

For late correspondence.

From: Teri Shore <tshore@greenbelt.org>

Sent: Tuesday, August 7, 2018 4:12 PM

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Cc: Broad, Gary <GBroad@srcity.org>; Guhin, David <dguhin@srcity.org>; Charity Wagner <charity@cityventures.com>

Subject: Round Barn Village - Greenbelt Alliance Comments

Dear Chair Edmondson and City of Santa Rosa Planning Commission,

Please find attached a letter from Greenbelt Alliance on Round Barn Village and also our previous letter on the General Plan amendment and rezoning for your reference.

Thank you for your consideration.

Teri Shore

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Teri Shore
Regional Director, North Bay

Greenbelt Alliance

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Bay Area greenbelt lands are at risk of being lost to sprawl development. [Get the facts here.](#)

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August 7, 2018

Chair Casey Edmondson and Commissioners
Santa Rosa Planning Commission
Santa Rosa City Hall
100 Santa Rosa Avenue
Santa Rosa, CA 95404

Via email

Re: PUBLIC HEARING 10.1* ROUND BARN VILLAGE - TENTATIVE MAP, MINOR USE PERMIT AND
HILLSIDE DEVELOPMENT PERMIT - 0 ROUND BARN BLVD - PRJ18-015

Dear Chair Edmondson and Commissioners,

Greenbelt Alliance previously submitted comments related to Round Barn Village when the Planning Commission was deliberating on the request for a General Plan Amendment and Rezone for the 40.18-acre site in Fountaingrove in Santa Rosa and reviewing the associated environmental documents produced to comply with the California Environmental Quality Act (CEQA) (Mitigated Negative Declaration). See letter attached from November 2017.

At that time, our concerns were related to the CEQA review and findings, project uncertainty, housing density and affordability and fire risk. Most of our concerns have been resolved with the proposed project details and the addendum to the Addendum to the Initial Study and Mitigated Negative Declaration. However, please accept these comments and recommendations as you deliberate on the project as a way to improve affordability, climate-smart provisions and fire safety.

The Round Barn Village project proposes the subdivision of a 40.48-acre site into three lots and the development of 237-townhouse for-sale condominium units in Fountaingrove near Old Redwood Highway.

Greenbelt Alliance appreciates the conversations and meetings that we've had with City Ventures to discuss Round Barn Village. As a result, the project has improved over time and we believe that it is likely to be approved by the Planning Commission. We that in mind, we offer these comments in good faith, which we have also discussed in general and made available to City Ventures.

Affordability: The developer, City Ventures, responded to requests from Greenbelt Alliance and other stakeholders to maximize the density of the housing development. The project as proposed includes 12 for-sale units at moderate income equal to 5 percent of total units.

Please clarify if the moderate affordability level is for 30 years (Page 3 of staff report) or in perpetuity (top of Page 11 under Housing Allocation Plan). Clearly, “in perpetuity” would provide the most public benefit.

Given the need for affordable housing across the income spectrum, please consider seeking additional affordable on-site for-sale or rental units at low or very low income levels to help meet the city’s Regional Housing Needs Allocation and to provide a mix of income levels within the large complex.

In order to endorse a development project, Greenbelt Alliance requires that it provide for at least 15% of the units to be deed restricted at below market rate for moderate and low/very low income households, or provide 10% of the units for low or very low income households.

Environmental:

City Ventures is proposing to build the project to its “Green Key” standards, which features all-electric townhouses with solar panels installed on each home with no natural gas to residences. This level of “greening” is commendable as it goes beyond existing city and state code for energy efficiency and could be a model for other multi-family developments in Santa Rosa. Ultimately, the residents will benefit from lower energy costs and the city from fewer climate-changing emissions.

The city and the developer could go farther by working with new homeowners and Sonoma Clean Power to recommend that all residents chose the Evergreen option when they move in.

CEQA review and mitigations: When it comes to the environmental review of the project, the Greenbelt Alliance suggests that the Planning Commission and the developer consider mitigations to address increased Vehicle Miles Traveled and Greenhouse Gas Emissions.

As proposed, the project will house about 628 residents and generate 1,751 new car trips per day, generating approximately 2.9 MT CO₂e per person at year 2020. Total operational emissions were estimated at 1,824.6 MT CO₂e. These new GHG emissions undermine the city and county’s stated goals to reduce climate-changing gases.

In Sonoma County between 2010 and 2015, the number of miles we drove in our cars increased by 12 percent or 260,000 miles per day. At this rate GHGs will increase and we won’t meet our goals to reduce GHGs by 25% below 1990 levels by 2020.

The IN/MNG makes several references to environmental mitigations and compliance with the City of Santa Rosa Climate Action Plan, and states that no further mitigation is necessary. These references are not adequate to reduce the impacts from greenhouse gas emissions from the zoning ordinance because:

1. The Climate Action Plan is out of date and not being enforced by the City of Santa Rosa.
2. The Climate Action Plan is out of date and not in alignment with the countywide Climate Action Plan.
3. The Climate Action Plan is voluntary and as a result does not provide enforceable or effective mitigation to ensure reductions in greenhouse gases from development projects.

The Planning Commission should consider working with City Ventures to achieve the following:

Require Travel Demand Management Plan for Round Barn Village to include car share, additional EV hook-ups, bike share, SMART shuttles, SMART and transit passes for one year per household, bike and pedestrian path connectivity and other innovative transportation options that avoid solo-driving.

Fire Risk: Given that the property in question and the surrounding areas of Fountaingrove recently burned in the Tubbs fire, it may be wise to give further consideration to how to ensure that the fire risk to new homes and families in the area could be prevented or significantly reduced.

We recognize that the project has been designed with fire resistant development practices, including defensible space landscape design, and the project's open space parcels will be maintained consistent with a Santa Rosa Fire Department approved Vegetation Management Plan. The developer proposes building materials compliant with the current Building and Fire Codes.

Since the city of Santa Rosa has not yet reviewed its building and fire codes since the October 2017 fires, and because this is potentially the first new development to move forward in the burned area, we urge the Planning Commission, the city and the developer to consider doing more than required by existing codes.

For example, the city could work with City Ventures to develop a fire evacuation plan for Round Barn Village in advance of approval of building permits. Even better, the city could work with City Ventures and the developers of the multiple other new and rebuild projects in the immediate area (see list of projects in the CEQA documents) to create a fire recovery and evacuation plan to ensure public safety before the significant intensification of development planned in the area.

The city may be aware of recent legal cases where developments were rejected or sent back to the drawing board in Lake Tahoe and Orange County due to inadequate fire evacuation safety measures. These situations may not apply to the current project, but we urge the City of Santa Rosa to consider taking additional steps to ensure that all new development in burned areas is as fire safe as possible and people are not put in harm's way.

Greenbelt Alliance's mission is to fully protect the Bay Area's 3.6 million-acre greenbelt of natural and agricultural lands; direct all new development into already urbanized areas; and supporting urban development that benefits residents across the socio-economic spectrum. Thank you for considering our views.

Sincerely yours,



Teri Shore, Regional Director

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November 30, 2017

Chair Patti Cisco and Commissioners
Santa Rosa Planning Commission
Santa Rosa City Hall
100 Santa Rosa Avenue
Santa Rosa, CA 95404

Via email

Re: Item 8.4 ROUND BARN GENERAL PLAN AMENDMENT AND REZONING AND MITIGATED
NEGATIVE DECLARATION - PLANNING PROJECT

Dear Chair Cisco and Commissioners,

Greenbelt Alliance urges you to consider the following questions and concerns while deliberating on the request for a General Plan Amendment and Rezone for the 40.18-acre site in the Round Barn area of Fountaingrove in Santa Rosa and reviewing the associated environmental documents produced to comply with the California Environmental Quality Act (CEQA) (Mitigated Negative Declaration).

We understand that General Plan Amendment would change the land use designation from Business Park to Medium Low Density Residential (8-13 units per acre) and Open Space, while the Rezoning would change the zoning from PD72-001 (Fountain Grove Planned Development) to R-1-6 (Single-Family Residential) and OSC (Open Space – Conservation).

While recognizing the benefits of providing new opportunities for housing and protecting urban open space, Greenbelt Alliance is concerned about the uncertainty of taking this action without a specific project, the level of housing density, the open space element, the fire risk and timing. See detailed comments below that offer some suggestions for addressing these concerns.

Nearby proposed luxury resort at Buzzard's Gulch

In addition, please accept these clarifications regarding our previous comments related to the proposed luxury resort and event center on lands north of the Round Barn project at Buzzards Gulch (aka Sonoma Solstice) in the community separator on the edge of Santa Rosa's Urban Growth Boundary. The proposed luxury resort is not directly related to the Round Barn properties or proposed rezoning and GP amendment. However, it could have environmental impacts on the project and the city. See more on this below.

Need to Correct Erroneous CEQA Comments by First Carbon Solutions on Luxury Resort

The main concern related to the luxury resort we'd like the Planning Commission to address now is First Carbon Solutions incorrect response to public comments. Their statement in the Mitigated Neg Dec that the proposed luxury resort at Buzzard's Gulch is compliant with the Sonoma County General Plan and covered by its associated EIR is erroneous and not at all accurate.

No determination had been made by the Sonoma County planning department, planning commission or board of supervisors about whether the proposed luxury resort and event center is consistent with the Sonoma County General Plan, nor the level of environmental review that will be required. In fact the luxury resort project's application for a new discretionary use permit remains incomplete, pending additional traffic and other studies. The number of cabins proposed for the luxury resort as cited by the consultants is only part of a much larger project that involves a new event center, parking lot, road, swimming pool, commercial kitchen and hundreds of events.

How or why First Carbon Solutions made its own determination that the project was allowed under the Sonoma County General Plan and programmatic EIR is unclear, but needs to be immediately corrected for the benefit of CEQA and the public record.

Greenbelt Alliance urges the Planning Commission to direct staff to correct and strike the statements from First Carbon Solutions EIR in the staff report and the associated CEQA document that the luxury resort is compliant with the Sonoma County General Plan and covered by the county programmatic EIR.

Greenbelt Alliance brought the issue of the proposed luxury resort to the attention of city planners to seek comment and review as requested by the County of Sonoma on the potential environmental impacts to the city and its UGB. The luxury resort if allowed would intensify development on the border of the UGB, undermining longstanding policies to prevent sprawl and maintain community separation with green buffers. Other potential negative impacts on city groundwater, air quality, traffic, noise and lighting should also be considered by the city.

When it comes to the Round Barn project, our goal was to alert the city planner and developers that the luxury resort could contribute to negative environmental and cumulative impacts in the vicinity, potentially making things difficult for the Round Barn project (not the other way around). We hope the city and the developers will oppose the luxury resort for these reasons, if in fact it moves forward.

Concerns and Questions about the Round Barn General Plan Amendment and Rezoning

1. Project Uncertainty: The proposed rezoning and General Plan Amendment is moving forward without a specific project proposal. That is very unusual. Without a specific project, making a significant rezoning decision from business park to housing, while certainly worthwhile, might be better done as part of a General Plan or Specific Area Plan update with wider community input.

As described in the staff report, because there is no project, rezoning as proposed would not obligate the applicant or any future developer to construct anything other than what is legally allowed under the proposed rezoning to low-to-medium density single family homes. As a result, rezoning without a project or specific conditions creates significant uncertainty as to what will eventually be built.

The city and the public would be better served if the Planning Commission added specific conditions on what might be allowed with the rezoning and General Plan Amendment, such as levels of affordability and number and type of units required. For example, could you condition the proposed actions on the maximum build out of 237 units, with 15 percent affordability and the option for density bonuses in line with existing city policies and the Housing Action Plan? Perhaps in a separate but associated resolution that puts you on record for the type of project that the city would support at the location would provide certainty for all, including the developer.

Another uncertainty is how the CEQA document that was developed for this action would be applied to future development. It seems to serve as a programmatic EIR at the same time it suggests future environmental review will be needed. It would be very helpful to provide clarifications and examples of what would or would not be covered under the Mitigated Neg Dec and when additional review would be required, mostly for the benefit for those of us who are not CEQA experts.

In one section it states that: *Furthermore, the Initial Study/Mitigated Negative Declaration will serve as the environmental compliance document required under CEQA for any subsequent phases of the project and for permits/approvals required by a responsible agency.*

Then in other sections it says:

Also previously noted, any future on-site residential development would be subject to separate approval, including zoning clearance, use permit, and/or hillside development, as applicable and indicated by Zoning Code Section 20-22.030. Separate CEQA review would be required for all discretionary permits.

2. Housing Density: Greenbelt Alliance urges the Planning Commission to consider rezoning for housing at a higher level of density if it decides to move forward. We agree with the need for more housing in Santa Rosa across the income spectrum while ensuring that affordable housing is built. We urge at least zoning for medium density residential or higher. This would be consistent with the Housing Action Plan and proposed new density bonus policies being considered by the city. In fact, the properties immediately adjacent to the Round Barn project site are slated for designation for the highest possible density bonus level of 100 percent. So zoning the property to higher density would not conflict with other policies or, more importantly, adjacent neighborhoods. In addition, any housing project at the Round Barn site should require at least 15 percent on-site affordable housing consistent with existing city policy.

3. Open Space Element: Greenbelt Alliance supports the designation of 21.92 acres as Open Space and the maintenance of the lands and existing walking path by the property owners and developers. However, we would like further clarification on the existing “easement” and how that is implemented. What is the difference between the existing easement and the designation of additional land as Open Space. Do these actions maintain these

lands as open space in perpetuity? What legal or policy mechanism would ensure that the land would not later be developed or converted to other uses?

4. Fire Risk: Given that the properties in question and the surrounding areas recently burned in the Tubbs fire, it may be wise to give further consideration to how to ensure that the fire risk to new homes and families in the area would be prevented or significantly reduced. Please refer to specific comments on fire risk submitted by Sonia Taylor in her letter of Nov. 29 concerning this and other projects before you today.

5. Timing: Greenbelt Alliance recognizes the need for the city of Santa Rosa to move forward on planning and other city business in the aftermath of the Tubb's and other North Bay Fires. At the same time, it may make sense to pause and consider providing more time for the city, the community, homeowners, businesses and developers to think more holistically about what should happen in burned areas including Fountaingrove, particularly when it comes to new development. While we recognize the urgent need for rebuilding replacement homes and more new housing, perhaps it is time to revisit the 1981 Fountaingrove Ranch Planned Community District and Policy Statement recently distributed to the Planning Commission before approving new developments.

Greenbelt Alliance's mission is to fully protect the Bay Area's 3.6 million-acre greenbelt of natural and agricultural lands; direct all new development into already urbanized areas; and supporting urban development that benefits residents across the socio-economic spectrum.

Thank you for considering our views.

Sincerely yours,



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