

APPENDIX B
RESPONSES TO THE NOP
&
SCOPING MEETING COMMENTS

RESPONSES TO THE NOP

August 14, 2007

Rick Tooker
City of Healdsburg
Planning and Building Department
401 Grove Street
Healdsburg, CA 95448



Re: Comments on Notice of Preparation for the Healdsburg 2025 General Plan

Dear Mr. Tooker,

As the agency responsible for implementing many of the waste diversion programs in Sonoma County required by the *California Integrated Waste Management Act of 1989 (AB939)*, the Sonoma County Waste Management Agency (SCWMA) is responding to the Notice of Preparation for the Healdsburg 2025 General Plan (Plan). Our comments are limited to the solid waste issues related to the proposed Plan. To support the Agency's efforts to reduce waste, encourage reuse and recycling, and to assist with AB939 compliance, two comments are offered:

First, the County is in the process of updating its General Plan and references the Sonoma County Integrated Waste Management Plan as the policy document for solid waste management issues. We recommend that the City of Healdsburg considers a similar approach, and have attached the objective for reference:

Objective PF-2.9: Use the County Integrated Waste Management Plan, and any subsequent amendments thereto, as the policy document for solid waste management in the county.

Second, Section 6.5 of the Healdsburg 2025 General Plan references Empire Waste Management as the company contracted for solid waste services. As you may be aware, Empire Waste Management is in the process of selling all of its Sonoma County collection agreements to North Bay Corp. Healdsburg Assistant City Manager, Marjie Pettus, is involved with this process and should be consulted regarding this matter.

Thank you for the opportunity to comment on the Healdsburg 2025 General Plan, and if any further assistance is desired on these or other solid waste management issues, please do not hesitate to contact us.

Sincerely,
KEN WELLS, DIRECTOR
SONOMA COUNTY WASTE MANAGEMENT AGENCY

A handwritten signature in black ink that reads "Patrick Carter". The signature is written in a cursive, flowing style.

Patrick Carter, Waste Management Specialist

Tony Crabb
1421 Chiquita Road,
Healdsburg, CA 95448

September 7, 2007

Attn. Director Tooker
Planning & Building Dept.
401 Grove Street,
Healdsburg, CA 95448

Re: - Healdsburg 2025 General Plan.

Dear Sir,

I would like to take this opportunity to comment on the latest draft of the Healdsburg General Plan.

First of all I would commend you, your staff and the various consultants on making a significant change to the plan that addresses many of the comments and input received from the public over the last several months, the current version is a significant improvement over previous versions.

I have read both the background report and the general plan and in general I would say I am very pleased with the result. However I did note several areas in the policies, goals and implementation measures that did not have a specific guiding principle to which they seemed to be anchored. As well as a couple of implementation measures that could usefully be added.

I have noted my suggestions below.

In the Guiding Principles, under "Sustainability".

After "Protect agricultural resources". Add.

Protect the Environment.

The city will promote the protection of the environment through conservation of resources within the community and lead by example in its municipal processes and projects.

Modify.

Foster Principles of sustainability and conservation; to Foster principles of sustainable development. As this principle seems to be focused on the type of development we wish to promote.

Protect and enhance the natural resources; to Protect and enhance the natural habitat. As this principle seems to be focused on the local habitat of the Russian River, Foss Creek and other riparian habitats, etc.

In the General Plan under section 6. Public Services

In support of PS-A-5 and PS-B-3 in the Implementation Measures – Utilities

Add.

PS-9 Provide new incentives to remove high water use lawns and replace them with drought tolerant landscaping.

PS-10 Review planning process to prohibit the installation on new high water use lawns or landscaping.

In support of PS-C-4 in the Implementation Measures – Utilities

Add

PS-11 The city will promote the use of private solar voltaic installations to reduce peak electrical demand by expanding the rebate program and seek opportunities for installations on city owned facilities.

In the General Plan under section 7. Natural Resources.

In support of Goal NR-E

Add

NR-E-4 The city will promote the use of Green Building practices in private development and lead by example in its municipal projects.

In support of NR-E-4 in the Implementation Measures – Natural Resources

Modify NR-10 e From Disseminating green building guidelines etc. to Promoting green building guidelines etc.

I look forward to further public discussion of the new general plan, which I think will be a model for other cities to follow.

Regards, Tony Crabb



GOVERNOR'S OFFICE OF EMERGENCY SERVICES
DISASTER ASSISTANCE PROGRAMS BRANCH
3650 SCHRIEVER AVENUE
MATHER, CALIFORNIA 95655
PHONE: (916) 845-8101 FAX: (916) 845-8381



August 15, 2007

Rick Tooker
City of Healdsburg
Planning and Building Department
401 Grove Street
Healdsburg, CA 95448

RE: Notice of Preparation for a Draft Environmental Impact Report for the City of Healdsburg
2025 General Plan Update, SCH# 2007082030

Dear Mr. Tooker:

Thank you for the opportunity to comment on your Notice of Preparation for a Draft Environmental Impact Report (DEIR) for the city's general plan update. In preparing the general plan and accompanying DEIR, the city should examine the sections of state planning law that involve potential hazards the city may face. For your information, I have underlined specific sections of state planning law where identification and analysis of hazards are discussed (see Attachment A).

Prior to the release of the draft general plan or within the DEIR, city staff or your consultants should examine each of the requirements in state planning law and determine if there are hazard issues within the community which the general plan should address. A table in the DEIR (or general plan) which identifies these specific issues and where they are addressed in the general plan would be helpful in demonstrating the city has complied with these requirements. If the DEIR determines that state planning law requirements have not been met, it should recommend that these issues be addressed in the general plan as a mitigation measure.

We note that state planning law includes a requirement for consultations with state agencies in regard to information related to hazards. OES would be happy to share all available information at our disposal to facilitate the city's ability to comply with state planning and environmental laws.

If you have any questions about these comments, please contact Andrew Rush at (916) 845-8269 or andrew.rush@OES.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Andrew J. Rush".

for
Dennis Castrillo
Environmental Officer

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AUG 17 2007

PLANNING DIVISION

CITY OF HEALDSBURG

Attachment A

Hazards and State Planning Law Requirements

(All citations are from the Government Code)

65302. Seven mandated elements

The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principles, standards, and plan proposals. The plan shall include the following elements:

(a) A land use element which designates the proposed general distribution and general location and extent of the uses of the land for housing, business, industry, open space, including agriculture, natural resources, recreation, and enjoyment of scenic beauty, education, public buildings and grounds, solid and liquid waste disposal facilities, and other categories of public and private uses of land. The land use element shall include a statement of the standards of population density and building intensity recommended for the various districts and other territory covered by the plan. The land use element shall identify areas covered by the plan that are subject to flooding and shall be reviewed annually with respect to those areas. The land use element shall designate, in a land use category that provides for timber production, those parcels of real property zoned for timberland production pursuant to the California Timberland Productivity Act of 1982, Chapter 6.7 (commencing with Section 51100) of Part 1 of Division 1 of Title 5.

(g) A safety element for the protection of the community from any unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to mudslides and landslides; subsidence, liquefaction and other seismic hazards identified pursuant to Chapter 7.8 (commencing with Section 2690) of the Public Resources Code, and other geologic hazards known to the legislative body; flooding; and wildland and urban fires. The safety element shall include mapping of known seismic and other geologic hazards. It shall also address evacuation routes, peakload water supply requirements, and minimum road widths and clearances around structures, as those items relate to identified fire and geologic hazards. Prior to the periodic review of its general plan and prior to preparing or revising its safety element, each city and county shall consult the Division of Mines and Geology of the Department of Conservation and the Office of Emergency Services for the purpose of including information known by and available to the department and the office required by this subdivision.

(d) A conservation element for the conservation, development, and utilization of natural resources including water and its hydraulic force, forests, soils, rivers and other waters, harbors, fisheries, wildlife, minerals, and other natural resources. That portion of the conservation element including waters shall be developed in coordination with any countywide water agency and with all district and city agencies which have developed, served, controlled or conserved water for any purpose for the county or city for which the plan is prepared. Coordination shall include the discussion and evaluation of any water supply and demand information described in Section 65352.5, if that information has been submitted by the water agency to the city or county. The conservation element may also cover:

- (1) The reclamation of land and waters.
- (2) Prevention and control of the pollution of streams and other waters.
- (3) Regulation of the use of land in stream channels and other areas required for the accomplishment of the conservation plan.
- (4) Prevention, control, and correction of the erosion of soils, beaches, and shores.
- (5) Protection of watersheds.
- (6) The location, quantity and quality of the rock, sand and gravel resources.
- (7) Flood control.

65302.3. Consistency with airport land use plans

- (a) The general plan, and any applicable specific plan prepared pursuant to Article 8 (commencing with Section 65450), shall be consistent with the plan adopted or amended pursuant to Section 21675 of the Public Utilities Code.

65302.6. Development of a local hazard mitigation plan

- (a) A city, county, or a city and county may adopt with its safety element pursuant to subdivision (g) of Section 65302 a local hazard mitigation plan (HMP) specified in the federal Disaster Mitigation Act of 2000 (P. L. 106-390). The hazard mitigation plan shall include all of the following elements called for in the federal act requirements:
 - (1) An initial earthquake performance evaluation of public facilities that provide essential services, shelter, and critical governmental functions.
 - (2) An inventory of private facilities that are potentially hazardous, including, but not limited to, multiunit, soft story, concrete tilt-up, and concrete frame buildings.
 - (3) A plan to reduce the potential risk from private and governmental facilities in the event of a disaster.

65560. Definitions (Open-Space Lands)

- (a) "Local open-space plan" is the open-space element of a county or city general plan adopted by the board or council, either as the local open-space plan or as the interim local open-space plan adopted pursuant to Section 65563.
- (b) "Open-space land" is any parcel or area of land or water which is essentially unimproved and devoted to an open-space use as defined in this section, and which is designated on a local, regional or state open-space plan as any of the following:
 - (1) Open space for the preservation of natural resources including, but not limited to, areas required for the preservation of plant and animal life, including habitat for fish and wildlife species; areas required for ecologic and other scientific study purposes; rivers, streams, bays and estuaries; and coastal beaches, lakeshores, banks of rivers and streams, and watershed lands.

(2) Open space used for the managed production of resources, including but not limited to, forest lands, rangeland, agricultural lands and areas of economic importance for the production of food or fiber; areas required for recharge of ground water basins; bays, estuaries, marshes, rivers and streams which are important for the management of commercial fisheries; and areas containing major mineral deposits, including those in short supply.

(3) Open space for outdoor recreation, including but not limited to, areas of outstanding scenic, historic and cultural value; areas particularly suited for park and recreation purposes, including access to lakeshores, beaches, and rivers and streams; and areas which serve as links between major recreation and open-space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors.

(4) Open space for public health and safety, including, but not limited to, areas which require special management or regulation because of hazardous or special conditions such as earthquake fault zones, unstable soil areas, flood plains, watersheds, areas presenting high fire risks, areas required for the protection of water quality and water reservoirs and areas required for the protection and enhancement of air quality.

DEPARTMENT OF TRANSPORTATION

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August 31, 2007

PLANNING & BUILDING DEPT. SON101975
CITY OF HEALDSBURG SON-101-34.36/36.98

Mr. Rick Tooker
City of Healdsburg
Planning and Building Department
401 Grove Street
Healdsburg, CA 95448

Dear Mr. Tooker:

City of Healdsburg 2025 General Plan Update – Notice of Preparation (NOP)

Thank you for including the California Department of Transportation (Department) in the early stages of the environmental review process for the 2025 General Plan Update. Please find our comments on the NOP below:

Traffic Analysis

The Department is primarily concerned with impacts of this General Plan Update on US 101, its on- and off-ramps and ramp terminal intersections in the area depicted in Figure 2 of the NOP and potentially affected sections of US 101 north and south of the City of Healdsburg. The traffic impact study to be prepared should include but not be limited to the information detailed below:

1. Information on the update's traffic impacts in terms of trip generation, distribution, and assignment. The assumptions and methodologies used in compiling this information should be addressed. The study should clearly show the percentage of project trips assigned to US 101 and its on- and off-ramps.
2. Current (2006) Average Daily Traffic (ADT) and AM and PM peak hour volumes on all significantly affected streets, highway segments and intersections.
3. Schematic illustration and level of service (LOS) analysis for the following scenarios: 1) existing, 2) existing plus project, 3) cumulative and 4) cumulative plus project for the roadways and intersections in the project area.
4. Calculation of cumulative traffic volumes should consider all traffic-generating developments, both existing and future, that would affect the State highway facilities being evaluated.

5. The procedures contained in the 2000 update of the Highway Capacity Manual should be used as a guide for the analysis. We also recommend using the Department's "*Guide for the Preparation of Traffic Impact Studies*"; it is available on the following web site: <http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf> .
6. Mitigation measures should be identified where plan implementation is expected to have a significant impact. Mitigation measures proposed should be fully discussed, including financing, scheduling, implementation responsibilities, and lead agency monitoring.
7. Mitigation measures should consider highway and non-highway improvements and services. Special attention should be given to the development of alternate solutions to circulation problems that do not rely on increased highway construction, such as:
 - Encouraging mixed-use developments;
 - Implementing bicycle- and pedestrian-friendly design solutions;
 - Planning for transit service improvements and expansion.

We look forward to reviewing the traffic study, technical appendices and Draft EIR for this Transportation Element update. We do expect to receive a copy from the State Clearinghouse, but in order to expedite our review please send two copies in advance to:

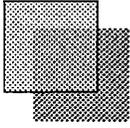
Ina Gerhard
Office of Transit and Community Planning
Department of Transportation, District 4
P.O. Box 23660
Oakland, CA 94623-0660

Should you require further information or have any questions regarding this letter, please call or email Ina Gerhard of my staff at (510) 286-5737 or ina_gerhard@dot.ca.gov .

Sincerely,


TIMOTHY C. SABLE
District Branch Chief
IGR/CEQA

c: State Clearinghouse



TOMARAS & OGAS, LLP

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AUG 30 2007

PLANNING & BUILDING DEPT
CITY OF HEALDSBURG

August 27, 2007

Rick Tooker, Director
City of Healdsburg
Planning and Building Department
401 Grove Street
Healdsburg, CA 95448

Re: Notice of Preparation of Draft Environmental Impact Report for the City of Healdsburg General Plan Update

Dear Mr. Tooker:

Our firm represents the Lytton Band of Pomo Indians. The Lytton Rancheria, a federally recognized Indian Tribe (hereinafter "Lytton Band"), submits the following response to your Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the City of Healdsburg General Plan Update (hereinafter "the Project"). The Lytton Band formally requests that it be involved in the entire Environmental Impact Report (EIR) process for the proposed Project.

Please add the Tribe and our firm to your mailing list for this and other projects which will impact Pomo sites.

Lytton Band of Pomo Indians
Lytton Rancheria
1300 N. Dutton Avenue, Suite A
Santa Rosa, CA 95401

Brenda L. Tomaras
Tomaras & Ogas, LLP
10755-F Scripps Poway Parkway #281
San Diego, CA 92131

PROJECT GENERALLY

The Lytton Band is not opposed to development projects in the City of Healdsburg and its sphere of influence ("SOI"). The Lytton Band's primary concerns stem from the potential for development projects to have impacts on Native American cultural resources. The Lytton Band is concerned about both the protection of unique and irreplaceable cultural resources, such as Pomo village sites and archaeological items which would be displaced by ground-disturbing work on projects within the City and its SOI, and on the proper and lawful treatment of cultural

items, Native American human remains and sacred items likely to be discovered in the course of the work.

REQUESTED INVOLVEMENT

The Lytton Band contends that a thorough cultural resources assessment of the non-developed areas in the City and its SOI should be required as part of the Draft EIR for the City of Healdsburg General Plan Update. Such an assessment should include consultation with the Tribe.

MITIGATION MEASURES

The cultural resources assessment and surveys may reveal significant archaeological resources and sites which may be eligible for inclusion in the historic site register, may contain human remains and/or may be sacred Pomo sites. Given that Native American cultural resources will likely be affected by the Project, the Lytton Band requests it be allowed to be involved and participate with the City in developing all mitigation plans for both the General Plan Update and development project which would fall within that Update.

The City has the ability to impose general mitigation measures for cultural resources as part of its General Plan. In project areas where resources are known or suspected, the Lytton Band believes that Tribal monitors should be required to be present during ground-disturbing activities and as such, a mitigation measure requiring tribal monitoring should be included.

According to the California Public Resources Code, § 5097.98, if Native American human remains are discovered, the Native American Heritage commission must name a "most likely descendant," who shall be consulted as to the appropriate disposition of the remains. The Lytton Band believes that should any Native American human remains be found during development, they will likely be of Pomo origin. Accordingly, the Band further requests that the City work with the Pomo tribes to draft any necessary agreements which would address any inadvertent discoveries of cultural resources, including human remains, during development within the City of Healdsburg and its SOI.

CONCLUSION

The Lytton Band requests that the draft EIR specifically commit to the inclusion of the Tribe as a partner in the assessment of impacts on cultural resources and drafting and negotiating the mitigation and monitoring concerning cultural resources; that it explicitly call for Native American monitoring of ground-disturbing activities in archaeologically sensitive areas; and that it commit to allowing either in-place location or on-site reburial of Native American human remains if any are discovered during the project.

The Lytton Band appreciates the opportunity to provide comments on the Notice of Preparation for the Draft EIR on the City of Healdsburg's General Plan Update and looks

Letter to Rick Tooker
Re: NOP for Draft EIR for City of Healdsburg General Plan Update
August 27, 2007
Page 3

forward to working together with the City and other interested agencies in protecting the invaluable Native American cultural resources found in the City of Healdsburg and its SOI.

Very truly yours,

TOMARAS & OGAS, LLP

A handwritten signature in black ink that reads "Brenda L. Tomaras". The signature is written in a cursive style with a large, looping initial "B".

Brenda L. Tomaras
Attorneys for the Lytton Band of Pomo Indians

Healdsburg City Council, and
Planning Department Staff

Hello City Council members,

The Eight (8) Principles of a Healthy General Plan include:

1. Achieving a Sustainable Community by determining a numeric Carrying Capacity limit for ultimate human population, where that amount of people and their impacts clearly does not imperil the existence of any native animal or plant populations. We may not agree on what the carrying capacity limit is, but we must establish one using the best available science. Within the Carrying Capacity Limit, until the affordable housing problem has been solved, whenever housing is approved, the primary goal shall be to first house those with the least income.
2. Provides full, and fully, enforceable protection for all of our priceless, imperiled remaining native oak savannahs and their ecosystem;
3. Prevents and reduces all man-made environmental impacts including pollution by chemicals (including pesticides) of air, land and water, and by noise and light (radiation) to levels unarguably below potential harm and significance;
4. Allows subdivisions, golf courses, dams, logging and roadway increases only when approved by a public vote;
5. Provides a Public Participation Element, which provides the same amount of participation for the public as it provides for developers, extractors and government with a fair and thorough process to provide facts and reasoning for decisionmakers and the public, and provides for fair and reasonable decisions in the public interest based upon facts and reason;
6. Provides for full genuine citizen enforcement of all General Plan violations;
7. Fully complies with, by exceeding, all state and federal environmental protection laws specifically including California's Environmental Quality Act, California's Endangered Species Act, our Federal Endangered Species Act, our Federal Clean Water Act, and our Coastal Act;
8. Must be ratified by the voters. This removes the burden from the public to objecting to a bad General Plan and places it on the City to make a good General Plan the public will support.

Further, I ask that ANY housing growth be limited to that area within .75 mile radius of the intersection of Matheson and Center Streets. By restricting growth to that area, it would encourage a walking/bicycling method of travel, as opposed to car trips and the ensuing parking, pollution and traffic tie-ups. This smart planning in Healdsburg would make the footprint of Healdsburg smaller and more viable for commercial enterprises; improving access to schools, health care, libraries and city services. Further it would minimize the costs involved in buildout of city services, which are conservatively estimated to be \$5,000 per new household.

The General Plan should eliminate any population growth/residential home/hotel/resort plans until adequate water supplies for a 5 year drought are proven to be available and easily accessed by current extraction methods. Currently, as of Aug 2007, Sonoma County is under a 15% reduction of water use - and the City of Healdsburg's General Plan should develop a plan for reducing the overall population by 15%. Basically, if the current system is not capable of keeping up with demand for resources - such as water, water treatment, electricity - then not only is a no growth option advisable but a "minus-growth" option should be studied. The General Plan should include such a study and have in it the financial impact on the current residents of Healdsburg.

The General Plan should include in it's traffic study the extra 4,000,000 to 5,000,000 vehicle trips being made to a local casino, River Rock. At least 2,000,000 vehicle trips per year are estimated to be made along Healdsburg Avenue alone, and any housing developments, commercial developments must include their effects on cue lengths and level of service along the main commercial/personal vehicular corridor of Highways 101, State Route 128, Dry Creek/Highway 101 interchange, Healdsburg Avenue, Healdsburg Avenue/Dry Creek Road intersection. Would these roads be adequate to the task and would they involve substantial noise, light, air pollution?

Healdsburg's General Plan should have an ART component, encouraging Public Art along all paths and public rights of way, inside Parks and surrounding public schools.

The General Plan should ask that any development costs (in US dollars) to be paid by the city, such as water resource development, water treatment, buildout of City Services (ie. Electrical service poles, wires, conduits, transformers, switches; water pipelines, sewage pipelines, pump stations), FOR ANY proposed subdivision inside the City Limits or up to and including the Urban Growth Boundary be part of the notice of hearing for development. Currently, for instance, the proposed Saggio Hills subdivision would cost every householder in Healdsburg \$5,000 (conservative estimate) in increased fees that would never be repaid by the developers. By placing the actual and true cost to EXISTING taxpayers on the Notice of Development, the General Plan would foster a "Truth in Advertising" now missing from the entire planning process.

The General Plan should have as a core transportation method using the NWP right away for light rail, and coordinate local bus routes to intersect with the light rail. The General Plan should look at the possibility of significant reduction in car trips should a cheap

economical and green technology transport, ie BioDiesel locomotives be made available during the time frame of the General Plan.

The General Plan should have as a core principle "green building practices", with environmentally sustainable, easily recycled, chemically safe, materials used. A major component of this principle would be to reduce the likelihood of toxic chemicals being introduced into the environment.

The General Plan should foster growth along the Old Redwood Highway from Grant Avenue , along Healdsburg Avenue northwards to Mill Street. This area to be mixed use, both commercial and residential, high density residential nearest Mill Street. Housing Developments along this path to be 60% regular housing and 40% low to moderate income housing. General plan to encourage a 20 year Low Income plan for assisting LOCALLY employed citizens.

The General Plan should seek methods for reducing every citizen of Healdsburgs - as well as every commercial and farming enterprise - carbon footprint, reducing the amount of water polluted and used, reducing the amount of energy consumed by each. The General plan should include as one of it's core principles utilizing Renewable Energy at every opportunity where it's practically feasible.

The General Plan should seek to foster development within the ¼ mile radius of the intersection of Matheson and Center Street and avoid build out to/around/near the Urban Growth Boundary through the year 2035. As a method of fostering such "in-fill" the General Plan should penalize any developments currently (August 2007) outside City Limits by having such developments "pay their own way" by paying for increases in City Services and staff, utility buildout, and water extraction/treatment/sewage facilities.

The General Plan should encourage the retention of all native trees inside any residential development. All trees 50 years and older would be retained as significant and desirable resources, and have protected status - developers of subdivisions would be required to set aside outside their development, within the City of Healdsburg - a similar tract of trees for any trees removed. The set aside tree community would be forever protected from development - this is the "Pay as you Go" clause, keeping the net amount of trees in a balance. The General Plan should encourage native tree/bush/shrub/flower plantings as a core principle - utilizing natives for their drought tolerance and habitat practicalities.

The General Plan should foster within the commercial community methods to reduce traffic, pollution and parking problems by seeking their input during public input from the Citizenry. All developments, commercial buildings to be voted upon by the public at large, and be subject to public review and scrutiny of at least 6 months before any approval/disapproval, decisions can be taken by the City of Healdsburg.

The General Plan should have as one of it's core goals the implementation of WireLess Internet access across the entire City boundaries. Also the Goal of a Fiber Optic service throughout the City of Healdsburg should be implemented as soon as is practically possible.

The General Plan of Healdsburg should foster a NO-Growth component to it, finding ways to keep the City "small", and allowing the citizens of Healdsburg the right to vote on all growth inducing developments, be they subdivisions, commercial tracts and or industrial/farming projects. By limiting growth to a balanced "for each one out a new one may come in" it encourages a slow planned ecologically sound pattern to utilization of resources.

Thank you for your consideration of these guidelines and I hope you will abide by the suggestions I have made. I believe them to be in the very best interests of every current and future resident of Healdsburg and in years to come will be viewed as being foresighted, progressive and ecologically sound.

All best wishes to those who will be determining our shared future,

Sincerely, Benjamin Raymond Marchand

PO Box 1363 Healdsburg CA 95448

With great help from and appreciation to my Brother David Dilworth,
1Hope.org

Addendum - all future construction to have
utilities placed underground.

-

M E R R I L Y N J O Y C E

FOR THE PUBLIC RECORD

August 28, 2007

HEALDSBURG
Planning Commission and
Department of Planning
401 Grove Street
Healdsburg, CA 95448-4723

RE: General Plan Update

Dear Members of the Planning Commission

I am here tonight to ask that you give more consideration in the General Plan Update to the fact of dwindling natural resources and global climate change that impact us here on a local level and add this simple principle to the update. We will REDUCE, REUSE, REPAIR OR RECYCLE first.

On January 22, 2007 I wrote to the City Council and Planning Commission requesting that the language in the General Plan update strengthen, not weaken, GREEN policies I have attached a copy of that letter.

Since January you have built a stronger foundation to the General Plan in a set of guiding principles. These overriding set of values carry a vision for a healthy future that focuses our attention locally preserving the character of our unique small, livable town. Again I am here to ask you to strengthen that vision in terms of sustainability. Is what we do going to leave the place more abundant and livable in the future or less abundant and livable?

Economic stability is not found in one crop or industry but in an attitude that asks one simple question when planning and considering new projects: Can we first REDUCE, REUSE, REPAIR OR RECYCLE? Whether the issue is waste water, a building project, garbage, a neighborhood, car trips, carbon reduction or our global footprint.

Sincerely,



Merrilyn Joyce

FOR THE PUBLIC RECORD

January 22, 2007

HEALDSBURG
City Council
Planning Commission and
Department of Planning
401 Grove Street
Healdsburg, CA 95448-4723

RE: General Plan Update

Dear Mayor Plass and Members of the City Council

If the General Plan is the city's constitution and its Bill of Rights; if it lays out a vision for the next 20 years then I vote to strengthen, not weaken, *GREEN* policies regarding renewable energy and clean technology that promote a sustainable, local living economy in Healdsburg to ensure the city will continue to thrive and be healthy into the future.

Recommendations cited below from the GPA 06-01 staff report: Attachment 3, Planning Commission meeting minutes 11/28/06 were headed in the right direction:

- Innovative business that brings sustainable building construction & operational practices
- Alternative transportation modes
- Water conservation
- Pollution reduction measures
- Green certified building projects

But then it was decided that *Green Building* will be reduced to read on a "voluntary basis" in Healdsburg—this seems to me like an unfortunate cop-out. There is plenty of data showing that voluntary "regulations" don't work. And there is plenty of data showing that GREEN is good for business' bottom line. In fact, GREEN technology is the 5th largest market sector in the US. The city of Oakland passed a resolution in Oct. 2006 to be *oil independent* by 2020. Oakland believes *Green* is good for the economy.

The City of Healdsburg has also set meaningful targets to reduce greenhouse gas emissions 25% below 1990 levels by 2015. I would urge you to make sustainability a real priority in all the elements of the General Plan Update—and especially in a set of Guiding Principles and in *Transportation* and *Economic Development*. Policy needs to spell out how we will achieve those ambitious emission reduction targets. "The City shall encourage" should perhaps read, "The City mandates or strongly promotes with (these incentives and rebates)." If there is a stick approach include a meaningful carrot at the end. Designing with sustainability in mind creates a more prosperous and connected community that is healthier, cleaner, quieter, more peaceful, beautiful and playful while accepting the 21st century's challenges with intelligence and grace.

Sincerely,

Merrilyn Joyce

4 September 2007

City of Healdsburg
Planning and Building Department
401 Grove Street
Healdsburg, CA

95448

re: Comments on EIR Scoping
Prepared by
Martin Dreiling

The following comments are offered in support of the scoping process, and ultimate CEQA assessment, of the Healdsburg General Plan. Absent a line by line comment on the Environmental Checklist that is typically the basis of CEQA scoping, I would like to address several very general areas of consideration that have been absent in previous CEQA documents and that represent a long time failure of CEQA to address regional and global impacts in disclosure form.

I am requesting that these items be elevated to genuine levels of consideration for both the immediate community and the region. They most affect the category of Land Use and Planning in the typical Environmental Checklist, however there are relationships with each of the other categories as well, particularly Transportation.

This letter is not intended to offer a methodology for these considerations, as space and time do not permit. However, as these are emerging concerns in the greater land use and environmental planning communities, a methodology should be developed to consider these items in the context of a local EIR.

Additionally there are emerging precedents requiring broader consideration of the global interfaces of local land use decisions that, if not a requirement at this time, will certainly become a requirement over the life of this update of the GP. Santa Barbara is the recent example.

Assessment Context.

The CEQA assessment will attempt to utilize established and defensible methods to generate results that can standup to scrutiny according to CEQA precedents. It is my opinion that, while defensible, this represents a general failure of CEQA to accomplish its stated goal of disclosing a full range of measurable impacts to a non-professional public. This is evidenced by the wealth of projects that have occurred since CEQA that have generated impacts that were never considered in the original document or that were not the key impacts important to the public. Ultimately this is also a reflection of the difficulty that the public has in envisioning a future impact based on statements in an EIR.

Historically, CEQA assessments occur within a bubble of context that imbeds certain assumptions about growth, acceptable levels of impact and metrics for the unavoidable impacts within the disclosure document. Traditional EIR documents have utilized metrics of a very particular nurture to assess impacts. These metrics have typically assumed a context of growth of a certain nature would occur over the course of the study period. In many cases the growth modeled is rooted in basic assumptions about both the future and the preferences of communities and individuals. To be explicit, much CEQA documentation tends to assume

that the suburban patterns of the past fifty years are both the norm and the desired result and that, without specific mitigations, these patterns will be the patterns of choice for the considered projects as well as adjacent or subsequent projects.

Example: Traffic impacts have generally been based on methodologies that assume a suburban pattern of trip and parking generations. Traffic and parking loads typically reflect ITE base information and assume isolated trips with no, or minimal, capture resulting from localization. This results in parking impacts that are inflated and generate either project reductions or specific mitigations, many of which tend to further exacerbate traffic impacts, or at least transfer them to another location.

Interestingly, a different approach to modeling futures might actually de-emphasize traffic in some CEQA contexts, thus reducing mitigation or increasing project opportunities.

This is probably my biggest single concern for the Healdsburg General Plan. It includes a number of forward thinking components that could be flagged as problematic in a traditional CEQA exercise. Language that is intended to reduce intersection LOS or minimize street sizes typically draw attention as potential environmental impacts, when in fact these can be environmental positives.

Additionally, increased urbanization and densities near downtown centers can generate apparent local impacts while reducing regional or even global impacts.

General Concerns

The following represent several key areas that should be both considered and used to inform other considerations of typical as well as non-typical environmental impacts. These are general in nature and require consideration within a number of the usual Checklist items. Alternately, there is a case to be made that these areas of concern should generate a new category within the checklist to cover the number of concerns that are often missed within a typical CEQA document.

Peak Oil

All impacts of the GP should be measured against the best information about the near term future of petroleum based energy. In the last 40 years, impacts have typically assumed that energy usage patterns would remain unchanged and that the life style patterns that result from the near-exclusive use of cheap oil as the basic energy input would continue to shape land use decisions.

Thus CEQA typically assumes worst case scenarios for traffic and parking growth, continued patterns of intercity commuting as a primary component of regional life styles, ongoing patterns of geographic separation between employment locations and residence locations, continuation of regional shopping patterns as the primary consideration for delivery of goods and services, and , generally an overall Conventional Suburban Design (CSD) ethos to land use decisions.

Expected Patterns

If we continue to see oil prices increase and global oil supplies stabilize or shrink, it is highly likely that a range of regional patterns will change and that localization will begin to affect land use decisions in numerous ways. Example results will include :

- Increasing pressure by individuals to find work and residence locations in the same town or neighborhood.

- Increasing pressure, via market forces, to provide opportunities for local merchants, local manufacturing, local repair and maintenance and local education.
- Increasing pressure to provide transportation alternatives to the automobile insubstantial form. This means genuine bicycle facilities, dignified pedestrian facilities throughout all neighborhoods and genuine allocations of portion of the current circulation system to these and other alternatives, thus reducing the portion of that system available to cars.
- Decreasing emphasis on regional retail and employment and decreasing emphasis on global retail suppliers and their respective distribution outlets (like big boxes)

Expected Results / Impacts

Proper consideration of this area may result in favorable readings for Traditional Neighborhood Development (TND) components of the general Plan while offering discouraging results for the more Conventional Suburban Development (CSD) components of the GP.

For example, this metric will favor neighborhood centered growth rather than growth at the edges of the UGB. Additionally, this metric will likely support continued and higher density development at the town center(s). At the same time it should offer a means to de-emphasize the expansion of roadways systems at the edge, freeway connections or other typical means to "reduce" or otherwise mitigate traffic.

Consideration of Peak Oil issues will also support elements of the GP that foster a range of housing and job types within town, it will favor

Care should be taken, however, that certain positive components of the GP are not awarded negative impacts based on CSD viewpoints. For example, in typical suburban settings, noise can be weighted as an environmental negative based on strictly immediate considerations. However, in the larger scheme of things, increased noise resulting from more compact development can be seen as an environmental positive if that compact development supports agricultural land preservation, reduced regional commuting and a general reduction in pavement and parking.

Climate Change

Climate change is likely a more difficult metric to consider for may issues related to the GP, however there are very clear ways to connect GP issues with the potential to generate greenhouse gasses. Most of these ways will relate to both local and regional transportation issues.

Expected Patterns

As awareness of Climate Change issues increase, several key patterns will likely emerge within the consideration of issues. The primary category of concerns will center around the issues of the generation of Greenhouse Gasses: Land use components that tend to increase the generation of greenhouse gasses will likely be discouraged, either by policy or, more likely, through energy pricing via the peak Oil issue above.

Resulting patterns may include:

- Smaller, more compact development patterns requiring reduced motorized transportation for functionality.
- Increased localization as a means to reduce generation of greenhouse gasses via transportation of

- goods and services.
- Reduced dependence on highly processed goods and materials, thus reducing energy inputs for manufacturing.
- Reductions in a wide range of actual materials and products that generate greenhouse gases, likely affecting building materials and methods most significantly with regard to the GP.
- Increased emphasis on smaller buildings, natural ventilation and cooling systems, trees for shading and overall reductions in heat island components of urban design.

Expected results / Impacts

Adequate consideration of this category of metrics may result in favorable readings for aspects of the GP that support localization, diversity and general compactness of development. As with Peak Oil, this will likely affect components of the GP that discourage big box retail, regional retail and even, if understood adequately, the occurrence of national chains and other commercial services that rely solely on providing materials and products from long distances.

Additionally, consideration of Climate Change should result in support both for density and protection of the urban forest, components that may appear to be in conflict, but which must be designed in harmony for positive results.

This consideration should also be supportive of GP components that seek to reduce the physical size of the roadway and paving system. This may result in GP provisions for transportation and safety reading as potential negative environmental impacts, as would freeway expansion, bridge replacement and other elements that will result in more paving.

Localization

Regardless of specific Climate Change or Peak Oil considerations, there will likely be a pattern of increasing localization emerging both across the nation, but in particular in the Healdsburg Area. This pattern will be fueled by a number of basic quality of life issues ranging from personal choices made to avoid congestion, to a focus on food quality and local food sovereignty.

Localization is increasingly being seen as a means for economic stabilization of a community by trapping economic resources. Localization can transform a good sales tax base into an equally important base for retaining wages and profits within a community.

For this reason, localization should be elevated beyond a life style consideration, which may not be fully justified for consideration within an EWIR, to a critical component of local economic stability, and resulting environmental benefits.

Thus, localization need not be considered simply as a solution to Peak Oil or Climate Change concerns, but

also as a stand alone environmental concern in its own right.

Localization as explicitly differentiated from regional or CSD patterns, must be a factor in all components of the EIR. Any factor that may generate a result when coupled with a regional factor, such as employment locations, must be dealt with differently when the factories explicitly local.

For example: components in the GP that discuss jobs within the city limits should measure that component in a manner that generates different results if the employees for those jobs are assumed to be housed locally vs. regionally. Additionally, the metric should clearly state assumptions about the proportions of workers assumed to be housed locally so that the public can clearly understand underlying assumptions about commuting rates and patterns.

Expected Patterns Resulting from Increased Localization

- Increased emphasis on localization will generate a greater need for smaller, more diverse workplaces, retail locations and a more highly integrated urban fabric that mixes home and workplaces.
- Localization can also generate a much greater emphasis on alternative transportation methods, particularly walking.
- Localization can generate a greater need for finer grained diversity than is evident in GP Land Use designations or the resulting Zoning Designations.

Expected Outcomes / Impacts

Proper consideration of localization will affect many of the same areas of the GP as the previous two categories, with additional emphasis on Economic Development, Agriculture.

Localization considerations should generate positive readings for the following:

- Support of the Plaza, downtown centered retail development.
- Diversity of jobs, housing, etc.
- Support of agriculture as a key industry.
- Support for new and diverse industries, provided they are locally owned and operated.
- Physical planning components that reduce building size and increase the supply of smaller venues for retail and commercial enterprises, particularly when located throughout the community and favoring smaller local tenants and owners, rather than marginalizing to favor the needs of larger, national firms.

Localization consideration may result in negative scoring of the GP with regard to weaknesses in dealing with the remaining large parcels in town, the lack of clarity in the mixed use designations and the emphasis on accommodating traffic demands in various portions of the transportation element.

Suburban Protectionism

The final major area of concern is a potential for Protectionism to become a factor in future land use decisions.

Protectionism in this case refers to a likely increase in the demand for the protection of suburban land use patterns in the name of economic security. As localism emerges as a potentially dominate factor in land use decisions, many entities, from business concerns, to industry organizations of individual corporate interests will

likely seek relief at the local land use regulation level to continue business and development practices that are in decline.

As an example, citizens will be faced with requests to offer concessions to larger regional business concerns for consideration of locating in community as a means to secure jobs and sales tax revenue. This already occurs, but is likely to increase.

Expected Patterns This concern will generate a number of potentially negative patterns that should be addressed both in consideration of the GP with regard to CEQA, but also in the design of the GP itself.

There will likely be great pressure to allow Conventional Suburban Development on the remaining large parcels in town. Additionally, external pressure will be applied to expand the freeway connections and road system to facilitate great exposure to these potential CSD sites while de-emphasizing existing Traditional neighborhood locations in town.

Expected Outcomes / Impacts The major weakness in the GP with regard to this concern lies in the lack of explicit language dealing with the large parcels in town, the lack of explicit language dealing with the parcels adjacent to the freeways and the lack of explicit language dealing with definitions of mixed use.

This could be mitigated by including clear language in the general Plan seeking to support Traditional Neighborhood Development patterns as a default setting for remaining development. Additionally clarification of the Mixed Use designation or the addition of a Traditional Neighborhood Development (TND) designation might offer adequate mitigation for this concern.

One of the most important considerations in any CEQA document is the requirement to assess accumulated impacts. In many CEQA documents, this is done poorly and often fails to assess true accumulations of impacts beyond a very local scale.

If there is one important demand that should be considered, both in the CEQA process and in the final development of the GP, it is that of synthesis. All items should be seen not as line items to be accumulated in a linear fashion, but as collective concerns that behave in a synthetic and emergent manner.

Absent defensible metrics for this kind of concern, both the authors and the City staff should be tasked with making judgments about the ways in which impacts either accumulate or offset each other in various synthetic scenarios. This must be a transparent process that can be audited, but it will likely not be an arithmetic process that can be measured.

This is asking much of what is no more than a disclosure process. Yet disclosure requires not only revealing what is known, but assessing, and making some educated assumptions about, what might occur.

In the context of a 20 year plan, this last component is critical. Language used today in General Plans, and the resulting policies, will likely have little applicability in 20 years given the larger paradigm changes that are occurring right now. Any plan that fails to properly emphasize these potential paradigm changes, and that fails to make a positive effort to anticipate the impacts of those changes, will be valueless in short order.

Healdsburg General Plan
EIR Scoping Comments
4 September 2007

Thus Healdsburg is faced with an opportunity to not only create a general Plan that addresses emerging futures, but also to set precedents for environmental disclosure that could shape the future of CEQA in California.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Dreiling', written over a large, stylized 'D'.

Martin Dreiling
337 Matheson
Healdsburg,
CA

95448

707 431 1305

QUAKER HILL DEVELOPMENT CORPORATION

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TELEPHONE: (707) 431-1780 · FAX: (707) 431-9577

August 24, 2007

Mr. Rick Tooker
Planning and Building Director
City of Healdsburg
401 Grove St. Healdsburg CA 95448

RECEIVED

AUG 24 2007

Dear Rick,

PLANNING & BUILDING DEPT.

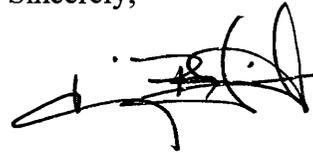
We offer the following comments regarding the ~~City of Healdsburg~~ Notice of Preparation for the General Plan Environmental Impact Report ("EIR").

1. In conjunction with the EIR, the City should prepare a Water Supply Assessment ("WSA") to comply with the requirements of SB 610 and State Water Code Section 10910 with respect to full build out of the General Plan.
2. In January 2007, the City Council directed staff to evaluate two alternative Land Use Designations (GI) General Industrial and (MU) Mixed-Use for the property we own at the north end of town, as part of the General Plan EIR. In March 2007 we provided City staff with a Site Impact Matrix and analysis prepared by Economic and Planning Systems (copy attached) to evaluate the impacts on water, sewer, traffic, schools and public safety associated with the (GI) and (MU) designations. We encourage to City and its consultant Christopher Joseph and Associates to utilize this information in preparing the General Plan EIR, to adequately address the maximum impacts associated with either Land Use Designation.
3. The cumulative impacts of the Circulation Element should consider the impacts of the anticipated conversion of the private at-grade roadway crossing of the NCRA rail line at milepost 70.85 to a public crossing.
4. The requirement for bike lanes at the North Entry along Healdsburg Avenue should be considered, consistent with the Sonoma County Transportation Authority Countywide Bicycle and Pedestrian Master Plan.
5. The EIR should address the impact, if any, of the recent Court of Appeal Decision in the *Riverwatch* case, to determine the City's ability to provide adequate sanitary sewer for full General Plan build out.

6. The General Plan must be internally consistent and part of that consistency is the availability of public revenue sources to achieve the identified Goals, Objectives and Implementation Measures. To the extent that mitigation measures for General Plan impacts are required and identified in the EIR, the EIR should discuss the fiscal state of the City and its ability to complete the required environmental mitigation measures.

Please call me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Harrington". The signature is stylized with a large, sweeping flourish on the right side.

Craig Harrington

Cc. w/o enclosure Steve Butler, Clement, Fitzpatrick & Kenworthy



Economic &
Planning Systems

*Public Finance
Real Estate Economics
Regional Economics
Land Use Policy*

February 27, 2007

Mr. Rick Tooker
Planning and Building Director
Healdsburg Planning Department
City of Healdsburg
401 Grove Street
Healdsburg, California 95448

Subject: Revised Site Impact Matrix, Quaker Hill Property; EPS #14093

Dear Rick:

This letter provides the most recent version of the Site Impact Matrix, which evaluates a range of use alternatives, including two that are consistent with the proposed General Industrial (GI) Land Use Designation and two that are consistent with the proposed Mixed-Use Commercial ("MX") Land Use Designation for the Quaker Hill Property.

The General Plan update process has refined the uses allowed under the proposed MX Land Use Designation. Specifically, the Draft General Plan Policy Document MX Land Use Designation allows for "retail, office, services and overnight accommodations that serve residents and/or visitors" as well as High Density Residential ("HR") units of up to 16 units per acre. The Draft General Plan proposes to combine various industrial uses, including light industrial and office parks into one General Industrial (GI) category.

While the MX Designation provides flexibility as to the use of the property, the related uncertainty creates some difficulties from a CEQA evaluation standpoint. Responding to this problem, the "Site Impact Matrix" provides a technical evaluation of a range of likely use alternatives under the MX Designation, focusing on key impact variables. The Matrix quantifies these variables in a manner that helps determine potential environmental impacts as a part of the Draft Environmental Impact Report (DEIR) for the City's General Plan Update.

We previously sent an earlier version of the "Site Impact Matrix" to Richard Spitler in May, 2005. More recently, in November 2006, we prepared a revised Matrix and forwarded a copy to you. In response to discussions with you and Richard, and following completion of traffic analysis, we have further revised the Matrix, incorporating a revised set of land uses, impact factors, and development "scenarios".

The methodology we have applied begins with identifying certain "impact factors" for the range of land uses that would be permitted in the proposed MX designation, as shown on Table 1. The impact factors are derived from industry sources and other impact and fee studies conducted by EPS. The traffic generation factors are adjusted to account for estimated "double-counting" of trips internal to the project. While there is considerable variation in these factors, additional review is essential. It will assure they are appropriate to Healdsburg and to this project in particular.

BERKELEY
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February 27, 2007

Page 2

The next step in the analysis applies the impact factors to the development quantities associated with four likely development scenarios: 1) General Industrial; 2) Office; 3) Mixed-Use Hospitality; and 4) Hospitality and Residential. In each case the results are arrayed in simple tables. In addition to the impact variables, an evaluation of key municipal revenue sources is also provided for each scenario. These are shown in the attached tables:

The scenarios include:

"General Industrial Impact" Scenario

- Light Industrial (300,000 square feet)

"Office Impact" Scenario

- General Office (300,000 square feet)

"Mixed-Use Hospitality" Scenario

- Specialty Retail (15,000 square feet)
- Restaurant (5,000 square feet)
- Hotel (335 rooms)
- Apartment (30 dwelling units)
- Conference Center (20,000 square feet)
- Health Club (15,000 square feet)

"Mixed-Use Hospitality and Residential" Scenario

- Hotel (300 rooms)
- Apartment (200 dwelling units)

As noted above, the purpose of the Matrix is to assist the City with its preparation of the General Plan EIR. Accordingly, as that effort gets underway, EPS, on behalf of Quaker Hill, will be happy to respond to questions and make modifications consistent with the needs of preparing a sound and defensible EIR. The methodology proposed for the Quaker Hill site may have relevance for the other "MX" designated areas in the General Plan. If you have questions or comments, please feel free to contact me or Richard Berkson in the Berkeley office.

Sincerely,

ECONOMIC & PLANNING SYSTEMS, INC.



Walter Kieser
Managing Principal

cc: Richard Spitler
Craig Harrington
Alan Cohen
Steve Butler

Table of Contents- Site Impact Matrix

Table Number	Description
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Table 1: Per-Unit Impact Factors

General Industrial Scenario

Table 2: General Industrial Impact Matrix

Table 3: General Industrial Fiscal Impacts

Office Scenario

Table 4: Office Impact Matrix

Table 5: Office Fiscal Impacts

Mixed-Use Hospitality Scenario

Table 6: Mixed Use Hospitality Impact Matrix

Table 7: Mixed Use Hospitality Fiscal Impacts

Table 8: Mixed Use Hospitality Sales Tax Revenues

Mixed-Use Hospitality and Residential Scenario

Table 9: Mixed Use Hospitality and Residential Impact Matrix

Table 10: Mixed Use Hospitality and Residential Fiscal Impacts

Table 11: Mixed Use Hospitality and Residential Sales Tax Revenues

Table 1
Per-Unit Impact Factors

Use	Unit	Employment (1) (per Unit or 1,000 Sq. Ft.)	Persons (2)	Daily Trip Generation (3)	Utility Demand			Annual Service Demand (per Unit or 1,000 Sq. Ft.)			School Students (7)
					Water (gpd) (4)	Sewer (gpd) (5)	Fire Calls (6)	Police Calls (6)	Police Calls (6)		
Specialty Retail (8)	Sq. Ft.	2.86	--	44.32	309	206	0.050 (9)	0.220	0.220	0.000	
Restaurant (10)	Sq. Ft.	2.58	--	89.95	278	186	0.050	0.220	0.220	0.000	
General Office (11)	Sq. Ft.	3.50	--	10.36	378	252	0.050	0.210 (12)	0.210 (12)	0.000	
Hotel (13)	Rooms	0.87	2.00	8.92	217	145	0.035 (14)	0.252 (15)	0.252 (15)	0.000	
Apartment (16)	Dwelling Unit	--	2.65	6.72	208	139	0.105	0.637	0.637	0.645	
Conference Center (17)	Sq. Ft.	0.40	--	0 (18)	43	29	0.080	0.210 (12)	0.210 (12)	0.000	
Health Club (19)	Sq. Ft.	2.86	--	32.93	309	206	0.080	0.220	0.220	0.000	
Light Industrial	Sq. Ft.	1.60 (20)	--	6.97	155	103	0.060	0.350	0.350	0.000	
Total											

Notes to Table 1

- (1) The Natelson Company, Inc., Employment Density Study, 2001
- (2) Dept. of Finance, Economic & Planning Systems.
- (3) Whitlock & Weinberger Transportation, Inc., Focused Traffic Impact Analysis for the Healdsburg Mill Site, 2007.
- (4) Water demand is assumed to be 1.5 times sewer flow.
- (5) Assumes 72 gpd sewer flow per employee and 146 gpd per dwelling unit. Cotati Sanitary Sewer System Master Plan. (2002)
- (6) Burbank Nexus Study; Economic & Planning Systems. (2004)
- (7) School impact or additional students attending school is determined by assuming 2.645 people per household, as reported by the Department of Finance, and that there are two adults per household.
- (8) Factors for retail/commercial are based on total square footage.
- (9) Alameda Point Redevelopment Study; Economic and Planning Systems, Inc. (2004)
- (10) Factors for restaurant are based on total square footage.
- (11) Factors for general office are based on total square footage.
- (12) Martinez Impact Fee Study; Economic and Planning Systems, Inc. (2002)
- (13) Factors for Hotel are adjusted based on a 70% occupancy rate, except traffic impact which assumes a 100% occupancy rate. Water and sewer utility demand represents the demand generated by hotel guests and employees.
- (14) Study Conducted for the City of Napa; Economic and Planning Systems, Inc. (2000)
- (15) EPS estimate
- (16) Factors for Apartment are adjusted based on the assumption that 95% of the units are occupied.
- (17) Factors reflecting the environmental impacts of the conference center space are based on total square footage.
- (18) It is assumed that all people utilizing the conference center are hotel guests.
- (19) Factors reflecting the environmental impacts of the health club are based on total square footage.

Table 2
General Industrial Scenario Impact Matrix

Use	Unit	Quantity	Employment	Persons	Daily Trip Generation	Daily Utility Demand		Annual Service Demand		School Impact
						Water Use (gpd)	Sewer Flow (gpd)	Fire Calls	Police Calls	
Light Industrial	Sq. Ft.	300,000	479	--	2,091	46,544	31,030	18	105	0
Total			479	0	2,091	46,544	31,030	18	105	0

Source: Economic and Planning Systems, Inc.

Table 3
General Industrial Fiscal Impacts

Use	Property Tax	Sales Tax	TOT		Total
			10%	2%	
Light Industrial (1)	\$24,000	--	--	--	\$24,000
Total	\$24,000	\$0	\$0	\$0	\$24,000

(1) Property Tax revenues from Light Industrial are based on

total property tax	1%
city tax factor	10%
development costs per square foot	\$80
total square footage	300,000

Source: Economic and Planning Systems, Inc.

Table 4
Office Scenario Impact Matrix

Use	Unit	Quantity	Employment	Persons	Daily Trip Generation	Daily Utility Demand		Annual Service Demand		School Impact
						Water Use (gpd)	Sewer Flow (gpd)	Fire Calls	Police Calls	
General Office	Sq. Ft.	300,000	1,050	--	3,108	113,400	75,600	15	63	0
Total			1,050	0	3,108	113,400	75,600	15	63	0

Source: Economic and Planning Systems, Inc.

**Table 5
Office Fiscal Impacts**

Use	Property Tax	Sales Tax	TOT		Total
			10%	2%	
General Office (1)	\$67,500	—	—	—	\$67,500
Total	\$67,500	\$0	\$0	\$0	\$67,500

(1) Property Tax revenues from General Office are based on

total property tax	1%
city tax factor	10%
development costs per square foot	\$225
total square footage	300,000

Source: Economic and Planning Systems, Inc.

Table 6
Mixed Use Hospitality Scenario Impact Matrix

Use	Unit	Quantity	Employment	Persons	Daily Trip Generation	Daily Utility Demand		Annual Service Demand		School Impact
						Water Use (gpd)	Sewer Flow (gpd)	Fire Calls	Police Calls	
Specialty Retail	Sq. Ft.	15,000	43	--	665	4,628	3,086	1	3	0
Restaurant	Sq. Ft.	5,000	13	--	450	1,392	928	0	1	0
Hotel	Rooms	335	291	670	2,988	72,636	48,424	12	84	0
Apartment	Dwelling Unit	30	--	80	202	6,242	4,161	3	19	19
Conference Center	Sq. Ft.	20,000	8	--	0	864	576	2	4	0
Health Club	Sq. Ft.	15,000	43	--	494	4,628	3,086	1	3	0
Internal Trip Capture					-322					
Total			397	750	4,476	90,391	60,260	19	115	19

Source: Economic and Planning Systems, Inc.

**Table 7
Mixed Use Hospitality Fiscal Impacts**

Use	Property Tax (1)		Sales Tax (2)	TOT (3)		Total
				10%	2%	
Specialty Retail	\$3,750	(4)	\$52,500	--	--	\$56,250
Restaurant	\$1,250	(5)	\$20,000	--	--	\$21,250
Hotel	\$100,500	(6)	\$96,300	\$2,139,810	\$427,960	\$2,764,560
Apartment	\$7,500	(7)	--	--	--	\$7,490
Conference Center	\$6,210	(8)	--	--	--	\$6,200
Health Club	\$3,750	(9)	\$3,000	--	--	\$6,740
Total	\$122,960		\$171,800	\$2,139,810	\$427,960	\$2,862,530

- (1) All property tax revenue estimates are based on
- | | |
|--------------------|-----|
| total property tax | 1% |
| city tax factor | 10% |
- (2) Sales Tax based on 1% of estimated taxable sales. See Table 8.
- (3) Revenue generated by Transient Occupancy Tax is based on
- | | |
|-------------------------------|-------|
| room rate per night | \$250 |
| total rooms | 335 |
| occupancy rate | 70% |
| occupied rooms | 235 |
| days per year | 365 |
| TOT rate (community services) | 10% |
| TOT rate (public safety) | 2% |
- (4) Property Tax revenues from Specialty Retail are based on
- | | |
|-----------------------------------|--------|
| capitalized value per square foot | \$250 |
| total sq. ft. | 15,000 |
- (5) Property Tax revenues from Restaurant are based on
- | | |
|-----------------------------------|-------|
| capitalized value per square foot | \$250 |
| total sq. ft. | 5,000 |
- (6) Property Tax revenues from Hotel are based on
- | | |
|----------------------------|-----------|
| development costs per unit | \$300,000 |
| total units | 335 |
- (7) Property Tax revenues from Apartments are based on
- | | |
|----------------------------|-----------|
| development costs per unit | \$250,000 |
| total units | 30 |
- (8) Property tax revenues from Conference Center are based on
- | | |
|-------------------------------|--------|
| capitalized value per sq. ft. | \$310 |
| total sq. ft. | 20,000 |
- (9) Property tax revenues from Health Club are based on
- | | |
|-------------------------------|--------|
| capitalized value per sq. ft. | \$250 |
| total sq. ft. | 15,000 |

Source: Economic and Planning Systems, Inc.

Table 8
Mixed Use Hospitality Sales Tax Revenues

Land Use	Estimated Total Sales	Percent Taxable	Taxable Sales	1% of Taxable Sales
Specialty Retail (1)	\$5,250,000	100%	\$5,250,000	\$52,500
Restaurant (2)	\$2,000,000	100%	\$2,000,000	\$20,000
Hotel (3)	\$10,699,100	90%	\$9,629,200	\$96,300
Health Club (4)	\$300,000	100%	\$300,000	\$3,000
Total	\$18,249,100		\$17,179,200	\$171,800

(1) Estimated operating revenue from Specialty Retail is based on

Square footage 15,000
Sales per square foot \$350

(2) Estimated operating revenue from Restaurant is based on

Square footage 5,000
Sales per square foot \$400

(3) Estimated operating revenue from Hotel is based on

Total rooms 335
Occupancy Rate 70%
Occupied rooms 235
Sales per occupied room \$125 (not including room rate)
Days per year 365

(4) Estimated operating revenue from Health Club is based on

Square footage (retail portion) 750
Sales per square foot \$400

Source: Economic and Planning Systems, Inc.

**Table 9
Mixed Use Hospitality and Residential Scenario Impact Matrix**

Use	Unit	Quantity	Employment	Persons	Daily Trip Generation	Daily Utility Demand		Annual Service Demand		School Impact
						Water Use (gpd)	Sewer Flow (gpd)	Fire Calls	Police Calls	
Apartment	Dwelling Unit	200	--	530	1,344	41,610	27,740	21	127	129
Hotel	Rooms	300	260	600	2,676	65,048	43,365	11	76	0
Total			260	1,130	4,020	106,658	71,105	31	203	129

Source: Economic and Planning Systems, Inc.

**Table 10
Mixed Use Hospitality and Residential Fiscal Impacts**

Use	Property Tax (1)	Sales Tax (2)	TOT (3)		Total
			10%	2%	
Apartment	\$100,700 (4)	--	--	--	\$100,700
Hotel	\$100,500 (5)	\$86,200	\$1,916,250	\$383,250	\$2,486,200
Total	\$100,500	\$86,200	\$1,916,250	\$383,250	\$2,486,200

(1) All property tax revenue estimates are based on

total property tax 1%
city tax factor 10%

(2) Sales Tax based on 1% of estimated taxable sales. See Table 11.

(3) Revenue generated by Transient Occupancy Tax is based on

room rate per night \$250
total rooms 300
occupancy rate 70%
occupied rooms 210
days per year 365
TOT rate (community services) 10%
TOT rate (public safety) 2%

(4) Property Tax revenues from Apartments are based on

development costs per unit \$503,700
total units 200

(5) Property Tax revenues from Hotel are based on

development costs per unit \$300,000
total units 335

Source: Economic and Planning Systems, Inc.

Table 11
Mixed Use Hospitality and Residential Sales Tax Revenues

Land Use	Estimated Total Sales	Percent Taxable	Taxable Sales	1% of Taxable Sales
Hotel (1)	\$9,581,300	90%	\$8,623,200	\$86,200
Total	\$9,581,300		\$8,623,200	\$86,200

(1) Estimated operating revenue from Hotel is based on
 Total rooms 300
 Occupancy rate 70%
 Occupied rooms 210
 Sales per occupied room \$125 (not including room rate)
 Days per year 365

Source: Economic and Planning Systems, Inc.

**PHILIP J. LUKS
709 BROWN STREET
HEALDSBURG, CA 95448**

August 29, 2007

Mr. Rick Tooker
City of Healdsburg
Planning and Building Department
401 Grove Street
Healdsburg CA 95448

RECEIVED
AUG 30 2007
PLANNING & BUILDING DEPT.
CITY OF HEALDSBURG

Re: June 12, 2007 Revised Draft, Healdsburg General Plan.

Dear Rick:

As I indicated last night, I have a number of specific comments on the Revised Draft. First, however, I'd like to refine some of the "carbon reduction" comments I made both during and after last night's meeting.

General Plan EIR Scoping

My main concern in the EIR process is that we identify the magnitude of the carbon reduction goal set in the Revised Draft, and get a "real world" sense of whether the strategies available to a small town can meet that goal at an acceptable cost. I would hope that there are enough metrics available, and enough 1990 and 2007 rough Healdsburg data on cars, houses, people, businesses, energy consumption, etc., to project back to a rough estimate of 1990 carbon emissions, and to estimate our current carbon emissions. These estimates, together with estimates for Saggio Hills and other large projects in the pipeline, together with a "swag" estimate for a substantial Nuforest development, would give some idea of the magnitude of the task.

The next step then would be for the EIR to provide "illustrative" cases, applicable to Healdsburg, for a programmatic array of the carbon reduction strategies available to a small town. For example, "reinsulating X houses to state-of the art levels, costing approximately Y, would reduce emissions by Z pounds per year," or "planting X shade trees, with initial and maintainance costs of Y per year, would reduce emissions by Z pounds per year."

With this sort of data, we could get an idea of whether the Revised Draft's goal is realistic. If so, then great. If not, the City should have a discussion of whether to reduce the goal, or whether to revise the goal to allow or require that carbon reductions outside the City count toward meeting the goal.

Assuming that, in any case, we keep a substantial City-required goal, I think it essential that the achievement strategies include major new projects, especially Saggio Hills. That project is unique both for its size and because the “no project” alternative has a carbon footprint no worse than zero. I have not read all of the Saggio Hills DEIR, but I did not see carbon emission projections at buildout. The project-related carbon reduction strategies in the DEIR seem to make sense, but other project-related aggressive strategies are available—large scale use of photovoltaics, frequent low-emission Plaza transportation and use of electric rather than gas appliances come quickly to mind. Moreover, given the zero-emission starting point for the project, contributions to savings elsewhere in Healdsburg make sense, in the same way that developers pay utility and school impact fees, and in the manner that the tree ordinance will already work to allow City-wide planting to replace project-related tree removal. I can imagine, for instance, substantial contributions to City-wide photovoltaic, insulation and tree-planting programs. Again, the data noted above can help the City arrive at a judgment of the “fair” balance between costs borne by existing businesses and residents and those borne by new projects such as Saggio Hills.

Comments on the Revised Draft

“Minimize Noise” Guiding Principle. This Guiding Principle does not reflect the nuanced Planning Commission recent discussion and decision in connection with Barndiva’s “wedding music” request. The Commission engaged in a discussion of the nature of noise, the problems with the measurement methodology in the City’s current noise ordinance and the inherent conflicts between residents and businesses in an increasingly urban setting. A “noise minimization” goal conflicts directly with several “identity” and all of the “vitality” Guiding Principles. I’d recommend deleting this Guiding Principle and adding a policy that the noise ordinance be reviewed and revised in light of the increased urban setting likely to result from the Guiding Principles.

Depot Study Area, page 28. Each of the other study areas contains a description of its geographic limits—the depot study area does not. Especially in view of the apparent current interest in the Nuforest site, it would be prudent to let potential developers know that that site is within the study area. While the Revised Draft provides that the studies themselves may result in boundary changes, this clarification may head off future misunderstandings.

Implementation Measure ED-7, page 42. I would propose adding, before the word “in,” the phrase “supporting the businesses.” I think it’s appropriate to keep the basic concept of support, but not to fix the precise locations of any parking for the next ten to twenty years. If this change was made, then the concept of periphery parking is appropriately limited by the degree it supports downtown business. The same change should be made to Policy T-C-4 on page 51.

Policy T-C-2, page 50. After the word “provide,” I would propose adding “or compensate others for providing.” The use of in lieu fees to deal with off-street parking

allows the location of parking to be separated from its need, and allows the location to better fit the objectives of the Guiding Principles.

Again, the revision of the General Plan reflects a lot of thought and plain hard work. Thanks.

A handwritten signature in black ink, reading "Phil Lusk". The signature is written in a cursive style with a large, stylized "P" and "L".

Richard Burg
POST OFFICE BOX 725
HEALDSBURG, CA 95448
707-479-9092

RECEIVED

SEP 04 2007

**PLANNING & BUILDING DEPT.
CITY OF HEALDSBURG**

September 4, 2007

Rick Tooker
Director, Planning and Building Department
City of Healdsburg
401 Grove Street,
Healdsburg, CA 95448

Re: Comments on Scope and Content of EIR for the General Plan Update

Dear Rick,

First let me applaud the staff and Planning Commission for the current Revised Draft. The June 12 document holds together as an integrated document, through both the additions made in response to public comments, as well as the editing, which more tightly couples the elements to one another. Future public hearings will provide opportunities to suggest specific language changes to the Draft. However, regardless of our continuing collective efforts to improve Healdsburg's General Plan, the inclusion of Guiding Principles allows all citizens, now and in the future, to measure Goals, Policies, Implementation Measures and proposed projects with a public yardstick. Expressed as "principles," they represent a set of widely held community values and therefore a useful guide to "desireable futures."

The scheduling of the September 28 Scoping Meeting was unfortunate. The typographical error in the first notice seems minor (27th instead of 28th) compared to the day of the week and week of the year that the meeting was held. Tuesday, September 28 was the last Tuesday night concert in the Plaza, the first full week of school, and three days before the Labor Day weekend. Citizen participation is hard enough to encourage but that night, in that week, prevented many interested community members from attending. I would hope that future public forums for the General Plan, "*...the community's 'blueprint' for future development and use of its land,*" were better calendared. There are always scheduling conflicts, but some are less monumental than others!

General comments on the Scoping of the EIR:

My biggest concern about the impacts of the General Plan arise from the difficulty in taking the whole context into account. It is in the relationships between the elements of the plan that systemic effects might be observed. Our decisions about Land Use, Transportation, Public Service, and Safety, in particular, but not exclusively, are tightly coupled to one another. The tools for examining their cumulative effects on the future viability, flexibility and resilience of the community are limited within the EIR. We

should be looking at all the risks to what we see and appreciate today, as “Healdsburg,” even when there is no statutory requirement to examine them. There is an widely accepted approach for the examination of more complex impacts from projects or programs.

A Community Impact Assessment (CIA) is a recognized process for looking at the consequences of a “program” in areas beyond the scope of an EIR. It is used frequently with transportation projects. As a structured tool, it examines qualities of our shared social and cultural environment that development can effect.

As a community, facing an uncertain future, it is important to understand the CIA process and what is required to apply it. Community Impact Assessment’s *“assist community groups and advocates in developing a sound understanding of the costs and benefits of actions planned by public and private actors, so that the community can decide whether it would be desirable and/or possible to support the action, stop it, or get it altered in some way.”* Our General Plan should have a goal to include such assessments for projects or programs that meet specific, enumerated criteria!

Some of the areas examined by the EIR, included in our General Plan, are also analyzed in a CIA, e.g. “noise”. The scope of a Community Impact Assessment includes: *noise, destruction or disruption of man-made resources, aesthetic values, community cohesion, and availability of public facilities and services, employment effects, tax and property value losses, displacement of people, businesses, and farms, disruption of desirable community and regional growth.* As you can see, this assessment includes many of the impacts people worry about when large projects are likely to effect the context of life in the city.

The desire for Guiding Principles expressed last winter arose from discomfort with the potential for the General Plan to impact the community in these very dimensions. A CIA would enable a dialogue about how changes in the quality of life in the city might be caused by a project. A CIA addresses systemic and subtle questions about the future indirectly. By looking at social and cultural effects, such issues as sustainability, localization, viability, independence, and interdependence are subject to inquiry.

From the *Notice of Preparation*:

A general plan must be comprehensive, long-term in scope and describe the desired physical development of the city [emphasis mine] and any land outside its boundaries, which in the city’s judgment bears relation to its planning....

This EIR will be a program-level EIR ... a program-level EIR provides a more exhaustive consideration of effects and alternatives than would be practical in an EIR or on an individual action, ensures consideration of cumulative impacts [emphasis mine] that might be slighted in a case-by-case analysis....

The EIR will also evaluate the potential cumulative environmental effects [emphasis mine] related to the General Plan Update, present and evaluate alternatives to the project and identify mitigation measures that could avoid or reduce environmental impacts.

My specific comments on the Scope of the EIR arise from a concern about what may be missing or assumed in the draft. And I take my cue from the phrases **bolded** above.

LU - p. 24. The “special study areas” previously known as “revitalization areas” represent some risk in that they will be left floating until the studies are done. How the city manages to control the development there in the interim is a challenge and represents potential significant impacts.

LU-E – p. 32. “preserves and enhances Healdsburg’s small town charm and unique character” is a goal that should appear and be linked throughout. Appearing here, as a way of preventing big box retail and outlet malls, only hints at all the dimensions of that “charm and character” that are at risk if not attended to. This could be linked to Transportation, Safety, and Public Service, as well as sustainability and the City’s efforts to reduce its carbon footprint!

ED-B – p. 41. It would seem logical that Economic Development address the ways that neighborhoods need services that might not be downtown. The broadest view of economic development would include the scaling down of services to allow for their distribution throughout areas of increasing density. This would reduce the City’s carbon footprint, contribute to sustainable goals, reduce car trips, etc.

T-A-2 – p 48. The reference to the Street Standard Cross Sections fails to address new development. The inclusion is misleading in that it suggests those are appropriate, except in “existing developed areas.” More Parkland Farms Blvd? The impact of this and other Transportation section Goals and Policies is in what isn’t stated.

T-A-3 – p. 49. A grid of street makes for lower volumes of traffic on arterials and increases choices. What is, in our context, “heavy through-traffic?”

T-C – p. 50. Analysis of parking, as our parking consultant suggested, is an art not a science. The proposed policies suggesting replacement of parking, and parking requirements fail to address potential changes in demand, land allocation strategies, improved intra-modal transport, and transportation solutions within the city. What is here leaves us with 40 year old thinking and no policies to address future constraints on an auto-centric culture.

PS-A,B,C,D – How the EIR can address impacts from “projected development” in these areas begs the question of what is “desirable!” For example, a commitment to a storm drainage system that accepts runoff from existing and projected development has us spending money on infrastructure, when the systemic solution is to allow natural; percolation to resolve the runoff problem. We should be inhibiting construction that creates a problem that then forces use to build an infrastructure solution to resolve it!

NR-C The benefits (also impacts!) of this Goal are potentially enormous. We should understand how it interacts with some negative impacts. This is where implementation of

an urban forest, restrictions on lawns and other water demanding landscaping are important to the future wellbeing of the City.

HC – The historic and cultural resources of the City are much larger than the built environment and the legacy of Native peoples. The social fabric, defined by neighborhoods and common pathways are also part of the resources of the City. They cannot be ignored in the reporting of impacts. Historic locations for corner stores are an example of an old development pattern that might make sense in the future. This Element offers an opportunity to re-examine cultural phenomena that have disappeared or are at risk and reinforce their value through attention and exemptions.

The Challenge of Seeing the Whole

One of the things this exercise demonstrated to me is that the EIR only reinforces our dilemma at seeing the City as an integral whole. The absence of attention to the human dimension is a failure of statute, but need not be a failure of our interest. We should be asking questions of the General Plan which relate to the experience of our Seniors, our children, our natives, our farm workers, and our weekenders. Each of those groups experiences the City in a different way, and the Plan allows or disallows the critical elements to thrive or dwindle.

We have not adequately considered what a more local economy would entail. This would require a kind of scenario planning that modeled a future with extreme changes – peak oil, climate change, population migrations, expensive food transport, etc. The EIR offers the most rudimentary tools and analysis to even support conversation about a radically different future.

I hope that as we move through the process of ratifying the General Plan, there are opportunities to talk about the extreme futures and how we might respond. While we have time and energy we can investigate our possibilities with the modest investment of words. It could only help us be more prepared if one of those extreme futures comes barreling at us like a freight train.

Thank you for your consideration of these concerns. They may not directly invoke another step r analysis in the EIR, they are part of the “human ecology” of Healdsburg, and thus, part of our “environment.”

Yours truly,

Richard Burg

City of Healdsburg
Planning and Building Department
401 Grove Street
Healdsburg California 95448

August 27, 2007

To Whom It May Concern:

Attached please find my comments on the Revised Draft of the Healdsburg 2025 General Plan. I have tried to make my comments clear and in direct relation to the draft. I have included some editorial explanation of my thoughts behind the proposed changes/amendments where I felt them relevant. I apologize if they are lengthy – I realize the scope of your work in revising the Draft and reviewing the many comments on it.

I am a relatively new resident of Healdsburg (less than two years) and am an architect by training. I am overcome with how many good things there are about this small town, yet there seem to be so many important issues on the immediate horizon – all of which will have tremendous effect on the fabric of Healdsburg, for the better, or for worse. This makes the General Plan all that more important.

If there are any questions about the enclosed comments, or if you should want to discuss any of them further, please do not hesitate to contact me. I would be happy to volunteer what time and effort I have toward the betterment of this great city.

Sincerely,



Paul Pavlak
12910 Old Redwood Highway
Healdsburg California 95448
Tel 707.591.4119
ppavlak@gmail.com

FIGURE 6

I would propose a revision to Figure 6 as follows:

Arterial Streets:

- 1) 72 foot right-of-way: three 12 foot Travel Lanes with 8 feet of Parking and 6 feet of Sidewalk either side plus 4 feet of Utility easement (or 10 feet of Sidewalk/Landscaping for a total of 72 foot right-of-way)

Collector Streets:

- 1) 60 foot right-of-way: two 12 foot Travel Lanes with 8 feet of Parking and 6 feet of Sidewalk on either side plus 4 feet of Utility easement (or 2 feet of Landscaping and 4 feet of Sidewalk plus 4 feet of Utility easement).
- 2) 72 foot right of way: (same as for Arterial Streets, above).

Industrial Streets (these are essentially the same as in the GP draft but with clearer info on Sidewalks):

- 1) 62 foot right of way: two 13 foot Travel Lanes with 8 feet of Parking plus 6 feet of Sidewalk plus 4 feet of Utility easement
- 2) 62 foot right-of-way: three 13 foot Travel Lanes with 6 feet of Sidewalk plus 4 feet of Utility easement on either side.

It is shocking that none of the street sections proposed for Arterial, Collector, and Industrial Streets include a designated, dedicated sidewalk on either side – if the un-labeled 10 feet to either side of all the proposed sections for Arterial, Collector and Industrial Streets are supposed to be sidewalk in whole or in part, they are not labeled as such, and so I assume they are not. Even if they ARE sidewalk, however, my comments remain the same insofar as they deal with the larger issue of appropriately scaled street sections.

Healdsburg Avenue in its current state has numerous different sections (and, the numerous confusing transitions that accompany them...) between one edge of town and the other. I would suggest that two lanes of travel with a single central turn-lane, with parking on either side, and a minimum 6 feet of sidewalk on either side of that (similar to the stretch of Healdsburg Avenue between Mill Street and Matheson) should be the only section necessary for the entire extent of Healdsburg avenue, period. I would propose that this section would not only be suitable to handle traffic on Healdsburg Avenue 90 percent of the time for the next 20 years or more, but would have a positive ripple effect, where the proposed (and, in some cases, existing) sections for Healdsburg Avenue and other Arterial streets will have effects that run counter to the General Plan, and the benefit of the City and community itself. Going further, I would propose that the City make it part of the General Plan to pursue funding to eventually reduce the sections of Healdsburg Avenue that have more Travel Lanes/Overall Travel Lane width and/or Sidewalk widths of less than 6 feet.

The existing segments of Healdsburg Avenue that currently provide four or five Travel Lanes seem to be almost entirely unnecessary, use of the multiple lanes seeming to be more a matter of preference than of necessity by those that travel on them. I would not accept the argument that their current under-use is an indicator that they are correctly sized to deal with future growth. On the contrary, reduction of the planned section of Healdsburg Avenue, and other arterial, collector and industrial streets to the sections proposed here would have the result of accommodating future growth of the correct scale and encouraging pedestrianism along the length of Healdsburg avenue in the future while reducing speed. Making Healdsburg Avenue,

and other Arterial Street sections of a more pedestrian scale and speed will encourage appropriate growth along Healdsburg Avenue. The current sections sacrifice safety (high speeds of traffic), livability, and appropriate future development types (mixed use, retail, etc.) to the automotive needs of a questionable proposed measure, scale and type of growth.

Rather than include an exemption in the General Plan (T-A-2c.) to preserve the existing and successful (and, in some cases, beloved) examples of street section in Healdsburg from the excessive and unexplained widening, I propose we use them as the successful example they are and amend Figure 6 to reflect this.

T-A-2

I would propose an amendment to T-A-2:

Add T-A-2 e: "The City shall preserve the existing angled parking adjacent to the plaza and along Center Street both north and south of the Plaza."

I realize that such angled parking, with its required maneuvering in the travel lanes of the streets themselves is not considered safe or acceptable by modern standards. I would, however, not only suggest that it be preserved as a charming and historic part of the Plaza itself, but I would also suggest that the parking as it is now is currently doing an important job of reducing the speed of traffic well below posted limits around the plaza and significantly adds to the entire area being an extremely safe pedestrian zone, almost without equal in the region.

FIGURE 2

I would propose to amend Figure 2 of the General Plan to require a Specific Plan for the area/parcels east of 101, North of the existing 101 northbound off-ramp (Healdsburg Avenue and 101 ramp), West of Ward/the railroad tracks and South of Mill Street/the railroad tracks. This area would include the following critical sites: the Nu-Forest site, the antique mall parcel or parcels that front on both Mill and Healdsburg Avenue, and the vacant gas station at the southeast corner of Healdsburg Avenue and Exchange Avenue.

I propose this amendment in light of the fact that this area includes issues of tremendous importance to the future of Healdsburg, both immediate and long-term. The issues are almost too many to list, and interrelate to a degree that requires extra attention and real vision by City planners.

A Specific Plan for this area would allow the attention to detail and close-up view necessary to deal with the many issues and potentials of this area, and avoid the difficulty and potential contradictions within the General Plan itself that come with trying to deal with this area solely by means of Figure 3, the Land Use Plan. I would propose the current mix of only Multi-Use and Industrial designations as currently proposed by Figure 3 be amended to show a more careful mix of MU, DC, OHR, and I.

I would also ask that the City consider a possible moratorium on development of any parcels in this area until the Specific Plan has been successfully completed and reviewed.

DEPOT STUDY AREA

I would propose that the final sentence in the first paragraph of the Depot Study Area section of the general plan be amended from:

"If the Sonoma-Marín Area Rail Transit, a regional transit district, is successful in re-establishing intercity passenger rail system in Sonoma And Marin County, the depot would be its stop in Healdsburg."

To read:

"If the Sonoma-Marín Area Rail Transit, a regional transit district, is successful in re-establishing intercity passenger rail system in Sonoma And Marin County, the depot is one possible location for a future stop in Healdsburg."

Concurrent with this proposed change, I would add an additional new "Study Area": The Cerri/Purity Building Study Area. I propose this area for a Study Area if for only the following reason: That the Cerri/Purity site be studied to include (amongst other possible programmatic uses) the main SMART rail stop for the City of Healdsburg. This does not preclude the historic depot complex being used as a logical secondary site in the future, so I do not suggest that the depot NOT be studied for use as a SMART stop. Simply put, the location of the Cerri/Purity site in relation to the downtown/plaza district and its adjacency to the rail corridor suggest that any future use of the site be carefully considered to logically include the primary rail stop for the City of Healdsburg. Making the Cerri/Purity site a Study Area would allow the City to study this and other potential uses of the site.

GOAL T-D/POLICIES

I would amend Goal T-D's Policies to include the following:

"T-D-6: The City shall encourage pedestrianism by providing generous and adequate sidewalks along city streets in all situations."

TRANSPORTATION IMPLEMENTATION MEASURE T-4

I would propose that T-4 be removed from the General Plan.

I believe that there has not been adequate study done on the ramifications of changing the existing unique interrelationship that the City of Healdsburg has with 101, nor has there been adequate public discussion. Traffic patterns are the least of the changes to the City fabric that could result from the significant alteration to the ramp locations. This issue should be included in the analysis that would be part of my proposed Special Plan area.

CD-A-8, and CD-A-9

These two Community Design Policies appear to be, to a significant degree either confused by or in direct conflict with the Land Use Plan, figure 3.

Preserving the "low profile" seems to conflict with a commercial/high density residential designation on the Land Use Plan. Also, this observance of "low profile" seems to recognize mostly the east side of Healdsburg Avenue, in light of the fact that the west side contains a strip mall, a gas station and the main fire station, amongst other commercial uses.

I urge that both the above policies AND the Land Use Plan be more carefully considered, and revised as part of the final General Plan.

CD-B-2

I would amend CD-B-2 to read:

“Private parking lots in the downtown shall be discouraged by the City and its zoning code, regardless of proposed or existing use, or parking requirements for those same uses outside of the downtown/plaza area. Parking lots outside the downtown/plaza area shall be located and designed to avoid interrupting façade continuity.”

Why even suggest that a private parking lot, let alone one required by the City’s own zoning, be allowed in the downtown/plaza area? This would go a long way towards preventing exactly the kind of formula/large ubiquitous businesses in and around the downtown/plaza that the General Plan states elsewhere are undesirable and to be discouraged. The City should disallow parking in this area – let business owners open businesses without parking, at their own risk, and let the residential density of the City (combined with patterns of tourist traffic/populations) dictate whether or not those businesses are a success.

HCR-A-3

I would proposed to strike the second sentence in its entirety (“Where such buildings cannot be preserved intact, the City shall seek to preserve the building facades.”). This is better left unsaid, rather than include it as a possible loophole for unscrupulous property owners/developers. Rarely is this a good idea, either – every instance I have seen of the preservation of just a façade, while the actual building is demolished or renovated beyond recognition, has amounted to nothing more than delayed demolition; with the building separated from its façade, the façade loses value to the community over time, and I have seen these buildings demolished almost every single time 5 to 10 years down the road when the next owner takes possession ... and rarely does anyone even care at that point. Let’s let this go unsaid, and let it be proposed on a case by case basis by those who consider it to be “enough” or “necessary” and let us reserve the right to say no.

PS-B-6

If it looks like a moratorium, and it smells like a moratorium...

I would strongly suggest that something be included in the General Plan that seeks to mitigate the moratorium on certain development in town due to outrageous sewer and water fees. For all the discussion on the topic, and the utter lack of resolution, the City should at least mention that long-range planning for such services shall seek to avoid this sort of massive bottlenecking of fee collection, if not come right out and suggest to itself that a solution be found to this for-all-intents-and-purposes moratorium.

A Comment on the General Plan Background Report, Table 3, Potential Development within Urban Service Area:

Examining Table 3 of the Background Report, and the related spreadsheet in Appendix A, I was found myself confused. The Potential Development within Urban Service Area for Area C reflects, at least in part, information in the Saggio Hills Area Plan. In fact, part of the information in Table 3 is lifted right from the Saggio Hills Area Plan.

Even after a call to Staff to clarify, I am left unclear as to the point and the messages sent by information in Table 3.

If the point of Table 3 is to reflect outside, private proposed development/uses for the Urban Service Area, then this should be made more clear in the title of the Table ... but then I am left wondering what it is doing in the Background Report.

If the point of Table 3 is to reflect the City's vision for the possibilities of the future development of the Urban Service Area – the City itself – then I am left wondering why the information in Table 3 is exactly the same as that proposed by private developers in unapproved projects of significant scale, impact, and controversy.

The City has an obligation in the preparation of this General Plan update to develop and communicate a vision for the future of this great city, Healdsburg. Table 3 of the Background Report is one of the most direct and important pieces of information communicating this vision in the Background Report and the General Plan, itself. There is no room for boilerplating off of private development proposals. At best, this shows a disturbing lack of vision on the part of the City in the entire preparation of this General Plan update. At worst, this smacks of the worst kind of shameless boosterism.

SCOPING MEETING COMMENTS (2007)

**COMMENTS RECEIVED IN RESPONSE TO NOTICE OF PREPARATION
AND AT DEIR SCOPING MEETING HELD ON AUGUST 28, 2007**

SUMMARY OF COMMENTS	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Geology / Soils	Hazards / Hazardous Materials	Hydrology / Water Quality	Land Use Planning	Noise	Population / Housing	Public Services	Transportation / Traffic	Utilities / Service Systems	Construction Impacts	Alternatives	Other	NOTES
<p>LETTERS RECEIVED IN RESPONSE TO THE NOTICE OF PREPARATION DATED August 3, 2007</p> <p>Regional Agencies Timothy Sable Department of Transportation 111 Grand Ave Oakland, Ca 94623 Sept. 5, 2007</p>													X					<p>Traffic impact study should include: 1) Info on GP Update's traffic impacts in terms of trip generation, distribution, and assignment; assumptions and methodologies used in compiling info should be address; study should clearly show percentage of project trips assigned to US 101 and its on- and off- ramps; 2) Current (2006) Average Daily Traffic (ADT) and AM and PM peak hour volumes on all significantly affected streets, highway segments, intersections; 3) Schematic illustration and level of service (LOS) analysis for following scenarios a) existing, b) existing plus project, c) cumulative and d) cumulative plus project for the roadways and intersections in project area; 4) Calculation of cumulative traffic volumes should consider all traffic-generating developments, both existing and future, that would affect State highway facilities being evaluated; 5) Procedures contained in 2000 update of Highway Capacity Manual should be used as guide for analysis; recommend using Department's "Guide for the Preparation of Traffic Impact Studies"; available at listed website (see letter); 6) mitigation measures should be identified where plan implementation is expected to have significant impact; mitigation measures proposed should be fully discussed, including financing, scheduling, implementation responsibilities, and lead agency monitoring; 7) Mitigation measures should consider highway and non-highway improvements and services; special attention given to development of alternative solutions to circulation problems that do not rely on increased highway construction such as: encouraging mixed-use dev., implementing bicycle- and pedestrian-friendly design solutions, planning for transit service improvements and expansion</p>

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<p>Ken Wells Sonoma County Waste Management Agency 2300 County Center Drive, Suite 100 B Santa Rosa, CA 95403 Aug 14, 2007</p>														X				<p>Recommend City of Healdsburg reference Sonoma County Integrated Waste Management Plan and consider attaching the objective for reference: Objective PF-2.9: Use the County Integrated Waste Management Plan, and any subsequent amendments thereto, as the policy document for solid waste management in the county; Empire Waste Management is selling all Sonoma County collection agreements to North Bay Corp- consult Assistant City Manager Marjie Petrus regarding this matter</p>
<p>Dennis Castrillo Governor's Office of Emergency Services Disaster Assistance Programs Branch 3650 Schriever Ave Mather, CA 95655 Aug 15, 2007</p>						X												<p>Examine sections of state planning law that involved potential hazards City may face, see attachment to letter; table in DEIR which identifies those specific issues and where they are addressed in GP would be helpful in demonstrating City complied with these requirements; OEs would be happy to share available info at their disposal to facilitate City's ability to comply with state planning and environmental laws</p>
<p>Brenda L. Tomaras Tomaras and Ogas, LLP Representing Lytton Band of Pomo Indians 10755-F Scripps Poway Parkway #281 San Diego CA 92131 Aug 27, 2007</p>				X														<p>Concerned about development projects that may impact Native American cultural resources; concerned with protection of unique resources like Pomo village sites and archaeological items displaced during ground-disturbing work; request thorough cultural resources assessment of non-developed areas in City and its Sphere of Influence as part of EIR- consultation with Tribe; Lytton Band requests it be allowed to be involved and participate with City in developing all mitigation plans for both GP update and development projects which would fall within that Update; in project areas where resources are known or suspected, Lytton Band believes Tribal monitors should be required to be present during ground disturbing activities, mitigation measure requiring tribal monitoring should be included; according to California Public Resources Code, § 5097.98, if Native American human remains discovered, Native American Heritage commission must name most likely descendent who shall be consulted as to</p>

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<p align="center">NOTES</p> <p>appropriate disposition of remains; Band believes any remains found will likely be Pomo, and requests City work with Pomo tribes to draft agreements which would address inadvertent discoveries of cultural resources during development within City and Sphere of Influence</p>																	
<p>Local Agencies Craig Harrington Quaker Hill Development Corporation PO Box 2240 Healdsburg CA 95448 Aug 24, 2007</p>																	<p>1) In conjunction with EIR, City should prepare Water Supply Assessment (WSA) to comply with requirements of SB610 and State Water Code Section 10910 with respect to full build out of GP; 2) In Jan. 2007, City Council directed staff to evaluate 2 alternative Land Use Designations GI-General Industrial and MU-Mixed Use for the property we own at north end of town; in March 2007 we provided City with Site Impact Matrix and analysis prepared by Economic and Planning Systems (see document attached to letter) to evaluate impacts on water, sewer, traffic, schools, and public safety associated with the GI and MU designations; encourage City and consultant CAJA to utilize this info in preparing GP EIR, to adequately address max impacts associated with either Land Use Designation; 3) Cumulative Impacts of Circulation Element should consider impacts of anticipated conversion of private at-grade roadway crossing of NCRA rail line at milepost 70.85 to public crossing; 4) Requirement for bike lanes at North Entry along Healdsburg Ave should be considered, consistent with Sonoma County Transportation Authority Countywide Bicycle and Pedestrian Master Plan; 5) EIR should address impact of recent Court of Appeal Decision in <i>Riverwatch</i> case to determine City's ability to provide adequate sanitary sewer for full GP build out.; 6) GP must be internally consistent and part of that consistency is availability of public review sources to achieve identified Goals, Objectives and</p>

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<p align="center">Private Individuals and Organizations Paul Pavlak 12910 Old Redwood Hwy Healdsburg, CA 95448 Aug 27, 2007</p>	<p>Implementation Measures; to extent that mitigation measures for GP impacts are required and identified in EIR, EIR should discuss fiscal state of City and ability to complete required environmental mitigation measures.</p>
Project Description	X
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Air Quality	
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Cultural Resources	
Geology / Soils	
Hazards / Hazardous Materials	
Hydrology / Water Quality	
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Noise	
Population / Housing	
Public Services	
Transportation / Traffic	X
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	<p>Revision of Fig. 6: Arterial Streets: 1) 72 ft right-of-way: three 12 ft travel lanes with 8 ft and 6 ft of sidewalk on either side plus 4 ft of utility easement or 10 ft sidewalk/landscaping for total 72 ft right-of-way; Collector Streets: 1) 60 ft right-of-way: two 12 ft travel lanes with 8 ft parking and 6 ft of sidewalk on either side plus 4 ft utility easement or 2 ft landscaping and 4 ft sidewalk plus 4 ft utility easement; 2) 72 ft right-of-way: same as arterial streets; Industrial Streets: 1) 62 ft right-of-way: two 13 ft travel lanes with 8 ft parking plus 6 ft of sidewalk plus 4 ft utility easement; 2) 62 ft right-of-way: three 13 ft travel lanes with 6 ft sidewalk plus 4 ft utility easement on either side; Shocking none street sections for Arterial, Collector and Industrial include sidewalks—or if 10 ft on either side supposed to be sidewalks, not labeled as such; Healdsburg Ave—Suggest 2 lanes of travel with single central turn-lane with parking on either side and minimum 6 ft sidewalk on either side for entire extent of Healdsburg Ave through town; should handle traffic 90% of time for next 20 yrs; City make it part of GP to pursue funding to reduce sections of Healdsburg Ave to have more travel lanes/overall travel lane width and /or sidewalk widths of less than 6 ft; existing sections with 4-5 lanes almost entirely unnecessary; reject argument that current under-use is indicator of correct sizing for future growth; reduction of planned sections of Healdsburg Ave and other streets in sections proposed would result in accommodating future growth encouraging pedestrianism along length of Healdsburg Ave; making Healdsburg</p>

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Project Description	<p>Ave and other Arterial Street sections more pedestrian scale and speed will encourage appropriate growth along Healdsburg Ave; current sections sacrifice safety, livability, and appropriate future development types; rather than include exemption in GP to preserve existing and successful examples of street section in Healdsburg from excessive and unexplained widening, propose we use them as successful examples they are and amend Fig 6 to reflect this; T-A-2: add T-A-2e: City shall preserve existing angled parking adjacent to Plaza and along Center St. both north and south of Plaza; preserve them as charming and historic part of Plaza, also suggest that parking currently doing important job of reducing speed of traffic below posted limits around Plaza— significantly adds to entire area being safe pedestrian zone; Fig. 2: req. Specific Plan for area east of 101, north of existing 101 northbound off ramp (Healdsburg Ave and 101 ramp), West of Ward/the railroad tracks and south of Mill St/the railroad tracks; this area would include following: Nu Forest site, antique mall parcel or parcels that front Mill and Healdsburg Ave, and vacant gas station at southeast corner of Healdsburg Ave and Exchange Ave; area includes issues of tremendous importance to future of Healdsburg- issues interrelate and require extra attention; Specific Plan for this area would allow close-up view necessary to deal with many issues and potentials of area and avoid difficulty and potential contradictions with GP; propose amendment from MU and I to MU, DC, OHR and I; consider possible moratorium on development of any parcels in area until Specific Plan completed and reviewed; Depot Study Area: final sentence of first paragraph of Depot Study Area section amend to: “If the Sonoma-Marín Area Rail Transit, a regional transit district, is successful in re-establishing intercity passenger rail system in Sonoma and Marin County, the depot is one possible location for the future stop in Healdsburg”; concurrent</p>
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Project Description	<p>with proposed change, add additional new "study area": Cerri/Purity Building Study Area; propose this area because: Cerri/Purity site be studied to include main SMART rail stop for Healdsburg; does not preclude historic depot complex being used as logical secondary site in future, don't suggest depot NOT be studied; location at Cerri/Purity site in relation to downtown/plaza district and adjacency to rail corridor suggest that future use of site be carefully considered to logically include primary rail stop for Healdsburg; Goal T-D/Policies: amend to following "T-D-6: The City shall encourage pedestrianism by providing generous and adequate sidewalks along city streets in all situations."; Transportation Implementation Measure T-4: propose T-4 be removed from GP; believe not been adequate study done on ramifications of changing existing unique interrelationships that Healdsburg has with 101, nor adequate public discussion; traffic patterns are least of changes to City fabric that could result from significant alteration to ramp locations; issue could be included in analysis as part of my proposed specific plan area; CD-A-8 and CD-A-9: both confused by or in direct conflict with Land Use Plan, Fig 3; preserving "low profile" seems to conflict with commercial/high density residential designation on Land Use Plan; this observance of "low profile" seems to recognize mostly east side of Healdsburg Ave. in light of fact that west side contains strip mall, gas station and main fire station and others; CD-B-2: amend to read: "Private parking lots in downtown shall be discouraged by the City and its zoning code, regardless of proposed or existing use, or parking requirements for those same uses outside of the downtown/plaza area. Parking lots outside the downtown/plaza area shall be located and designed to avoid interrupting façade continuity."; why suggest private parking lots be allowed in downtown/Plaza area? Would go a long way towards</p>	
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preventing exactly the kind of formula/large ubiquitous businesses in and around downtown/plaza that GP states elsewhere are undesirable and to be discouraged; City should disallow parking in this area- let business owners open businesses without parking at own risk, let residential density of City dictate whether or not businesses area a success; **HCR-A-3:** strike second sentence totally (“Where such buildings cannot be preserved intact, the City shall seek to preserve the building facades.”); better left unsaid rather than include as possible loophole for unscrupulous property owners/developers; rarely is this a good idea- every instance I have seen of preservation of façade while building is demolished/renovated amounted to nothing more that delayed demolition; with building separated from façade, façade losses value to community over time; all facades demolished 5-10 yrs later when next owner takes possession; let it be proposed on case by case basis; **PS-B-6:** include something in GP that seeks to mitigate moratorium on certain development in town due to outrageous sewer and water fees; City should at least mention that long-range planning for such services shall seek to avoid massive bottlenecking of fee collection if not come right out and suggest to itself solution be found to this for-all-intents-and-purposes moratorium; **GP Background Report, Table 3. Potential Development with Urban Service Area:** potential development within Urban Service Area for Area C reflects in part information in Saggio Hills Area Plan- part of info in Table 3 is lifted from Saggio Hills Area Plan; even after call to Staff to clarify, still unclear as to point and messages sent by info in Table 3; if purpose of Table 3 is to reflect outside, private proposed development/uses for USA, then this should be more clear in title of Table, but what is it doing in Background Report?; if purpose of Table 3 is to reflect city’s vision for possibilities of future development of USA- the city-itself-

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<p>Marilyn Joyce 920 Harold Ln Healdsburg, CA 95448 Aug 28, 2007</p>		X				X	X	X	X				X	X			<p>then why info in Table 3 is exactly same as that proposed by private developers in unapproved projects of significant scale, impact, and controversy; City has obligation in preparation of this GP update to develop and communicate vision for future of city; Table 3 of Background Report is one of most direct and important pieces of information communicating this vision in Background Report and GP itself; no room for boilerplating off of private development proposals; this shows disturbing lack of vision on part of City in entire preparation of GP update</p>
<p>Benjamin Raymond Marchand PO Box 1363 Healdsburg CA 95448</p>			X					X	X	X	X	X	X	X			<p>Add simple principal to GP update: Reduce, Reuse, Repair or Recycle first; wrote City Council Jan. 22, 2007 requesting language in GP be strengthened; strengthen vision in terms of sustainability- is what we do going to leave place more abundant and livable in future?; Letter sent Jan 22, 2007: strengthen GREEN policies regarding renewable energy and clean technology that promote sustainable, local living economy of Healdsburg; sites GPA 06-01 staff report: Attachment 3, Planning Commission meeting minutes 11/28/06; later decided the Green Building reduced to "voluntary basis"- plenty of data showing voluntary regulations don't work; Healdsburg targets to reduce greenhouse gas emissions 25% below 1990 levels by 2015</p> <p>8 Principals of Healthy GP: 1) Achieving sustainable community by determining numeric carrying capacity limit for ultimate human population where that amount of people and their impacts does not imperil existence of any native animal or plant populations; within carrying capacity limit, until affordable housing problem is solved, whenever housing is approved, primary goal shall be to house those with least income first; 2) Provide full and fully enforceable protection for all priceless, imperiled remaining native oak savannahs and their ecosystems; 3) Prevents and reduces all man-made environmental</p>

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Project Description	<p>impacts including pollution by chemicals of air, land, and water, and by noise and light to levels unarguable below potential harm and significance; 4) Allow subdivisions, golf courses, dams, logging and roadway increases only when approved by public vote; 5) Provides Public Participation Element which provides same amount of participation for public as is provides developers, extractors, and government with fair and thorough process to provide facts and reasoning for decision-makers and public, and provides for fair and reasonable decisions in public interest based upon facts and reason; 6) Provides for full genuine citizen enforcement of all GP violations; 7) Fully complies with, by exceeding, all state and federal environmental protection laws specifically including CEQA, CA Endangered Species Act, our Federal Clean Water Act, and CA Costal Act; 8) Must be ratified by voters; removes objection by public to bad GP, places it on City to make good GP; Any housing growth be limited to that area within .75 mile radius of intersection of Matheson and Center Streets, by restricting growth, encourage walking/bicycling method of travel; would make Healdsburg footprint smaller and more viable for commercial enterprises- improving access to schools, health care, libraries and city services; would minimize costs involved in buildout of city services, estimated about \$5000/household; GP should eliminate any population growth/residential home/hotel/resort plans until adequate water supplies for 5 yr drought are proven available and easily accessed by current extraction methods; Sonoma County currently under 15% reduction water use plan—Healdsburg’s GP should develop plan for reducing overall population by 15%; if current system not capable of keeping up with demand for resources, not only is no growth option advisable, but a “minus-growth” option should be studied; GP should include study and have in it financial impact on current</p>
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residents; GP should include in traffic study extra 4-5 million vehicle trips being made to local casino, River Rock; 2 mil vehicle trips per year estimated to be made along Healdsburg Ave alone and any housing developments, commercial developments must include effects on cue lengths and level of service along main commercial/personal vehicular corridor of HWY 101, State Route 128, Dry Creek/ HWY 101 interchange, Healdsburg Ave Healdsburg Ave/Dry Creek Rd intersection- would these roads be adequate to the task and would they involve substantial noise, light, air pollution?; GP should have art component, encouraging Public Art along paths and public rights of way, inside parks and surrounding public schools; GP should ask that any development costs (in US dollars) be paid by City, such as water resource development, water treatment, buildout of City services for ANY proposed subdivision inside city limits or up to and including Urban Growth Boundary be part of notice of hearing for development; currently, Saggio Hills development would cost every homeowner in Healdsburg \$5,000 in increased fees that would never be repaid by developers; by placing actual true cost to EXISTING taxpayers on Notice of Development, GP would foster "truth in advertising" now missing from entire planning process; GP should have as core transportation methods using NWP right away for light rail and coordinate local bus routes to intersect with light rail; GP should look at possibility of significant reduction in car trips should cheap, economical and green technology transport be made available during time frame of GP; GP should have core principal "green building practices" with environmentally sustainable, easily recycled, chemically safe materials used; reduce likelihood of toxic chemicals being introduced into environment; GP should foster growth along Old Redwood Hwy from Grant Ave, along Healdsburg Ave northwards to Mill St- area to be

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<p align="center">SUMMARY OF COMMENTS</p> <p>Martin Dreiling 337 Matheson St Healdsburg, CA 95448 Sep 4, 2007</p>																		<p>City; GP should have one of it's core goals the implementation of Wireless Internet access across entire City boundaries; also Goal of Fiber Optic service throughout City implemented as soon as possible; GP foster No-Growth component to it, finding ways to keep city small and allowing citizens right to vote on all growth inducing developments; by limiting growth to balance "for each one out, a new one may come in" encourages slow planned ecologically sound pattern to utilization of resources; all future developments have utilities placed underground</p> <p>Assessment Context: CEQA doesn't adequately assess impacts as evidenced by other projects that generated impacts never considered in original document; growth models used are rooted in basic assumptions about both future and preferences of communities and individuals; assumes pattern of last 50 yrs is norm and desired result and that without mitigation these patterns will be patterns of choice for considered projects; different approach to modeling future may reduce mitigations and increase project opportunities; traffic example- see letter; General Concerns: Peak Oil: impacts of GP should be measured against best info about future of petroleum based energy; over last 40 yrs, impacts assumed energy usage patterns would remain unchanged; CEQA assumes worst case scenario for traffic and parking growth, continued patterns of intercity commuting, regional separation between employment and residences, regional shopping patterns as consideration for delivery of goods and services and overall Conventional Suburban Design (CSD); <u>Expected Patterns:</u> continue to see oil prices increase, likely regional patterns will change and localization will begin to affect land use decisions; examples: increasing pressure by individuals to work and live in same town/neighborhood; increasing pressure to provide opportunities for</p>

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Plaza, downtown centered retail development, diversity of jobs, housing etc, support agriculture as key industry, support new and diverse industries, locally owned and operated, physical planning components that reduce building size and increase supply of smaller venues for retail and commercial enterprises, favoring smaller local tenants and owners; result in negative scoring of GP with regard to weaknesses in dealing with large parcels in town, lack of clarity in mixed use designations and emphasis on accommodating traffic demands in various portions of transportation element; Suburban Protectionism: refers to likely increase in demand for protection of suburban land use patterns in name of economic security; business concerns, industry organizations, individual corporate interests will seek relief at local land use regulation level to continue business and development practices that are in decline; example: citizens may get requests to offer concessions to larger regional business concerns for consideration of locating community as means to secure jobs and sales tax revenue; Expected Patterns: will be great pressure to allow Conventional Suburban Development on remaining large parcels in town; external pressure applied to expand freeway connections and road system to facilitate great exposure to potential CSD sites while de-emphasizing existing Traditional neighborhood locations; Expected Outcomes/Impacts: major weakness of GP is lack of explicit language dealing with large parcels in town, lack of explicit language dealing with parcels adjacent to freeways and lack of explicit language dealing with definitions of mixed use; mitigated by including clear language in GP in support of Traditional Neighborhood Development patterns; clarification of Mixed Use designation or addition of Traditional Neighborhood Development (TND) might offer adequate mitigation; **Assessment of Cum. Impacts**: all items should not be seen as line items to be accumulated in linear

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<p>Philip J. Luks 709 Brown St Healdsburg, CA 95448 Aug 30, 2007</p>	<p>fashion, but as collective concerns that behave synthetic and emergent manner; authors and City staff should make judgments about ways in which impacts either accumulate or offset each other in various synthetic scenarios; must be transparent process that can be audited; language in GP today will likely have little applicability in 20 yrs; any plan that fails to emphasize potential changes will be valueless shortly</p> <p>Identify magnitude of carbon reduction goal set in Revised Draft and get a "real world" sense of whether strategies available to small town can meet goal at acceptable cost; hope there is enough data to project back to 1990 levels and to estimate current carbon emissions; estimates together with estimates for Saggio Hills and other large projects in pipeline, together with "swag" estimate for substantial Nuforest development, would give idea of magnitude of task; EIR to provide "illustrative" cases, applicable to Healdsburg, for programmatic array of carbon reduction strategies available to small town; example: "reinsulating X houses to state-of-the-art levels, costing approximately Y, would reduce emissions by Z pounds per year"; could get idea of whether Revised Draft's goal is realistic; if not realistic, City should have discussion of whether to reduce goal or whether to revise goal to allow or require carbon reductions outside City count toward meeting goal; achievement strategies should include major new projects, like Saggio Hills; project is unique for its size and that "no project" has carbon footprint of zero; did not read Saggio Hills DEIR, but did not see section of carbon emissions projections at build out; project-related carbon reduction strategies make sense but more aggressive strategies available- large scale photovoltaics, frequent low-emission Plaza transportation and use of electric appliances; given zero-emissions starting point of this project, contributions to savings elsewhere in Healdsburg make sense; maybe contributions to City-wide</p>		X							X	X			X				

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																		<p>photovoltaic, insulation and tree planting programs; Comments of Revised Draft: <u>Minimize Noise Guiding Principle</u>: principal does not reflect Planning Commission discussion and decision in connection with Bardiva's "wedding music" request; Commission engaged in discussion of nature of noise, problems with measurement methodology in City's current noise ordinance and inherent conflicts between residents and businesses in increasingly urban setting; "noise minimization" goal conflicts directly with several "identity" and all "vitality" Guiding Principles; recommend deleting this Guiding Principle and adding policy that noise ordinance be reviewed and revised in light of increasing urban setting likely to result from Guiding Principles; <u>Depot Study Area, pg.28</u>; depot study area does not contain description of geographic limits; prudent to let potential developers know that site is within study area; Revised Draft provides that studies themselves may result in boundary changes, clarification may head off misunderstandings; <u>Implementation Measure ED-7, pg.42</u>: adding before the word "in" the phrase "supporting the businesses"; keep basic concept of support, but not fix precise locations of any parking for next 10-20 yrs; if change was made, then concept of periphery parking is appropriately limited by degree it supports downtown business; same change to Policy T-C-4 on pg.51; <u>Policy T-C-2, pg.50</u>: after "provide" propose adding "or compensate others for providing"; use of in lieu fees deal with off-street parking allows location of parking to be separated from its need and allows location to better fit objectives of Guiding Principle</p> <p>Concern with taking whole context into account-relationships between elements of plan that systematic effects might be observed; Community Impact Assessment (CIA) is recognized process for looking at consequences of a "program" in areas beyond scope of EIR; GP should</p>
Richard Burg PO Box 725 Healdsburg CA 95448 Sept. 4, 2007				X														

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<p>Tony Crabb 1421 Chiquita Rd Healdsburg CA 95448 Sept. 7, 2007</p>	<p>from existing and projected development has us spending money on infrastructure, when systematic solution is to allow natural, percolation to resolve runoff problem; inhibit construction that creates problem that forces us to build infrastructure solution to resolve it; NR-C: benefits and impacts of this goal are enormous; understand how interacts with some negative impacts; implementation of urban forest, restrictions on lawns and other water demanding landscaping important to future wellbeing of City; HC: historic and cultural resources of City much larger than built environment and legacy of Native people; social fabric, defined by neighborhoods and common pathways are part of resources of City; historic locations for corner stores are example of old development pattern that might make sense in future; Element offers opportunity to re-examine cultural phenomena that disappeared or are at risk and reinforce value through attention and exemptions; Seeing the Whole: absence of attention to human dimension is failure of statute, but need not be failure of our interest; ask questions of GP that relate to our seniors, children natives, farm workers, and weekenders; what would more local economy entail? Changes in peak oil, climate change, population migrations, expensive food transport etc; EIR offers most rudimentary tools and analysis to even support conversation about different future</p> <p>In Guiding Principles, Sustainability: after "Protect agricultural resources...." Add "Protect the Environment: The City will promote the protection of the environment through conservation of resources within the community and lead by example in its municipal processes and projects."; Modify: Foster Principles of sustainability and conservation; to Foster principles of <u>sustainable development</u>. As this principle seems to be focused on type of development we wish to promote; Protect and enhance natural resources; to Protect and enhance natural habitat—this</p>

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																	<p>principle seems to be focused on local habitat of Russian River, Foss Creek and other riparian habitats; In GP under section 6, Public Services: "In support of PS-A-5 and PS-B-3 in Implementation measures -Utilities"—add "PS-9 Provide new incentives to remove high water use lawns and replace them with drought tolerant landscaping"; "PS-10 Review planning process to prohibit the installation on new high water lawns or landscaping"; In support of PS-C-4 in Implementation Measures—Utilities add "PS-11 The city will promote the use of private solar voltaic installations to reduce peak electrical demand by expanding the rebate program and seek opportunities for installations on city owned facilities"; In GP under section 7, Natural Resources, in support of Goal NR-E, add "NR-E-4 The city will promote the use of Green Building practices in private development and lead by example in its municipal projects"; In support of NR-E-4 in Implementation Measures—Natural Resources, modify NR-10e From disseminating green building guidelines etc to Promoting green building guidelines etc</p>

COMMENTS FROM August 28, 2007 EIR SCOPING MEETING

Private Individuals and Organizations

Speakers	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Geology / Soils	Hazards / Hazardous Materials	Hydrology / Water Quality	Land Use Planning	Noise	Population / Housing	Public Services	Transportation / Traffic	Utilities / Service Systems	Construction Impacts	Alternatives	Other
Richard Burg																X
Mark Dreiling 337 Matheson St Healdsburg, CA 95448												X				<p>From Healdsburg Independent Town Meeting; produced matrix comparing guiding principals and goals/policy; do goals express values of guiding principal; coded as red- conflict; yellow- potential conflict; green- no conflict; example: embrace river vs. potable water and projected growth- might need to drill more wells, take more water from river, maybe change language projected growth</p> <p>Also Healdsburg Independent Town Meeting; change language could change red cell to green; language in GP is old- roads always get bigger, traffic increases- for larger cities, not applicable for small town;</p>

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Don McEnhill Russian Riverkeeper PO Box 1335 Healdsburg, CA 95448				X				X										paragraphs accommodate commuting which Hldbg. May see less of, not more; too general for Hldbg.; some not necessarily a conflict, but needs watching; Comments for EIR; judgment of context- 50 yrs old; new contexts; GHG, localization, traffic, noise, embrace new contexts Russian Riverkeeper Foundation.: Water Conservation- drought occurs every 3 yrs, should leave water for downstream; implementation measures- water conservation tips, retrofit program, decrease flow to treatment plant; Safety- flooding, language is old; use Low Impact Development (LID)- source control to decrease storm water run off, increase permeable surfaces, slow amount of water to creek; 40% of Hldbg. Is impermeable rooftops; disrupt gutter flow to creek; Transportation- GHG considerations- bicycle racks downtown would be good; Background- Nat. Resources- steelhead and coho still in Russian River and Foss Creek; flooding north of North St- all concrete, maybe structural solutions possible; EIR Scoping- water quality and flooding; benefits and costs of LID- look for studies; benefits and practices of water conservation Comment on General Plan- owns property at 1 Front St; wants change of designation from service commercial to mixed use
Jana Aitken 851 Limerick Ln Healdsburg, CA 95448									X									Surface and well water not tied together; well people don't want to connect to surface water; its all the same water; connect aquifers and surface water
Warren Watkins 418 Matheson St Healdsburg, CA 95448								X					X					Transportation- focus on cars; train site recommendations?; transit entrance to city?; bike paths?; specific area plans OK, but not enough focus on the rest of the city with specific planning goals; all development are single use, not mixed use; expand definition of plaza- plaza has expanded itself one block in each direction; consider smart and green planning- be specific; businesses that will serve locals to
Brad Drexler 509 Greens Dr Healdsburg, CA 95448									X									

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Phil Luks 709 Brown St Healdsburg, CA 95448			X															prevent need to go outside city; Area C- new services needed for residents
Richard Spither													X					Air Quality- production of GHG emissions- handle in programmatic way, understand 1990 levels, what strategies will do- chose them well; any different ways to get there, solar voltaic might be better than CFL change over; address systematically
Marilyn Joyce 920 Harold Ln Healdsburg, CA 95448													X					Circulation- past 10 yrs, planning commission looked at cross sections; over years road width narrowed to 20-24 ft in hillside areas; see progress away from Caltrans standards; Grove St north of Dry Creek is 2 lanes not 3 as suggested- works fine; Hldbg. Ave- 4 lanes on north side; Policy TA-1- lower levels of service to D and F- not going to meet best standard, and commuters wait more, but acts as traffic-calming
Jim Wood																	X	Comment on Guiding Principals- language for sustainability is weak, needs beefing up; consider dwindling resources and global climate change; "reduce, reuse, repair, recycle" should be included; economic stability achieved with 4 R's
																		Hldbg. had 150 th anniversary; town not going to change; most change in core downtown; smart growth, pedestrian friendly, mixed use; growth management ordinance- no residential growth at all in downtown; likely to see big parcels taken by anchor tenant takes over; live and work amongst each other; special study zones- need specific focus; rethink how growth will happen; housing in office areas is good, but people who live there need to know what they are getting in to; Plaza needs better description, subsidized housing, it's a nighttime area with noise, Grove St is better; special study should be done soon; Noise- p 75, 2002 studies; west side of town near freeway has loud noise—mitigation?; north study zone should be to city limits p 24; p17-18 density bonuses; low density not used- mistake; bonuses work well at lower densities