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Ms. Susie Murray
Senior Planner
City of Santa Rosa
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Email: smurray@srcity.org

Re: Recess Storage Project – Santa Rosa (the “Project”)

Dear Ms. Murray,

Thank-you for the opportunity to provide questions and comments regarding the proposed storage project referenced above.

Better Neighborhoods Inc. is an organization established to help people have a voice in local development decisions as prominent as that of planners and developers. Our aim is to encourage smart growth consistent with the needs of the community while protecting the natural environment and places of historic and aesthetic significance, supporting California’s need for affordable housing and balancing the desire for growth with the need for features that make cities livable.

I confess we were surprised and more than a little concerned to see a Mitigated Negative Declaration (MND) (the “Report”) progress this far without certainty regarding the annexation and rezoning that would be required to make this Project legally permissible. Currently, the land parcels at 4200 and 4224 Sonoma Hwy, the Project site, are under the authority of Sonoma County, not the City of Santa Rosa. We don’t actually get an explanation until page 50 of the Report, which provides as follows:

“The site is being annexed into the City of Santa Rosa through Sonoma County LAFCO. (LAFCO here means the Sonoma County Local Agency Formation Commission). LAFCOs were created by state law in 1963 to encourage the orderly formation of local government agencies, to preserve agricultural and open space land, and to discourage urban sprawl.

Sonoma LAFCO has jurisdiction over changes in local government organization occurring within Sonoma County.”

Has the Applicant or the City submitted an application for this change to LAFCO? If so, where is the documentation to show the requirements, such as notice to all relevant parties, for example, and whether these have been properly met? Which stage of the process is the Project at today? Because according to the rationale for LAFCOs described at page 50, it seems unlikely the agency would approve a super-sized, four-story, self-storage facility and two high-density residential complexes – not when the land is currently zoned Rural Residential, which, under the City Code, is defined as follows:

RR (Rural Residential) district. The RR zoning district is applied to areas of the City intended to accommodate residential neighborhoods with compatible agricultural uses, but where the primary uses are residential, and compatible accessory uses. The maximum allowable density ranges from 0.2 to two dwellings per acre, with the specific allowable density for each parcel shown on the zoning map by a numerical suffix to the RR map symbol (see Section 20-22.040). The RR zoning district implements and is consistent with the Residential—Very Low Density land use classification of the General Plan.

This designation would not only prohibit the Project at the proposed location but breach the goals of the agency whose approval would be required – goals “to preserve agricultural and open space land, and to discourage urban sprawl.”

Failure to make full and frank disclosure of the procedures that would be required to make this Project permissible at the proposed location is a fundamental defect of the entire application. Such a defect renders the proposal mere whimsy! LAFCO approval requirements are not provided, strangely, but they must be similar to the City’s quite onerous six-step rezoning application process described at <https://srcity.org/423/Rezoning>. How does the City explain the omission of such crucial information? Certainly, there is no way to proceed without it.

Unfortunately, there are two further equally serious problems. Appendix B, the report on biological resources, appears to be based on an entirely different project! This from the opening page of the report:

“American Recess Development Company (ARDC) proposed to construct a 124,000 square foot storage facility and up to **18 single-family homes** (emphasis added) on approximately 2.68 acres at 4224 Highway 12 in unincorporated Sonoma County. The proposed storage facility will be four stories with each floor comprising approximately 31,000 square feet for a total area of 124,000 square feet. The storage facility will have a 900 square foot office located on the southwestern side of the facility. **Up to 18 residential homes will be constructed. Residences will vary in size from approximately 854 square feet to 1,407square feet. Each home will be two or three-stories, include a covered parking area for one car, and a yard area.** (emphasis added). Seventeen guest parking spaces will be provided throughout the site and some spaces may be in tandem with the covered spaces

for the unit. Construction of the residences would include installation of utility connections including water, sewer, electricity, and natural gas.”

It looks as if the author/s have tried to re-use a report prepared for a previous client. Or is the City contemplating multiple proposals for similarly super-sized storage facilities?

One further problem concerns Appendix F, the Hazardous Materials Report. Unfortunately, the scope of this survey was limited exclusively to lead and asbestos and only within the house and outbuildings. No consideration was given to the potential soil contamination resulting from the Project site’s previous use as a walnut orchard. Such use makes the likelihood of pesticide residue almost a certainty as a cursory search of the agriculture commission quickly reveals. Further investigation of the Project site, including soil and groundwater, should be required in accordance with Department of Toxic Substances Control (DTSC) regulations.

The Project

The proposal calls for the annexation of 4200 and 4224 Sonoma Hwy so that it comes under the jurisdiction of the City of Santa Rosa. The Report fails to disclose the procedures that would be required to approve such a radical change, an unlikely prospect considering the goals of the approving body, which are to prevent the kind of urban sprawl the Project would create and induce.

On the thin chance that such approval were granted, the property at 4224 Sonoma Hwy would be subdivided into three parcels – one for a four-story, 124,000-sq ft self-storage facility and two others for residential complexes - one with six units, the other with eight - for a total of 14 market rate dwelling units plus on- and off-site improvements. The Report refers to a process unknown at law which the author/s call ‘prezoning’ -- a whimsical notion intended no doubt to gloss over or conceal the actual quite onerous hurdles that would have to be overcome to make this otherwise prohibited development permissible.

According to the Report, the great leap from annexation from County to City and then another from Rural Residential to General Commercial would be but the work of an instant.

From there, a Tentative Parcel Map, Hillside Development Permit, Design Review and Conditional Use Permit (presumably because of the massive size of the self-storage facility) would be obtained in convenient, quick succession so that Applicant could begin demolishing the unoccupied house and outbuildings at the Project site.

Where is the documentary evidence to support such wild overconfidence?

Surrounding Uses

Existing residential development occurs to the south and north of the Project site. Commercial developments occur to the south, north and west. The Santa Rosa Creek multi-use trail is east of the site. There is insufficient description of surrounding uses to determine whether and how the Project

would fit in or overwhelm. Some photos would be useful as well as a full and frank description of the area's actual zoning. A search of Google images suggests a sparsely populated area with an increasingly rare rural feel – something the land commission was created to protect.

Aesthetics

The proposed four-story storage facility would have combination fiber cement board, concrete masonry and “decorative metal siding” with varied roof lines and two elevators - a structure more appropriate for an industrial area. Each floor will be approximately 31,000 square feet for a total area of 124,000 square feet. The storage facility would include a 900 square foot office at the southwestern portion of the facility. A concrete driveway would link the storage facility and residences to the Sonoma Highway. A tiny, 25-foot landscaped area along the western front of the property would separate the storage facility from Sonoma Highway. A new sidewalk would also be constructed between the facility and Sonoma Highway, though it's hard to imagine storage facility tenants arriving or leaving on foot.

The first residential complex to be located near the southern property line, would contain eight units and overlook the creek and multiuse path. The second, adjacent to existing homes on upscale Calloway Drive, would contain six units. Construction would involve a combination of vertical and horizontal fiber cement board and metal siding with complementary decorative reclaimed wood siding accents and varied roof lines. Some photos of existing Calloway Drive homes as well as computer-generated graphics would have assisted in determining whether and how the Project would fit with the existing neighborhood. Judging from a cursory search of Google images, not well at all.

The complex facing the creek path would have to comply with the Hillside development standards by following the natural topography and stepping with the existing slope. This is hard to imagine without any actual images.

Each complex would be two or three stories with units of between 885 square feet and 1,562 square feet with water, sewer, electricity, and natural gas connections included.

Certainly the prospect of a giant self-storage concrete-steel box and two concrete, high-density residential structures would impede and to some extent privatize the current scenic view of the creek and trail considerably – a significant environmental impact. The value of the trail to users would suffer an immediate decline. The intrusion of an urban storage facility and high-density residential development would degrade a neighborhood of sparse, single-family development in a pastoral, scenic area like this.

In fact, the Project site is actually on a portion of highway that is eligible for designation as a state scenic highway. Why has the official designation not been sought and obtained? What features, if any, are lacking to satisfy the requirements for an official designation as a scenic highway?

However one looks at it, the Project would represent a radical change from the modest, 1948, single-family home and two outbuildings no longer occupied or in use at the site. And although there are currently no plans to build at the already developed parcel at 4200 Sonoma Hwy, how would such an extraordinary leap first from County to City then from Rural Residential to General Commercial not induce similarly unplanned growth?

Surely the purpose of the General Plan is to create longer-term certainty for all property owners. As a practical matter, there is nothing special or extraordinary about the Project to justify the exceptional treatment sought. Is the City in especially urgent need of self-storage?

Storage Facility/Residential Separation

A secure gate entry will be installed at the separation of the driveway to separate the storage facility from the residences. Landscaping will be added to augment the separation and provide privacy for the residences. Again, some graphics rather than simple line drawings would be helpful. The noise section of the Report fails to anticipate traffic to and from the storage facility. Further study is needed.

Trees

Appendix C, the Arborist Report, identified 58 heritage trees to be removed with just two oak trees to be retained (Arcadis 2019). Have City engineers and geotechnical authorities considered the impact of removing so many trees from the site? Appendix D, the Geotechnical Report did not touch on it but perhaps the author/s would have if advised.

Parking

Interestingly, the Project would provide 36 parking spaces, three of which would comply with the Americans with Disabilities Act (ADA). What about residential units? How many would be barrier free/accessible?

Landscaping and Lighting

Lighting for the Project is expected to include a variety of fixtures, such as residential lighting, security lighting and parking lighting. Because these are not properly described, there is no way to determine adequacy or the potential for glare and light pollution. Certainly the Project would create a new and substantial source of light and glare. In the absence of full disclosure, could the City provide examples we might review for comparison purposes?

The Report interestingly provides only minimal black and white line drawings of the proposed storage facility and residential complexes but large full-color photos to illustrate proposed landscaping.

Utilities and Infrastructure

The Report includes a brief description of utilities installations that would be required but there is no assurance that current facilities will accommodate Project needs.

Significantly, there is no stormwater plan as required.

Debris from demolition would be removed from the site and deposited at appropriate landfills but these are not listed along with the required assurance that each would be able to accommodate the debris.

According to the Report, the existing well and septic system would be abandoned in accordance with permits from the Sonoma County Well and Septic Division. What does ‘abandoned’ actually mean in the context of the California Environmental Quality Act (CEQA)? What are the procedures involved and what is the risk, if any, to the water supply? Have all relevant public authorities been consulted and reviewed actual plans? Much more and detailed information is needed.

Construction Period

Construction will occur for approximately 14 to 16 months, 12 hours a day every day except holidays, beginning in the summer of 2020. However, construction could take longer if fall and winter conditions create excessive moisture (Appendix D, Geotechnical Report). Such a long construction period in a quiet rural area might exceed the value, if any, such a Project might bring on the slim chance the land commission approves the annexation.

Agricultural Land

At one time, the Project site was a small walnut orchard, but it has not been in production for some years. Contrary to the Report’s finding at page 11, development would, in fact, destroy any potential for agricultural use at the site ever again, and that is a very significant adverse impact. In addition, the Report fails to provide any analysis regarding potential toxins in the soil resulting from former agricultural use. Have toxins impacted the groundwater? What would be the effect of disturbing the soil? Further study is required. It is therefore improper to conclude as the Report does that the Project would not result in the conversion of farmland to non-agricultural use. Clearly, it would if the land commission abandons its rural mandate and approves the annexation.

Air Quality

There is insufficient information to assess the impact the Project would have on air quality. Tables of bare statistics without meaningful interpretive analysis are not at all persuasive. It would be an error to conclude the Project would have a less than significant impact on air quality. Again, the Project at the proposed site could not possibly have been contemplated in any of the Plans cited despite the Report’s erroneous insistence otherwise.

Biological Resources

Santa Rosa Creek is located just 150 feet southeast of the site so, clearly, a major development Project in such close proximity would have a significant impact on nearby birds, plants and animals. The assertion at page 25 of the Report that “the Project will create increased noise and human presence but will not obstruct or interfere with wildlife movement along the trail or within Santa Rosa Creek” seems implausible.

Hazardous Materials

Where are the storage and handling plans for such materials during construction, and what about residue from pesticides that might have been used during agricultural production? Has the site been properly tested for agricultural toxins? Appendix D, the Geotechnical Report identifies at page eight an “undocumented fill slope near the eastern end of the site.” What if the fill is actually brimming with potential toxins? Surely further investigation is needed to determine and address the problem.

Noise

Two multiunit residential complexes and a super-sized self-storage facility are intensive urban uses wildly exceeding what is allowed under a Rural Residential zoning designation. There can be no doubt that the Project would be a significant new source of noise not only during construction and operation. Potential noise levels have been assessed in the Report in the context of commercial/residential use. Noise should be measured according to the Project site’s current zoning, Rural Residential. As the Report indicates, the Santa Rosa General Plan shows an acceptable noise exposure level of 60-65 Ldn dBA for residential communities, and 70-75 Ldn dBA for commercial and industrial use. Projected noise and vibration levels during the Project’s anticipated 16-month construction period alone wildly exceed both maximums, as page 56 of the Report reveals. This is still another reason the Project should not proceed.

Transportation and Traffic

There is insufficient data to properly assess the Vehicle Miles Travelled (VMT) the Project would create. More study is needed, including similar case studies if the data is somehow not available. It shouldn’t be that challenging to track VMT for other storage facilities and residential complexes of similar size and location.

Sincerely,


J. Michael Goolsby