

July 1, 2011

Dear Mayor Wilson,

Re: Mitigated Negative Declaration/Initial Study- 6877 Sebastopol Avenue

If you approve this Initial Study (IS) as it is currently written, you will be indicating that the environmental issues of aesthetics, green house gas emissions and community design will not be receiving your oversight to ensure mitigation measures that are relevant to our community. The current Initial Study glosses over the significant, long-term detrimental effects that this project will have on our community if it is allowed to proceed without adequate scrutiny and guidance from you. Now is the appropriate time to build requirements into the IS that will guarantee that the design of this proposed project is compatible with the historic appearance and layout of the areas of downtown Sebastopol which surround it, and that it serves the needs and desires of our citizens in the best possible manner. These should be core concerns of the City Council - ones that take on a greater importance than the details of design and site configuration that are typically the purview of the Design Review Board.

### **Section III- Evaluation of Potential Environmental Impacts (Page 6)**

I. Aesthetics- Would the project:

c) Substantially degrade the existing visual character or quality of the site and it's surroundings?

A finding of "Less Than Significant Impact" was found: "No substantial degradation of visual character or quality will occur."

Pellini Chevrolet has been on that corner in Sebastopol since 1932. In a city like ours, which has nearly reached its development potential, having that much land to develop is both a valuable resource and a weighty responsibility. The appearance and character of the existing structures on this site narrate the story of mid 20th century America small town development. It is imperative that the aesthetic essence of these structures be preserved through mandated building design criteria for this site, thus preserving and enhancing the visual character of the other older structures (Frizelle-Enos, NAPA Auto Parts, Real Estate office, Screamin' Mimi's, Hopmonk Tavern, et al.) which surround the site. The existing structures appear to not be economically feasible for incorporation into this project. Therefore, we need to require the construction of brand new "old buildings" on this site. The reuse of this site and its conversion to retail use should require site layout and building design considerations that embody these goals. The proposed project, as delineated to date, could be considered by many to be nothing more than "manufactured contemporary blight". We can and we should do better.

This project appears to have been compartmentalized into the realms of legal compliance and design criteria, with potentially no role played by the City Council. The land use and design concerns for this gateway project do not exist in separate realities. CEQA exists to assure that a lack of existing downtown design guidelines does not impede our ability to assure that this site continues the exquisite historic layout and atmosphere found on Main Street Sebastopol. While it may be true that a stand alone drive-thru coffee kiosk could be located in the center of the site and meet all City codes, an inappropriate, yet fully compliant, project still remains inappropriate. While meeting the letter and requirements of the law, it would not meet the *intent* of CEQA, by degrading the visual character of the site and its surroundings. You have the clear ability and responsibility, as community leaders, to develop design criteria for this site, under CEQA, for the sake of preserving our community's historic character.

### **Section III- Evaluation of Potential Environmental Impacts (Page 8)**

III. Air Quality- Would the project:

- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- f) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

A finding of “Less Than Significant Impact with Mitigation Incorporation” was found for both of these concerns.

Blocking infill development with CEQA is wrong. It appears as if this site cannot be more intensively developed due to concerns about GHG emissions; a seeming case of “the tailpipe wagging the dog”. A review of CEQA that originated with the San Francisco Planning and Urban Research Association, dated February 1, 2006, “Form and Reform: Fixing the California Environmental Quality Act” is critical of CEQA. It contends that one result of CEQA is that; overall, it leads to sprawl by preventing infill at higher densities. Concerns regarding traffic congestion cause agencies to “mitigate” those impacts by reducing density, forcing development to locate elsewhere. If smart growth and efficient land use are part of the efforts to address climate change, then CEQA mitigations should be in alignment with that goal, *not* counter to it.

The applicant is advocating using as yet-undefined CO<sub>2</sub>e offsets within Sonoma County to reduce this project’s overall impacts. This project should first and foremost be required to achieve a lowering of these impacts through the design of the site and the buildings. While the proposed mitigation measures may provide an immediate general reduction in the short term, the site and building design should be crafted to ensure that people will change their store access habits over the long term. This can be done by creating a streetscape that is similar to that found along Main Street – a place where people are comfortable, and where they go out of their way to walk to. It cannot be done with multiple driveways, blank walls and drive- thrus, which are known to *increase* GHG’s by encouraging vehicle queuing/idling and which consume precious real estate.

Recognizing the realities of the 21st century, many new general plans turn the old development patterns upside down. They emphasize infill development that will help cut down on long commutes, support public transportation and lower our dependency on automobiles.

We need to plan for tomorrow by ensuring that this site plan is designed to recreate the perfect town-building epoch– early 1900’s small town America. This will help us create a place that we *want* to visit. Sonoma County’s small towns have committed to building more densely within their downtown cores to provide the right mix of uses and intensities to assure that we can walk, bike or use mass transit to access them. This project is within one block’s walk of three Sonoma County Transit stops. As proposed, it now consists of contemporary, single-use, detached, single story buildings and, as such, may be considered to constitute visual pollution.

The Attorney General’s Office issued a News Alert listing actions that local governments should be taking to reduce GHGs from projects, including:

- High-density developments that reduce vehicle trips and utilize public transit
- Limits on parking
- Transportation impact fees on developments to fund public transit service
- Energy-efficient design for buildings, appliances, lighting and office equipment
- Solar panels, water reuse systems and on-site renewable energy production

Attorney General (now Governor) Brown never intended for us to use the goal of reducing GHGs as a justification to build single use, lower density projects within our downtowns.

### **Section III- Evaluation of Potential Environmental Impacts (Page 16)**

IX. Land Use and Planning- Would the project:

a.) Physically divide an established community?

A finding of “No Impact” was found.

In order to integrate and naturally link this proposed project with our downtown, all efforts should be made to ensure that the finalized site design is true urban infill and not merely manufactured sprawl. The proposal continues to reflect an auto-centric design where the parking lots and drive-thrus dominate. The buildings should abut one another as they do on Main Street, so that this area invites walkability. The design will divide an established community by failing to ensure that we can comfortably walk from Main Street to Morris Street, due to the alienation and chaos that will be created by the strip mall character of the current proposal. Good buildings are instrumental in building good communities. When great spaces are created, they inspire creativity, civility and generosity of spirit — the elements of great societies.

The primary purpose of CEQA is disclosure. If something is not adequately addressed in the environmental document, then the environmental document itself is inadequate and should not be adopted. Your land-use decisions in this matter will create lasting, long term impacts to Sebastopol's built environment. Poor choices made in haste today will result in unsustainable and potentially regrettable consequences for generations to come. This is your opportunity to leave a legacy of beauty, vision and community from your tenure on our City Council. It really is all in your hands.

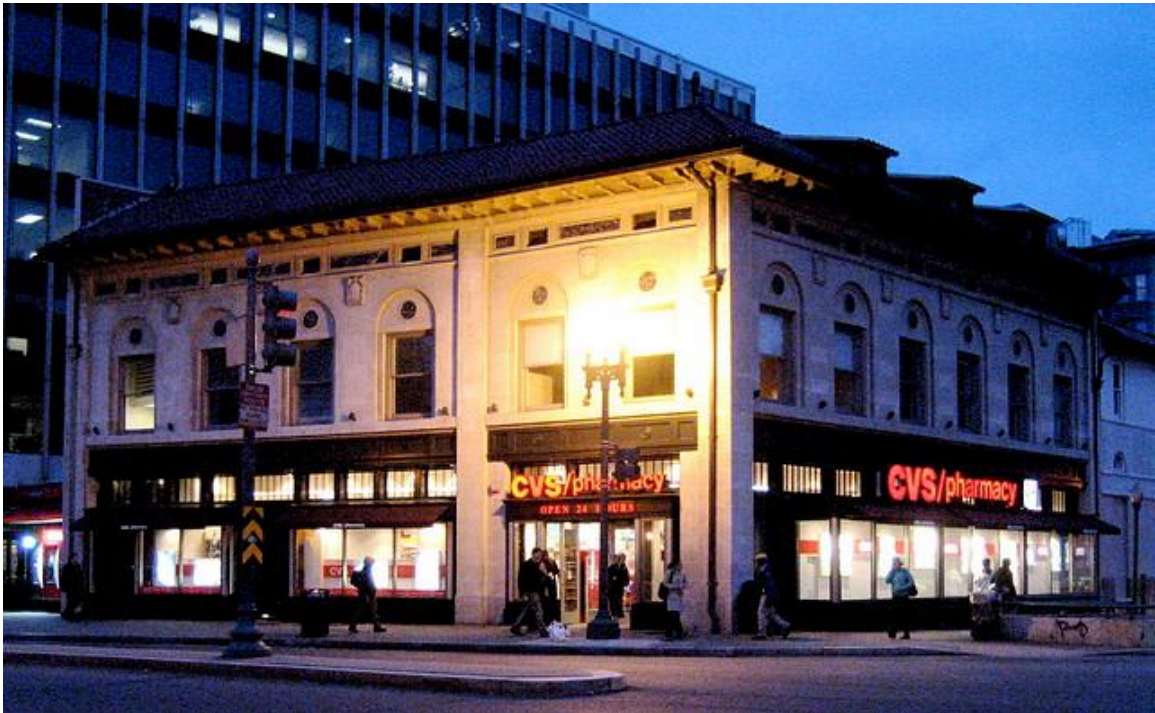
In conclusion, please use CEQA as it was intended: to allow you to enhance and preserve the unique and widely-envied historic small town atmosphere of Sebastopol by requiring strong downtown site and building design criteria as a part of your CEQA compliance for this project.

Examples of what this project *could* look like, with your direction:



A reutilized 1920's car dealership in Oakland - now a Whole Foods store.





A reutilized building on Du Pont Circle in Washington, D.C. - now a CVS pharmacy with mixed use on the second floor. Note the absence of drive thrus.



A reutilized car dealership in Columbus, Ohio- now a popular upscale restaurant (note the neon sign that is similar to the now-removed Pellini "CHEVROLET" sign- it could read: "SEBASTOPOL", visible as you enter our town on Highway 12).



CVS **has** departed from its “one size fits all” packaged store concept that they have proposed in Sebastopol. The CVS in Baldwin Park, Florida is a three story structure, and has a limited number of on-street parking spaces in front and a shared parking lot in the rear, in the middle of the block, hidden from street view (this is *new* construction). Note the absence of drive thrus and the abundance of large windows, awnings and an inviting, walkable feel. This is a great urban infill mixed-use project, which is what we should be seeking.



A reutilized car dealership in Buffalo, New York- now a bank branch (an inspiration for the Chase Bank component of this project, perhaps?)





A reutilized car dealership in Kansas City, Missouri- now a bank branch featuring an internal (hidden) drive thru created in the former service department area.

On the other hand, the project *could* look like this.....

