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March 25, 2008

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**Kenyon Webster, Planning Director
City of Sebastopol
714 Johnson St.,
Sebastopol, CA 95472**

Re: COMMENTS ON NORTHEAST AREA REDEVELOPMENT PLAN

Dear Kenyon,

The Laguna Foundation, in the name of our mission to preserve, restore, study and educate the public about the Laguna de Santa Rosa, submits the following comments for the consideration of the City:

GENERAL PRINCIPLES. The Foundation recognizes that conditions throughout the Laguna's watershed determine the health of the Laguna itself, and that expanded urban footprints create problems downstream. Accordingly, we support the principles of "New Urbanism" which minimize the footprints of cities, encouraging higher densities and growth up rather than out. The Foundation's core value is preservation of existing habitat and enhancement of habitat where it is currently degraded, and we understand that if Sebastopol does not choose higher internal density, it will be forced both by the law and by economics to expand outward, with greater cost to the Laguna. The citizens of Sebastopol voted overwhelmingly to limit the expansion of the City's footprint in 1996 with passage of Measure O, and in so doing, they agreed to maximize development within the Urban Growth Boundary. We believe that the Northeast Area Redevelopment Plan in general is a reasonable and appropriate response to this commitment on the part of the voters.

POTENTIAL IMPACTS NOT CONSIDERED IN COMMENTS. The Laguna Foundation's focus is the Laguna; accordingly, potential impacts of the Specific Plan not directly linked to impacts to the Laguna, such as traffic congestion levels, though they may be of concern to others, have not been considered in our analysis.

PLANNING AREA SCOPE. Given that the Specific Plan is located between the commercial sector of the City and a natural and recreational area in the Laguna de Santa Rosa, it does not make sense to exclude the thin strip of commercial properties between these two uses. The properties along the east side of Morris Street and extending up to the Laguna Wetland Preserve should be included in the scope of the plan—not only will this enable more coordinated and sensible planning, it could potentially allow for projects in the Wetlands Park benefiting the Laguna while also offsetting fill within the planning area.

CONNECTING THE COMMUNITY TO THE LAGUNA. The Foundation believes that if properly implemented, the Specific Plan will lead to a greater sense of community connectivity to and stewardship of the Laguna de Santa Rosa. Accordingly, connection to Laguna trails, orientation of buildings to appreciate views of the Laguna, interpretive signage and other opportunities for the public to sensitively enjoy and learn about the Laguna should be incorporated into design standards.

CONCERNS RELATING TO CLIMATE CHANGE. As the City has acknowledged, we are now in the era of global climate change. Future projections vary widely but include increased frequency of intense storms, longer duration of the rainy season, as well as more intense periods of drought. This brings into question the validity of the estimated 100 year flood contour used in developing the plan. Until the contour is reevaluated by FEMA, the Laguna Foundation urges the City to treat the 80' contour as the 100 year flood contour in the Specific Plan and its associated policies.

CONCERNS RELATING TO FILL OF THE LAGUNA FLOODPLAIN. The Foundation supports the no-net-fill policy and recommends that this occur within the Planning Area to as great a degree as is possible. This will almost certainly result in identification of a portion of the Planning Area which cannot be developed, but must instead be designated for removal of fill to offset fill elsewhere in the Planning Area. This must be done in a manner which is responsible and leads to enhancement of the ecological functioning of the Laguna. Areas where fill is anticipated should be subject to full hydrologic review to assess flooding and other ecological impacts likely to occur upstream and downstream of the site.

The City should only allow offsite mitigation for fill if such mitigation is a part of an ecological restoration project in the Laguna and the City issues a formal finding that results of this project will provide a net benefit to the ecology of the Laguna. Examples could hypothetically include restoration projects in the Wetland Preserve, or to remove sediment and/or establish drainage swales with native plantings in other areas of the Laguna to improve habitat and water quality conditions. These are only examples—any such projects would have to be thoroughly studied for their impacts on wildlife, hydrology and the Laguna's system overall, and any such project should be consistent with the recommendations of *Enhancing and Caring for the Laguna*, the Restoration and Management Plan for the Laguna watershed published in 2006, of which the City was a stakeholder participant and for which a support resolution has been approved by the City Council.

Due to the well-recognized uncertainty of mitigation projects, the Foundation further recommends that offsite mitigation of fill be required at a 2-to-1 ratio.

We appreciate the opportunity to comment on the Redevelopment Plan, and the City's consideration of the Foundation's concerns and recommendations. Please contact me or Mark Green, Associate Executive Director, if there are questions relating to these comments or more information is needed relating to the Foundation's perspective on the draft plan.

Sincerely,



Dan Schurman
Executive Director