



City Council Report

Subject: **Whitney Ranch Unit 49**

General Plan Amendment, GPA2021-0004
General Development Plan Amendment, PDG2021-0003
Rezone, Z2022-0002
Tentative Subdivision Map, SD2021-0003

Date: December 13, 2022

Submitted by: David Mohlenbrok, Community Development Director
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Department: Community Development Department

Recommendation

As the entitlement request includes an Ordinance amendment, a two-meeting process is required. At the first meeting the City Council shall conduct a public hearing, complete deliberation, provide staff with direction (if appropriate) as to any desired modification(s) to the draft entitlement documents and, if approving, introduce the ordinance and continue the item to the next feasible City Council meeting as indicated below:

December 13, 2022 (first reading of the ordinance and final action on all project entitlements)

MOVE TO ADOPT A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ROCKLIN APPROVING AN AMENDMENT TO THE GENERAL PLAN OF THE CITY OF ROCKLIN TO CHANGE THE LAND USE DESIGNATION OF APPROXIMATELY 19.9 ACRES FROM PUBLIC QUASI PUBLIC TO LOW DENSITY RESIDENTIAL (Whitney Ranch Unit 49 / GPA2021-0004)

MOVE TO INTRODUCE, WAIVE THE FULL READING AND READ BY TITLE ONLY AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF ROCKLIN AMENDING THE NORTHWEST ROCKLIN GENERAL DEVELOPMENT PLAN AND REZONING AN APPROXIMATELY 19.9-ACRE SITE FROM JUNIOR HIGH SCHOOL (SCHOOL)/PLANNED DEVELOPMENT 5 UNITS TO THE ACRE (PD-5) TO PLANNED DEVELOPMENT 3.3 UNITS TO THE ACRE (PD-3.3C) (Whitney Ranch Unit 49 / PDG2021-0003 and Z2022-0002)

MOVE TO ADOPT A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ROCKLIN APPROVING A SMALL LOT TENTATIVE SUBDIVISION MAP (Whitney Ranch Unit 49 / SD2021-0003)

January 10, 2023 (final action on Ordinance)

The Planning Commission and Staff recommend the following:

MOVE TO ADOPT AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF ROCKLIN AMENDING THE NORTHWEST ROCKLIN GENERAL DEVELOPMENT PLAN AND REZONING AN APPROXIMATELY 19.9-ACRE SITE FROM JUNIOR HIGH SCHOOL (SCHOOL)/PLANNED DEVELOPMENT 5 UNITS TO THE ACRE (PD-5) TO PLANNED DEVELOPMENT 3.3 UNITS TO THE ACRE (PD-3.3C) (Whitney Ranch Unit 49 / PDG2021-0003 and Z2022-0002)

Proposal/Application Request

This application is a request for approval of the following project entitlements:

- Amendment to the City of Rocklin General Plan to change the land use designation of an approximately 19.9-acre site from Public Quasi Public To Low Density Residential.
- Amendment to the Northwest Rocklin General Development Plan to update various narrative passages, tables, and figures to be consistent with the concurrent rezone of Whitney Ranch Unit 49 from Junior High School (School)/Planned Development 5 Units to the Acre (PD-5) to Planned Development 3.3 Units to the Acre (PD-3.3C).
- Small Lot Tentative Subdivision Map to create sixty (60) single family lots and three (3) landscape lots on an approximately 19.9-acre site.

Owner/Applicant

The property owner is Southern Placer School Transportation Authority. The applicant is Ubora Engineering & Planning Inc.

Project Location

Whitney Ranch Unit 49 is generally located at the northeast corner of the intersection of Whitney Ranch Parkway and Songbird Way, east of Old Ranch House Road, and south of Laredo Drive, as shown on **Figure 1**. APN 017-174-020.

Figure 1. Project Location



Background, Surrounding Land Uses, and Site Characteristics

Whitney Ranch Unit 49 is an infill site that was originally planned to be a junior high school. The Rocklin Unified School District has since determined that an additional middle school, or other campus is not needed to support the build out of Northwest Rocklin and the City. The project site was first designated as a school site with the pre-zoning adopted for the North West Rocklin Annexation Area in 2002 via City of Rocklin Ordinance 858. In 2004, the large lot map for Whitney Ranch Phase I, processed as Liberty Hill, was approved by Resolution 2004-68. Subsequently, revisions were approved as part of Whitney Ranch Phase II that included the current large lot parcels (SD-2006-06) and zoning (PDG-99-02E) approved in September, 2008 by Resolution 2008-254 and Ordinance 941, respectively. There have been a number of subsequent amendments to the Northwest Rocklin General Development Plan which did not impact this site, the most recent being Ordinance 1151 adopted in October 2022.

Unit 49 has been mostly vacant since the early approvals of the Northwest Rocklin Annexation Area. A telecommunications tower, approved and built before the area was annexed from Placer County, was formerly located in the southeastern corner of the site until it was replaced by a new facility in Whitney Ranch Community Park a few years ago. The rest of the site has

been disturbed during the construction of other portions of Whitney Ranch. The project site supports native and non-native grasses on rolling terrain that generally slopes to the west and south into the existing drainage areas that are tributary to Pleasant Grove Creek.

The Unit is immediately adjacent to or across streets from existing Whitney Ranch single-family neighborhoods including Units 42/44A, 44B, 46D, 46E, 50, 52A, and 61C, and to the west, the future site of the PCWA water tank and existing Pernu Park.

See **Table 1** for surrounding uses and see **Figure 2** for the current General Plan and Zoning.

Table 1. Surrounding Uses

	Current Use	Current General Plan / Zoning
Project Site	Vacant	Public Quasi Public (PQP) / Junior High School and Planned Development 5 units per acre (PD-5)
North	Single Family Residential (Unit 46E, across Laredo Drive)	Medium High Density Residential (MHDR) / Planned Development 6.1 units per acre (PD-6.1)
East	<ul style="list-style-type: none"> • Single Family Residential (Unit 50, under construction) • Single Family Residential (Unit 61C) 	<ul style="list-style-type: none"> • MHDR / Planned Development 7.3 units per acre (PD-7.3) • MHDR / Planned Development 8.3 units per acre (PD-8.3)
South	<ul style="list-style-type: none"> • Single Family Residential (Unit 52A) • Single Family Residential (Units 42 & 44A) 	<ul style="list-style-type: none"> • MHDR / PD-7.3 • MHDR / Planned Development 5.1 units per acre (PD-5.1C)
West	<ul style="list-style-type: none"> • Single Family Residential (Unit 46D) • Pernu Park • PCWA Water Tank (future site) • Single Family Residential (Unit 44B) 	<ul style="list-style-type: none"> • MHDR / PD-7.3 • Recreation Conservation / Park • PQP / Water Tank • MHDR / Planned Development 8 units per acre (PD-8)

Figure 2. Current General Plan & Zoning



Land Use Designation	
	Professional Office
	Business Professional/Commercial
	Bus. Prof./Comm./Light Industrial
	Heavy Industrial
	Light Industrial
	Retail Commercial
	Service Commercial
	Mixed Use
	Public/Quasi-Public
	High Density Residential
	Medium-High Density Residential
	Medium Density Residential
	Low Density Residential
	Rural Residential
	Recreation/Conservation
	Park
	Downtown Plan Area
	Future School Site

Zoning
PD-2.5C – Planned Development 2.5 units per acre
PD-2.9C – Planned Development 2.9 units per acre
PD-3.2C – Planned Development 3.2 units per acre
PD-4.2 – Planned Development 4.2 units per acre
PD-5.1C – Planned Development 5.1 units per acre
PD-7.3 – Planned Development 7.3 units per acre
PD-8 – Planned Development 8 units per acre
PD-8.3 – Planned Development 8.3 units per acre
K-6 SCHOOL, JH School, Water Tank, etc. for PQP Areas
PARK – Neighborhood Park
OS – Open Space

General Plan Amendment

Whitney Ranch Unit 49 is designated Public Quasi Public (PQP) in the Rocklin General Plan Land Use Map. The PQP designation allows for public facilities of a neighborhood, community or regional nature and the site was given this designation with the early planning for the Northwest Rocklin/Whitney Ranch area in anticipation of the Rocklin Unified School District building a junior high school. The proposed general plan amendment to Low Density Residential (LDR) would make the land use designation consistent with the proposed density of the project and the proposed zoning of PD-3.3C.

Surrounding single family development is designated Medium Density Residential (MDR). The proposed LDR designation is compatible with the higher density residential development of MDR surrounding the project site.

General Development Plan Amendment and Rezone

The Northwest Rocklin General Development Plan was originally approved by Ordinance No. 858 by the City Council in 2002. Since that original approval, the General Development Plan has been updated numerous times, most recently via Ordinance No. 1151 in 2022.

The proposed project would amend the General Development Plan to remove references to the designation of the Junior High School site and change the zoning to Planned Development 3.3 units per acre (PD-3.3C) consistent with the requested General Plan Amendment, and to update the appropriate Figures. Similarly, the Rezone would update the Citywide zoning map to replace reference to the Junior High School and PD-5 with PD-3.3C.

The potential for residential lots on Unit 49 was anticipated and analyzed in the Northwest Rocklin Annexation Area original entitlements. The original underlying zoning of PD-5 on Unit 49 would have allowed the creation of as many as ninety-nine (99) lots based on the 19.9 gross acres.

Note, the City has been processing several projects in the Northwest Rocklin General Development Plan area, including the Estia and Placer Creek Apartments projects. Each of these projects required updates to the Northwest Rocklin General Development Plan. Estia has been approved and Placer Creek Apartments is on the December 13 meeting agenda for its second reading. The General Development Plan revisions for these projects for Whitney Ranch Unit 49 reflect the changes approved with these other projects.

Summary of Planning Commission Hearing and Action

On September 20, 2022, the Planning Commission considered the proposed Whitney Ranch Unit 49 project. Staff presented the Project, as well as two Blue Memos that included a request by the applicant to modify two of the tentative subdivision conditions of approval, correspondence from the public, and the addition of a staff-recommended condition of approval regarding widening the sidewalk along the project's Songbird Way frontage to create a Class 1 bike lane separate from the existing Class 2 bike lane on the street. The Blue Memos with attachments as well as correspondence included with the Planning Commission staff report are provided as Attachment 1.

Correspondence received prior to the public hearing expressed concerns about traffic in the vicinity of the project site, the need for stop signs, and questioned the Rocklin Unified School District's (School District) determination that the Junior High School site was not needed to accommodate future enrollment growth. Staff noted both in a Blue Memo and verbally in response to questions during the public hearing that Public Services staff will be conducting a traffic investigation to determine if warrants, per State regulations, are met to allow the installation of any additional traffic control measures in the area of the project.

Following Staff's presentation, the Planning Commission asked questions regarding potential access to the subdivision from Whitney Ranch Parkway, Senate Bill 743 (transportation impacts measurement of Vehicle Miles Traveled for new development), and the School District's decision to not use the project site for a junior high school.

The School District representative, Craig Rouse, addressed the Commission, stating he was available to answer any questions. The Commission had questions for Mr. Rouse regarding the following:

1. District's decision not to have a third Junior High School
2. Age of current schools
3. How many elementary schools are in Rocklin
4. How often the demographic enrollment study is done
5. Growth in Rocklin

The Commission then opened the hearing for public comment. The following residents addressed the Commission:

1. Jason Clark, Rocklin – had questions regarding the age of the CEQA document, elevation differences, grading completed in 2019, and traffic concerns
2. Gary Stevens, Rocklin – expressed concern about traffic and speeding
3. Dave Williams – traffic concerns

Dave Berry, project engineer, addressed questions regarding the project access; previous grading; and noted that traffic issues are an enforcement matter.

There being no further public comment, the hearing was closed.

During deliberations, the Commissioners generally expressed support for the project.

The Commission then voted unanimously 4 to 0 (one Commissioner absent) to recommend approval of the project to the City Council including the revisions noted in the Blue Memo.

The draft minutes of the Planning Commission meeting minutes are provided as Attachment 2.

Project Updates Subsequent to the Planning Commission Hearing

Public correspondence received after the Planning Commission meeting is provided as Attachment 3. This includes several pieces of correspondence from Jason Clark, who spoke at the Planning Commission hearing. Mr. Clark came in to the City Clerk's office late in the day on Friday, September 30, 2022 and requested to file an appeal of the Planning Commission action on the Whitney Ranch Unit 49 project and requested to have the application fees for an appeal waived. Given the proximity to the appeal deadline, close of business that day, the City Attorney's office advised staff to accept the correspondence/appeal request materials to allow staff to determine the correct procedure for processing the appeal request and the fee waiver request, which was made without payment of the required fee, thereby preserving Mr. Clark's right to appeal if it was determined that such a right existed given the circumstances. Community Development Department Staff informed Mr. Clark that accepting his correspondence/appeal request materials did not guarantee him an appeal as Staff would have to look into whether he was allowed an appeal hearing without timely payment of the appeal fee.

After reviewing the Rocklin Municipal Code (RMC) staff subsequently determined that Mr. Clark would need to pay the applicable application fees to file an appeal and, as a part of the appeal, request the application fees be refunded. Staff spoke with Mr. Clark via telephone and explained the need to pay the appeal fee and provide written justification for the fee waiver request. In follow up, Staff emailed Mr. Clark requesting confirmation of his desire to file the appeal and the submission of the fee. Mr. Clark did not respond to Staff's follow-up email messages and did not submit the appeal fee. Given that, staff believes that the opportunity to file a timely appeal has passed. Nonetheless, as noted above, this application must be approved by the City Council and so moves on to the City Council automatically. The correspondence provided by Mr. Clark, noting his concerns, has been included in Attachment 3 to this staff report. The issues Mr. Clark raised are addressed herein for consideration by the City Council. In

his correspondence Mr. Clark raised the following concerns:

1. The environmental evaluation of the project impacts is flawed as it relies upon an old EIR document that assumed a Junior High School would be developed on the project site.

Response: The Whitney Ranch Environmental Impact Report (EIR) assumed that the project site could be developed as either a Junior High School or a single-family residential subdivision with a density of 5 dwelling units per acre. The proposed project has a density of 3.3 dwelling units per acre, less than that assumed in the EIR. Further, consistent with State requirements, staff prepared a 15162 analysis to review and verify that the existing EIR adequately addresses the impacts of the proposed project and no further review under the California Environmental Quality Act (CEQA) is required. That analysis it included as Attachment 4 to this staff report, no new information has been received that would potentially alter the conclusions of that analysis.

2. Increased traffic on surrounding streets, particularly Laredo Drive, from proposed residential development will be worse than that from a school because of the reduced speed limits in school zone and other special controls in place during pick up / drop off times.

Response: Special standards do exist for streets adjacent to school sites, however the bulk of complaints staff receives with regard to school traffic is typically related to the sheer volume of traffic and the resulting circulation difficulties during pick up / drop off times. Staff would expect the proposed project to generate traffic volumes similar to the surrounding single-family residential subdivisions, although potentially at slightly reduced levels on a project area basis as the project is proposed with a density of 3.3 dwelling units per acre and the surrounding developments are at 7.3 dwelling units per acre or greater. Speeding on local streets, typically frequented only by area residents, is largely an enforcement issue handled by the Police Department; staff has no reason to expect that compliance with traffic speed limits would be a more significant issue in this area than any other part of the City.

3. Project should be redesigned to remove access from Laredo Drive and Songbird Way and instead connect with Grouse Ridge Way, in the adjacent Unit 50 development, and directly with Whitney Ranch Parkway due to unacceptable traffic increases on Laredo Drive and Songbird Way.

Response: The existing stub of Grouse Ridge Way was designed with a slightly less than standard width than the adjacent streets to provide access to the two lots that face that

roadway section and not to serve as a through street. This is because, at the time the Unit 50 subdivision was developed, it was still probable that the adjacent property, Unit 49, would be developed as a school. Subsequent to construction plans for the Unit 50 subdivision being approved, the School District's plans for the site changed. Access to the project site from Whitney Ranch Parkway is possible, but not desirable, as Whitney Ranch Parkway is designed as an arterial street intended to carry a larger volume of vehicles at higher speeds than the collector streets and local streets that feed onto it. In peak hours, traffic going through the roundabout at Songbird Way / West Oaks Boulevard and Whitney Ranch Parkway may back up making exiting from a street in the project site difficult at those times if the street is too close to the roundabout. Shifting a potential connector street further east to line up with Jamboree Drive is not possible as that street is centered on the project site's easterly property line so additional right-of-way would be required from the Unit 50 subdivision (effectively losing a lot), or the new street would need to shift westerly creating an off-set intersection, which is not desirable and not consistent with City standards. Specifically, due to safety concerns, the adopted City standards require street intersections to line up or be offset by a minimum of 150 feet which would move the intersection closer to the roundabout than would be preferred. Songbird Way is designed to serve as a local collector street feeding traffic from local streets to Whitney Ranch Parkway. Laredo Drive is a local street designed to carry traffic generated in the immediate area and accommodate traffic from a larger area that would have been attracted to the area due to the formerly anticipated Junior High School on the site. As such, this street has more than adequate capacity to safely accommodate traffic from the proposed development. Additionally, based upon experience, staff would expect the bulk of traffic to and from this development to use Songbird Way to more quickly get to Whitney Ranch Parkway or West Oaks Boulevard as that is the shortest distance to / from Highway 65, shopping, schools, offices, and other generators of traffic.

4. The site should be preserved as open space.

Response: The Whitney Ranch development has already met its obligations for provision / construction of parks consistent with the standards set forth in the Rocklin General Plan and also for provides significant passive open space areas. In fact, Pernu Park is located directly across Old Ranch House Road from the project site and links to the trail system in the Whitney Oaks area. The proceeding notwithstanding, the City has not programmed funds to purchase, develop, or maintain this site as a park or open space area.

In response to concerns raised about giving up the project site as a potential future school site the Rocklin Unified School District provided additional information, **Attachment 5**, about the School Board's determination to declare the project site, Unit 49, as surplus and allow it to be

sold for development as a residential subdivision. In addition, Ubora Engineering and Planning, Inc., the project engineers, provided additional information responding to Mr. Clark's concerns, **Attachment 6.**

Since the Planning Commission hearing, the Engineering Division has more thoroughly reviewed the proposed addition of a Class 1 Bike lane along Song Bird Way, which was noted in one of the Blue Memos and memorialized as a condition of approval (4.f.ii.A), to add a Class 1 bike lane on Songbird Way. Unfortunately, they concluded that neither a Class I bike lane nor an expanded sidewalk could be installed along the Songbird Way frontage. Some of the factors leading to that conclusion include: the requirements of a Class 1 bike lane to be separated from the roadway; the presence of the existing sidewalk and existing five (5) foot wide bike lane along the frontage; as well as grading and retaining wall implications.

The review also considered pedestrian access to Pernu Park and the hiking / bike trail terminus in the park, across Old Ranch House Road from the project site. It was determined the project could be required to install a 3-way stop sign with a crosswalk at the intersection of Creek Hollow Road/Old Ranch House Road and to install a crosswalk only (no stop signs) at the intersection of Songbird Way/Old Ranch House Road. As noted in the staff report, the City is currently evaluating the intersection of Baronial Lane/Old Ranch House Road for the potential application of future stop signs and crosswalks. The applicant has agreed to the proposed pedestrian improvements and accordingly, the previous Planning Commission Blue Memo recommendation to modify condition of approval (4.f.ii.A), to require a Class 1 bike lane along Songbird Way has been eliminated, and the original unedited condition, without reference to Class 1 bike lane was restored. Additionally, a new condition has been added to the draft resolution for approval of the subdivision as indicated below to address pedestrian crossings on Old Ranch House Road and a "Park Connections sheet" has been added to Exhibit A of the draft resolution to approve the subdivision to clarify the intended improvements.

Proposed Condition of Approval for City Council

Section 3.B.4.f.ii.D: Intersection improvements along Old Ranch House Road including the installation of a 3-way stop and a crosswalk at the Creek Hollow Road/Old Ranch House Road intersection and installation of a crosswalk at the Songbird Way/Old Ranch House Road intersection, and any advanced warning signs for the crosswalks, if required per the California Manual of Uniform Traffic Control Devices based on the sight distance and geometry of the roadway, to the satisfaction of the City Engineer and Director of Public Services.

Tentative Subdivision Map

Subdivision Design - General

The proposed Tentative Subdivision Map will subdivide approximately 19.9 gross acres into sixty (60) single-family residential lots and three lettered landscape lots to be dedicated to the City. Lot sizes range from 7,593 square feet to 18,471 square feet.

The streets within this subdivision are proposed to be public and are designed to the City's 46-foot and 42-foot standard residential street sections. The 46-foot street section provides for parking, rolled curbs, gutters, and sidewalks on both sides of the street. Cul-de-sacs and some short street segments that terminate, meet the City's 42-foot standard residential street section with rolled curb, gutter, and sidewalk on one side and vertical curb on the other; parking would only be allowed on one side of these streets.

The project is obligated to construct all on-site streets and improvements and to install sewer, water, and other infrastructure as required by the City and the applicable utilities to provide service to the project.

The subdivision is designed with two points of entry. The entries are flanked by landscape lots to be dedicated to the City. Construction of this subdivision includes installation of landscaping in the existing median in Songbird Way.

Grading and Drainage / Stormwater Quality

The project's grading is designed to balance the amount of cut and fill. Internal retaining walls are used throughout the project site to retain slopes where needed.

The project site is within the Pleasant Grove Creek watershed. Drainage and detention for Whitney Ranch was master planned and has been implemented with earlier phases of development. The proposed storm drainage system has been designed and/or conditioned to meet the City of Rocklin Storm Water Quality standards and the City's National Pollutant Discharge Elimination System (NPDES) Phase II State Water Resources Control Board General permit. Effective water quality and sediment and erosion control measures are required to be implemented and maintained during construction.

Masonry Walls and Fencing

The following wall and fence types, consistent with the earlier phases of Whitney Ranch, are proposed and/or conditioned to be used at various locations throughout the project:

- Six-foot tall "Proto II" masonry wall with decorative cap and stone veneer pilasters to be spaced no greater than 80 feet on center (at project entries)

- Six-foot tall “Proto II” masonry wall with decorative cap and pilasters to be spaced no greater than 80 feet on center (along the major arterial roads)
- Future privacy fence along the eastern boundary with Unit 50 (single family development under construction)

The wall and fence designs and their locations within the project area are provided on the Preliminary Fencing Plan in Exhibit A.

Landscaping

The project frontages and entry landscape lots will consist of a combination of decorative masonry walls and landscaping including street shade trees, accent trees, shrubs, and groundcover consistent with the Whitney Ranch streetscape design standards. The median in Songbird Way will be landscaped to match that in the similar medians also flanking the roundabout at Whitney Ranch Parkway and West Oaks Boulevard.

Street Lights, Site Lighting, Street Sign Poles, Bollards

The project has been conditioned to include decorative street lights, street sign poles and brackets, and bollards that are consistent with those used in Whitney Ranch Phases I and II, as well as ensure that adequate pedestrian lighting is provided at the paseo.

Environmental Determination

When the Northwest Rocklin Annexation (Sunset Ranchos) project was approved in 2002, an Environmental Impact Report (EIR) was also approved per City Council Resolution 2002-230. Subsequently, an Addendum to the Northwest Rocklin Annexation EIR was approved in 2008 per City Council Resolution 2008-252. Project specific analysis was conducted and potential impacts of the Northwest Rocklin Annexation project were identified in the EIR and Addendum documents. Section 15162 of California Code of Regulations, Title 14, Division 6, Chapter 3 (California Environmental Quality Act Guidelines) contains the provisions for relying on previously adopted environmental impact reports. Pursuant to Section 15162, it has been determined that the EIR and Addendum that were adopted for the Northwest Rocklin Annexation project took into consideration the anticipated potential environmental impacts associated with the development of Whitney Ranch Unit 49 as both a Junior High School or a single-family residential subdivision therefore no additional environmental documentation is necessary. This determination has been made because according to Section 15162, when an environmental impact report has been adopted for a project, no subsequent environmental document shall be prepared unless there are substantial changes to the project or to the circumstances under which the project is undertaken, or new information of substantial importance results in the identification of a new impact or an increase in the severity of a previously identified significant impact, or new information of substantial importance which was not known or could not have been known shows any of the results further described in

Section 15612. The proposed Whitney Ranch Unit 49 project proposes 60 dwelling units while the Northwest Rocklin Annexation Area EIR anticipated and analyzed up to a maximum of ninety-nine (99) dwelling units for the project area, consistent with the underlying zoning. Thus, the Whitney Ranch Unit 49 project is within the scope of the previously approved Northwest Rocklin Annexation Area EIR and does not result in any new significant impacts nor does it result in an increase in the severity of a previously identified significant impact. The Section 15162 analysis is provided as Attachment 4.

Public Correspondence

Correspondence received at or prior to the Planning Commission meeting on September 20, 2022 is included with Attachment 1. Correspondence received after the Planning Commission hearing and prior to publication of this staff report is included in Attachment 3.

Prepared by Dara Dungworth, Senior Planner