Appendix A:
Notice of Preparation and Comments
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A.1 - Notice of Preparation
NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

Date: July 12, 2017

To: Public Agencies, Organizations, and Interested Parties

Lead Agency: City of Santa Rosa
Contact: Andy Gustavson, Senior Planner
Planning & Economic Development Department
100 Santa Rosa Avenue
Santa Rosa, CA 95404

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Elnoka Continuing Care Retirement Community Project

Review Period: July 12, 2017 to August 11, 2017

This Notice of Preparation (NOP) initiates the environmental review process in accordance with the California Environmental Quality Act (14 California Code of Regulations [CCR] Section 15082) for a senior residential development project in the City of Santa Rosa. The City of Santa Rosa will be the Lead Agency and will prepare the Environmental Impact Report (EIR). The purpose of an NOP is to provide sufficient information about the proposed project and its potential environmental impacts to allow agencies, organizations, and interested parties the opportunity to provide a meaningful response related to the scope and content of the EIR, including mitigation measures that should be considered and alternatives that should be addressed (CEQA Guidelines 14 CCR Section 15082[b]). The project description, location, and probable environmental effects of the Elnoka Continuing Care Retirement Community (CCRC) Project are briefly described below.

Providing Comments

The City of Santa Rosa is soliciting comments from responsible agencies, organizations, and interested parties regarding the scope and content of the environmental documentation. Because of time limits mandated by State law, comments should be provided no later than 5:00 PM on Friday, August 11, 2017. Please send all comments to:

Andy Gustavson, Senior Planner
County of Santa Rosa Planning Division
100 Santa Rosa Avenue, Santa Rosa, CA 95404
Tel: (707) 543-3236
Email: agustavson@srcity.org

Agencies that will need to use the EIR when considering permits or other approvals for the proposed project should provide the name of a contact person, phone number, and email address in their comment. Comments provided by email should include “Elnoka CCRC NOP Comment” in the subject line, and the name and physical address of the commenter in the body of the email.

Public Scoping Meeting

A public scoping meeting will be held by the City to inform interested parties about the proposed project, and to provide agencies, organizations, and the public with an opportunity to provide comments on the scope and content of the EIR. The meeting time and location are as follows:

Thursday, July 27, 2017
7:00 p.m. – 8:30 p.m.
Berger Auditorium at Oakmont Community Center, 6633 Oakmont Drive, Santa Rosa, CA 95409
Project Location and Setting

The project site is located at 6160 Highway 12 (Sonoma Highway) and 300–425 Elnoka Lane in the southeastern portion of Santa Rosa in the urban/rural fringe. The surrounding area contains plant and animal life, including several native tree species as well as wetlands and aquatic life. The project site is surrounded on the northwest by single-family homes, on the northeast by Sonoma Highway, on the southeast by the active adult community of Oakmont, and on the southwest by Channel Drive and Trione Annadel State Park (Exhibit 1).

The project site is an approximately 68.7-acre site consisting of four 17 parcels (031-050-062, 031-050-071, 031-050-063, and 031-050-072). There is a moderately sloped ridgeline running east to west through the center of the site surrounded by more gentle terrain. There are over 1,660 trees on-site. There is a seasonal creek running east-west in the northern portion (near Sonoma Highway), and two other creeks on the western, upper portion. The site is predominately undeveloped with the exception of three single-family homes located in the approximate center of the site. The area is envisioned as a low-density residential community in the City of Santa Rosa General Plan 2035. The General Plan land use designations applicable to the site are Very Low Density Residential, Low Density Residential, and Medium Density Residential and the site is zoned Planned District (PD 93-002) and Multi-Family Residential (R-3-18).

Project Description

The Elnoka Continuing Care Retirement Community (CCRC) Project would develop 664 senior care units (74 cottages, 528 apartments, and a 62 unit care center) with 12 affordable employee housing units and recreational center (Exhibit 2). The project would be developed in phases over time. The first phase would contain 202 units of project housing, plus the 12 employee housing units. The remaining 462 units would be built in subsequent phases over time based on market conditions. There would be a total of approximately 975 residents on-site at full buildout (1.42 seniors per unit plus an average of 2.62 persons per employee units). The project would employ approximately 194 people in full and part-time positions, including care staff, housekeepers, landscaping, maintenance, administrative and recreation center staff. There would be an average of 75 employees on site daily. Residents and employees will likely be drawn largely from the Santa Rosa area.

Access to the site would be taken from a gated entrance on Sonoma Highway, which would serve as the primary entrance. A secondary entrance would be located on Melita Road. Emergency vehicles would be provided additional site access from a fire access road off Channel Road. Pedestrian linkages and trails would be provided for the residents and their guests within and amongst all on-site land use areas. A publicly accessible bicycle trail running parallel to Sonoma Highway would be constructed.

The site plan would respect the natural features and slopes of the site and be laid out with a goal of maximizing the natural features of the site. Over 58 percent of the site would be left as natural open space and landscaped area. Over 75 percent of the trees on site would be preserved. Table 1 lays out the development plan summary.
Table 1: Development Plan Summary

<table>
<thead>
<tr>
<th>Project Component</th>
<th>Acreage</th>
<th>Percent coverage</th>
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</thead>
<tbody>
<tr>
<td>Natural Open Space</td>
<td>16.7</td>
<td>24.3</td>
</tr>
<tr>
<td>Landscaped Area</td>
<td>23.5</td>
<td>34.2</td>
</tr>
<tr>
<td>Parking and Circulation</td>
<td>11.2</td>
<td>16.2</td>
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<tr>
<td>Exterior Flatwork</td>
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<td>6.4</td>
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<tr>
<td>Building</td>
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<td>18.9</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>68.8</strong></td>
<td><strong>100</strong></td>
</tr>
</tbody>
</table>

On-site landscaping would incorporate drought resistant native plants and variations in color, texture, and massing to compliment the buildings. The landscaping, trees, and shrubs would enhance screening throughout the project and provide vertical relief to the horizontal massing of the buildings.

**Required approvals and permits**

The proposed project requires the following discretionary approvals from the City of Santa Rosa:

- Subdivision Tentative Map
- Conditional Use Permit
- Design Review
- Hillside Development Permit
- Subdivision Tentative Map
- EIR Certification

In addition, the proposed project would require ministerial approvals, including but not limited to grading, site work, and building permits.

**Potential Environmental Impacts**

The determination to prepare an EIR was made by the City following preliminary review of the project. Because an EIR is clearly needed for the project, no initial study has been prepared for the project and is not required, pursuant to CEQA Guidelines Section 15063(a). The EIR will evaluate potentially significant impacts associated with the approval and implementation of the project. Consistent with the California Environmental Quality Act (CEQA) Guidelines (Appendix G), the following environmental resource categories will be analyzed in relation to the project:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Land Use/Planning
- Mineral Resources
- Noise
- Population/Housing
Elnora Continuing Care Retirement Community Project
City of Santa Rosa

- Cultural and Tribal Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Public Services
- Recreation
- Transportation/Traffic
- Utilities/Service Systems
- Mandatory Findings of Significance

All of the resource categories listed above will be considered in the EIR; however, given the local context of Santa Rosa, the following issues will be central to the environmental analysis:

- Sonoma Highway (SR 12) is an important regional arterial street that carries between 26,500 and 77,000 vehicles per day on segments that pass through the city. While the highest volumes occur near the junction with US 101, SR 12 is a key transportation route in the vicinity of the project site and careful consideration of potential cumulative traffic impacts along this roadway will be needed.
- As SR 12 is an officially designated State Scenic Highway and Melita Road is designated as a Scenic Road in the Santa Rosa General Plan, aesthetics impacts to views from these roadways will need to be closely evaluated. Additionally, changes to the visual character of the site, including those associated with the onsite ridgeline, will be assessed for consistency with City of Santa Rosa General Plan, Zoning Code and applicable Design Guidelines.
- With residences adjacent to the northwest and southeast, potential neighborhood impacts related to air quality, noise and local traffic will also need to be quantified and assessed.
- Given the presence of creeks and wetland areas on the site, the EIR will need to closely examine potential impacts related to biological resources, water quality, and flooding on- and off-site.
- Potential impacts to known cultural resources in the vicinity of the site will also need to be carefully evaluated.

CEQA allows environmental effects for which there is no likelihood of a significant impact to be “scoped out.” The following effects have been determined not to be significant, as outlined below. Full documentation of the factual basis for this determination will be included in the EIR. Unless specific comments are received during the NOP public comment period that indicate a potential for the project to result in significant impacts, these less than significant effects will be addressed briefly in the EIR and “scoped out.”

- **Agriculture and Forest Resources**: The project site is currently designated for Very Low Density Residential, Low Density Residential, and Medium Density Residential uses in the Santa Rosa General Plan. The project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses, would not affect properties subject to a Williamson Act contract, and would not conflict with existing zoning for forest land or timberland.

- **Mineral Resource**: There are no mineral recovery sites on or in the vicinity of the project site. The nearest mine is the Mark West Quarry, located approximately 7.43 miles to the north of 1 City of Santa Rosa General Plan 2035 Land Use Diagram
the project site. Therefore, implementation of the project would not result in the loss of a locally important mineral resource recovery site. Further, while a Mineral Land Classification report prepared by the California Geological Survey indicates that the project site is located in an area containing known mineral occurrences of undetermined mineral significance, residential areas and areas committed to residential development are not considered suitable as Aggregate Resource Areas under the California Surface Mining and Reclamation Act (SMARA). As such, construction and operation of the project would not result in the loss of availability of a known mineral resource of value to the region.

**Alternatives to the Project**

In accordance with CEQA Guidelines Section 15126.6, the EIR must contain a comparative impact assessment of alternatives to the Elnoka CCRC Project. The primary purpose of the alternatives section is to provide decision-makers and interested parties with a reasonable number of feasible project alternatives that could attain most of the basic project objectives while avoiding or reducing any of the project's significant adverse environmental effects.

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1 Mineral Land Classification of Sonoma County Map, March 2005.
Exhibit 1
Aerial of Site and Surroundings

Source: Brelje and Race, 2017
Exhibit 2
Proposed Site Plan

Legend

Project Site

Source: ESRI Imagery

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NOTICE OF PREPARATION
A.2 - Comments
August 9, 2017

Mr. Andy Gustavson
City of Santa Rosa
Planning and Economic Development Department
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 95404

Elnoka Continuing Care Retirement Community – Notice of Preparation (NOP)

Dear Mr. Gustavson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission’s (MTC) Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). Caltrans’ Strategic Management Plan 2015-2020 aims to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the NOP.

**Project Understanding**
The applicant proposes to construct 676 senior care units which consists of 74 detached senior cottages, 528 senior apartment units, 62 senior care center, 12 affordable employee housing units, and a recreational center. The project will be developed in several phases resulting in approximately 975 residents. The first phase will contain 202 units of project housing and the 12 employee housing units. The remaining 474 units will be constructed in subsequent phases over time based on market conditions. The applicant proposes to employ 194 people in full-time and part-time positions, including care staff, housekeepers, landscaping, maintenance, administrative and recreation center staff. There will be an average of 75 employees onsite daily. Primary access to site will be provided via a new gated driveway on State Route (SR) 12 (Sonoma Highway), secondary access will located on Melita Road, and emergency vehicles access will be provided on Channel Road.

**Project Description**
Please address the following:

- Timing and duration of project phasing, including specific project elements to be completed in each phase;
- Total number of number of senior care units due to a discrepancy between the State

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Clearinghouse NOP and the City of Santa Rosa’s Project Referral; and
- Total number of employees during the construction phase and when fully operational.

**Lead Agency**
As the Lead Agency, the City of Santa Rosa is responsible for all project mitigation, including any needed improvements to the STN. The project’s financing, scheduling, implementation responsibilities and monitoring should be fully discussed for all proposed mitigation measures.

**Cultural Resources**
The project area is highly sensitive to cultural resources, and there are known archaeological sites that may be impacted by the project. We recommend that the City of Santa Rosa conduct a cultural resource technical study that at a minimum includes a records search at the Northwest Information Center of the California Historical Resources Information System (CHRIS), as well as a field survey of the project area by a qualified archaeologist and qualified architectural historian.

Additionally, per California Environmental Quality Act (CEQA) and Assembly Bill (AB) 52, we recommend that the City of Santa Rosa conduct Native American consultation with tribes, groups, and individuals who are interested in the project area and may have knowledge of Tribal Cultural Resources or other sacred sites. If an encroachment permit is needed for work within Caltrans right-of-way (ROW), we may require that cultural resource technical studies be prepared in compliance with CEQA, Public Resources Code (PRC) 5024, and the Caltrans Standard Environmental Reference (SER) Chapter 2 (http://www.dot.ca.gov/ser/vol2/vol2.htm). Should ground-disturbing activities take place within Caltrans ROW and there is an inadvertent archaeological or burial discovery, in compliance with CEQA, PRC 5024.5, and the SER, all construction within 60 feet of the find shall cease and the Caltrans District 4 Office of Cultural Resource Studies (OCRS) shall be immediately contacted at (510) 622-1673.

**Access Operations**
We are concerned with the projected increase in generated trips, which has the potential to create significant speed differentials and increase the number of conflicts. Turning movements along SR 12 (Sonoma Highway), Melita Road, and within the project vicinity should be evaluated as well as whether a left-turn lane is needed as a result of the proposed development. The potential for vehicles making left-turns into the proposed driveway from SR 12 may present a significant conflict. Trip generation and distribution should be identified to determine the scope and significance of issues that may arise from the project’s potential conflicts. CEQA does not exempt these types of operational concerns from evaluation.

An encroachment permit is needed for the proposed gated-driveaway on SR 12 (Sonoma Highway). Any improvement of access to SR 12 or changes in its operations shall be coordinated with Caltrans. Lane or shoulder closure charts for any work which interferes with operations of SR 12 shall be submitted to Caltrans for review and approval. Please provide plans for the proposed access to the site from SR 12. Detail design comments will be provided during the Encroachment Review.
Permit Review Stage. Please see the Encroachment Permit section below for more details. The City of Santa Rosa/applicant can schedule an encroachment pre-application meeting with Arun Guduguntla at arun.guduguntla@dot.ca.gov.

**Travel Demand Analysis**

With the enactment of Senate Bill (SB) 743, Caltrans is focusing on transportation infrastructure that supports smart growth and efficient development. Recently approved guidance for incorporating SB 743 (*Local Development-Intergovernmental Review Program Interim Guidance, November 2016*) intends to ensure that development projects align with State policies through the use of efficient development patterns, innovative travel demand reduction strategies, and necessary multimodal roadway improvements.

In Caltrans’ *Smart Mobility 2010: A Call to Action for the New Decade*, this project falls under **Place 4 Suburban Communities – Neighborhoods**, which includes areas with a low level of integration of housing with jobs, retail service, poorly connected street networks, low levels of transit service, a large amount of surface parking, and inadequate walkability, residential subdivisions and complexes including housing, public facilities and low-serving commercial uses typically separated by corridors. Given this Place Type and intensification of use, which typically leads to high levels of VMT and corresponding low levels of active transportation, we recommend a travel demand analysis that provides VMT analysis resulting from the proposed project including:

- A vicinity map, regional location map, and site plan clearly showing the project’s location in relation to the STN. Clearly identify State right of way (ROW), bicycle paths, and transit facilities within the study area.
- A VMT analysis pursuant to the City’s guidelines or, if the City has no guidelines, the Office of Planning and Research’s Draft Guidelines. Projects that result in automobile VMT per capita greater than 15 percent below existing (i.e. baseline) county-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies—such as Caltrans—are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- Potential safety issues for all road users should be identified and fully mitigated.

**Vehicle Trip Reduction**

Given this Place Type and the opportunities to reduce VMT, we encourage the City to establish a Transportation Management Association (TMA) in partnership with other developments in the area to pursue aggressive trip reduction targets with Lead Agency monitoring and enforcement. In addition, the Transportation Demand Management (TDM) elements described below should be included in the program to promote smart mobility and reduce regional VMT and traffic impacts to the STN:

- Ten percent vehicle parking reduction;

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Mr. Andy Gustavson, City of Santa Rosa  
August 9, 2017  
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- Project design to encourage walking, bicycling, and convenient transit access;
- Commuter subsidy for transit, carpool, vanpool, and bicycle use for visitors and employees on an ongoing basis;
- TDM coordinator;
- Transit and trip planning resources such as a commute information kiosk;
- Enhanced bus stops including bus shelters;
- Outdoor patios, outdoor areas, furniture, pedestrian pathways, picnic and recreational areas;
- Nearby walkable amenities;
- Electrical vehicle (EV) charging stations and designated parking spaces for EVs and clean fuel vehicles;
- Carpooling incentives and dedicated parking spaces for carpooling employees;
- Secured bicycle storage facilities;
- Bicycle route mapping resources and bicycle parking incentives, unbundling of residential parking;
- Showers, changing rooms, and clothing lockers;
- Fix-it bicycle repair station(s);
- Provide shuttle services to take seniors to and from business commercial centers;
- On demand transit service including paratransit and private shuttles; and
- Decrease headway times and improve way-finding on nearby bus lines to provide a better connection between the project, nearby transit stations and regional destinations.

Transportation Demand Management (TDM) programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on SR 12 and other nearby State facilities. These smart growth approaches are consistent with the MTC’s RTP/SCS goals and would meet Caltrans Strategic Management Plan sustainability goals.

For additional TDM options, please refer to Chapter 8 of Federal Highway Administration’s Integrating Demand Management into the Transportation Planning Process: A Desk Reference, regarding TDM at the local planning level. The reference is available online at: http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf. For information about parking ratios, please see MTC’s report, Reforming Parking Policies to Support Smart Growth, or visit the MTC parking webpage: http://www.mtc.ca.gov/planning/smart_growth/parking.

**Multimodal Planning**
The project should be conditioned to ensure connections to proposed bike lanes and multi-use trails to facilitate walking and biking to the project site, local destinations, and transit nodes, such as the

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Downtown Santa Rosa Sonoma-Marin Area Rail Transit (SMART) Station. Specifically, the project should be conditioned to connect to the Eastside Transit Center, Santa Rosa – Sonoma County Transit Highway 12/Brookwood Avenue Transit Center, 2nd Street Transit Mall, North Burma Trail, Orchard Trail, Steve’s Trail, Richardson Trail, proposed Central Sonoma Valley Trail, proposed Class III bike lanes on Channel Drive, and proposed Class II bike lanes on SR 12, as shown in the 2010 City of Santa Rosa Bicycle and Pedestrian Master Plan. Providing these connections with streets configured for alternative transportation modes will reduce VMT and by promoting usage of nearby Santa Rosa City bus routes 30, 30X, 34, and the SMART rail line.

Please provide a parking demand analysis. The ratio of parking to senior care units should be relatively low, given that seniors may have less propensity to drive and/or may have lower rates of vehicle ownership. In addition, secondary impacts on pedestrians and bicyclists resulting from any traffic impact mitigation measures should be analyzed. The analysis should describe any pedestrian and bicycle mitigation measures and safety countermeasures that would in turn be needed as a means of maintaining and improving access to transit facilities and reducing vehicle trips and traffic impacts on STN.

Traffic Impact Fees
Given the project’s potential increase of VMT and proximity to SR 12, the project should be conditioned to contribute fair share impact fees to lessen future traffic congestion and improve multimodal forms of transportation in the project vicinity. The draft environmental document should include mitigation identified in the Mitigation Monitoring and Reporting plan and fair share fees. Required roadway improvements should be completed prior to the issuance of the Certificate of Occupancy.

Transportation Management Plan
Please identify whether any staging adjacent to SR 12 is anticipated. If it is determined that traffic restrictions and detours might be needed on or affecting SR 12, a Transportation Management Plan (TMP) may be required of the developer for approval by Caltrans prior to construction. TMPs must be prepared in accordance with California Manual on Uniform Traffic Control Devices. Further information is available for download at the following web address: http://www.dot.ca.gov/hq/traffops/engineering/mutcd/pdf/camutcd2014/Part6.pdf. Please ensure that such plans are also prepared in accordance with the TMP requirements of the City of Santa Rosa. For further TMP assistance, please contact the Office of Operations Strategies at 510-286-4579.

Transportation Permit
Project work that requires movement of oversized or excessive load vehicles on STN requires a transportation permit that is issued by Caltrans. To apply, a completed transportation permit application with the determined specific route(s) for the shipper to follow from origin to destination must be submitted to: Caltrans Transportation Permits Office, 1823 14th Street, Sacramento, CA 95811-7119. See the following website for more information:

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**Encroachment Permit**
The applicant will be required to apply for and obtain an encroachment permit for any work within Caltrans ROW prior to construction. As part of the encroachment permit process, the applicant must provide the appropriate CEQA approval, where applicable, for potential environmental impacts within the ROW. The applicant is responsible for quantifying the environmental impacts of the improvements within Caltrans ROW (project-level analysis) and completing appropriate avoidance, minimization and mitigation measures.

To apply for an encroachment permit, please complete an encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW, and submit to the following address: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website link below for more information: http://www.dot.ca.gov/hq/traffops/developserv/permits.

Should you have any questions regarding this letter, please contact Stephen Conteh at (510) 286-5534 or stephen.conteh@dot.ca.gov.

Sincerely,

[Signature]

PATRICIA MAURICE  
District Branch Chief  
Local Development - Intergovernmental Review

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"
Hi Andy, we won’t be providing written comments.

If the project will be impacting any of the creeks on the property, CDFW may require a Lake and Streambed Alteration Agreement (LSAA), pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant. Issuance of an LSAA is subject to CEQA. CDFW, as a Responsible Agency under CEQA, will consider the CEQA document for the project. The CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for completion of the agreement. To obtain information about the LSAA notification process, please access our website at http://www.dfg.ca.gov/habcon/1600/; or to request a notification package, contact CDFW’s Bay Delta Regional Office at (707) 944-5500.

Thanks, Karen

Karen Weiss
North Bay Supervisor
Bay Delta Region
CA Department of Fish & Wildlife
7329 Silverado Trail
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707-944-5525
Karen.weiss@wildlife.ca.gov
August 11, 2017

Mr. Andy Gustavson
Senior Planner
City of Santa Rosa Planning Division
100 Santa Rosa Avenue
Santa Rosa, California 95404

Project:  Elnoka Continuing Care Retirement Community (CCRC) SCH # 2017072021
Subject:  Comments for Notice of Preparation of Environmental Impact Report

Dear Mr. Gustavson,

California State Parks, Bay Area District appreciates the opportunity to provide comments on the Notice of Preparation (NOP) for the Elnoka Continuing Care Retirement Community (CCRC) draft Environmental Impact Report (EIR).

California State Parks is a Trustee Agency as defined by Title 14 CCR 15386 for the resources within the park potentially affected by this project. Trione Annadel State Park shares a common boundary line with four of the parcels that comprise this 68 acre development proposal which is the subject of this NOP EIR comment letter, and would be affected by this project. Further, Trione Annadel State Park has federal park protections in place via a Land and Water Conservation Fund Agreement with National Park Service (NPS), and any uses other than for park purposes would be considered a violation and cannot be allowed.

Therefore, we are submitting these preliminary written comments in response to the City of Santa Rosa’s Notice of Preparation of Elnoka Continuing Care Retirement Community (CCRC) draft Environmental Impact Report (EIR) for your consideration.

The proposed high density housing development as currently designed could adversely affect the existing state park’s natural and cultural resources, state park users, both human and wildlife, and recreational health benefits. Therefore it is imperative that the EIR include an analysis of the potential impacts, including those affecting the health of the neighboring community (state park), and outlines mitigations to address the adverse impacts. The EIR should study a wide range of impacts and several alternatives.

Depending on the final development plan and its project description, Trione Annadel State Park may be directly affected and impacted by the proposed development project.
The state park is well loved by the community for its recreational use by hikers, mountain bicyclists, runners, and nature-lovers, has several species of wildlife inhabitants, and both important natural and cultural resources that should be not be diminished by this proposed development project. Additionally, Trione Annadel State Park cannot be used for the benefit of private developments’ use, direct or indirect. Therefore, we are looking forward to reviewing an EIR that fully assesses the range of project alternatives to avoid or limit potential impacts to the state park and encourage the development project to make beneficial contributions to the community (state park), study different alternatives, adequately assess and analyze the range of potential development impacts on Trione Annadel State Park; first seek to avoid those potential impacts, then to offer a range of mitigations that will be fully funded and monitored for success to address those impacts. In this EIR scoping process, we encourage urge you to:

Re-draft the development project/plan that 1) reduces the number of residents to a level more conducive to its adjacency to the neighboring properties on three sides which are rural residential and Trione Annadel State Park (open space), 2) limits the development of the 68 acre site to the north side of the Santa Rosa Creek, and 3) provides for a self-contained development project/plan where the site fully contains its development’s infrastructure to support its new buildout including storm water management, emergency vehicle ingress and egress access, domestic pets, noise and night lighting buffering/screening, building height limitations based upon the site’s ridgeline (and not the state park’s ridgeline), and continues the natural view shed and aesthetics from the park users’ vantage point.

Ensure the scope of the EIR studies any on-site and off-site affects from the project for potential impacts on the adjacent rural community members, park users and wildlife inhabitants as well as cumulative and growth-inducing impacts. The project EIR should consider any environmental effects which will cause adverse effects on the environment and human beings, either directly or indirectly. Therefore, the EIR must consider the human health, in addition to the whole of the project. This comment letter outlines the need for engaging studies and analyzing impacts on the Trione Annadel State Park in the areas of aesthetics, air quality and greenhouse gases, archeology/cultural resources, biological resources, hydrology/water quality, noise, traffic, parks and recreation, and cumulative and growth-inducing impacts.

Study a wide range of mitigations to address the potential impacts, both direct and indirect, on the state park’s wildlife inhabitants and visitors. If mitigations are needed, a few projects that would bring benefit to the park could be to prepare a General Plan and Trails Plan for Trione Annadel State Park; beautify or remove the retention basin adjacent to the state park’s Channel Drive; impose impact or mitigation fees to be used in the state park for recreational programs or resource protection projects; install a boundary fence to keep domestic pets contained within the site; offer undeveloped portions of project as open space conservation easement, etc. to protect the land in perpetuity.
Aesthetics
The potential large multi-story building structures located in areas directly adjacent to the park where we have significant number of hikers, bicyclists and park visitors that currently without the development project benefit from the recreational view shed experience and calming essence of the mostly natural open space aesthetics. This could completely change with the proposed development project resulting in buildings, parking lots, and extensive vehicle circulation which would detract and be an impact from the generally peaceful environment and natural view shed from the state park. The EIR should study these potential impacts and we suggest an avoidance measure to limit the project development to the north side of Santa Rosa Creek.

Air Quality and Greenhouse Gas Emissions
The potential increase in traffic resulting from greater density and population growth will result in increased emissions from vehicle sources. Increases in respiratory disease, heart disease, and diabetes are all well documented outcomes from exposure to air pollution from cars and trucks. The EIR should study what effects the project will be on potential park visitors that exercise and recreate in the park so there is not increased risk for diminished air quality. The EIR should include quantification of the risk of health problems from exposure to highway emissions in the long-term as well as construction-related dust and pollutants in the short-term. Additionally, the EIR should study the air flow and movement from the traffic emissions from Highway 12 to the park’s ridgeline to ensure the potential air pollution doesn’t become trapped in the park due to the ridgeline.

- How would changes in vehicle volumes as a result of the proposed development affect air quality in the surrounding parkland, its wildlife inhabitants, and park visitors? If the air quality is diminished by added vehicle volumes, will the air flows be stalled in the park around or because of the park’s ridgeline?
- What are the current levels of air pollution?
- Will projected changes in air pollution exposure adversely impact people along the extent of Highway 12 corridor due to increased traffic and resultant back-up or potential stopped traffic?
- How would changes in air quality resulting from the proposed high density housing development be expected to affect the wildlife inhabitants, watershed and natural resources of the park (via acid rain)?

Archaeological Resources
There should be sufficient studies in collaboration with State Parks’ Archeologist to assess the important environmental effects and potential impacts that the project will have on the famous and nationally-significant Annadel Obsidian Quarry, where indigenous people obtained obsidian for well over 10,000 years and determine how this site can be avoided and protected in the development plan. The archaeological site occurs on both sides of the boundary in this area.
Biological Resources/Dark Skies
The proposed development project will bring over one thousand additional residents to the area which will significantly increase the density, and construct several buildings and infrastructure which will change the current undeveloped condition of land and creeks and how existing wildlife use it. There should be sufficient studies performed to assess what/how wildlife from neighboring Trione Annadel State Park and other open space areas, use the 68 acre site especially the Santa Rosa Creek as a potential riparian corridor and whether there are possible wildlife connections/linkages with other open spaces across Highway 12. The very nature of a high density housing development is in contrast with the open space of the park and wildlife which could be impacted, therefore, we encourage the lowest amount of development on site and adequate studies to determine avoidance measures and possibly provide development conditions that require above minimum setbacks from the creeks, using local native species for landscaping, limit potential loss of habitat, and condense and confine developed areas needing nighttime lighting, provide adequate measures to keep domestic animals within the development (and not wandering onto park property that may harass or kill the wildlife in the park) and if necessary, provide adequate fully funded mitigation measures.

- What is the impact of the population growth use and potential domestic pets on the existing state park resources?
- How will the residential development’s night lighting and added noise level affect the state park’s wildlife?
- How does the state park’s current wildlife population use the proposed development’s existing land base, creeks, habitat and how will the proposed development affect those wildlife’s future use and how will the potential impacts be addressed? Does the wildlife use the site as wildlife corridor and critical linkage to other open spaces or creeks as riparian corridor?
- How will the displacement and loss of the open space or wildlife corridors from the development affect or burden the adjacent state park’s natural resources?
- How will the development project improve the baseline conditions of state park, open space and community in the area, in addition to the mitigation of impacts?

Drainage/Absorption/Soil Erosion/Grading
The project should study and provide solutions for containing hardened surface drainage, storm water runoff, soil erosion and grading to be completely within its development and not slope or drain onto adjacent state park property.

Fire Hazard (Wildland Urban Interface)
The proposed high density residential development should provide adequate setbacks for its structures for defensible space so that it is accommodated completely within its property limits. The project building materials and protective measures should be as required for high fire risk areas. The required defensive space buffer and setback from the Trione Annadel State Park would be at least 130’ from the state park boundary. Further, there should be a study to assess whether because this site is in the Wildland-
Urban Interface, that additional buffer requirements should be considered and limiting development north of the Santa Rosa Creek is encouraged.

**Land Use**
The proposed high density residential development seems in contrast to its adjacent neighbors which are zoned for rural residential and open space for Trione Annadel State Park, thus the EIR should evaluate compatibility and proximity to the state park and perhaps place development conditions to limit the scale of the development project.

The proposed project suggests using the Trione Annadel State Park’s ridgeline for mitigation for its height of buildings against the horizon baseline, however, this should not be permitted as a reference point unless the project has fully analyzed impacts on its own and then, if necessary as a mitigation, adequately mitigate by appropriate impact or mitigation fees for use at the state park.

**Parks and Recreation**
The proposed plan will bring over one thousand additional residents to the area which will increase the density thereby potentially impacting the state park with additional visitors. Research on human health, has proven that persons who engage in recreational activities, including exercise and being outside, receive some health benefits and this should be a part of the EIR studies for the development project. The study should include how much area should be provided within the development so that the recreation component is fully contained. Further, while we support and encourage the added recreational potential users of the state park, there should be adequate studies conducted for potential impacts as result of this development proposal influx of persons, and provide suitable mitigations to alleviate potential impacts. Currently, the park does not have a general plan, so if there are impacts found, it would be beneficial for managing the park if there were mitigation or impact fees imposed that could be contributed to State Parks for the production of a general plan for the park, which would facilitate the management of those added potential park visitors and limit potential adverse impacts to the park due to exceeding capacity and impacting natural and cultural resources.

- What is the impact of the population growth on the existing state park?
- What is the projected growth of transitory type services for the retirement and senior care facilities and associated population?
- How will the open space/recreation needs of the population growth be addressed?
- What is the loss of open space and how is the displacement of the open recreational space of the project on the adjacent community?
- How will the plan improve the baseline conditions of park space and community center space in the area, in addition to the mitigation of impacts?
- How will the population growth from development affect access to public services?

**Noise**
The proposed plan will bring over one thousand additional residents to the area which will increase the density thereby increasing the noise level and reducing the amount of...
quiet natural open space. For projects adjacent to the State Park, the analysis should address noise impacts of the development project, both construction and long term sounds associated with a high density housing development (use of vehicles, building HVAC equipment, transitory but frequent service providers, such as garbage trucks, and large gathering type activities). If the analysis finds an impact, then mitigation measures, (sound walls or berms or other proven sound buffering devices, preferably natural to keep sounds confined as much as possible to the development) should be incorporated as part of the conditions of approval for the proposed project.

**Traffic**

In addition to assessing the important environmental effects that the project might have on Level of Service (LOS) of roadways and the probable change in vehicle trips, it is as important to assess the impacts on pedestrian, bicycle, and motor vehicle injuries associated with the LOS and vehicle trip generation. It is particularly important to see how the plan will affect traffic and safety.

- What are the origins and destination of existing traffic? How will this change with additional development?
- How will changes in car volume impact the rate of injuries & fatalities from motor vehicle collisions with pedestrians and bicycles?
- How would the proposed plan impact walkability and bikeability in the area?
- How will development impact travel times for existing park users and visitors to the area?

Lastly, the current development proposes 58% of open space and undeveloped land which could be dedicated or donated to City of Santa Rosa as permanent open space or conveyed to a third party for a conservation easement for preservation of the open space protection in perpetuity.

In summary, in this letter we encourage the City to avoid direct, indirect, cumulative and growth-inducing impacts to Trione Annadel State Park with careful planning, detailed studies and analyses and proposed mitigations during the EIR process that will be necessary for this development project’s environmental document. With that said, we welcome the opportunity to engage with the City throughout the environmental review and project development process.

If any of these comments need clarification or further explanation please do not hesitate to contact me at (707) 769-5652, extension 218.

Sincerely,

Laura Wilson  
Senior Park and Recreation Specialist  
Bay Area District

cc: Vince Anibale, Bay Area District Superintendent (Acting)
Dear Mr. Hill and Mr. Gustavson,

Valley of the Moon Alliance, a group of volunteers dedicated to preserving Sonoma Valley's rural character, is responding to your request for scope and content of the EIR for Elnoka.

Our principal concern is that the proposal will exacerbate cumulative traffic and noise impacts along the Hwy 12 corridor, especially from Santa Rosa to Sonoma.

Is it inevitable that the overconcentration of motor-vehicle-dependent, congregant senior housing at the edge of Santa Rosa's city limit continue? If the Elnoka proposal is built, seeing as it lies between the ever expanding Spring Lake Village—and Oakmont (with its ±3500 homes, Oakmont Gardens, Memory Care, etc), a broad swath of east Santa Rosa would be permanently devoted to a purpose that seems inconsistent with modern planning guidelines.

We urge that the EIR include a realistic assessment of on-site parking demands at Elnoka, as well as public transit options (or lack thereof) for residents, staff, and care workers. Trip generation for anticipated visits to St Francis and other shopping centers, as well as to medical providers (noting that few, if any, are convenient to Elnoka), in addition to trips to and from Elnoka by caregivers and medical providers need to be included. Assessment of traffic should capture recent projects such as Sugarloaf Custom Crush, as well as vested wineries Annadel and Westwood, along with those along the Hwy 12 corridor that are soon to be built or expanded (Memory Care in Oakmont, Resort at Sonoma Country Inn, Palooza, VJB, Kenwood Vineyards), along with the Southeast Greenbelt housing element. Transportation analysis should be done on both 'vehicle miles traveled'- and 'level of service’ bases. We’re concerned that peak hour impacts from the proposed stop light at Elnoka’s Hwy 12 entrance will be substantial, given that traffic already backs up to Oakmont Drive and beyond. The project’s relationship to the anticipated pedestrian/bicycle trail connecting Santa Rosa to Sonoma should be addressed, as well.

Also, we request that you evaluate mitigation of enviromental impacts on the Santa Rosa Creek watershed, specifically the South Fork of Melita Creek 1, and Oakmont Creek 1.

Diffuse permanent impacts from lack of affordable housing for support staff will be far reaching, and need to be better understood. Additionally we imagine an increase in noise impacts additive to the already high volume of emergency vehicle responses to its vicinity. Visual impacts on the scenic Hwy 12 corridor and adjacent community separator element should be looked at, as well as the impacts of light and noise on Annadel State Park south of Elnoka.

While the 600+ units currently proposed for the Elnoka property may fall within pre-existing zoning, we’re concerned that degraded traffic, additive noise nuisance, and other conditions resulting from the long-ago annexation of Oakmont absent the four-lane state highway originally envisioned to access Oakmont (and beyond) have had unintended, yet very real
impacts on the viability and appropriateness of high density congregant senior housing at the Elnoka location today.

VOTMA encourages the City of Santa Rosa to work closely with the County of Sonoma and the SCTA. Public sessions prior to initiation of traffic and related studies would provide citizens a timely opportunity to comment on scope of analysis. We recommend that the City retain a traffic engineer with access to all inputs, including the County’s latest traffic study for Sonoma Valley, to facilitate peer review of Elnoka's traffic study as a course of practice. Traffic engineers' typical Tuesday through Thursday data collection can be misleading at this location due to high weekend tourism.

Also, can you clarify whether ‘vested’ or ‘grandfathered’ conditions, entitlements and/or permissions apply to the Elnoka property?

We sincerely appreciate the opportunity to participate in this process, and ask that VOTMA be added to the list of those expressing interest: Kathy Pons <exec@votma.org

Thank you,

--Rick Hill VOTMA
Like many of my neighbors along Melita Road, my concern has not changed from the previous development proposed for Elnoka property before the recession: the problem of increased traffic along this country road and narrow bridge located in front of my property. Presently, it is increasingly dangerous to cross the road where there are "blind" spots such as at turns and on the bridge, and pull out of driveways and side streets, because of the volume of traffic and speed.

If Elnoka's "secondary" access opens onto Melita, as proposed, I suggest the City give serious consideration to speed bumps on Melita at strategic points to discourage through traffic from Elnoka to Montgomery Drive on Melita, and divert this traffic to Sonoma Hwy.

Thank you for this opportunity to comment.

Tom Arens
5877 Melita Road
SR - 95409
707-538-4577
Please provide us with comments on the scope of environmental issues and alternatives to consider in the EIR. Feel free to use the back of the card as needed.

Name: George + Sue Bisbee

Address: 6111 Melitz Rd.

Email: sbisbee@ sbglobal.net

Comments: Traffic flow on Melitz Rd (speed bumps)
Cars use Melitz Rd. from bridge to Hwy 12 as a cut-through, and speed is often an issue. Speed bumps would slow down traffic and also discourage use as a speedway to Hwy 12.

Please send all comments to: Andy Gustavson, Senior Planner, Planning and Economic Development
100 Santa Rosa Avenue, Room 3, Santa Rosa, CA 95404
Email: AGustavson@srcity.org
Hello Andy,

Our home is near the Melita Rd exit from the property. We suggest that for those exiting onto Melita Rd, there would be a right turn only. Then those cars would proceed to the light on 12. With increased traffic going east on Melita at high speeds, this would be much safer. Also, speed limit signage is minimal now and more signs are needed. In addition, speed bumps on Melita between Los Alamos and 12 would discourage drivers from taking a speedy "short cut."

Thank you, Sue and George Bisbee, 6111 Melita Road
Dear Mr. Gustavson,

As residents of 6005 Melita Glen Pl., a cul-de-sac directly off Melita Rd., my husband I are deeply concerned about the scope of the proposed Elnoka project and its catastrophic impact upon the traffic on our already heavily traveled Melita Rd.

We have lived here since 2002 and have watched traffic grow exponentially since that time. Cars are using the stretch of Melita Rd. between Los Alamos Rd. and Hwy. 12 as a quick by-pass around Hwy. 12 out to Oakmont.

We have lost one beloved pet due to the increased traffic and speeding along this road, and it is only a matter of time before something even more catastrophic happens. Many families with young children have recently moved in, and I fear for them.

Speed bumps have been proposed to the city in the past, but to no avail. And now, with this high-density project upon us, I can't imagine how much worse it will be. This road is already being pushed to its maximum capacity.

It was our understanding, when this project was in the planning stages years ago and our neighborhood was attending meetings at the planning commission, that this stretch of road was designated as scenic, including the small bridge over Santa Rosa Creek at Los Alamos Rd., and could not be touched.

How is it possible that a project of the scope of Elnoka can be constructed without a devastating environmental impact upon neighboring communities?

At the very least, we would hope that entry in & out of the proposed Elnoka site would be limited to Hwy. 12, and NOT on Melita Rd. And if this project is inevitably to go through, some consideration must be given to this disastrous traffic impact. Speed bumps and extra signage would surely help, at the very least.

Thank you for your consideration,

Sue & Joe Boden
6005 Melita Glen Pl.

Sent from my iPhone
Please provide us with comments on the scope of environmental issues and alternatives to consider in the EIR. Feel free to use the back of the card as needed.

Name: David Dearden

Address: 

Email: 

Comments: How many units is ea Bldg P & Bldg N of these buildings

Please send all comments to: Andy Gustavson, Senior Planner, Planning and Economic Development 100 Santa Rosa Avenue, Room 3, Santa Rosa, CA 95404
Email: AGustavson@srcity.org
Please provide us with comments on the scope of environmental issues and alternatives to consider in the EIR. Feel free to use the back of the card as needed.

Name: Rob Edgar
Address: 6395 Meliku
Email: robssteph.c93cglobal.net

Comments:

Who is the county Rep who we can contact about this project.

Please send all comments to: Andy Gustavson, Senior Planner, Planning and Economic Development
100 Santa Rosa Avenue, Room 3, Santa Rosa, CA 95404
Email: AGustavson@srcity.org
Please provide us with comments on the scope of environmental issues and alternatives to consider in the EIR. Feel free to use the back of the card as needed.

Name: Stephanie Edgar
Address: 6395 Meilta Road
Email: 
Comments: Please review the exhaust impact on Hwy 12 & Meilta Rd as the traffic idles waiting at the lights. Our home will have traffic idling in front of it and this exhaust will accumulate & can impact health issues (asthma)

Please send all comments to: Andy Gustavson, Senior Planner, Planning and Economic Development
100 Santa Rosa Avenue, Room 3, Santa Rosa, CA 95404
Email: AGustavson@srcity.org
Please provide us with comments on the scope of environmental issues and alternatives to consider in the EIR. Feel free to use the back of the card as needed.

Name: Cathy Fletcher
Address: PO Box 483, Kenwood Ca. 95452
Email: fletcher-family07@gmail.com
Comments: Please don't allow Segway & Bike Rentals on Bike Path. Vernal Pools? Flooding. Lighting is a concern, re-check Lighting after passed by County. People cheat Change out Lighting (Direct Down) (Tall Buildings located in Center)
Greetings Mr. Gustafson,

As a person who lives and owns property on Hwy 12 across from the proposed project, I feel that the exit onto Sonoma Hwy should not have a traffic light. It will be very close to the Melita light and a block down from it is the Los Alamos light. I understand that you need a second exit, for safety, but the main one should be onto Melita where there is already a traffic light. At rush hour traffic on Hwy 12 already backs up from the Melita light to almost the Oakmont light, and one more light on Hwy 12 would just make it a nightmare.

Thank you for your attention,
Caryn Fried

Sent from my iPhone
Melita Road is a designated scenic road. It is particularly unsuited to high volumes of traffic consequent upon its twisting nature and a tight bridge. The bridge has been the site of many vehicle/vehicle and vehicle/wall collisions.

It would appear that the Melita Road "secondary access" for Elnoka would be preferred for traffic to and from Santa Rosa as it is the most direct and avoids multiple traffic lights. How is "secondary access" defined? In terms of traffic volume it would certainly be primary.

Current traffic volumes already make exiting many of the driveways and courts hazardous as they are unavoidably positioned close to semi blind bends.

We feel very strongly that Melita Road should certainly not be directly accessed by Elnoka should it be constructed.

The real question is whether Elnoka, as it is presently offered as high density housing with associated volume of vehicle movements is appropriate in this location.

Yours,

Rob and Kerry Granshaw
5881 Melita Road
Sent from my iPad
Thank you, Andrew. The group I referred to is the Sonoma Valley Citizens Advisory Commission which was established to review projects proposed for Sonoma Valley. Although this project is within the Santa Rosa City limits, it borders and impacts Rincón Valley, Kenwood, and Sonoma Valley.

Linda Hale

From: Linda Kay Hale [mailto:lindakayhale@gmail.com]
Sent: Tuesday, July 25, 2017 10:17 AM
To: Andrew Hill
Cc: Susan Gorin; tom; tom@geopraxis.org
Subject: Re: Notice of Preparation of an Environmental Impact Report for the proposed Elnoka Continuing Care Retirement Community Project - City of Santa Rosa

Thank you for this update. May I suggest that the City of Santa Rosa and the County begin to coordinate on this huge project that will affect traffic flows, water resources (since this allocated water will come out of the Russian River), and the local environment. May I also suggest that you contact The Valley of the Moon Alliance since they have recently completed a traffic study for part of this Hwy 12 corridor. Also, be aware that a lawsuit is pending regarding the County's emissions commitments which may not be possible to meet given current growth levels.

These concerns should be addressed by the Sonoma Valley Citizens Committee.

Linda Hale
1500 Warm Springs Road
Glen Ellen, CA 5442
Please provide us with comments on the scope of environmental issues and alternatives to consider in the EIR. Feel free to use the back of the card as needed.

Name: Sandy Hudson
Address: 5876 Stone Bridge Rd
Email: bluesky@aol.com
Comments: The height of buildings backing Stone Bridge Rd - 3 stories will block sunset view

Please send all comments to: Andy Gustavson, Senior Planner, Planning and Economic Development
100 Santa Rosa Avenue, Room 3, Santa Rosa, CA 95404
Email: AGustavson@srcity.org
Flood Control and Drainage

As Oakmont Creek, Melita Creek and Annadel Creek all pass through the property. The local flood control agency should be given an easement along the center lines of these creeks with the right to enter the Elnoka property for the propose of clearing the creek in case of blockage during flooding and also for maintaining the creeks.

Channel Drive along the property should be graded so that proper drainage can be maintained as to prevent flooding of either Channel Drive or the Elnoka development.

Transportation

There is an existing problem that that is only going to get worse with the addition of Elnoka along Highway 12. That is the connection of Melita Rd where it connects with Highway 12 on the east side if Highway 12. It should be a condition of the Elnoka Development that Melita Rd at highway 12, should be blocked off to all traffic except Emergency Equipment. This would help the residence along Melita Rd to maintain their rural life.

Fencing

What type of fencing is planed around the development? How will the areas through the creek be done as to prevent it from blocking the flow of water?
Please provide us with comments on the scope of environmental issues and alternatives to consider in the EIR. Feel free to use the back of the card as needed.

Name: John Martin
Address: 5980 Melita Rd, Santa Rosa, 95469
Email: johnjanism@yahoo.com
Comments: safety and long term impact on the rural setting is significant concern for the impact on Melita Road & Traffic. Do not allow traffic exiting on Melita to turn left. cont.

Please send all comments to: Andy Gustavson, Senior Planner, Planning and Economic Development 100 Santa Rosa Avenue, Room 3, Santa Rosa, CA 95404
Email: AGustavson@srcity.org
My wife and I have previously voiced our concerns over the El Noka development by attending the meetings in Oakmont and in writing as well as contacting associated agencies to the review. Something that is not spoken of is the very strong responses in the past to this development. It appears over time and possible submittals that the project has grown larger. Although the scope of this project may meet current zoning it is very large and will have a very large impact on the surrounding area for years to come. Thank You for a thoughtful and deliberate consideration of the many individual issues associated with this project.

John and Janis Martin
5980 Melita Road
707.539.6719
August 7, 2017

Andy Gustavson, Senior Planner  
City of Santa Rosa Planning Division  
100 Santa Rosa Avenue  
Santa Rosa, CA 95404

Bill Rose, Supervising Planner  
City of Santa Rosa Planning Division  
100 Santa Rosa Avenue, Room 3  
Santa Rosa, CA 95404

Dean Parsons, Project Review Division Manager  
Sonoma County Department of Permit and Resource Management  
2550 Ventura Avenue  
Santa Rosa, CA 95403

Susan Klassen  
Sonoma County Department of Transportation and Public Works  
2300 County Center Drive, Suite B100  
Santa Rosa, CA 95404

Susan Gorin, District 1 Supervisor  
575 Administration Drive, Room 100A  
Santa Rosa, CA 95403

Mr. Gustavson, Mr. Rose, Mr. Parsons, Ms. Klassen and Ms. Gorin:

We’re writing to express our concerns about the potential for the proposed Elnoka Continuing Care Retirement Community (CCRC) project to create unsafe conditions in our neighborhood—the easternmost loop of Melita Road, between Oakmont and the stoplight at the Valley of the Moon Plaza, directly across Highway 12 from the project. Because of this project’s potential to affect residents of unincorporated property at the gateway to the Sonoma Valley, I’m also writing to urge the County of Sonoma to take an interest in traffic mitigation regarding the development.

Beginning in 2007, when the proposed project was called Elnoka Village, representatives of at least four families in this neighborhood began to express a specific concern in public meetings, related to the developer’s recent construction of a right turn lane into the project: This section of Highway 12, already clogged with slow-moving traffic in the afternoons, became much worse during the turn-lane construction, and many drivers in the westbound lane, to leapfrog vehicles in front of them and reach the Valley of the
Moon Plaza stoplight, turned right at the southeastern terminus of Melita Road and sped through our neighborhood.

Ten years later, afternoon traffic is much worse. Westbound vehicles approaching the Valley of the Moon stoplight are often backed up to Pythian Road—a three-mile-long line of vehicles. It’s often slow during other times of the day, and vehicles of all kinds—cars, trucks and even commercial vehicles—are now racing through the neighborhood at all times of day.

There are several families with young children on this loop of Melita Road. It’s reasonable to think this problem will become much worse with the addition of nearly 1,000 residents directly across the highway. The installation of a single deceleration/turn lane on Highway 12—the extent of traffic mitigation thus far—hardly seems an adequate measure to accommodate the traffic likely to be generated by this project.

Furthermore, at previous public meetings, the developer’s representative has proposed, as a solution to prevent congestion, that there will be no left turn allowed at the project’s Highway 12 outlet—drivers who want to travel west on Highway 12, toward Santa Rosa, will be compelled to turn east. We urge everyone involved in this project to consider this: The first opportunity for those drivers to reverse course and head west is at this very intersection, the easternmost Melita/Highway 12 junction. It’s likely that immediately upon turning right, those cars will switch on their left turn signals and begin to back up eastbound traffic on the highway.

We ask three things:

1. for traffic impacts to this neighborhood to be a specific item of study in any Environmental Impact Report prepared for the project. Despite our repeated requests, this has not been done.

2. for county officials to take an active role in discussing traffic mitigation efforts relative to the Elnoka project. Despite requests dating to 2007, this has not been done.

3. for future mitigation measures to be at least as stringent for this neighborhood as those enacted for the residents of neighboring Oakmont. Directly across the highway from the southeastern end of Melita, an entrance to the Oakmont development is closed off by a locked gate and designated an emergency vehicle entry. Since the main entrance to our section of Melita is at the Valley of the Moon Plaza stoplight, and egress onto Highway 12 is relatively unsafe from the southeastern end of Melita, we believe this southeastern end should be similarly closed off from Highway 12—a measure that would allow emergency vehicles access to Melita, while preventing its increasing use as an expressway for westbound drivers.

This proposed development has serious implications for its neighbors across the highway, who live on rural parcels that fall under the jurisdiction of both the City of Santa Rosa and the County of Sonoma. We hope you will agree that some level of interagency
cooperation should be initiated, and that the concerns of residents on this loop of Melita Road, after ten years, should no longer be ignored.

Thanks for your time. We look forward to hearing from you.

Sincerely,

Andrea and Craig Collins
6319 Melita Road
(707)538-0362

Emily Joan Bamford
6311 Melita Road

Rob and Stephanie Edgar
6395 Melita Road

Sean and Jamie McFarland
6317 Melita Road

Nancy and Burdette Poland
6285 Melita Road

Larry Fields
6244 Melita Road

Patrick and Linda Smithson
6293 Melita Road

Don Roberts
6249 Melita Road

Kevin and Diana Salyer
6245 Melita Road

A. M. Nazeri
6297 Melita Road

Marcia and John Hoeft
6302 Melita Road

Brad and Tara Bello
6357 Melita Road
Mr. Gustavson, Mr. Rose, Mr. Parsons, Ms. Klassen and Ms. Gorin:

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Thanks for your time. We look forward to hearing from you.

Sincerely,

Andrea and Craig Collins
6319 Melita Road

(707)538-0362

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6311 Melita Road

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Kevin and Diana Salyer
6245 Melita Road
A. M. Nazeri
6297 Melita Road

Marcia and John Hoeft
6302 Melita Road

Brad and Tara Bello
6357 Melita Road
Please provide us with comments on the scope of environmental issues and alternatives to consider in the EIR. Feel free to use the back of the card as needed.

Name: Li2 Meyer

Address: 4125 Melita

Email: li28off11@gmail.com

Comments:

EMS limit coming and going to Hwy 12 entry

Restrict access on Melita

Please send all comments to: Andy Gustavson, Senior Planner, Planning and Economic Development
100 Santa Rosa Avenue, Room 3, Santa Rosa, CA 95404
Email: AGustavson@sorcity.org
Good Morning Andy,

We are immediate neighbors to the west side of the proposed Elnoka Development. Our address is 6066 Melita Road, Santa Rosa. We would like to express our concerns about the scale and density of this project.

The scale of the project is staggering. The large, institutional looking apartment buildings are highly unappealing and seem inappropriate, sited on this highly visible, scenic property.

The increased traffic that will be generated as a result of the high density is our biggest concern. We are relieved that a traffic light has been added to the main entrance on Hwy. 12. However, we are still greatly concerned that the entrance on Melita Road will be the route more frequently used to avoid the traffic jams on Hwy 12. Having lived here since 1988, we have seen Melita Road become a frequent 'short cut' to bypass traffic back ups on Hwy. 12. I'm certain this will only increase with the entrance on Melita Road. We have a narrow bridge (Melita Road/Los Alamos) that will not handle the additional traffic this project will generate.

Thank you and we hope our concerns will be heard and considered.

Helene Morneau & Bob Landman
6066 Melita Road
Santa Rosa, CA 95409
707 538 3341
I am going on record as being **adamantly opposed** to ANY development of the property which is being considered as "Elnoka", on Hwy 12. All of Santa Rosa's city planners must be aware of the horrible traffic that exists right now in that area. The back-ups are atrocious, the accidents are often; allowing 676 more units in this bottlenecked neighborhood should not even be considered. Is Santa Rosa giving into a developer's greed? That area could easily be divided into larger acreages which could be developed as very pricey estate homes. The developer would win, the city would win, and MOST IMPORTANTLY, the **people would win**! Stand up and do what's right...deny this project completely.

If Santa Rosa wants to do something even better, convince the developer to sell that property to Land Paths and protect it forever. The fragile environment should be protected, not destroyed. We don't need any more high density housing, Santa Rosa is full of it. We need, and our future generations need for you to do the right thing.

Mary Nashawaty
227 Belhaven Ct
Santa Rosa

Sent from my iPad
Mr. Gustavson,

We have reviewed the initial information provided regarding the Elnoka CCRC.  

We request that the impact of traffic be studied as part of the process and any impact mitigated.  We send busses and vans with students on route 12 in this area and substantial delays could impact the amount of time it takes to transport these students and increase our costs.

Thank you.

--

Best Regards,

Joseph V. Pandolfo, Jr., Ed. D.
Deputy Superintendent
Rincon Valley Union School District
(707) 542-7375
Mr. Gustavson,

When I saw the breakdown on number of units and the projected result would be 975 residents, plus 194 employees, it didn’t add up. Even taking out the assisted living and memory care residents, the rest of the units will hold the potential for two people per unit, with probably two cars per unit. When one extrapolates on the potential numbers, including staff, and then adding in vendors delivering goods to the property, as well as visitors, the numbers using Hwy. 12 on a daily basis from that enclave alone, will really impact the current traffic flow. The fact that you contemplate the main entrance being located on Hwy. 12 is a terrible idea, it should be positioned on Melita Road to alleviate the need for another signal.

As residents of Oakmont Village, we find the existing traffic jams and/or accidents on that road bed dangerous for us now. Add another 1,500-2,000 people moving about the area on any given day, concentrated in the same tight two-lane road, it is enough to scare us to death. Any natural disaster would leave us and the proposed Elnoka Village without any options for medical assistance in a timely way, or the ability to leave our premises to safety. Has anyone brought forth an emergency services study?

Realizing that the Elnoka project is going to make money for many, it appears that good sense has left the room in favor of profit. The proposed community should be positioned on another property entirely, preferably on a property positioned like Sutter Hospital, close to freeway access, not a two-lane country road.

As seniors, we understand the need for more housing, but good sense should accompany the planning.

Sincerely,

Gail Passalacqua
Santa Rosa, 08-07-2017

Dear Mr. Andy Gustavson,

I am completely opposed to the proposed ELWOKA project. Here is why:

- There is no mitigation for the increased traffic on Highway 12 by around 475 residents and 194 full and part-time employees.
- The new stoplight and left turn to the project doesn't change anything. The increased traffic by this project will be negative.
- Period. Already, the traffic between Citizens Drive and Helix Road is very heavy, specially around 4 to 6 PM!!!
- The effects on creek and wetland areas on the site will be negative. Trees will be cut.
- You will tell me, they will be replaced.
But how long it takes to replace native trees --- so wildlife on the site will be hugely impacted. I know, you will say "Who cares about wildlife?" people need a place to live. Well, in this case it's important because next to Annadel State Park and it is a corridor for wildlife.

Everytime you have people you have danger to have fire and in this case Annadel State Park and Salmon residents are next to the project so the risks of a dangerous fire will be increased because of people living there.

So I repeat this project is too big and it is a negative project period.

Sincerely,

Jean Michel Poulnot

8936 Oalment Drive

Santa Rosa, CA, 95409

Email: Jeanpoulnot91@gmail.com
Hi Mr. Gustavson

I am concerned about the scale of this development and the impact it would have on traffic on Melita Road. Although I would like for the city to continue to have tax revenue and good residents, I do not want it to affect traffic and the safety and wellbeing of my family. I think that having this development right next to my home would adversely affect both of these.

I am against this, unless if there was a way we could not have an entrance from Melita.

Thanks.

Avinash

Avinash Ramchandani, MD, MBA
dravi@me.com

"No one has ever become poor by giving" - Anne Frank
Mrs. Reese,

Thank you for your comments. They will be shared with the environmental consultants contracted by the City to prepare the environmental impact report (EIR) for the project.

Thank you also for pointing out that the project description mention describes emergency vehicle access to Channel Drive. The prior project description was revised to eliminate the Channel Drive emergency access. You will note the submitted project plan do not include this access. I will make sure this correction is made public at the upcoming public meeting on the EIR scope.

Please give me a call if you have any questions.

Andy Gustavson | Senior Planner
Planning and Economic Development
100 Santa Rosa Avenue | Santa Rosa, CA 95404
Tel. (707) 543-3236 | Fax (707) 543-3269
AGustavson@srcity.org

Hello Andy,

my husband and I live on Channel Dr directly across from the proposed Elnoka Continuing Care Retirement Community. We have met personally with Steve McCullagh several times at our house about this development. Here are our comments that we have shared with Steve and wish to extend to the City of Santa Rosa:

1. Steve shared with us that the number of units has been scaled down since the original proposal. Quite frankly, we’d like to see it scaled down even more. This is a development that is surrounded by a scenic corridor and state park. The fact that there are 3-story buildings going in next to a creek frequented by wildlife is disturbing.
2. The EIR draft notice includes in its project description an emergency vehicle fire access road off Channel Road (which should be Channel Drive). In our last meeting with Steve he shared that this was taken off the table. Could you clarify this?
3. My husband and I have already endured the intrusion of the City of Santa Rosa on our
personal property on Channel Drive when the city sewer easement was moved away from the creek to the middle of our driveway. We were promised that the old easement would be deeded back to us and this has never happened. Once a year I write an email to the City of Santa Rosa and am promised that someone will be right on it. It’s been 5 years with no action. Realizing that the City of Santa Rosa is going to be involved in a bigger project on two sides of our 3-acre parcel simply fills us with dread. You do not have a good tracking record with us, as we were threatened with eminent domain and felt bullied throughout the entire construction process that tore through our land. I’m assuming, of course, that the new sewer easement was in preparation for this retirement community. I also remember the day when concrete was being poured to close off the old sewer line and there was a spill that went directly into the creek. Who knows how much damage was done to the environment and creek that day — we do remember seeing dead fish floating in the water. Now comes a far bigger project — what will happen to the wildlife, flora and fauna in this commercial endeavor?

4. Our field is prone to flooding during bad storms in the winter. I have pictures of my chickens in a flooded hen house. Since we moved here in 1988, there has been substantial run-off from the adjacent Annadel State Park. There are two buildings proposed that border Channel Drive and our property. They will probably get the same run-off from the park. This area would be best served as a seasonal park for the residents of the retirement community rather than additional residences.

5. Traffic is getting worse and worse on Montgomery Drive that intersects Channel Drive. People use Melita and Montgomery as a shortcut to avoid the horrible congestion on Hwy 12. The proposed retirement community is only going to make traffic worse and certainly will affect local residents along these roads as well as the residents of the existing retirement community of Spring Lake Village.

6. Last but not least, there is the impact of additional pedestrian access to Channel Drive, a narrow country road full of potholes frequented by pedestrians, bicyclists, horse trailers and vehicles. It is an accident waiting to happen, and now more elderly pedestrians will be encouraged to use this road. Every day as I drive down the road I see pedestrians walking down the middle of the road and bicyclists riding through the stop sign at the ranger station as they also ride down the middle of the road (often ignoring vehicles as they are listening to music on their iPhones and don’t pay attention to traffic). The free dirt parking Cobblestone lot on Channel Drive encourages double parking and on weekends people stand in the middle of the road talking and conversing after bike rides — heaven forbid that they move off the road and get dirty. If the City of Santa Rosa is going to make tax revenue from this new development, then they should work with the County of Sonoma and the State Park system to improve the quality of Channel Drive and put in some bike/pedestrian lanes. Bike lanes being added on Hwy 12 is not going to help the additional impact of pedestrians on Channel Drive. I’ve attached a letter that I sent several years ago about the problems on my road. It was sent to supervisors, bicycle coalitions, and local high schools whose track teams use the road for training. Everyone agreed that there is a problem, but nothing has been done. With the addition of a huge retirement community, perhaps it’s time to address the issues described in my letter. Please read it!

Thank you for reading my concerns,
Contact information:
Ken and Cyndi Reese
6350 Channel Drive, Santa Rosa 95409
(707)538-7445
good2go@pacbell.net
Please provide us with comments on the scope of environmental issues and alternatives to consider in the EIR. Feel free to use the back of the card as needed.

Name: Cyndi Reese

Address: 6350 Channel Dr

Email: gop2go@pacbell.net

Comments: Please consider the effects on Channel Dr, the entrance to Annadel State Park. Already a congested country road with vehicles, bicyclists and pedestrians, this project will bring in more foot traffic and safety problems. Make this road safer and pave the Cobblestone Parking lot!

Please send all comments to: Andy Gustavson, Senior Planner, Planning and Economic Development 100 Santa Rosa Avenue, Room 3, Santa Rosa, CA 95404
Email: AGustavson@ssrcity.org

It's time for the City of SR to work with the State Park system.
Dear Mr. Gustavson,

Aug 7, 2017

As a long time resident on Melita Road, I am very concerned about the traffic your project will create. I have lived at 6070 Melita Road since 1976. During this time I have seen five accidents on my property. Our residential area cannot endure more cars, etc. People go too fast. They ignore speed signs. More cars would create a dangerous situation.

On your secondary entrance on Melita Road, we want a right turn only exit to Highway 10. This may require some road access improvement to make it a right turn only exit.

For our safety, we hope this will be created.

Sincerely,

Gertrude Reynaud

Gertrude Reynaud
6070 Melita Rd
Santa Rosa, CA 95409

(707) 539-4017
Please provide us with comments on the scope of environmental issues and alternatives to consider in the EIR. Feel free to use the back of the card as needed.

Name: Marla & Bill Rochefieu

Address: 236 Silver Creek Circle

Email: marblroc@foxvalley.net

Comments: We are supportive of the project as currently outlined.
Dear Andy,

As an original owner in the Melita Meadows neighborhood, we have seen many changes in this area in regards to traffic. Many years ago, a three way stop was installed at the Melita/Los Alamos intersection. This has slowed traffic some yet I continue to see rolling stops and or outright running of all three of the stop signs at the intersection.

The traffic both ways on the Melita Road section that Elnoka development wants to use is already very busy. The speed is 30 but very few cars actually go the limit. I walk around the neighborhood with my dog so I see it first hand. The morning and evening commutes are especially busy. We have many delivery trucks and bicycles also that make the road harder to travel. Speed bumps would help and discourage cars from using Melita as a short cut.

Having Elnoka's almost 1000 extra residents and 100 + employees will create an especially congested roadway in our neighborhood. This is a scenic road meant to be driven at a slower speed.

Thank you for your time and attention.

Patricia and Greg Steele
Andy,

We have a main concern when it comes to the Elnoka Project. The traffic that would result would be absolutely astronomical. Highway 12 is extremely congested on a daily basis, and adding more homes, and in-turn, cars, wouldn't help the matter. This isn't something that can be fixed once implemented, so it should be strongly considered beforehand.

Sincerely,
Vera and Nick Shlyapin
Hello Andy,

We live in the Melita Meadows neighborhood which stretches along Melita Road east from Los Alamos Road to Highway 12. We are concerned about the proposed Elnoka development for several reasons.

First, in the past 10+ years that we have lived in our house, we have seen a significant increase in traffic in our neighborhood. The lanes are narrow as is the historic bridge over Santa Rosa Creek and it creates a chaotic environment not originally intended for the area. People often use our neighborhood as a cut-through and drive well over the speed limit most of the time. Second, with the recent expansion a year or so ago of Spring Lake Village, this area has seen even more traffic. And now that Spring Lake Village is expanding again, this will only increase even more. Third, with the suggested new stoplight at the Elnoka entrance, the residents and employees of this proposed Elnoka development will most likely use Melita Road as their main entry and exit route rather than wait through two stoplights (Elnoka stoplight and Melita stoplight).

All of this is already more than the area can handle. With the proposed Elnoka development, a whopping 1,000 new residents and 200 employees would be added to the already tight, congested area that does not lend itself to road expansion. We had requested stop signs and or speed bumps for years to slow down the traffic on Melita Road, but haven’t seen anything to help control our already busy stretch of Melita. This proposal would undoubtedly exacerbate that problem even more.

Another key issue to note is the ridgeline as it relates to Trione-Annadel State Park. We live in a very scenic, beautiful area and a development of this magnitude that close to Trione-Annadel could compromise the view and pleasure that everyone should be able to enjoy. New buildings, congestion and pollution would only take away from this natural wonder.

Thank you for addressing our concerns as it relates to this development.

-Katie and Marc Traverso

Sent from my iPhone
Dear Andy,

In the past I have acted as a spokesman for the Melita Road Alliance. The alliance covers the Melita Meadows development and homes along Melita Road from the proposed Melita Road entrance to the Los Alamos Road intersection.

Our main concern with this development has been the increased traffic that would result along Melita Road. During meetings with the City 10 years ago, I presented my studies and observations that contradicted the traffic study developed for the EIR. My power point presentations were included as an attachment to the final EIR.

My conclusions were:

1. The consultants traffic study did not take into account the difficulty in turning left onto Hwy 12 while exiting the main entrance. The delays would be long for the left turn forcing many drivers to use the Melita Road entrance where the delays would be much shorter. This would greatly increase the traffic volume on Melita Road. With almost double the drivers in the current proposal over the original, this could increase the Melita Road traffic to an estimated 5 times the current rate.
2. In addition to this significant traffic increase, the Hwy 12 entrance would be unsafe for drivers entering and exiting the entrance.
3. A traffic light is justified for the main entrance. At that time the city, caltrans and the developer agreed to include a traffic signal. Depending on the signal timing drivers may still use the Melita Road entrance. It was further recommended that a way to restrict traffic from turning left exiting the Melita Road entrance be found. Signage and barriers should be considered.

The original traffic was also flawed in other calculations and assumptions. It is extremely important the traffic study for the current EIR be conducted using real traffic counts and not depend on generalized assumptions.

Bob Walker
Hi Andy-

My apologies for the last-minute email. Unfortunately, I have been in a jury trial for the last week and... as an attorney (don't hate me already), all I know is deadlines.

As you may have surmised, I am writing to memorialize my absolute opposition to the Elnoka development. This opposition is not because I do not think it would be beneficial to our city - I think it would as people are living longer and that cannot be ignored. My opposition stems from what I have personally perceived since we moved into 5897 Melita Road in February of this year.

The traffic on Melita is very dangerous. When we moved to the area, I had several friends laugh and say "I know Melita - I use it every day to commute." As you may or may not be aware, the speed limit is 30mph; it should be less, given the serpentine nature of the segment we live on. Not to mention the fact that well over 50% of the cars travel over the road markers in the middle of the road. I am an avid distance runner and run my dog most mornings. I run from our house to Channel Drive and either back towards Oakmont or over to Spring Lake Park. In either scenario, I have to cross the rather narrow bridge on Melita at Los Alamos with sharp turns on either side. There are no sidewalks and no matter the time of morning, it is a dangerous event (obviously a risk I assume, given the lack of sidewalk). I also walk with my 7-month old daughter and my other dog along Melita going the other direction. The volume of traffic at any given hour is enormous for a road of that size and condition. I have personally seen a few accidents that were all because of excessive speed and a failure to maintain the lane. I have also seen many collisions at the 3-way stop of Melita and Los Alamos. People just roll that sign... There are in fact many, many people who use Melita to bypass some of the congestion on Highway 12 or take a more direct route to varying parts of Santa Rosa. Simply put, there are already too many cars on that road and the City's benediction of a new development utilizing Melita Road would be something evidencing a lack of pragmatism and exuding shortsightedness.

What's more, our neighborhood is changing. Many homes have sold in our neighborhood recently and there are more children coming in, ultimately utilizing Melita Road to play. Just yesterday while walking my dog, I saw a boy roughly 9-11 years old riding his bike on Melita. My first thought was "where are his parents?!" Then I thought about it. He is a young boy doing what a young boy should do. He wasn't being unsafe. The speed limit is 30mph. He had a helmet and was simply riding his bike - a very innocuous act. The problem is the volume of cars and the excessive speed on that road. Adding 1000 residents to the area and 200 employees would result in the City's constructive participation in taking an already dangerous situation and making it worse. That is not what government is intended to do, no matter what is on the table and how much there may be. Lives and safety come first.

On a less important note, but still necessary to mention is the environmental impact to the area, especially in light of there being a series of parks that are intended to be preserved. Just because a fence exists to demarcate a preserved area like Annadel/Trione, it does not mean that what is done out of that demarcation does not impact what is sought to be protected. In other words, we are lucky to have a series of parks/preservations in the subject area. Those areas cannot be improved upon or built on. But, if the City places a development just outside, especially with the volume of people and infrastructure as proposed, the derivative impact on our parks and preserved areas will result in those areas losing their "preserved" status as a matter of fact. Those areas will be
negatively impacted to a severe degree; views will be lost and pollution and abuse will seep into what was sought to be protected by designating these areas as parks.

I ask that the City rethink its stance on this project and consider what will be lost. I also look forward to the City's response to these issues as they cannot be ignored.

Sincerely and respectfully,

Ryan (and Rachel) Wilber,

R. Ryan Wilber, Esq. | Wilber Law Offices
703 2nd Street, Suite 351, Santa Rosa, CA 95404
Office: (707) 527-3451 | Mobile: (707) 955-5298 | Spanish: (707) 536-1230 | Fax: (707) 540-6545
www.WilberLawOffices.com

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