

OAKMONT

IN THE VALLEY OF THE MOON

June 14, 2021

Kristinae Toomians, Senior Planner
City of Santa Rosa
Department of Planning and Economic Development
100 Santa Rosa Avenue
Santa Rosa, CA 95404

RE: Comments on Elnoka CCRC Draft EIR

Dear Kristinae :

There are at least four broad areas where the Oakmont Village Association has significant interest and believes the Draft EIR to be deficient:

- Wildfire Risk
- Traffic/Transportation
- Zoning Issues and Noise
- Obstructed Visibility

Wildfire risk:

In this part of Sonoma County fire risk has materially increased in the past several years, with multiple nearby fires. The fires last fall burned the several buildings on the property where Elnoka would be developed, and that fire and those in 2017 destroyed several residences within Oakmont Village. As noted by Jean Kapolchok (see attached), the information in the Draft EIR section 3.16 incorrectly asserts that the project site does not lie in a “High Fire Risk” zone. Referring to the current maps and documents shows that it certainly does. An **up-to-date assessment of the overall impact of fire threats** to the proposed development (as well as new threats arising as a consequence of the proposed construction) must be completed prior to approval of any the proposed Elnoka project alternatives. Presently the site is mostly open space, an easier environment for firefighter control. The dense development proposed for the Elnoka site can be expected to be far more problematic.

OAKMONT VILLAGE ASSOCIATION

In addition to analyzing any changes to the risk of spreading wildfire, the assessment must also include **a detailed description of evacuation plans** for the planned development. Such analysis needs to reflect the impact on the present evacuation realities, which were demonstrably inadequate during Oakmont Village evacuations in both 2017 and 2020. Further stressing the already severely deficient evacuation routes will increase the threat of injury and death during wildfire events.

The EIR should also include input collected from personnel staffing the fire station located in Oakmont Village, showing how the **added volume of fire and ambulance** calls would be managed by the small fire station on Stonebridge Road.

Traffic and Transportation:

The traffic analysis in the Draft EIR in Section 3-14 is based on old data, from April 2017. Even this four-year-old information shows the current situation on **Highway 12 is unacceptably congested on a regular basis**, with levels of service at peak times rated either “E” or “F.”

Because traffic has increased on Sonoma Highway over the past several years, any serious consideration of a development project that would add traffic involving nearly 1000 additional residents in the area must use freshly collected data—based on normal (post-pandemic) traffic in 2021 and 2022. In addition to the delays and inconvenience, traffic bottlenecks on Highway 12 also create **health and safety issues** in proximity to the age-restricted community of Oakmont Village. An **additional traffic light** between Melita Road and Oakmont Drive has been discussed, and this inevitably will further impede traffic flow.

Traffic analysis for the project’s impact must include not only the increased volume of vehicles associated with all the additional residents, it must also realistically account for the **hundreds of off-site employees** and others (not 88, as estimated) for staffing the Elnoka amenities, care center, maintenance, and other services associated with the residential community. These individuals represent year-round commute traffic to and from the site, seven days a week.

Zoning Issues and Noise:

The Elnoka Project involves **many years of construction noise**. While unavoidable for such a construction project, the Draft EIR should provide more details on specific noise-abatement plans, particularly for the proposed multi-level apartment buildings immediately adjacent to homes in Oakmont Village.

Present zoning would allow less than half the number of residences proposed in the Draft EIR. Even with the current zoning, housing in Elnoka would be more than double the density of Oakmont Village. (The nearly 700 residences proposed would be roughly five times the number

per acre in Oakmont Village). The total number of proposed residences in the Draft EIR is also substantially above the limit ultimately negotiated between the developer and OVA in 2011. Zoning modification to allow such housing density would greatly **exacerbate traffic, health, safety, and evacuation issues.**

Santa Rosa **water availability is also under stress**, especially in the increasingly frequent drought years. The Draft EIR must also address how a substantial additional number of water customers could be supplied with water. The area has also been subject to **frequent Public Safety Power Shutoff events (PSPS)**, interrupting power. The EIR must also demonstrate how the proposed community would deal with this without making future situations worse.

Obstructed Visibility

Visibility issues are also not adequately addressed in the Draft EIR, particularly those associated with the sizable apartment buildings envisioned along Channel Drive across from Trione-Annadel State Park. (And the drawings provided in the EIR show a connector from those buildings onto Channel Drive, which is not discussed in the overall project documentation. The uses and or limitations on this connector need to be documented.)

Visibility from the state park was the reason cited by Santa Rosa City Commissioners when they **denied project approval** in 2011-2012, and this proposal does nothing to address the earlier concerns.



Tom Kendrick

President, Oakmont Village Association

Suite A, 6637 Oakmont Dr., Santa Rosa, CA 95409

Attachment: Letter from Jean Kapolchok, dated June 7, 2021



J. Kapolchok

+ Associates

Land Use Planning
Urban Design

June 7, 2021

Kristinae Toomians, Senior Planner
City of Santa Rosa
Department of Planning and Economic Development
100 Santa Rosa Avenue
Santa Rosa, CA 95404

RE: Comments on Elnoka CCRC Draft EIR

Dear Kristinae,

On behalf of my clients, the Oakmont Village Association, I would like to submit the following comments on the Elnoka CCRC Draft EIR (DEIR). My comments will focus primarily on DEIR Section 3.16: Wildfire.

The analysis performed and the mitigation proposed in the DEIR in the Wildfire section are inadequate. Given the 2017 Nuns fire and the 2020 Glass fire which directly impacted the project site and surrounding lands it is puzzling why information regarding response times, evacuation times, intensity of fire, rate of fire spreading, sufficiency of State Highway 12 and Melita Road as evacuation routes etc. do not appear in the DEIR fire analysis.

The DEIR gives a misleading impression as to the fire risk the Project site is under. The DEIR claims that the Project site is not designated as being in a very high or high fire risk area based, in part, on Figure PS-1g of the Sonoma County General Plan. This map only designates land within the unincorporated areas of the County. The project site is within the city limits of the city of Santa Rosa. No conclusion can be drawn based on a map that takes no stand on city properties. And yet the DEIR fails to indicate that the Project site is designated as High Risk in the City of Santa Rosa 2020 Community Wildfire Protection Plan (CWPP Risk Assessment map Figure 18).

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The DEIR does confirm that the Project site is sandwiched between a very high fire hazard zone to the northeast (within 0.25 miles) and a high fire zone to the south (abuts Annadel-Trione State Park). It also acknowledges that the 2017 Nuns fire came close to the borders of the site and the 2020 Glass fire burned the Project site including the three houses on the site.

The Project is for the development of 676 residential units. At 676 units, approximately 1,200 to 1,300 new residents would reside in this High Risk of Wildfire area.

The proposed Project locates in excess of 200 units on the backside of the property's ridge line. There are two ways out of this property: Highway 12 and Melita Road. Both of these access points are located towards the front portion of the site. The design and density of the project further exacerbates the ability to evacuate.

The Project is for the development of a CCRC: Community Care Residential Community. The DEIR finds that: "the project could require relocation of a large elderly population associated with the proposed care facility during a disaster".

Given all of this, the DEIR recommends, only, the preparation of an emergency evacuation plan AFTER project approval.

The DEIR states, in the absence of credible information, that this yet to be prepared and analyzed emergency evacuation plan WILL:

"Ensure that the project is adequately prepared to respond to a large-scale emergency, such as a wildfire, and prevent interference with an emergency response plan."

There is nothing in the DEIR that supports this declaratory statement. This conclusion cannot be drawn.

Furthermore, General Plan Policy NS-G-1 states:

Require proposed developments in the Wildland Urban Interface zone, including the Very High Fire Hazard Severity zone, to investigate a site's vulnerability to fire and to minimize risk accordingly.

The DEIR offers no vulnerability assessment of the site and fails to identify any reasonable and substantial ways to minimize risks. Without such an assessment the project is potentially inconsistent with this policy.

Although it is considered to be inadequate, DEIR Section 3.7 on Hazards also proposes the development of an emergency evacuation plan after project approval as a mitigation. However, the Executive Summary shows no such mitigation.

Thank you for your consideration of these comments.

Sincerely,

Jean A. Kapolchok

Jean A. Kapolchok