Date: December 13, 2022

Honorable Mayor and Council Members:

Author and title: Lucas Kannall, Assistant Planner

Title: **Application No. 2022-00000118/APL (Ferwerda SB 9 Urban Lot Split Appeal)**

Approved By: Jen Callaway, Town Manager

Recommended Action: That the Town Council adopt Resolution 2022-71 thereby taking the following actions:

- Deny the appeal to remove the stated conditions of approval for Planning Application 2022-00000004 (Ferwerda SB 9 Urban Lot Split) on the basis that the conditions are required pursuant to the Town of Truckee's Development Code, the State of California's Senate Bill 9 and the Subdivision Map Act;

- Uphold the decision of the Community Development Director and Planning Commission in approving the requested SB 9 Urban Lot Split and related conditions of approval.

- Determine the Community Development Director's determination exempt from the California Environmental Quality Act (CEQA) Guidelines per Section 15061(b)(3) (General Rule Exemption).

Project Summary: The appellant, Robert Ferwerda, has requested to appeal three conditions of a conditionally approved Senate Bill 9 Urban Lot Split. On January 4, 2022, the appellant applied to subdivide his 5,000 square foot, Single-Family Residential, no further subdivision (RS-X) zoned lot into two lots of 3,000 square feet and 2,000 square feet through the Senate Bill (SB) 9 Urban Lot Split process adopted by Town Council through Urgency Ordinance 2021-10 on December 14, 2021. The application for this project was deemed complete on February 1, 2022 and was conditionally approved on February 23, 2022. The conditions for the project were required to be satisfied prior to a map being recorded with Nevada County's Clerk Recorder's Office, which would finalize the two-lot subdivision. The conditions being appealed are to restore a parking pad, which was expanded without permits, to its original size, provide for the conveyance of utilities to the site by recording a utility easement for existing power lines and provide a legal description and final map for recordation. The appellant feels that these requirements are burdensome, and the Town has overstepped its authority in requiring them.

Location: The property is located at 14379 East Reed Avenue (APN 017-316-004-000) which is also described as Lot 9 in Block 13 of the Lakeview Subdivision. It is located on the South side of East Reed Avenue and is bordered by Donner Avenue on its southern property line.

Figure 1: Site location

Project Site Information: As discussed earlier, the property is zoned Single-Family Residential, no further subdivision (RS-X), which makes it eligible for a SB9 Urban Lot Split. The parcel is also able to meet the minimum size requirement of 2,400 square feet, the proposed lot split is between 60 percent and 40 percent of the original lot area, is not located within a sensitive area, is not historic, was not part of a previous SB9 lot split and would not impact protected housing. Due to these factors, Town Staff was able to determine that the lot would be qualified to be subdivided into two small single-family lots through the SB 9 Urban Lot Split process.

Discussion/Analysis:

A. *History*

In 2016, Robert Ferwerda applied to construct a residence under Building Permit 2016-00000587 on a property located at 14379 East Reed Avenue. Included in this Building Permit was a 24-foot by 10-foot parking pad on the south side of the property on Donner Avenue. In this location, the parking pad acts both as a parking pad and a roadway encroachment. In previous revisions of the plan this feature had been crossed out indicating that it was no longer part of the proposal and was not approved. However, the final approved version of the plans had the proposed parking pad included and it was thus accepted and approved by the Town by mistake as staff likely did not notice this change from prior versions. Both at the time of construction and under the most current version of the Town Development Code, this improvement would not be permissible. Development Code, Section 18.48.080.A states that one encroachment shall be allowed for each parcel of two acres or less. Due to this requirement, the

improvement is now considered legal nonconforming and cannot be expanded without a Zoning Clearance approved by the Community Development Director (CDD) as required by Development Code Section 18.130.040.A. Additionally, the Public Improvements and Engineering Standards (PIES) Section 4.07 requires that encroachments not exceed 24 feet. At some time between 2016 and 2020, Mr. Ferwerda expanded his encroachment to 50 feet, which is the entire width of his property, without notifying the Town or seeking approval. This additional 26 feet is considered illegal and there is no permit pathway to allow this improvement.

B. Conditions Being Appealed

The appellant for the SB9 Lot Split, Mr. Ferwerda, has submitted a timely application to appeal three conditions of approval for his project. They are as follows along with his concerns for each item:

1. The parking pad on the southern side of the property was permitted through Building Permit 2016-00000587 as 240 square feet (10' X 24'). The current configuration is shown as 550 square feet. This shall be brought back into compliance with the original permit.

    - *The appellant states "The parking pad is a separate issue and should not be a condition of the urban lot split. The parking pad does not violate any provisions of the Development Code."*

2. Existing electric facilities run parallel (East/West) along the southern parcel line. The applicant shall verify that those existing utilities are located in the right of way or a utility easement [will be required], ensuring that they are in a protected location.

    - *The appellant states "The electrical facility easement is not a Town issue. The [Truckee Donner Public Utility District] TDPUD erred when the poles were installed by failing to have the line surveyed. The PUD refuses to cooperate on resolving the encroachment."*

3. In order to continue processing your application, please provide the following information for routing to the Town Surveyor:

    a. Legal Descriptions for each resultant parcel, prepared and stamped by a licensed surveyor or qualified engineer.

    b. Final Map conforming to the approved application and tentative plat. The exhibit map must include all information required for a tentative exhibit map, be prepared by a licensed land surveyor or qualified engineer, include the wet stamp and signature of the surveyor or engineer preparing the map.

    - *The appellant states "A Final Map should only be required by the Town when there are compelling circumstances."*

C. Specifics of the Appeal

On April 18, 2022, the appellant submitted a timely appeal of the second formal approval letter for the SB9 Urban Lot Split located at 14379 East Reed Avenue. The original conditional approval was issued on February 23, 2022, and the applicant notified us that he would like to appeal the conditions of his project in early April, well after the 10-day appeal period had expired. Due to the original letter not being explicit about the 10-day appeal period, a new conditional approval letter was issued on April 13, 2022 to allow for the applicant to appeal if he chose to do so. In accordance with the Town's procedures, the appeal was considered by the Planning Commission as all CDD determinations/decisions can be appealed to the Commission. After the Planning Commission denied the initial appeal, an appeal of their decision was submitted for review by Town Council. The below discussion includes the primary issues raised within the appeal and each issue is followed by a staff response. The full text of the appellant's appeal letter, with each issue raised, is enclosed within Attachment 1. Below are the appellant's contentions in **bold** *italics* and staff's responses to each:

1. ***Parking Pad***

There is no reason to connect this issue with the urban lot split. None of the provisions of Chapter 18.95-URBAN LOT SPLIT AND TWO-UNIT PROJECTS (SENATE Bill 9) establish or enable such a requirement. This appears to be unnecessary and overreaching. This original situation was created when Town Engineering incorrectly deemed this parking pad a driveway. A driveway is "a short private road which provides vehicular access from a public street to a building or to a garage." This parking pad does neither. A demand to remove a portion of the existing pavement is unreasonable and unnecessary. This parking pad provides 2 on-site parking spaces and does not exceed the allowable site coverage. This parking pad was in place when the Building and Grading Permits were Finaled. A very simple fix would be to obtain a permit for the additional coverage. However, I do not believe a permit is required for the placement of impervious coverage if it does not exceed the allowable lot coverage of 50%.

Staff Response: The existing parking pad was approved in 2016 in error and is considered legal nonconforming due to the fact that it was a part of an approved building plan (2016-00000587) but would not be allowed under the Town's current codes. As mentioned earlier, Town staff had previously crossed out the proposed encroachment because it could not be approved. However, a later iteration of the building permit was submitted without the crossed-out improvement and Town staff did not catch this needed correction. The permit was subsequently approved. Because the Development Code does not allow for two encroachments this improvement could not normally be approved. Despite the paved area being used for parking, the connection of the paved area to an improved road constitutes an encroachment, which is required to adhere to the requirements of the Development Code and Public Improvements and Engineering Standards (PIES).

On the plans provided by the applicant for the Senate Bill 9 Urban Lot Split, the parking pad was shown as spanning the entire southern frontage of the parcel, or 50 feet. This work was done without seeking a permit from the Town and paved over some of the storm water improvements required for the original legal nonconforming 10x24 parking pad. In addition to the work being unpermitted and removing required aspects of the original improvement, the expanded parking pad cannot be permitted due to the PIES only allowing a maximum 24-foot-wide encroachment. Since the parking pad was expanded without approval from the Town, the portions of the pad that extend beyond the previous approval would not have a legal nonconforming status and would be strictly unpermitted.

Senate Bill 9 was enacted into law as Government Code, section 65852.21 and states "Notwithstanding any local law and except as provided in paragraph (2), a local agency may impose objective zoning standards…" An exemption stated in paragraph 2 would only apply if the implementation of zoning standards would preclude the construction of a residence on the resultant parcel from an Urban Lot Split. Under this section of the code and because the allowable driveway width is limited to 24-feet, the Town has the ability to require the parking pad be brought into compliance with the approved plans prior to recordation of the SB 9 Urban Lot Split since the current configuration is in violation of Town ordinances. Although the applicant is appealing this requirement for his project, he has attempted to come into compliance by removing soil from the hillside and burying enough of the asphalt to meet the required dimensions. This would not meet the Town's requirements for restoration of this improvement, as the latest work was performed without attempting to obtain a permit, removing soil from the hillside has destabilized it and the original requirements of stabilizing the hillside with riprap and constructing stormwater retention basins on either side of the parking pad have not been met. Further, the Town requires that the actual improvement (i.e. the paving) be removed and not buried underneath soil. The applicant's attempt at bringing this improvement into compliance can be seen below in Figure 2.

Figure 2: Attempted Restoration of Parking Pad

Figure 3: Remaining Asphalt Under Soil

2. ***Electrical Facilities***

There is an existing overhead secondary electrical line crossing the urban lot split parcel. It encroaches a few feet onto the parcel. This line has been in place openly and notoriously for a period of time greater than 5 years. Thus the TDPUD has established a basis for a prescriptive easement. Again nothing in Chapter 18.95 give the Town standing to require resolution of this matter. This appears to be overreaching.

Staff Response: After the two-week routing period for this project, Truckee Donner Public Utility District responded that "Existing electrical facilities run parallel (East/West) along the southern parcel line. The applicant shall verify that those existing facilities are located in the Right of Way or a utility easement ensuring that they are protected in place." Development Code, Section 18.95.020.D.8 (Easements) states that the owner must enter into an easement agreement with each public service provider to establish easements that are sufficient for the provision of public services and facilities to each of the resulting lots from an Urban Lot Split. This allows the Town to require that the provision of these utilities is protected in perpetuity through the recordation of an easement over the public utility lines. Additionally, the Senate Bill 9 legislation (Government Code 66411.7.3.G.e) states that "a local agency may require any of the following conditions when considering an application for a parcel map for an urban lot split" including "easements required of the provision of public services and facilities." The location of the lines is currently unknown since a survey has not been conducted, although a resolution to this condition has already been reached. Truckee Donner Public Utility District has agreed that if the lines are found to be on the property located at 14379 East Reed Avenue, they will be relocated into the right of way at the utility district's expense. Staff reached out to Mr. Ferwerda on June 23, 2022, and June 27, 2022, to see if he would like to remove this item from his appeal since it has already been satisfied but did not receive a response. As mentioned above, staff initially included the TDPUD's request to require an easement agreement as a condition of approval due to the requirements set forth in the SB 9 Urban Lot Split legislation.

3. ***Legal Description/ Final Map***

This is a duplication to require both items. This should be an either/or requirement. Section 18.98.030.A of the Development Code provides for: "Waiver of a Parcel Map may be requested by a subdivider and granted by the Zoning Administrator for a subdivision that results in the creation of only two parcels, and the boundaries of the original parcel has been previously surveyed and a map recorded and are certain and recorded." The original parcel was surveyed as part of the Lakeview Subdivision. The requirement for a Final Map is an unnecessary expense that has no benefit with regards to an urban lot split.

Staff Response: Upon completion of the conditions for Mr. Ferwerda's SB9 Urban Lot Split, it was requested that he provide legal descriptions for each resultant parcel prepared by a licensed surveyor as well as a Parcel Map, so these documents could be reviewed by the Town Surveyor for technical correctness. Once errors in these documents have been identified and remedied, they can be recorded to create the two proposed resultant parcels. Development Code, Section 18.95.020.C.1 (Approval), states "A Tentative Parcel Map for an urban lot split shall be approved ministerially if it complies with all the requirements of this section. Recordation of a Tentative Parcel Map is not required. A Final Parcel Map shall be approved ministerially as well…" The tentative map was provided to staff as part of the formal application for Mr. Ferwerda's Urban Lot Split but does not meet the requirements for recordation. Minor modifications will be required to be made to the map and approved by a licensed surveyor prior to recordation to ensure all information is accurate. The legal description will be used to describe the new parcels for future surveying purposes and will appear on the new grant deeds for each parcel. These will be important documents for future homeowners as

well as agencies or departments that are trying to determine property lines or easements for the newly created parcels.

Further, in his appeal, Mr. Ferwerda cited Development Code Section 18.98.030.A (Waiver of Parcel Map) and stated that he should be allowed to request a Parcel Map Waiver pursuant to this section. However, authorization of this request occurs during consideration of a ***discretionary*** subdivision application and is granted by the Zoning Administrator, as follows:

> **A. When waiver is allowed.** Waiver of a Parcel Map may be requested by a subdivider and granted by the Zoning Administrator for a subdivision that results in the creation of only two parcels, and the boundaries of the original parcel have been previously surveyed and a map recorded, and are certain as to location.

As required by State law, SB 9 applications are inherently ministerial and are reviewed at the staff level not by the Zoning Administrator. So, the Parcel Map Waiver process is explicitly not available to SB 9 applicants and a standard Parcel Map recordation process is required. Lastly, there is no discretion to waive the requirement to record an Urban Lot Split and Mr. Fewerda's request is impermissible.

D. Previous Appeal

At its July 19th, 2022, Planning Commission meeting, the Ferwerda Urban Lot Split Appeal was noticed and agendized but was continued at the applicant's request. The appeal was then noticed and agendized for the September 20, 2022, Planning Commission meeting, where the Commission reviewed and took action to deny the appeal and uphold the original approval of the Senate Bill 9 Urban Lot Split as conditioned on April 13, 2022.

During the appeal the appellant brought a packet (Attachment 6) to support his argument that was not submitted with the appeal application. The items in this packet are addressed below:

I. *Site Plan*

The appellant provided a site plan depicting what was approved in 2016 when the primary residence was constructed. Although this does not appear to be the approved stamped version of the plans, it substantially conforms to the approved version. Most importantly, the provided site plan shows the southern encroachment on Donner Avenue as being 24 feet in width as is shown on the approved site plan.

II. *Work Exempt from Permit*

The appellant maintains that the expansion of the legal nonconforming parking pad was not required to be permitted through the Building Division pursuant to a handout from the Building Division that states "sidewalks and driveways not more than 30 inches above adjacent grade" are exempt from building permit requirements. Despite this being true, this exemption would not apply to the expansion of the appellant's parking pad due to its legal nonconforming status. The parking pad is considered legal nonconforming, because it was permitted at the time of construction due to a revised set of plans including the second encroachment being accidentally approved, despite secondary encroachments being prohibited by Development Code, Section 18.48.080. Additionally, a permit would be required for the expanded parking pad due to the encroachment being expanded, which is not allowed to exceed 24 feet as stated in the Public Improvements and Engineering Standards (PIES).

III. *Site Coverage*

The appellant states that his property has not exceeded the allowable 50% site coverage as allowed on

lots under 10,000 square feet in the Residential Single-Family Zoning District. This is correct but would still not allow for the expansion of the legal non-conforming parking pad and this was not the issue that prevented the expansion.

IV. *Public Improvements and Engineering Standards (PIES)*

The appellant provided a page from the Public Improvements and Engineering Standards (PIES) with a section highlighted that states "above all else common sense shall prevail". The intent of this statement is to allow for interpretation of regulations with "grey areas" and to provide those allowances when the code permits it. Staff would argue that this phrase shores up the argument that the original conditions of approval shall be upheld since they are supported by the Development Code, the State's Senate Bill 9 Urban Lot Split legislation, the Subdivision Map Act and allowing reasonable regulation of the process, including rectifying illegal improvements on the parcel. There are two additional sections that have been highlighted by the appellant that are as follows "**Driveway:** Vehicular access constructed pursuant to Chapter III of the Development Code and the Standard Drawings." This is a definition for a driveway and states that driveways shall be constructed in compliance with the Development Code, which also further strengthens staff's argument that the parking pad was expanded outside of the requirements of the Code since it was done without permits and without notifying the Town. And the final passage is "Outside of the right-of-way, on private property (onsite), the driveway width can deviate from this width requirement to accomplish purposes such as vehicle parking, vehicle turn around, vehicle access or pedestrian access." This section of the Code specifies that a driveway may expand past the maximum 24-foot encroachment once the driveway is on private property. This section also supports staff's position that the expanded encroachment is not allowed since it is connected to the roadway and in the right-of-way. The last item included in item number 4 is a Wikipedia definition of a driveway. The Town would not use this definition since it is from an outside source and would instead rely upon the definitions of a driveway contained within the Public Improvements and Engineering Standards and the Town's Development Code (stated above).

V. *Vicinity Map Showing Parcels with Two Encroachments*

The appellant has provided a map that he created showing parcels in the neighborhood that have more than one encroachment or an encroachment that exceeds 24 feet in width. This map is not verified, and even if it is accurate there is no information to show that these parcels legally created a second encroachment or expanded their encroachment. In addition, the Lakeview Subdivision, of which these parcels are a part, was recorded in 1919 and Nevada County's Building Department was not established until 1962, which means that these encroachments could have been created before that date without regulation. It is staff's position that his map does not aid in the appellant's argument that he should be allowed improvements in violation of current regulations.

VI. *Grading Permit*

Item number 6 is a grading permit for the appellant's property at 14379 East Reed Avenue showing that it was completed on July 23, 2018. This permit was for preparing the site for construction of the single-family residence. It would have included the secondary encroachment and 24-foot by 10-foot parking pad since they were accidentally approved as part of the project.

VII. *Building Permit*

Item number 7 is a record of the Building Permit for the primary residence, which received its final inspection on January 23, 2020.

VIII. *List of Inspections*

Item number 8 is a list of inspections that took place for the primary residence. The appellant has

highlighted several items on this list, including the driveway final, the driveway subgrade, the Planning Final (which wasn't required) and the Engineering Final. Planning would not typically perform a final inspection on a single-family residence as this is generally reserved for higher level projects.

IX. *Parking Pad*

The appellant has provided a picture of his truck parked perpendicular on the parking pad to show that his truck would not fit within the parking space. A 10-foot by 24-foot parking stall is intended to be parked parallel to the roadway and will accommodate most vehicles when parked in the manner.

X. *Parking Pad II*

The appellant has provided a second picture of his truck parked perpendicular to the roadway from the opposite side of the truck (west) to further exemplify how the vehicle will not fit within this parking stall. Again, parked parallel to the roadway the parking spot would more than likely accommodate this vehicle.

XI. *Email from Truckee Donner Public Utility District*

Item 11 is an email from Keith Renshaw, who was the Interim Electric Engineering Manager at the Truckee Donner Public Utility District, to Lucas Kannall, an Assistant Planner at the Town, explaining that if the utility lines are found to be on the appellant's parcel they will be relocated into the right of way, satisfying condition number 2 that is being appealed at this hearing. This condition was added at the behest of the utility district to have an easement recorded over the utility lines if they are found to be on the appellant's property but was resolved with the applicant through other means. A second email is also included from Lucas Kannall to the appellant stating that this condition was not removed from the project, but rather satisfied and required no further action.

XII. *Parcel Map Waiver*

Item number 12 is a copy of Development Code, Section 18.98, which allows for a Parcel Map Waiver when a two-lot subdivision is brought before the Zoning Administrator. The Senate Bill 9 Urban Lot Split would not be eligible for this waiver due to it not being a discretionary project and would therefore not go before the Zoning Administrator. The second provided code in item number 12 comes from the Subdivision Map Act, Section 66411 (Local Agencies to Regulate and Control Design of Subdivisions), which has the following section highlighted "Regulation and control of the design and improvement of the subdivisions are vested in the legislative bodies of local agencies." This section of the Subdivision Map Act gives local agencies discretion in how subdivisions are regulated, although this would not apply to Senate Bill 9 Lot Splits since they are ministerial in nature.

Overview of Appeal Process: In accordance with Development Code Chapter 18.140 (Appeals), any determination or action by a Town decision-maker can be appealed to the Planning Commission, and the Planning Commission's decisions are appealable to the Town Council. The decision of the Council shall be final on all matters unless an appeal is filed with the Nevada County Superior Court within 30 days. At the hearing, the appeal body may consider any issue involving the matter being appealed, in addition to the specific grounds for appeal which are articulated in Attachment 1. In accordance with Section 18.140.030.E (Filing and Processing of Appeals, Action), the appeal body may, by resolution, affirm, affirm in part, or reverse the action, the decision, or determination of the original review authority. The Town Council should consider whether staff has correctly interpreted the Town's Development Code, correctly applied the Development Code, and in general whether the Community Development Director's determination was consistent with the Development Code.

The appellant and other interested parties shall not present new evidence or testimony at the appeal hearing unless the party can demonstrate, to the satisfaction of the appeal body, that new information:

(a) Was not previously available to the party; or

(b) The party could not have participated in the review process because they could not have known about the review process.

If new or different evidence is presented on appeal, the Council, may, but shall not be required to, refer the matter to the original review authority for further consideration.

What information is provided during consideration of an appeal?

In addition to the appellant's submittal requesting the Council overturn the Planning Commission's decision, the Council will receive a copy of the appellant letter, initial application for the SB9 Urban Lot Split, the CDD's April 13, 2022 Conditional Approval Letter, a copy of the Town's adopted ordinance allowing for SB9 Urban Lot Splits, a copy of the appellant's packet supporting his appeal and public comments from the Planning Commission appeal hearing. The appellant's request is to remove three of the required conditions of approval that will allow for the creation of two parcels through a SB9 Urban Lot Split.

The appeal process is called a *de novo* review (Latin for "from the new"). The Council will be reviewing the determination without consideration of the CDD's and Planning Commission's previous actions—as if the project is being heard for the first time. Accordingly, the Council will need to determine if the conditions of approval were appropriately applied to the project and will need to now serve as the review body of the requested Urban Lot Split.

Fiscal Impact: The cost of submitting this appeal is paid for by the appellant through a fixed-fee application. However, the cost of processing the appeal has surpassed the amount of the fixed fee, which includes preparation of the staff report, public noticing for the hearing and staff's attendance at the hearing. Because the fixed-fee application has not been adequate to cover the Town's expense to process the appeal, the remaining costs are borne by the Town's General Fund, through the Planning Division. If the appeal is granted, the appellant has the option of requesting a refund of the appeal fees.

Environmental Review: Staff has determined the appeal to be exempt pursuant to CEQA Guidelines Section 15061(b)(3), which states that CEQA applies only to projects which have the potential for causing a significant effect on the environment. This project would allow for the expansion of residential infrastructure on the resultant parcel, which would be available with or without the lot split. Additionally, pursuant to section 15300.1 of the California Environmental Quality Act, projects for which public agencies exercise only ministerial authority are exempt from environmental review.

Public Comment: As of publication of this staff report, no public comments have been received. Any - comments received subsequent to publication of the staff report will be forwarded to the Town Council directly. Additionally, public comments that were received as part of the Planning Commission Appeal have been attached with this staff report (Attachment 7).

Staff Summary and Recommendation: As stated previously, staff's recommendation is to uphold the CDD's determination, Planning Commission decision/denial of the appellant's appeal and deny the appeal. In doing so, the Council would be approving the requested SB 9 Urban Lot Split with all the original conditions of approval. For the reasons articulated in the discussion section, staff does not agree that the conditions were improperly applied to the project and believes that they should be required to record the lot split. All of the CDD's required conditions of approval are based either in existing State law (SB9 legislation) and/or the Town's existing subdivision ordinances. Most importantly, SB9 subdivisions are ministerial and the CDD exercised no discretion in requiring the conditions of approval.

Alternative Action: Actions that the Town Council may take as an alternative to the recommended action include:

1. Continue the public hearing to a date and time certain.

   The Town Council may request additional information from the applicant and/or staff (if new information is presented at the next meeting, the public portion of the hearing must be reopened on the new information submitted).

2. Overturn the CDD's and Planning Commission's decisions and grant the appeal.

Attachments:

(1) Resolution 2022-71
(2) Appellant letter, dated April 18/ September 26
(3) Senate Bill 9 Urban Lot Split Tentative Map, dated January 4, 2022
(4) Community Development Director determination, dated April 13, 2022
(5) Development Code Chapter 18.95 (Urban Lot Split and Two-Unit Projects (Senate Bill 9))
(6) Ferwerda Rebuttal Packet
(7) Planning Commission Public Comment Letters

Priority:

☐ Enhanced Communication	☐ Climate and Greenhouse Gas Reduction	☒ Housing
☐ Infrastructure Investment	☐ Emergency and Wildfire Preparedness	☐ Core Service