

From: Stefan Matwijiw [REDACTED]
Sent: Tuesday, September 22, 2026 4:43 PM
To: John Jay <jjay@cityofsebastopol.gov>
Cc: Alex Costello [REDACTED]
Subject: Public Comment – Agenda Item 6A, 8100 Valentine Ave (File 2025-067) – Sept 22 Planning Commission

Dear Mr. Jay and Members of the Planning Commission,

I am a resident near 8100 Valentine Avenue. Please enter this letter into the record for Agenda Item 6A and forward it to the Commissioners before tonight's hearing.

I respectfully ask the Commission to continue this item until the issues below are resolved. If the Commission proceeds, I ask that it add the conditions listed at the end of this letter.

1. The protected tree count is incorrect

The public notice and staff report describe removal of up to 7 of 18 protected native trees. The City's consulting arborist (Urban Forestry Associates, July 21, 2026) found that the applicant applied the 20-inch threshold for single-family and duplex properties. Because this site is a former church and not a single-family property, the 10-inch threshold of SMC 8.12.040 applies. Correctly counted, the site has 23 protected native trees, of which 11 are proposed for removal.

The arborist also found that most field ID tags were missing, that Tree 52 is misidentified, that tree counts do not reconcile across documents (18, 19, and 15 "heritage" trees), that no tree protection plan meeting SMC 8.12.050 has been submitted, that replacement species, sizes and in-lieu fees are unspecified, and that neighboring trees whose driplines extend onto the site were omitted. He recommends reclassifying Tree 52 as a removal.

The Commission cannot make tree-related findings on a count the City's own expert says is wrong, and the public was noticed on that count. Adjacent owners have separately written about redwoods on the west line that are root-connected to trees on their property.

I also support staff's finding that the requested concession from the tree ordinance would have a specific adverse impact on public health, and ask that it be denied.

2. Fire and emergency access

The W-Trans transportation study (August 25, 2026) finds the 12-foot secondary route inadequate for fire trucks, notes that Gold Ridge Fire preferred either a loop road or an emergency access at least 24 feet wide, and states it is unclear whether the hammerhead turnaround can accommodate fire apparatus. Conditions 28–30 defer these questions

until after approval, and Condition 30 contemplates relocating or removing carports. The site plan before the Commission may therefore not be the one that is built.

3. Sewer capacity on a flood-zone site

The CEQA checklist confirms the site is in FEMA Flood Zone AE. The staff report states that the Valentine Avenue sewer segment has root intrusion and debris that prevent full camera inspection, that capacity depends on the City first completing cleaning, and that wet-weather performance was not evaluated. Yet Condition 20 charges the project approximately \$88,605 toward "existing sewer capacity issues" on that line. The record should clarify whether this is a maintenance problem or a capacity deficiency.

This matters because the 2025–2026 Sonoma County Civil Grand Jury report, "City of Sebastopol's Water and Sewer Systems: Deferred Action has Consequences," estimated that approximately \$5.5 million was over-allocated from the water and sewer enterprise funds to the general fund over nine years, resulting in deferred maintenance and neglected upgrades. An approval should not rest on maintenance the City has not yet funded or performed.

4. CEQA

The Section 15183 determination relies on the 2016 General Plan EIR. The checklist itself states that no biological study, no geotechnical investigation, no project-specific energy analysis, and no project-specific greenhouse gas study were prepared. Its Finding 2 also states that there "are project specific effects which are peculiar to the project or its site," contradicting its conclusion. Unanalyzed wet-weather sewer performance in a flood zone, an undercounted protected tree inventory, and a dead-end site with unresolved fire access are site-specific effects that should be examined before the exemption is adopted.

5. Electrical capacity

The staff report states only that dry utilities will use existing infrastructure on Valentine Avenue. The record contains no PG&E capacity confirmation or load analysis for 39 homes, each with an EV charging outlet. Our neighborhood experiences frequent power outages.

6. Incomplete record

- Maximum lot coverage is listed as "Not shown."
- Usable open space is deferred to a future condition.
- Parking figures conflict: the report cites 83 spaces, while its table lists 54 carport spaces and 80 regular stalls.

- The staff report and CEQA checklist list APN 008-510-054, while the public notice and conditions list 004-510-054.
- SMC 16.28.070(D)(9) lists failure to submit complete or adequate information as a ground for denial.

7. ADU impact fees

Condition 11 relies on SMC 17.220.025, the City's January 2026 AB 1033 ordinance. Please have staff state for the record how many of the 19 ADUs will pay impact fees for sewer, water, parks, and traffic, given that eleven ADUs are 748 square feet, just below the 750-square-foot exemption threshold under state law. I ask the Commission to flag for the City Council whether developer-scale use of this ordinance was anticipated.

Requested actions and conditions:

- Correct the protected tree count and re-notice the project on the corrected figures.
- Require a complete tree protection plan meeting SMC 8.12.050, with specified replacement or in-lieu mitigation, before any recommendation.
- Deny the tree ordinance concession.
- Fire Chief approval of a revised access design (loop road or emergency access of at least 24 feet) before the City Council hearing.
- Sewer cleaning, camera inspection, and a wet-weather capacity analysis completed and verified before Final Map recordation.
- PG&E capacity confirmation (will-serve letter) before Final Map recordation.
- Complete lot coverage and open space data added to the record.
- A staff statement of impact fees payable by each ADU.

Thank you for your consideration.

Sincerely,
Stefan Matwijiw