

From: Tom Boag [REDACTED]
Sent: Thursday, September 24, 2026 2:28 AM
To: City Council <citycouncil@cityofsebastopol.gov>
Cc: Mary Gourley <mgourley@cityofsebastopol.gov>; Engineering <engineering@cityofsebastopol.gov>; Darrin Decarli <darrindecarli@goldridgefire.org>; John Jay <jjay@cityofsebastopol.gov>
Subject: Public Comment — 8100 Valentine Ave (File 2025-067) — CEQA Adequacy, Emergency Access, and Tree Review Findings, For Placement in File Prior to Calendaring

Dear Mayor and Councilmembers:

I am writing ahead of this matter's calendaring to raise a concern about the adequacy of the CEQA Section 15183 record the Council will be asked to rely on, together with two related and unresolved factual gaps in that record concerning emergency access and tree removal. I believe all three should be resolved before any final action on the Vesting Tentative Map, Density Bonus, and CEQA determination for this project.

CEQA adequacy: the environmental record understates the project's tree impacts.

The Section 15183 exemption determination presented to the Planning Commission depends on the accuracy of the impact data underlying it. On that point, the City's own Arborist review (Exhibit D, dated July 21, 2026) found that the applicant's tree inventory used the wrong protected-tree threshold for this R-4 zoned property — applying the 20-inch single-family/duplex standard to a site the review itself confirms is not single-family or duplex. Correcting the threshold changes the protected-tree count from the 18 trees and 7 removals stated in the staff report to 23 protected trees and 11 proposed removals. The Arborist also found that the submittal does not address construction within the driplines of protected trees, including coast redwoods with shallow, moisture-sensitive root systems, and is not the tree protection plan Sebastopol Municipal Code Section 8.12.050 requires wherever such dripline construction is proposed.

In other words, the environmental record the Planning Commission acted on materially understated the scope of tree removal and dripline disturbance — the very impact the staff report itself identifies as the project's primary environmental sensitivity, and the basis on which staff found a specific adverse public-health-and-safety impact from the applicant's requested concession from the tree ordinance (reduced greenhouse-gas capture). An impact analysis built on an understated tree count and an incomplete protection plan is not a sound basis for a CEQA exemption finding, and I do not believe the checklist has been corrected or recirculated to reflect the Arborist's findings.

This adequacy problem is compounded by a procedural gap: the Design Review Board/Tree Board — the body with quasi-judicial authority over tree matters under SMC Chapter 8.12, and whose five members are entirely distinct from the Planning Commission’s five members — does not appear to have taken any final action on this project using the corrected counts. The Tree Board participated in a joint session with the Planning Commission on March 17, 2026, but that predated the Arborist’s corrected figures by four months, and I have found no published minutes or resolution showing a vote. The Design Review/Tree Board’s own regular meeting on September 22, 2026, held that same afternoon in the same building before the Planning Commission convened, did not include this project on its agenda. The draft Conditions of Approval assign tree protection review only to the “City Arborist” prior to Final Map recordation, and do not name the Tree Board at all.

Emergency access.

A parallel discrepancy exists regarding emergency access. At the September 22, 2026 Planning Commission hearing, at which the Commission voted 4-1 to recommend approval, staff represented that the Fire Marshal had approved the project’s access and emergency-escape plan. The documents in the record do not support that characterization:

- The City’s own traffic consultant, W-Trans, states in its focused transportation study (Exhibit B to the September 22 staff report) that the proposed 12-foot-wide secondary emergency route “would be inadequate to accommodate passage by fire trucks,” and recommends the site plan be modified “to either extend the drive aisle back to Valentine Avenue as a loop or widen the emergency access to at least 24 feet.”
- The staff report itself does not state that the Fire Marshal approved the access design; it states only that circulation standards under SMC Chapter 16.40 “have been confirmed through the Public Works and Engineering departments,” and separately acknowledges the 12-foot route “is not proposed to support emergency vehicles.”
- The draft Conditions of Approval confirm Fire Chief approval has not yet occurred: they require the applicant to “submit a Fire Apparatus Access Plan for review and approval by the Fire Code Official” prior to approval of final improvement plans, and state that “the 12’ emergency egress route for project residents shall not be represented or relied upon as a compliant fire apparatus access road unless redesigned and approved by the Fire Chief.”

I have submitted a Public Records Act request for any written Fire Marshal correspondence and the meeting recording to clarify exactly what was represented. None of the September 22 packet materials address Sebastopol Municipal Code Section 16.40.040, which

requires multiple access for subdivisions with streets exceeding 500 feet; W-Trans independently measured the project's single drive aisle at approximately 545 feet — above that threshold — yet no written determination on this ordinance appears in the record.

Before the Council takes final action, I respectfully request that it:

1. Direct staff to confirm whether the corrected tree counts and dripline findings in the City Arborist's July 21, 2026 review require the CEQA Section 15183 checklist and supporting analysis to be revised, and place that written confirmation in the record before this item is decided;
2. Confirm whether the Design Review Board/Tree Board is required to review and act on the corrected tree removal permit and tree protection plan before the Council's final action, and if so, ensure that hearing occurs with accurate tree counts before this item is decided;
3. Require a written determination from the Fire Chief/Fire Code Official confirming the adequacy of the project's emergency access, placed in the record prior to the Council hearing rather than deferred as a post-approval condition;
4. Direct that the loop or 24-foot-width modification recommended by the City's own traffic consultant be adopted as an actual, specific condition rather than left to future plan review; and
5. Obtain a written finding on whether Sebastopol Municipal Code Section 16.40.040 requires multiple access for this project, given the measured length of the internal street network.

I ask that this letter be included in the administrative record for this project and would welcome the opportunity to address the Council when this item is calendared.

Thank you for your consideration.

Sincerely,

Thomas R. Boag

