



Sierra Club, Sonoma Group
55A Ridgway Ave.
P.O. Box 466
Santa Rosa, CA 95402

June 17, 2021

Ms. Nina Bellucci
Planner / Project Manager
Permit Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

Via E-mail HousingSites@sonoma-county.org

Re: Draft EIR for Rezoning Sites for Housing Project

Dear Ms. Bellucci—

The Sierra Club appreciates this opportunity to comment on the Draft Environmental Impact Report for the above project. We think it is possible for the County to meet the RHNA requirements for affordable and market-rate housing, while minimizing wildfire risks, and while meeting its net zero greenhouse gas emission goals by the year 2030.

It is understood that the current RHNA process will very likely require the unincorporated County to accommodate at least 3,881 new housing units during the next ten years. However, without an inventory of currently available housing sites and their capacity, the need to up-zone existing sites, or to rezone additional parcels is unclear.

Of the 59 parcels of property under consideration in this project, some appear to be in locations that have adequate access to transit and jobs, with minimal exposure to wildfires. However, the DEIR does not evaluate each proposed site and describe its access to present or future bus service, its proximity to jobs, and its risk of exposure to wildfire. Further, while the acreage of each site is provided, there is no estimate of the likely number of living units that would be appropriate for each site.

Any rezoning to meet the RHNA requirements must take into account the travel requirements of the potential residents, along with the need to reduce driving. It should not take place without considering the changes in public transportation that are essential and feasible in order to address the climate crisis.

To reduce greenhouse gas emissions related to transportation and land-use, it is essential to reduce driving (vehicle miles traveled). The expected shift to electric vehicles will be incomplete by 2030, which is the County's target date for net-zero emissions. Furthermore the shift will not erase greenhouse gas emissions embedded in the manufacture of cars and trucks, nor will the shift to electric vehicles reduce the emissions resulting from required road maintenance and reconstruction. Shrinking VMT is essential.

We suggest that the staff should present the Planning Commission with a summary of the existing parcels available to meet RHNA requirements, with suggestions for up-zoning. Each of the 59 additional parcels in this project can be scored for access to transit and jobs, as well as its wildfire risk. Only the highest ranking parcels needed to meet the RHNA requirements should be rezoned at this time.

Thank you for your work on this interesting project. If you have questions, I can be reached at [<scbaffirm@gmail.com>](mailto:scbaffirm@gmail.com) or 707-576-6632.

Cordially,

A handwritten signature in blue ink that reads "Steve Birdleough". The signature is stylized and cursive.

Steve Birdleough
Transportation Chair
Sierra Club Sonoma Group