing? Where is the correlation or evaluation or any evidence that this is true in the DEIR?

Also, what exactly does this mean?

Other **project-level developments** would be required to adhere to applicable zoning and development regulations and General Plan policies to mitigate environmental impacts where feasible and would undergo environmental review, including consideration of whether the projects would **induce unplanned population growth**. With these considerations prior to project approval, cumulative impacts related to growth inducement would be less than significant. Furthermore, the proposed project's contribution to less than significant cumulative impacts for Impact PH-1 would be less than cumulatively considerable.

This is supposed to be a Programmatic EIR to allow the proposed parcels to get rezoned and then built in a streamlined process without further environmental review. The state above seems to contradict that and/or to make very confusing claims to achieve a finding of "less than significant" impact.

RHNA

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

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

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

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

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

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

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

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

Summary and Conclusion

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

The Scattered Housing Rezone is not in line with our mission to support climate-smart growth. That is why we oppose it going forward as proposed. Instead, it should be halted until the Housing Element is updated and we can see where and how we can provide housing inside existing urban areas, adding innovative housing options, and without scattering housing on the edge of UGBs and rural communities.

Thank you so much for your consideration of our views.

Sincerely yours,



Teri Shore

Advocacy Director

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From: [Arielle Kubu-Jones](#)
To: [Arielle Kubu-Jones](#)
Subject: Public Comment: Housing Rezone agenda item for NSVMAC - Glen Ellen parcels
Date: Wednesday, May 19, 2021 3:10:31 PM
Attachments: [Vicki Hill Comments on County Housing Rezoning EIR Scope 5-4-2020.pdf](#)
[VH Additional Comments on County Housing Rezoning EIR Scope-5-14-20.pdf](#)

Councilmembers,

Please see below and attached for Vicki Hill's comments on Item 5 on tonight's agenda.

Arielle Kubu-Jones

District Director | Supervisor Susan Gorin | 1st District
arielle.kubu-jones@sonoma-county.org | 707.565.2241

From: Vicki Hill <vicki_hill@comcast.net>
Sent: Wednesday, May 19, 2021 3:06 PM
To: Arielle Kubu-Jones <Arielle.Kubu-Jones@sonoma-county.org>
Cc: Susan Gorin <Susan.Gorin@sonoma-county.org>
Subject: FW: Housing Rezone agenda item for NSVMAC - Glen Ellen parcels

EXTERNAL

Hi Arielle,

I sent this email yesterday to several members of the NSVMAC and realized I should have cc'd you and Supervisor Gorin. I didn't have the email addresses for other MAC members. Thank you for forwarding. I realize the MAC is not the official body to receive comments but sent the email since the rezoning project is on the agenda this eve.

Thanks,
Vicki Hill

From: Vicki Hill <vicki_hill@comcast.net>
Sent: Tuesday, May 18, 2021 10:01 AM
To: 'Mark Newhouser' <mnewhouser@vom.com>; 'Arthur Dawson' <baseline@vom.com>
Cc: 'matthew dickey' <thesolcat@gmail.com>; Kate Eagles (eagleskate11@gmail.com) <eagleskate11@gmail.com>; Nardo-Morgan Angela (angelaglenellen@gmail.com) <angelaglenellen@gmail.com>
Subject: RE: Housing Rezone - Glen Ellen parcels

Hi there,

I will not be able to attend the NSVMAC meeting tomorrow evening regarding the County's proposed rezoning for housing project EIR. I don't believe that the EIR addressed some of my concerns expressed in my scoping comments (attached). I will complete a thorough review of the lengthy EIR and submit written comments to the County but I wanted to share several serious concerns in light of the fact that this project is being discussed at the MAC meeting.

- 1) There is no real analysis of the appropriateness of applying the Workforce Housing (WH) zone district to Glen Ellen's 2 block long village. I fully support housing, especially affordable housing, but it must be in an appropriate urban setting. That's why there are county policies regarding city-centered growth, to discourage sprawl, reduce vehicle trips, and ensure that new residents have adequate access to goods and services. The WH zone was intended to be applied to urban areas where services and jobs are available. Glen Ellen is not within an urban growth boundary, transit is all but non-existent, and there's no job center.

- 2) **The increase in density will dramatically change the tiny village of Glen Ellen.** For a larger urban area (such as the city of Sonoma), the change would not be that significant. However, for the small Glen Ellen village, it represents a substantial increase in density (more than tripling the existing onsite density of 5 units). This is further exacerbated by the fact that the property across the street (site of Garden Court) has already been redeveloped with 8 or 10 residential units and 2 more ADUs are now proposed there - a major change to the downtown.
- 3) The WH zone district requires a **MINIMUM** development density, which would be 16 units on the Glen Ellen site (composed of the 2 parcels). So, the property owner couldn't redevelop with fewer units than that. At a density of 24 units per acre, the proposed Workforce Housing would allow 22 units on this property that is just under one acre (0.85 acre), representing a substantially increased density. The WH Combining Zone also provides for additional density allowed under the County's density bonus programs for affordable units. There is no place in downtown Glen Ellen where housing density is close to this high density.
- 4) Given the density required/allowed by the WH zone district, the zone district is clearly not consistent with General Plan polices and the design guidelines. Rather than conducting this policy consistency analysis now, the EIR assumes that future projects will comply with General Plan policies and the Glen Ellen Development and Design Guidelines. However, future projects will be ministerial (allowed "by right") with no CEQA required so there will be very little, if any, ability for review and comment. No public decisionmaker hearing would be required and the public would have no real opportunity to weigh in on property proposals. Excerpt from Draft EIR, Land use section, page 4.11-38: "The project does not propose development on these sites at this time but rezoning to allow for medium-density residential development. Future projects on these sites would be required to comply with the County Code and Glen Ellen Development and Design Guidelines, and compliance would be evaluated by the County during the project application and approval process." It cannot be assumed that projects would be consistent with the design guidelines. The County is putting off the analysis – it should be done now. The County needs to address how the WH zone and what it allows does or does not comply with specific growth policies and policies/guidelines to protect Glen Ellen's semi-rural character. The very nature of the WH zone district is in direct conflict with existing County policies regarding Glen Ellen.
- 5) The Glen Ellen site contains the oldest commercial building in the village of Glen Ellen, and its historic setting would be significantly impacted by redevelopment allowed by the WH zone district.
- 6) Draft EIR Page 4.11-43 - "Cumulative development, listed in Table 3-1 in Section 3, Environmental Setting, would be required to meet current applicable design standards and would undergo environmental review, including consideration of whether the projects would physically divide an established community." Again, the County is postponing analysis that should be conducted now.
- 7) Despite requests to look at alternative zone districts for the Glen Ellen properties that would be lower density and more appropriate than the WH zone, the EIR does not consider other zone districts.
- 8) It appears that the Glen Ellen properties were included in the rezoning merely because the property owner had already applied for the WH zone, although his site plan was rejected by the Design Review Board and there was no analysis of the appropriateness of the WH zone.

Please let me know if you have any questions or would like additional information.

Regards,

Vicki Hill, MPA

Land Use Planner

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(707) 935-9496
Email: vicki_hill@comcast.net

May 14, 2020

DELIVERED VIA EMAIL

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

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

Dear PRMD Staff:

As a follow up to the scoping meeting held on May 6, 2019, I am submitting the following additional comments on the above-referenced housing rezoning EIR scope.

1. Alternatives

There appears to be a misunderstanding that the SVCAC somehow directed staff and the above-referenced Glen Ellen parcels’ property owner to pursue the Workforce Housing (WH) Zone District. While it is true that SVCAC indicated that additional housing and less or no commercial uses be developed on these two parcels, they did not indicate that they wanted to see a five-fold increase in residences (from 4 existing to 20 allowed under WH zone) on this small .85 acre property. Furthermore, the WH zone district has a minimum density requirement (estimated to be 16 units on the Glen Ellen property) so the property owner cannot even choose to develop it at a lower density. As I pointed out in my comment letter of May 4, 2020, that densification is completely out of scale with Glen Ellen, a village that contains maybe a total of 500 homes spread throughout a rural area.

There must be an alternative that allows housing on the site, without this dramatic mandated increase in number of units. Please evaluate such an alternative that allows housing at a reasonable density consistent with other land use densities in the village of Glen Ellen.

2. Piecemeal Planning Process

The scoping meeting explanation of why this separate rezoning process is going forward (especially during this difficult pandemic) separate from the Housing Element update was insufficient. Resolution of housing issues and identification of housing sites should be a comprehensive process which is all part of the Housing Element update. Also, the process must consider current and planned development that is occurring, particularly in Glen Ellen, which is more than satisfying its fair share of housing.

3. Misleading Terminology

Both County staff and EIR consultants stated in email and during the scoping meeting that “no rezoning is proposed at this time.” That is an inaccurate and misleading statement that needs to be corrected and avoided. The proposed project is a rezone project, by definition. Even though not all of the parcels may be ultimately rezoned, we must assume that they are being considered for rezoning. The statement that “no rezoning is proposed” implies that there will be some future planning and evaluation process, which is incorrect. This EIR is the only CEQA analysis that will be conducted for the rezone and that needs to be clear to the public.

4. Parcel Screening Process

The screening process and criteria for selecting sites to rezone need to be made public and thoroughly reviewed. Also, the EIR consultant stated that parcels could not be added or deleted from the project. I question this assertion, given CEQA guidelines for evaluating alternatives. There could be alternatives that have a different set or subset of properties for rezoning. As EIRs are developed, new alternatives may be identified.

5. Noticing of Proposal and EIR Scoping

Notices to adjacent properties should be provided now, to allow nearby property owners to comment on the EIR scope and EIR analysis. If notices are delayed until the Board gets ready to take action on the rezoning, it will be too late for meaningful public input. It seems that the importance of engaging the community is somewhat dismissed because not all of the parcels will ultimately be rezoned.

Thank you for taking the time to consider my comments on the EIR scope and process.

Regards,

A handwritten signature in blue ink that reads "Vicki A. Hill". The signature is written in a cursive, flowing style.

Vicki A. Hill, MPA

Environmental Planning Consultant

Vicki A. Hill, MPA
Environmental Planning

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May 4, 2020

DELIVERED VIA EMAIL

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

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

Dear PRMD Staff:

This letter contains extensive comments regarding the EIR scope for the Sonoma County proposed Rezoning Sites for Housing Project, specifically regarding the two properties in Glen Ellen at the corner of Carquinez and Arnold Drive (parcels GE-1 and GE-2 on the County rezone map). My comments include: 1) concerns about the scoping process, timing, and lack of notice, especially during this pandemic; 2) lack of consideration of previous comments submitted regarding this property; 3) inappropriateness of including these parcels given other housing being developed nearby and to be included in the SDC Specific Plan; 4) inadequate definition of the County’s proposed rezone project for purposes of CEQA; and 5) serious environmental impacts.

In my professional opinion, the proposal for these two parcels in Glen Ellen involves **inappropriate and precedent-setting rezoning to a potential high-density zone district, which is out of scale and has the potential to result in significant adverse impacts on the small village of Glen Ellen.**

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

1. Lack of Community Notice

The NOP was issued at the beginning of the current pandemic and has not received the proper amount of notice or community attention for the substantial change that it represents for our village. **Given the current shelter in place order and associated stress and conditions, this proposal should be delayed for the time being.** As a professional land use planner/CEQA specialist and local resident who submitted comments on previous proposals for this particular property, I consider myself reasonably

informed. However, I just learned in the May 1 issue of the Kenwood Press that these two parcels have been included in the County's rezoning proposal. I am concerned about how many other people are unaware of this proposal and therefore have not submitted scoping comments to the County. Dozens of comment letters were submitted regarding the property owner's (Marty Winters) previous submittals (i.e., WH rezoning application in 2019; application considered by SVCAC in March 2019), including letters to the County Design Review Committee (DRC) in September 2019. Many of the public comments expressed concerns about increasing residential density on this site. The DRC rejected the proposal and directed the applicant to work with the community to reduce the mass and scale, something that has not been done. **The community believed the rezoning project was on hold.** There was no notice to the Glen Ellen Forum or members of the public who previously submitted comments that the County was taking on the rezone proposal itself, as part of the Countywide housing rezoning project.

2. Lack of Consideration of Previous Comments

Over the past several years, the property owner has attempted to redevelop his property at a higher density than is currently allowed. Dozens of community members submitted comments opposing the increased density on the site, referencing serious environmental concerns. It does not appear that these previous comments were considered when the County chose to include these parcels in the rezoning proposal. Please include as scoping comments all previous comments (attached to my email sending this letter), as well as comments made to the SVCAC in March 2019 regarding this property.

While this proposal may appear nonthreatening to those who are unfamiliar with Glen Ellen, the rezone site represents a large part of the downtown core (which is only two blocks long) and will dramatically change the character of our village. As a planner, it is disheartening to see a proposal that is **clearly inconsistent with the intent of the Glen Ellen policies established in the General Plan and Glen Ellen Development and Design Guidelines.** With the devastating loss of established neighborhoods during the 2017 fires, it is more important than ever to not overtax our rural infrastructure and to protect the quaint, small town feel that the community values so much.

Both the County Design Review Committee and the SVCAC rejected the applicant's proposal and directed the applicant to adhere to the Glen Ellen Guidelines and work with the community to address concerns about his proposal. Yet, it appears that the County is now advancing a rezone proposal in line with his project. I understand that the County will not evaluate specific site designs as part of this Program EIR, but it is not understandable why the County would pursue rezoning this developed site in light of valid concerns expressed by the community.

3. Inappropriateness of Including These Parcels Given Other Housing Sites

Our small community is being faced with a substantial amount of new housing, as a result of the current Sonoma Developmental Center (SDC) Specific Plan process (housing is mandated there by the State legislation) and as a result of the increased density currently being developed across the street at 13647 Arnold Drive (6 new residential units). It does not make good land use planning sense to force additional housing when it is clear that Glen Ellen is already undergoing a disproportionate amount of housing development and lacks adequate infrastructure and services for higher density housing.

4. Inadequate Definition of Proposed Project for Purposes of CEQA

The County FAQ sheet regarding the rezoning proposal states the following answer to this question: What will the new zoning for my property be?

“Potential proposed zoning designations for each parcel will be determined as part of the environmental review process is near complete. Possible zoning designations will be R2 Medium Density Residential or R3 High Density Residential, or the WH Workforce Housing or AH Affordable Housing combining zones.”

I question the adequacy of not defining proposed zoning during the scoping phase. There must be a proposed project with specified zone district(s) (rather than a variety of potential zones). How else can the EIR be scoped and impacts be assessed? The public cannot make meaningful comments on the EIR scope without knowing which of these zone districts are proposed for a particular site. R2 is very different from R3 or WH zoning. Is the environmental analysis going to consider the worst case, highest density zoning for each site? How will this be decided? This information is crucial to make scoping comments.

5. Potential Environmental Effects that must be considered in the EIR

In addition to the issues explained above, there are numerous land use and environmental concerns associated with this proposal, as summarized below. Given the potential for significant impacts in regard to substantial density increase, growth-inducement, land use compatibility, visual effects, drainage, tree removal, traffic issues, and cumulative effects, new studies (not the property owner's studies) in all these issue areas should be required and impacts fully disclosed in the EIR.

Workforce Housing (WH) Combining Zone Concerns: The potentially proposed Workforce Housing Combining Zone is particularly problematic and could set a significant growth-inducing precedent for future projects in downtown Glen Ellen. The parcels DO NOT meet the criteria for application of the Workforce Housing (WH) Combining Zone and should not be considered for such designation.

The stated purpose of the WH zone is: “to increase housing opportunities for Sonoma County's local workforce in areas that are close to employment and transit.” Glen Ellen is not a substantial

employment center, nor does it provide adequate transit to employment centers. The regulation states that “The WH Combining Zone can be applied to properties within an urban service area that are also within 3,000 feet of a transit center, or to an employment node with at least three acres of commercial zoning or 10 acres of industrial zoning.” There is no transit center in Glen Ellen and very little commercial zoning so this zone district is inappropriate.

The WH Combining Zone allows a density of 16 to 24 dwelling units per acre, with additional density allowed under the County’s density bonus programs for affordable units. Furthermore, the regulation **requires a minimum density of 16 units per acre** as stated in the ordinance. There is no option to provide less than 16 units per acre. This high density zone is completely out of scale with existing housing density and existing zoning. There is no place in downtown Glen Ellen where housing density is remotely close to this density. This combining zone is appropriate for urban areas, not rural villages. While the community supports housing in Glen Ellen, the amount of housing that would be allowed to be concentrated on these small parcels is completely out of character with surrounding land uses and would not be supported by appropriate infrastructure (roads, parking, services, transit, etc.). Furthermore, it is likely that other downtown parcels would seek the WH zone to increase density far beyond existing allowed levels.

The zoning, if applied to the two Glen Ellen parcels (totaling .85 acre), could result in 20 units on the site, or more, if a density bonus granted. This would be a dramatic change from the existing 4 residential units on the project site.

The WH ordinance also requires that:

“(d) The proposed rezoning is consistent with the overall goals, objectives, policies, and programs of the General Plan and any applicable Area or Specific Plans as amended from time to time.”

This zone district is not consistent with the General Plan provisions for Glen Ellen. Sonoma County General Plan Policy 20i requires that new uses in the Glen Ellen area meet the following criteria:

- The size, scale, and intensity of the use is consistent and compatible with the character of the local community,
- Capacities of public services are adequate to accommodate the use and maintain an acceptable level of service,
- Design and siting are compatible with the scenic qualities and local area development guidelines of the local area.

There are clear inconsistencies with bullets 1 and 3 above, as the high density zone district is not compatible with the local community, nor is it compatible with the scenic qualities or local development guidelines.

The County staff report on the previous rezoning proposal states that: “the WH Combining Zone would allow residential development of 16-24 units per acre **in addition** to the uses allowed by the base zoning district.” This would further exacerbate impacts on the downtown area.

Land Use Compatibility and Historic Value: Although housing is important for Glen Ellen, the bottom line is that the potential magnitude of the rezoning on these sites simply doesn’t “fit in.” Land use compatibility is a critical issue yet it is often overlooked. Uses that are developed at densities and intensities greater than surrounding uses have the potential to become a focal point and erode the existing land use character of the small downtown area. It is undeniable that increased density will have adverse land use and quality of life impacts on Glen Ellen and its residents. Furthermore, the historic value of the existing structures should be evaluated.

Aesthetic Impacts and Community Character: An independent and thorough analysis of visual and aesthetic impacts by experienced professionals is necessary to inform decision makers regarding how increased density may appear on this site. What building heights will be analyzed? When a previous proposal was submitted for the site, it was clear that the increased density would result in little open space or landscaping to soften the buildings’ appearance. **The large mass structures required to accommodate increased density on this highly visible site (and within the Scenic Resources zone) will degrade the visual qualities of the area.**

The density will not be consistent with Glen Ellen policies regarding design and massing. For example, Sonoma County General Plan Policy 20i requires that new uses in the Glen Ellen area meet criteria noted above (see discussion under Workforce Housing). Clearly, the proposed rezone is not consistent with bullets 1 and 3. The Glen Ellen Development and Design Guidelines are intended to ensure that the size and scale of new development is compatible with the existing local land uses. Higher density development, by definition, will not be compatible with downtown Glen Ellen.

Traffic, Circulation, and Parking: Traffic impacts need to be assessed through an independent thorough traffic analysis. Observation and common sense indicate that there are valid circulation, parking, and line of sight concerns associated with increased density. The Carquinez/Arnold Drive intersection is in an awkward location, just a block down from the stop sign at Arnold and Warm Springs. Directing traffic to Carquinez to access the site (and potential parking area) will create many more left turns onto Carquinez from Arnold Drive. The amount of parking that will be required to meet the requirements for the higher density will generate on- and offsite circulation problems. The site does not provide adequate turning/maneuver space for the two way traffic that will be using it. Adjacent properties will be subject to substantial impacts from traffic. Also, future residents will likely park on Arnold Drive, thus creating competition for onstreet parking. Another potential impact is that community residents will increase use of the unpaved Railroad Street to avoid negotiating the Arnold Drive/Carquinez intersection. This rural road is already impacted by the redevelopment across the street, which is increasing residential density.

Tree Removal and Landscaping: Because of the large building footprint that would be required to meet increased density, most mature trees will be removed from the project sites, including removal of an ancient redwood tree and heritage oak trees. There will be nothing left to screen or at least soften the appearance of large unattractive buildings. The stark appearance will significantly detract from Glen Ellen's visual qualities. Given the large number of trees lost during the 2017 fires, every attempt to preserve existing mature vegetation should be made. Further analysis of property owner claims that trees (e.g. the redwood) must be removed due health conditions should be investigated.

Site Drainage and Containment: How would onsite drainage be handled, particularly given all the new impervious surfaces required for higher density housing? Significant drainage impacts could occur, given the lack of large capacity drainage systems and proximity to the junction of Sonoma and Calabazas Creeks.

Cumulative and Precedent-Setting Effects: While impacts in issues like traffic, circulation, visual, and land use may not be individually significant, when combined together they result in substantial impacts, especially within our two-block town. These aggregate effects can cause the demise of local land use character and quality of life. For example, the existing Accessory Dwelling Unit (ADU) ordinance allows second units on single-family parcels, in effect doubling the density in single family zones in Glen Ellen. Furthermore, there is a development across the street from the proposed rezone site that is adding residential units and increasing density within the same block. Also, there are several parcels, including property on Carquinez, which may soon transfer ownership and will likely undergo redevelopment. If the WH zone district or other high density district is approved, it will become an attractive tool for developers wishing to substantially increase density. Finally, development allowed under the upcoming SDC Specific Plan must be considered in the cumulative impact analysis.

Conclusion

The County's proposed rezoning is a significant project for downtown Glen Ellen and will permanently change the town's character and will set precedent for future development.

Please delete these two parcels from further consideration in the County's rezoning proposal to ensure impacts on our small town are avoided. These sites are not appropriate and not needed to meet the County's housing requirements.

Regards,



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