

# Toward Simulating Dire Wildfire Scenarios

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**Abstract:** Recent extreme wildfires are motivating unprecedented evacuation planning. A critical need is to consider *dire scenarios* that allow less time to clear an area than required. Although these scenarios often begin with an ignition near a community, any scenario can become dire due to weather conditions, human response, technology, cascading events, and community design. Although research has widely addressed scenarios with ample time and favorable conditions, protecting people in dire scenarios is much more challenging. We provide a framework for generating dire scenarios that includes difficult starting conditions, delayed decision-making, variable fire spread rates, limited warning technology, and random adverse events. The goal is to move beyond favorable scenarios and generate challenging ones that inspire novel protective planning. A key finding is that minimizing losses in dire scenarios may involve disaster response elements not represented in current simulation models, including improvisation and altruism. DOI: [10.1061/\(ASCE\)NH.1527-6996.0000474](https://doi.org/10.1061/(ASCE)NH.1527-6996.0000474). © 2021 American Society of Civil Engineers.

## Introduction

The 2018 Camp Fire in Paradise, California, began as a scenario that most residents would consider common based on previous experience. The town had experienced 13 near miss fires in the last two decades, some that resulted in stressful evacuations, but none that resulted in any major losses. However, as the Camp Fire advanced toward Paradise at an unprecedented rate, officials planning for a 2–3 h evacuation were unaware that homes on the north edge of town would ignite in less than 90 min (Mooallem 2019). The result was a dire scenario that garnered worldwide attention and motivated a new era in wildfire evacuation planning, which has historically been very scarce (Kano et al. 2011).

Dire scenarios have not been a focus of previous study. Researchers and planners prefer favorable ones with ample time and positive outcomes to highlight model and plan efficacy. The accepted approach is to set ignition points far enough from a community to allow sufficient time for the residents to clear a study area. However, favorable scenarios do not challenge emergency managers to identify novel protective plans for the most difficult cases that arise in real wildfires. Furthermore, these dire cases are becoming more common as drought leads to larger, faster-moving wildfires (Thompson 2020). The goal of this paper is to propose a framework for generating dire scenarios, highlight their value in evacuation planning, and identify research challenges and opportunities.

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## Dire Scenarios

We define a scenario as “dire” if the required time to clear an area is greater than the time available (i.e., lead time). Dire scenarios fall into the class of extreme events where important variables are located at the tail of their distribution (Tedim et al. 2018; Sanders 2005). *Evacuation time* and *lead time* are common metrics, where the former is the estimated time to clear an area of its population and the latter is the estimated time available to do so before hazard impact (Lindell et al. 2019). Here, we adopt a dynamic perspective and assume that both variables can be estimated at every point in time during a scenario. The estimate at time  $t$  represents the *remaining* lead time and evacuation time to move residents to safety. For example, if the estimated evacuation time is 1 h, and 20 min has transpired since it commenced, the remaining evacuation time is 40 min. We define a direness index that yields a score at time  $t$  across a scenario as

$$d_{ijt} = e_{ijt}/l_{ijt} - 1 \quad t = 0..T \quad (1)$$

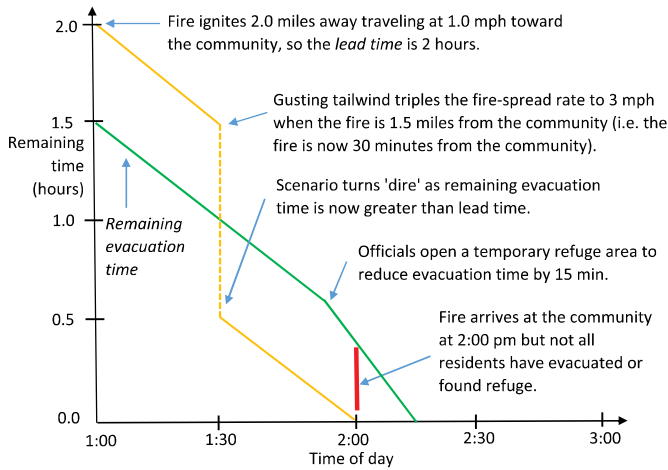
where  $d_{ijt}$  = score for community  $i$  threatened by wildfire  $j$  at time  $t$ ;  $e_{ijt}$  = time required to evacuate the remaining residents in community  $i$  from wildfire  $j$  at time  $t$ ; and  $l_{ijt}$  = lead time at  $t$  before wildfire  $j$  impacts community  $i$ . This is a socioecological metric that integrates a human system variable (evacuation time) with a natural system one (lead time) (Moritz et al. 2017). Fig. 1 depicts a means to translate a score into a direness category ranging from “routine” to “extremely dire.”

For example, assume that at 3:15 p.m. ( $t = 0$ ), a community has 1 h to evacuate before a fire arrives at 4:15 p.m. ( $l_{ijt} = 1.0$ ), and it will take 1.25 h to evacuate the residents ( $e_{ijt} = 1.25$ ). Thus, the initial state of the scenario at time  $t$  is “dire” using Fig. 1 because evacuation time is 25% greater than lead time [ $(1.25/1.0) - 1 = 0.25$ ]. Because this score is dynamic, a scenario can enter or exit a given dire category as events alter  $l_{ijt}$  and  $e_{ijt}$  (e.g., a blocked egress point at time  $t_1$  that increases  $e_{ijt}$  or a change in wind direction at  $t_2$  that increases or decreases  $l_{ijt}$ ). In real wildfires, these variables are uncertain and so are a direness score and associated category. This means that a scenario that appears routine may turn out to be dire.

To provide an example, Fig. 2 depicts the anatomy of a routine scenario that turns dire due to a dramatic increase in a fire’s

Dire Evacuation Scenario Categories			
<b>Routine</b> (<= 0.0)	<b>Dire</b> (> 0.0)	<b>Very Dire</b> (> 0.5)	<b>Extremely Dire</b> (> 1.0)
Evacuation time is less than or equal to lead time.	Evacuation time is greater than lead time.	Evacuation time is 50% greater than lead time.	Evacuation time is at least twice as long as lead time.

**Fig. 1.** (Color) Dire evacuation scenario categories based on a score.



**Fig. 2.** (Color) Anatomy of a dire scenario due to a sudden increase in fire spread rate.

spread rate. At 1:00 p.m., a deputy reports a fire 2 mi from a community traveling 1 mph toward it, and officials estimate the initial lead time at 2 h. Evacuation time is estimated at 1.5 h, so the scenario is not initially dire ( $1.5/2.0 - 1 = -0.25$ ). Officials warn the residents, and the plan is to have the area cleared by 2:30 p.m. At 1:30 p.m., a gusting tailwind triples the fire spread rate to 3 mph, and the lead time drops from 1.5 h to 0.5 h. Because the remaining evacuation time is 1 h, the scenario turns “very dire” ( $1.0/0.5 - 1 = 1.0$ ). At 1:45 p.m., officials designate a temporary refuge area (TRA) to reduce the required time to protect the remaining residents by 15 min. Despite their best efforts, the fire enters the community at 2:00 p.m., but some residents have yet to clear the area or secure shelter, which could lead to casualties.

### Dire Scenario Sources

Dire scenarios arise from a variety of sources. Foremost is a wildfire ignition point close to a community because this condition offers less time to respond than one further away. A second factor is detection time, which is usually brief because citizens rapidly report smoke plumes, but nighttime wildfires can go undetected longer when people are asleep. A third factor is official decision-making because emergency managers may delay the decision to alert or warn residents to avoid unnecessarily disrupting a community based on their threat assessment (Drews et al. 2014). This can lead to a dire scenario if officials subsequently issue a warning at the last minute (Cova et al. 2017). Notification systems can also

affect a scenario if many residents do not receive an alert or warning in time (Lindell 2018; Doermann et al. 2021). Public response rates can affect scenario direness due to low-mobility households (e.g., age, disability, resources), a low warning compliance rate, or a tendency to adopt a wait-and-see approach (Dash and Gladwin 2007; McCaffrey et al. 2018; Edgeley and Paveglio 2019). Traffic factors can affect a scenario, as in the case where residents have difficulty finding a safe exit route (Brachman et al. 2019) or when many households depart at once and induce gridlock (Chen and Zhan 2008). Community design can affect a scenario if a road network cannot support rapid residential evacuation (e.g., many homes and few egress points).

There are many recent examples of dire wildfire scenarios. The 2018 Camp Fire is an iconic example because it includes many interacting factors. This case included a fast-moving fire that ignited near a low-egress community with many low-mobility residents. Furthermore, officials accustomed to prior near misses waited to assess the fire’s direction and spread rate before ordering the first phased warning, and many residents did not receive a warning due to a low reverse-911 subscription rate (Todd et al. 2019). On the favorable side of the scenario, officials and residents were highly prepared and experienced with a state-of-the-art plan, and officials successfully reversed a lane on the main exit to increase the capacity of a key traffic bottleneck. Other examples of recent dire wildfire scenarios include the 2020 Alameda and Holiday Farm fires in Oregon, which both ignited close to a community and offered very little time to act. The 2017 Tubbs Fire in California was also dire given that it moved 12 mi in its first 3 h through populated areas on a Sunday night, and many residents reported not receiving a warning.

### Modeling Dire Scenarios

To generate a dire scenario, a modeler can start with lead time less than evacuation time or design a scenario where the former falls below the latter at any point. Fig. 3 shows a scenario dashboard with factor categories (columns) to generate a dire scenario ranging from no impediment (green) to a major impediment (red). For example, Scenario 1 (row 1) includes minor impediments in the ignition location, fire spread rate, public response, and mobility. This scenario could be a proximal fire moving moderately fast toward households, some of whom voluntarily delay their decision to leave and others with low mobility. Scenario 3 has major impediments, including official decision-making, notification and warning, public response, and traffic congestion. In this scenario, the fire started far from the community, but delays and difficulties in warning residents ultimately led to a dire scenario with traffic congestion. Scenario 4 is the most challenging, with major impediments in all of the factor categories. Although Fig. 3 lists impedance categories in the columns, an analyst must provide the details for each category to create a realistic scenario.

	ignition location	fire spread rate	detection	official decisions	warning	public resp.	mobility	traffic flow	adverse events
S	Lead time categories			Evacuation/Protection time categories					
1	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow	Green	Green
2	Green	Red	Red	Red	Yellow	Green	Green	Green	Green
3	Green	Green	Green	Red	Red	Red	Yellow	Red	Green
4	Red	Red	Red	Red	Red	Red	Red	Red	Red

**Fig. 3.** (Color) Dire scenario dashboard where scenarios (rows) progress from routine to extremely dire (1–4) due to varying factor impediment levels (green, yellow, red).

In addition to combining factors to create a dire scenario, we need new metrics to compare outcomes that may not be successful. Wolshon and Marchive (2007) provide one example: the number of vehicles that do not clear a community in time when the lead time is short. This does not mean that the fire will trap the remaining residents because recent events reveal that many evacuees safely navigate burning corridors. Beloglazov et al. (2016) also developed a valuable dynamic metric to estimate the population threatened throughout a wildfire scenario called the *exposure count*, which may rise or fall as scenario direness changes.

## Reducing Scenario Direness

Dire scenarios can become less so due to natural and human factors that increase lead time, decrease evacuation time, or both. Factors that may increase lead time by reducing a fire's spread rate include weather (natural), as well as fuel management and fire suppression (human). Although fuel management and fire suppression refer to an array of techniques, modelers do not generally include their effects in coupled fire-evacuation model scenarios because of a lack of data on local fuel management actions. There are also limits on including structural fuels in fire models, which reduces the predictive accuracy of fire spread rate estimates through communities (Kaufman and Roston 2020).

Many factors can decrease evacuation time before and during a scenario. Examples include phased warnings (Li et al. 2015), lane reversal (Xie et al. 2010), and traffic signal optimization (Ren et al. 2013). To broaden the purview, *protection time* is preferable because there are other options. Fire shelters and safety zones are alternatives that have multiple benefits (Amideo et al. 2019). First, they can protect people who cannot leave in time due to low mobility or egress issues, and second, they can reduce traffic delays for residents who decide to leave (i.e., shorter travel times). Households and communities can construct or assign areas of refuge, which can be public or private and permanent or temporary. In the 2018 Camp Fire, parking lots and community buildings were designated as temporary refuge areas (i.e., improvised fire shelter and safety zones), and designating and constructing places of refuge is a growing need. Steer et al. (2017) and Shahparvari et al. (2016) provide representative examples of optimal plans that combine evacuation and refuge shelters to protect people.

Many facets of human response in an actual wildfire can be challenging to model. One example not represented in current models is improvised protective actions. However, improvisation and flexible decision-making is often required in responding to dire disaster scenarios (Webb and Chevreau 2006). One recent example is the use of military transport helicopters to rescue campers trapped by the 2020 Creek Fire in California (Fuller and Mervosh 2020). Altruism is another neglected factor, particularly for many individuals caught in uniquely dire circumstances. Altruism refers to self-selected individuals who demonstrate a willingness to help others address a problem (Batson and Powell 2003). Altruistic examples in wildfires include (1) citizens providing rides for others, (2) citizens providing temporary refuge shelter, (3) citizens providing information via social media, (4) individuals clearing blocked traffic, and (5) citizens aiding in relocating vulnerable populations (e.g., medical facilities, retirement homes, childcare centers). Altruism relates to social capital because communities with greater social cohesion are more likely to have residents help one another (Aldrich and Meyer 2014). One example in the 2018 Camp Fire was Joe Kennedy, who single-handedly cleared abandoned cars that blocked traffic with a bulldozer (Mooallem 2019). Modelers may not have considered altruistic behavior because the need only

arises in very dire scenarios, and it is difficult to predict how much might be displayed or where. However, altruistic acts can also lead to losses if people take excessive risks in helping others. Thus, it represents a challenging research frontier in creating more realistic agent-based wildfire evacuation simulations (i.e., agents helping or cooperating with other agents).

## Conclusion

Although dire wildfire scenarios have not been a focus of study or modeling, they hold potential to help emergency planners and communities cooperate and consider novel protective actions. Key questions for further research include:

1. What can we learn from studying and modeling dire scenarios over favorable ones?
2. How does the direness of a scenario vary geographically across a threat area?
3. What factors serve to make a scenario more or less dire at different scales?
4. How can we incorporate protective behavior found in real wildfires into simulation models (e.g., improvisation, altruism)?
5. How many places of refuge do we need, where should they be located, and what capacity should they have to reduce likely scenarios from dire to routine?
6. What advanced technologies can help reduce the likelihood of dire scenarios before one occurs (e.g., artificial intelligence, wireless emergency alerts, automated fire detection, real-time decision support) (Zhao et al. 2021)?
7. What technology can aid in responding to a dire scenario (e.g., rescue robots, protective fire suits, temporary fire shelter)?
8. How can we visualize the dynamics of dire scenarios, as well as the beneficial and adverse events that affect lead and evacuation time, to improve situational awareness and decision-making?

Studying and modeling dire scenarios are important because they are challenging and increasing in frequency (Schoennagel et al. 2017). The benefit of simulating them is that it may lead to better planning and outcomes in cases where more things go wrong than right. Modeling wildfire evacuation as a coupled natural-human system is challenging (Ronchi et al 2019; Li et al. 2019), and there are limitations to the framework presented herein due to human behavior and uncertainty. Although the science of simulation continues to advance, we still have a long way to go toward incorporating many events that occur in real wildfires.

## Data Availability Statement

No data, models, or code were generated or used during the study.

## Notation

The following symbols are used in this paper:

- $d_{ijt}$  = direness score for community  $i$  threatened by wildfire  $j$  at time  $t$ ;
- $e_{ijt}$  = time required to evacuate remaining residents in community  $i$  from wildfire  $j$  at time  $t$ ;
- $i$  = index of communities;
- $j$  = index wildfires;
- $l_{ijt}$  = lead time at  $t$  before wildfire  $j$  impacts community  $i$ ; and
- $t$  = index of time.



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## Senate Governance and Finance

And

## Natural Resources and Water Committee

### Living Resiliently in the New Abnormal: The Future of Development in

### California's Most Fire Prone Regions

**Speaker Kate Dargan:** Former California State Fire Marshal

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**Summary:** Some areas of California may be too dangerous to build upon. But to know this, we first need to develop a systematic way of evaluating where those areas exist and what mitigations will reduce wildfire risk enough to be acceptable. This should include a trained body of professionals in land use, a clear risk model for mitigation requirements, and an approach that addresses both current buildings and new. The land use development process will substantially benefit from the following programs to enable this risk assessment. These are the gaps in the current wildfire resiliency planning process.

#### Critical Needs for Land Use Best Practices

1. **Educate and certify Land Use Planners, Building Officials, and Fire Marshals** – these are the ‘first responders’ of the development world and need better training, certification, and knowledge sharing than they currently have access to. These professionals approve the permitting, maps, development agreements, zoning, General Plans, Fire Protection Plans and other necessary enforcement provisions but do not have ready access to training, wildfire planning specialist certification, or continuing education.  
**Action:** Develop coursework and require certification in Wildland-Urban Interface Plan Review or equivalent and require at a minimum one-time certification.  
**Value:** Planners, builders, inspectors, and consultants across the state will develop consistent means and methods of designing, approving, and enforcing wildfire resilient communities because they share a common body of practice.
2. **Develop both a wildfire zoning overlay and parcel-based risk maps.** The FHSZ methodology accurately describes hazard and is suitable for a zoning overlay but it is not a risk analysis. To understand risk, you need to measure the fire hazard PLUS the mitigations that reduce the hazard. This combination is risk. This will become an increasingly apparent gap if development approvals become tied to fire hazard zones. Using CEQA as an example, consider the process of evaluating a development for environmental impact. The core of the CEQA decision is based on whether the project can meet a defined need for mitigation so that the project impact is either negligible or acceptable. To do this for wildfire, we must define the wildfire mitigations that result in negligible or acceptable risk to lives, homes, and communities. The FHSZ’s do not have this capability but risk

assessment does. We need to extend the concept of fire hazard into the more mature evaluation of fire risk and this assessment must be enabled at the parcel scale to be useful for land use decision-making.

**Action:** Adopt a statewide wildfire zoning overlay. Direct CAL FIRE to develop a Wildfire Risk Assessment Model for state and local use in all aspects of wildfire resiliency planning, development, and mitigation.

**Value:** The quantifiable metrics of mitigations will take shape within a systematic risk framework that is predictable for land use development and will measure against fire mitigation effectiveness over time. This will drive improved outcomes.

- 3. Build capacity for Hardened Home assessments at the local level.** Home Hardening includes BOTH ignition-resistant building construction and defensible space. Each must be present to harden the home to withstand the heat from fire in adjacent landscaping/ household items and the ember storm that threatens the home. Local community firesafe education groups, defensible space code enforcement, and the building community all need assistance to place boots on the ground to work with homeowners to both retrofit and maintain these fundamental mitigations that improve structural vulnerability.

**Action:** Assist local governments with funding for the first 3 years of home retrofit and defensible space enforcement efforts through 3-year block grants. Encourage collaborative approaches that link to land use best practices, parcel-based risk assessments, and resilient community actions.

**Value:** Creates a holistic set of practices that reinforce one another and leads to a more fully hardened community rather than one divided into new and old housing vulnerabilities.

Bio: Kate Dargan has been a firefighter, fire chief and the former State Fire Marshal (CAL FIRE) for California. She has responded to emergencies and disasters around the state and worked on boards, committees, councils, and task forces to advance wildland-urban interface fire safety. She chaired the State Board of Fire Services, co-chaired the Tahoe Fire Commission, served on the Napa County Watershed Board, and is a Board Member of the CA Firesafe Council and the United States Geospatial Intelligence Foundation. She has worked at the community, public agency, industry, and policy levels of the California fire service and is widely recognized for her consensus-building style and innovative approaches to old problems. She founded Intterra in 2010, a successful situational awareness and analytics software company for firefighters.



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Comments on Wildfire Hazards and Risk for Sonoma Development Center DEIR

September 13, 2022

The State Alliance for Firesafe Road Regulations (“SAFRR”) works to ensure that California’s road standards provide for safe and concurrent evacuation and firefighter access. SAFRR engages with local and state agencies to address road standards that foster safe evacuation for new residential and commercial development in fire prone communities. SAFRR works with technical experts to develop data-supported CEQA analyses that ensure road and evacuation standards protect public and firefighter safety in areas with high fire risk.

## General Comments on Wildfire Hazards and Risk

The DEIR has failed to describe existing conditions of wildfire hazards or to properly analyze potential impacts required by CEQA and the Sonoma County 2020 General Plan. An overriding public safety and environmental issue is that it is impossible to evaluate evacuation safety for a Proposed Project and the associated potential impacts on existing residents and employees when no baseline was provided for evacuation of existing residents and businesses utilizing the same routes. **Before any consideration of additional housing or any other development for the Sonoma Development Center (SDC) can be evaluated, the county must establish the existing conditions as a baseline and properly analyze the potential impacts of the Proposed Project.** Highly relevant to baseline and potential impact analyses, we know from real-life experience from several wide-scale evacuations (2017 Nuns Canyon Fire; 2019 Kincaid Fire) and even smaller scale evacuations (2020 Glass Fire), that Highway 12 became completely blocked, with traffic often at standstill for hours. We simply cannot justify increasing wildfire hazardous conditions that are not mitigated to an acceptable level of risk, exacerbating an already dire and unsafe condition. Moreover, these unmitigated hazards are compounded by the increase in rapidly moving wildfires due to climate change, often with only an hour or less advance notice before mandatory evacuation. We cannot continue with ‘business as usual’ and promote economic development, new housing, and new businesses in fire-prone rural areas that are served by inadequate road infrastructure. Any new large-scale development needs to provide for evacuation onto major roads such as Highway 101 and be situated in existing cities and towns to increase evacuation safety and reduce wildfire risk.

In 2019, Former State Fire Marshal, Kate Dargin outlined critical needs for land use best management practices to the Senate Governance and Finance and Natural Resources and Water Committee<sup>1</sup>. *“The Fire Hazard Severity Zone (FHSZ) methodology accurately describes hazard and is suitable for a zoning*



*overlay but it is not a risk analysis. To understand risk, you need to measure the fire hazard PLUS the mitigations that reduce the hazard. This combination is risk. This will become an increasingly apparent gap if development approvals become tied to fire hazard zones. Using CEQA as an example, consider the process of evaluating a development for environmental impact. The core of the CEQA decision is based on whether the project can meet a defined need for mitigation so that the project impact is either negligible or acceptable. To do this for wildfire, we must define the wildfire mitigations that result in negligible or acceptable risk to lives, homes, and communities. The FHSZ's do not have this capability but risk assessment does. We need to extend the concept of fire hazard into the more mature evaluation of fire risk and this assessment must be enabled at the parcel scale to be useful for land use decision-making."*

### **Specific Comments on Wildfire Hazards and Risk:**

#### 16.1.1.3. Regional and Local Regulations.

The Sonoma County 2020 General Plan Goal PS-3 provides: "Prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires;" Objective PS-3.2 provides: "Regulate new development to reduce the risks of damage and injury from known fire hazards to acceptable levels;" Policy PS-3b provides: "Consider the severity of natural fire hazards, potential damage from wildland and structural fires, adequacy of fire protection and mitigation measures consistent with the Public Safety Element in the review of projects."

The DEIR fails on all the above requirements by not establishing a baseline and not properly addressing the increased risk of wildfire from an increased number of residents and businesses, not properly addressing the increased frequency, severity, intensity and spreading speed of wildfires due to climate change, and not properly analyzing the actual evacuation times and risks in conjunction with all existing residents and businesses that utilize the same evacuation routes.

Furthermore, the DEIR erroneously applies the Sonoma County Code Chapter 13 (p499) in the unincorporated State Responsibility Area (SRA). The Board of Forestry and Fire Prevention refused to certify Chapter 13 because it concluded it was not equal or more stringent than the state Title 14 SRA Fire Safe Regulations. Thus, those stricter state regulations govern the entire SRA as well as VHFHSZ of the Local Responsibility Area (LRA) as required by PRC 4290 and the implementing law, Title 14, Division 1.5, Chapter 7, Subchapter 2, SRA Fire Safe Regulations. Section 1270.04(d) of those regulations states "The Board's regulations supersede the amended local ordinance(s) when the amended local ordinance(s) are not re-certified by the Board."

Although the DEIR acknowledges that 95% of wildfires are caused by human activity (p500), it fails to provide any analysis of how the 2,500+ additional residents as well as hotel guests and businesses will exacerbate this ignition risk. It provides no mitigation of the known increase in wildfire risk. Realistically, there is no way to mitigate this increased wildfire risk other than to reduce the number of people and vehicles in the area. The DEIR must adequately analyze and mitigate wildfire hazards and risks and the issues identified above to prevent more loss of lives in Sonoma Valley and beyond.

There is a growing body of scientific literature regarding wildfire hazards and risks, and specifically evacuation scenarios. Dr. Thomas Cova<sup>ii</sup> describes how recent extreme wildfires are motivating



unprecedented evacuation planning. He defines a scenario as “dire” if the required time to clear an area is greater than the time available (i.e., lead time). A critical need is to consider dire scenarios that allow less time to clear an area than required. This occurred in Paradise in 2018 with only one exit route available, resulting in over 85 lives lost. Although these scenarios often begin with an ignition near a community, any scenario can become dire due to weather conditions such as high winds, human response, technology, cascading events, and community design. Although research has widely addressed scenarios with ample time and favorable conditions, protecting people in dire scenarios is much more challenging. Dr. Cova, et al. provide a framework for generating dire scenarios that includes difficult starting conditions, delayed decision-making, variable fire spread rates, limited warning technology, and random adverse events. The goal is to move beyond favorable scenarios and generate challenging ones that inspire novel protective planning.

### 3.16.1.3. Impact Analysis

16.1.3.1 Significance Criteria. CEQA Criteria from Appendix G, any of which would create a significant impact, are:

**Criterion 1:** Substantially impair an adopted emergency response plan or emergency evacuation plan;

**Criterion 2:** Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;

**Criterion 3:** Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or

**Criterion 4:** Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes.

#### 16.1.3.2 Methodology and Assumptions

The DEIR relies on FHSZ mapping, assessment of existing conditions, and an unrealistic evacuation analysis. Its evaluation ignores that areas downwind from or adjacent to a high or very high fire hazard zone are likely targets of the wildfire, as proven in recent fires in Sonoma County. The 2017 Nuns fire consumed many areas that were only rated as moderate fire hazard in the vicinity of the SDC lands, and this same outcome has been documented across California. Saying that much of the area is only in a moderate fire hazard zone is not based on fact, policy or reality. As noted above, former State Fire Marshal Kate Dargin asserts that the FHSZ methodology accurately describes hazard and is suitable for a zoning overlay, but it is not a risk analysis. The DEIR must be revised to adequately describe, analyze and mitigate this reality in an accurate way.

Proposing building a microgrid within the Core Campus is positive (p510). However, the microgrid is stated as only a future proposal, only for emergency use and does nothing to mitigate that this will be connected to PG&E’s grid, or that existing PG&E powerlines may spark fires in adjacent lands. Increased energy demand increases transmission needs with increased fire risk. All existing and new PG&E lines should be buried to mitigate risks.

#### 16.1.3.4 Impacts (p511)

To state that the proposed development would not substantially impair an adopted emergency response plan or evacuation plan is an unsupported assertion and defies all data from experience.



Firstly, as discussed above, stating that since the addition of low to medium density residential housing as well as commercial uses is not in a high fire hazard zone, it will not increase fire hazard, itself defies even statements in the DEIR (p500) that humans are the ignition source for 95% of wildfires. The discussion of evacuation routes to Highway 12 completely ignores that fact that Highway 12 already gets rapidly congested with vehicles during mass evacuations, turning it into a parking lot with traffic inching along for hours. Oakmont's 5,000 residents, Kenwood's 1,000 residents, Rincon Valley's 5,600 residents, Skyhawk's 1,800 residents, Los Alamos Rd's 500 residents plus Glen Ellen's 1,200 residents all exit onto Highway 12 during fire evacuations. This already results in huge delays and inchworm traffic on Highway 12. Depending on the direction of the fires, residents may either need to evacuate South, thus combining with additional traffic from Boyles Hot Springs and Sonoma, or North, with additional traffic from eastern Santa Rosa. The analysis ignores an additional 400+ future new residents in the new low-income apartment complex approved to be constructed at the intersection of Calistoga Road and Highway 12. To state that adding thousands more people from the new SDC development proposed would not impair existing evacuation is incomprehensible and unsupported.

The evacuation analyses shown in Figures 3.16-3 and 3.16-4 are completely unrealistic. Under a mandatory evacuation from a fast-moving fire, why would only a maximum of 65% of residents evacuate in the first hour? The fire may be upon them within the hour. And what about the additional ~14,000 thousand people discussed above, coming from north of Glen Ellen and evacuating south on Highway 12 in scenario 1 (Figure 3.16-3)? For scenario 2 (Figure 3.16-4) for a northwest progressing fire, the 3,000 residents from Bennett Valley would also ultimately feed into the evacuation routes.

The suggestion that occupants and visitors could be directed to a shelter-in-place facility is not explained nor supported. Shelter-in-place planning requires incorporation and analysis of fire behavior factors, codes and anticipation of reactions of occupants and visitors during a wildfire scenario. Essential information and analysis are notably absent from the DEIR. Human behavior is challenging to manage, especially during a conflagration. Shelter-in-place is never a first choice; studies have shown that people want to flee a fire, not let it burn over them. Many fire professionals suggest that shelter-in-place only serves as a last resort and emergency plans cannot rely upon sheltering to mitigate fire risks. Furthermore, even last resort sheltering requires detailed planning, professional staffing, coordination, equipment, air quality testing, communication capabilities and practice drills. Visitors will not be able to participate in practice drills. Limited emergency responders and resources are diverted to sheltering, taking away from other critical efforts for fire suppression and evacuation of civilians.

Many wildfire experts, researchers, building and code officials, and fire officers have explored sheltering options to hold people trapped in a wildfire. Fire professionals grasp that fires not only kill people via flames, but also via smoke and removal of oxygen. Significant research is required to determine building construction requirements for shelters because simply following recent building codes does not ensure safe refuge. No state-of-the-art master planned community is safe from wildfire, and evacuation is the safest first option. Sheltering plans have not been tested under the increased fire severity, intensity and unpredictable behavior occurring recently and which are not completely understood. In summary, the SDC Proposed Project has not mitigated the potentially significant impacts related to wildfire.



The DEIR mentions evacuation from the 2019 Kincaid Fire (incorrectly listed as in 2018, p516). That evacuation order was not as imminent as for other closer, fast-moving fires, with residents evacuating over a period of many hours, not all in the first hour. Yet there were still very blocked roads. The DEIR calculates that the evacuation times would only be increased by 1-5% (Table 1.16-1, p517) from the additional development proposed for SDC. These calculations defy all reality from evacuations on Highway 12 from recent fires and defy all logic and scientific methods to calculation evacuation times (e.g., see body of scientific work of Dr. Thomas Cova, University of Utah, on scientific analysis of evacuation times<sup>ii</sup>).

The DEIR does conclude that the Proposed Plan would increase wildfire risk to new residents and visitors, and that new utility lines would also increase fire risk (p520), but then only 'proposes policies' for 'future consideration' (p519-520) such as managed landscape and banning wooden fences, burying utility lines, building a microgrid for emergency use. But these mitigations are only listed as 'future considerations, not requirements and hence not a part of the proposed project. The DEIR states that no mitigation measures are required.

Only two mitigations are possible:

- 1) To significantly reduce the number of new housing units, eliminate the hotel and other commercial development and to widen Highway 12.
- 2) To maintain this only as open space and preserved historical buildings, with very limited new low-income housing.

The County of Sonoma needs to face the new reality of increased wildfire risk and voracity and limit new development in fire-prone rural areas. The SDC DEIR and Specific Plan must be revised to reflect these new realities. By ignoring wildfire issues at the onset, the life safety risks become insurmountable, not only to the SDC occupants, but also to surrounding communities. The assumptions and determinations in the DEIR related to wildfire safety are unequivocally inadequate. The DEIR ignores current and potential wildfire risk factors and assessment methods, and dismisses them as insignificant, failing to identify or mitigate the potentially significant impacts of the proposed project.

SAFRR appreciates the opportunity to present our concerns regarding the Sonoma Developmental Center DEIR. If you have any comments or questions regarding this letter, please contact Deborah Eppstein by email ([deppstein@gmail.com](mailto:deppstein@gmail.com)) or phone (801-556-5004).

Sincerely,



Deborah A Eppstein, PhD

Director

State Alliance for Firesafe Road Regulations (SAFRR)

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<sup>i</sup> Dargin, Kate. 2019 Living Resiliency in the New Abnormal: The Future of Development in California's Most Fire Prone Regions. Presented to Senate Governance and Finance and Natural Resources and Water Committee

<sup>ii</sup> Cova, T. J. et al. 2021. Toward Simulating Wildfire Scenarios. Natural Hazards Review. DOI: 10.1061/(ASCE)NH.1527-6996.0000474. © 2021 American Society of Civil Engineers.

**From:** [andrew harper](#)  
**To:** [PlanningAgency](#)  
**Subject:** Proposed plan at SDC  
**Date:** Wednesday, September 14, 2022 9:04:23 AM

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ar Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
2. **Support Historic Preservation Alternative** as it is the most environmentally sound.
3. **Protect Open Space** by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.
  - a. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).
  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
4. **Wildfire:** Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.
5. **Climate Crisis:** Given the County's Climate Crisis Resolution and commitments to reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.
6. **DEIR is Inadequate** While the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts, the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as "promote" or "encourage" or "if feasible." The DEIR needs to be revised

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and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program.

On a personal note, this place is special to my family, as we have enjoyed hiking in the area and love all the nature. Please don't spoil this pristine space!

**Signed,**

**Andrew Harper**

**1217 Tamalpais Street**

**Napa, Ca 94558**

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**From:** [Angus Parker](#)  
**To:** [PlanningAgency](#); [Brian Oh](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcquiere@senate.ca.gov](mailto:senator.mcquiere@senate.ca.gov)  
**Subject:** Public Comment on SDC Specific Plan and DEIR  
**Date:** Tuesday, September 13, 2022 2:58:46 PM

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Dear Sonoma County Planning Commissioners:

I am a homeowner in Kenwood and I have been watching with mounting horror at the proposed massive redevelopment plan for the SDC. The community has clearly voiced its opinion that 450 homes is acceptable but any more are not. This is not simply a NIMBY response but it reflects the damage such a huge development will make to our communities in terms of the economy in Glenn Ellen, traffic congestion, destruction of open space, wildfire evacuation times, and water use. Please respect the will of the vast majority of the people in the valley and don't bend to the wishes of developers.

Yours sincerely,

Angus Parker  
Kenwood Homeowner

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. Scale Back Size of Development to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
2. Support Historic Preservation Alternative as it is the most environmentally sound.
3. Protect Open Space by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.
  - a. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).
  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
4. Wildfire: Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter- place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.
5. Climate Crisis: Given the County's Climate Crisis Resolution and commitments to



reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.

6. DEIR is inadequate while the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts, the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as “promote” or “encourage” or “if feasible.” The DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program.

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**From:** [B](#)  
**To:** [PlanningAgency](#)  
**Subject:** Public Comment on SDC Specific Plan and DEIR – Scale it Back!!  
**Date:** Wednesday, September 14, 2022 10:27:37 AM

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## EXTERNAL

This Sonoma County resident and frequent visitor to Sonoma Valley urges changes to the SDC Specific Plan or DEIR as proposed by Permit Sonoma.

Instead, please direct Permit Sonoma to:

1. Scale Back Size of Development to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.

2. Support Historic Preservation Alternative as it is the most environmentally sound.

3. Protect Open Space by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.

1. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).

2. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.

Wildfire: Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.

Climate Crisis: Given the County's Climate Crisis Resolution and commitments to reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.

DEIR is Inadequate While the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts, the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as "promote" or "encourage" or "if feasible." The DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program.

Thank you!

B Dudney, MD (retired)

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**From:** [Bob Flagg](#)  
**To:** [PlanningAgency](#)  
**Subject:** SDC Specific Plan or DEIR  
**Date:** Wednesday, September 14, 2022 9:14:24 AM

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Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
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**Signed,**

**Your name, address, phone, email**

**BACKGROUND ON WHAT'S BEEN HAPPENING:**

Now is the time to reject county's plans for subdivision of up to 1,000 new single family mostly market rate homes at SDC and demand that Specific Plan development be scaled back, more affordable housing added and the hotel eliminated. We need more details and stronger protections for the open space, Sonoma Valley Wildlife Corridor and Sonoma Creek.

The future of the 945-acre expanse of open space lands and historic campus in the heart of Sonoma Valley at the former Sonoma Developmental Center, also known as Eldridge (next to Glen Ellen), is at risk of being urbanized due to county plans to create a new town with a large 1970s style sprawl subdivision, high-end hotel and a new road on rural and agricultural lands.

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**From:** [brian bollman](#)  
**To:** [PlanningAgency](#); [Brian Oh](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district4](#); [district3](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [Senator Mike McGuire](#)  
**Subject:** Public Comment on SDC Specific Plan and DEIR  
**Date:** Wednesday, September 14, 2022 9:54:42 AM

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Dear Sonoma County Planning Commissioners,

I support the recommendations from the Sierra Club listed below. However, I would go further and suggest that at this time, while we are in the midst of a climate crises, and declining population in Sonoma County, we shouldn't be building any new buildings in a location such as this. I recommend reusing and renovating existing buildings only (until circumstances change).

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
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6. **DEIR is Inadequate** While the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts, the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as “promote” or “encourage” or “if feasible.” The DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program.

**Signed,**

Brian Bollman  
9464 Wellington Circle  
Windsor, CA 95492

707 838-2996

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**From:** [Bridget Flocco](#)  
**To:** [PlanningAgency](#); [Brian Oh](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcquire@senate.ca.gov](mailto:senator.mcquire@senate.ca.gov)  
**Subject:** Public Comment on SDC Specific Plan and DEIR – Scale it Back!!  
**Date:** Wednesday, September 14, 2022 9:28:07 AM

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Dear Sonoma County Planning Commissioners,

I live less than 3 miles south of the SDC off of Arnold Drive. I drive through the SDC multiple times weekly on my way to my son's school in Santa Rosa (and drive south down Arnold to my daughter's school on Leveroni). Arnold Drive is my main transportation route and I have concerns (in addition to the ones listed below) about the increased traffic & emissions on Arnold with a 1000 home development proposal (my car is electric, so all of my Arnold driving is emission free). Plus, with the recently added roundabout at Agua Caliente (I live just south of Hanna Center), I already struggle to turn right or left out of my driveway onto Arnold. Frequently, I have to wait for 40+ cars to pass on the left before turning right (usually in the mornings) and going left is even harder. I have no other route alternative.

I do support & understand a need for more housing in Sonoma Valley, but the current proposals are too extensive and do not do enough to: require that the housing be affordable & accessible to local workers (especially teachers and other municipal employees), preserve the historic site, protect open space & wildlife corridors, prevent wildfire risks, or reduce climate changing emissions.

So I write to ask you to please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
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4. **Wildfire:** Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives.



Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.

5. **Climate Crisis:** Given the County's Climate Crisis Resolution and commitments to reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.
6. **DEIR is Inadequate** While the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts, the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as "promote" or "encourage" or "if feasible." The DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program.

Let's not allow Sonoma Valley be a place where the "profits over people" motto reigns supreme.

**Sincerely,**

Bridget Flocco

1255 Stevens Gate Road / Sonoma, CA / 95476

[bridget.flocco@gmail.com](mailto:bridget.flocco@gmail.com)

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**Warning:** If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** [Christine Montalto](#)  
**To:** [PlanningAgency](#); [Brian Oh](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcquiere@senate.ca.gov](mailto:senator.mcquiere@senate.ca.gov)  
**Subject:** Public Comment on SDC Specific Plan and DEIR – Scale it Back!!  
**Date:** Wednesday, September 14, 2022 8:22:15 AM

---

Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
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I've lived in Sonoma County for over 35 years and have seen our beautiful open lands encroached up again and again for development. This project goes too far. Traffic is already overburdening our streets and highways. How can Highway 12 and the beautiful town of Glen Ellen possibly support a project such as this? Our family is already greatly reducing our water use, trying to do our part. What is the county doing in the face of another predicted dry winter season?

PLEASE! Reconsider.

Chris Montalto  
2744 Desert Rose Lane  
Santa Rosa, CA 95407  
707-843-6407  
[chrismont7@gmail.com](mailto:chrismont7@gmail.com)

PLEASE,

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**From:** [Dawn Theilen](#)  
**To:** [PlanningAgency](#)  
**Subject:** Save our open space at SDC  
**Date:** Wednesday, September 14, 2022 9:19:06 AM

---

EXTERNAL

To whom it may concern

With climate change and 1 in 5 trees dying, we need our open space more than ever.

I'm a home owner of 17 years in the springs and the reason I moved here was for this open space. I raised my kids at the reservoir and hiking trails. My oldest child works at the ropes course that is on that land.

Please vote for smaller housing and no resort!!!! So many things outweigh money.

Thank you

Dawn Theilen

415-254-4434

Sent from my iPhone

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**From:** [Deborah Eppstein](#)  
**To:** [Greg Carr](#); [Larry Reed](#); [Jacquelynn Ocana](#); [Shaun McCaffery](#); [Eric Koenigshofer](#)  
**Cc:** [Scott Orr](#); [Brian Oh](#); [SAFRR](#)  
**Subject:** SAFRR Comments on SDC DEIR Wildfire Hazard and Risk  
**Date:** Tuesday, September 13, 2022 3:30:43 PM  
**Attachments:** [SDC DEIR Fire Safety Comments from SAFRR 9-13-22.pdf](#)  
[Kate Dargan Sen Gov and Fin And Nat Res and Water Comm 3 2019.pdf](#)  
[Cova Dire Scenarios NHR 2021.pdf](#)

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Dear Planning Commissioners and Permit Sonoma,

SAFRR appreciates the opportunity to present our concerns regarding the Sonoma Developmental Center DEIR. If you have any comments or questions regarding this letter, please contact Deborah Eppstein by email ([deppstein@gmail.com](mailto:deppstein@gmail.com)) or phone (801-556-5004).

The two articles referenced in the letter are also attached.

Thank you.

Sincerely,  
Deborah Eppstein  
Director  
State Alliance for Firesafe Road Regulations (SAFRR)

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**From:** [Denise Lacampagne](#)  
**To:** [Brian Oh](#); [PlanningAgency](#)  
**Cc:** [Susan Gorin](#); [eldridgeforall@gmail.com](mailto:eldridgeforall@gmail.com)  
**Subject:** Re: DEIR OF Sonoma Developmental Center Campus  
**Date:** Wednesday, September 14, 2022 3:09:57 PM

---

Greetings,

I am ordinary citizen that is concerned about the future of Sonoma Developmental Center. I have lived on Marty Drive in the Glen Ellen neighborhood adjacent to SDC since 1976. I own my home. I worked at the Center for 33 years. I am not opposed to reasonable renovation, housing and development. I appreciate this opportunity to share my thoughts.

Overall, it has been disheartening and unbelievable to see this report indicate that this project, overall, would have less than significant impact in so many areas that seem directly related to quality of life and environmental issues. Already, since the facility has closed, the campus portion has been impacted by the lack of care and upkeep of the grounds as evidenced by overgrown foliage and dying and fallen trees.

Although I have reviewed parts of the DEIR, I make no claim to understanding everything, following the format or what some of the references to acronyms and regulations of this tool are. I am the first to admit my comprehension is minimal. I must trust the experts to address the impact of numerous outstanding water, light, noise, climate/environmental, fire safety, traffic, demolition, wildlife and habitat, etc. issues.

3.10-1 indicates this project as having no impact regarding dividing an established community and 3.12-1 speaks to the population growth as less than significant.

As I understand this document, a **separate** development of with 1000 homes, shops, adjacent buildings and businesses and over twice the number of vehicles appears to directly contradict the terms “no impact” and “less than significant”. As proposed, this development **would** divide an established community.

My concerns are primarily the number of homes and businesses that are being considered (along with other Sonoma Valley proposed developments at Hanna Boys Center and Elnoka Lane) and how this will impact evacuation throughout Sonoma Valley and our everyday life in Glen Ellen. As you are well aware, both

Arnold Drive and Highway 12 are one lane roads to/from Santa Rosa, Napa or Highway 37. Petaluma and Rohnert Park can only be reached by one lane roads, as well.

Please note that references to population and vehicles at Sonoma Developmental Center when it was an active community are skewed. Overall, the number of people that lived there at any time did not drive or own vehicles. They lived in congregate housing. The staff who worked there came in at least 3 separate shifts and were not on the roads at all times of day or simultaneously.

Fire in this area has been a very real threat. Some tables in the original reports showed the fire line of the 2017 Nun's fire within the SDC grounds. In fact, the fire extended beyond the SDC grounds, burning a home on Burbank St. and continuing along the creek bordering several more homes. During that evacuation, cars were bumper to bumper, taking over two hours to get out of this end of the valley.

Many questions have come up after reviewing pieces of this DEIR for Sonoma Developmental Center. I do have several simple questions that jumped out at me that I am hoping to get direct answers to.

1) I would like to **NOTE** that the yellow area identified as Eldridge North area on pages 75-76 **DOES NOT** border on Eldridge South. It is part of Eldridge and the SDC campus. It **DOES** border on Martin St. which is part of the town of Glen Ellen. Labeling the Martin St., Burbank St., Cecilia Dr., Lorna Drive and Marty Drive as Eldridge has been a confusing and misleading misnomer and continued to not be addressed or corrected throughout the SDC planning documents.

**Would you please consistently clarify the correct boundaries in ALL of the maps, tables**



**and ALL documents  
pertaining to this SDC.**

**2) Will a barrier/fence  
remain in place between the  
the yellow area identified as  
Eldridge North on page 76  
and the current Glen Ellen  
neighborhood where Martin  
St. and Burbank St. intersect?  
Will the proposed streets of  
Eldridge North merge onto  
Burbank St.?**

**3) Where exactly does the  
possible road from the SDC  
campus to Highway 12 come  
out at? How would the cars  
trying to merge onto Highway  
12 be managed?**

I have personally tried merging  
on to Highway 12 past Temelec  
during an ordinary accident  
where traffic was at a lengthily,  
complete stop because of  
emergency vehicles (not  
threatened by fire) and other  
drivers were unwilling to let  
other cars onto the major  
thoroughfare.

**4) Land Use Classifications  
indicates that the Institutional  
area-page 72- Walnut Circle  
identified in blue on page 76  
could allow short term  
residential housing and  
events. What is meant by  
short term residential  
housing? What type of  
additional events other than  
the types noted for the  
Historic Core (purple),  
Firehouse Commons (hot**

**pink) and the Maker  
Place(coral) are intended?**

With these combined events, it is reasonable that a significant number of attendees/tourists/employees will need daily access and egress from the venues as well as convenient parking on campus. **How is this traffic generated by other than residential housing, being accounted for in terms of the single road/narrow bridge coming in and out of this campus?**

5) There are references Paratransit/Dial-a- Ride options being presented. Although, they provide a great service, there are eligibility and time frame requirements that do not make it simply a matter of making an appointment whenever a ride is needed. **Whose oversight will the proposed Transportaion Management Association (TMA) be under?**

6) As a resident that lives very close to the proposed project and a retired employee that signed annual asbestos waivers, I am concerned how the asbestos issues will be contained during demolition. I see references to “should, may, could”, but no definitive “will or must” terms.

**Who exactly will actually be monitoring and ensuring this process is carried out correctly?**

I  
look  
forward  
to  
your  
responses.

Sincerely,

Denise  
Lacampagne

834  
Marty  
Drive

Glen  
Ellen,  
CA  
95442

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**From:** [DJ DeProspero](#)  
**To:** [PlanningAgency](#); [Brian Oh](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcquiere@senate.ca.gov](mailto:senator.mcquiere@senate.ca.gov)  
**Subject:** Public Comment on SDC Specific Plan and DEIR- Scale it Back!  
**Date:** Wednesday, September 14, 2022 9:12:32 AM

---

Dear Sonoma County Planning Commissioners,

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**Signed,**

**Dorothy DeProspero, 7870 Brookside Ave., Sebastopol 95472**

Sent from my iPad

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**From:** [Edward Dillon](#)  
**To:** [Brian Oh](#)  
**Subject:** SDC  
**Date:** Wednesday, September 14, 2022 10:43:47 AM

---

Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

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Respectfully Submitted,

Edward Dillon

*Ned Dillon*

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**From:** [Erick Theilen](#)  
**To:** [PlanningAgency](#); [Brian Oh](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcquiere@senate.ca.gov](mailto:senator.mcquiere@senate.ca.gov)  
**Subject:** Public Comment on SDC Specific Plan and DEIR – Scale the project back  
**Date:** Wednesday, September 14, 2022 9:39:31 AM

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Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

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enforceable Mitigation and Monitoring Program.

**Signed,**

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**From:** [Gerry](#)  
**To:** [PlanningAgency](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](#); [senator.mcquiere@senate.ca.gov](#); [BOS](#); [engage@sdcspecificplan.com](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](#); [senator.mcquiere@senate.ca.gov](#); [BOS](#); [engage@sdcspecificplan.com](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](#); [senator.mcquiere@senate.ca.gov](#)  
**Subject:** Public Comment on SDC Specific Plan and DEIR - Scale it Back!!  
**Date:** Wednesday, September 14, 2022 2:26:13 PM

---

Dear Sonoma County Planning Commissioners,

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DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program.

Geraldine Wadia  
1079 Craig Ave.  
Sonoma, 95476  
707 938-7537  
gwadia@gmail.com

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**From:** [Hale Linda](#)  
**To:** [PlanningAgency](#); [Hale Linda](#); [Sonoma Water](#)  
**Subject:** Specific Comments on the DEIR for the SDC  
**Date:** Tuesday, September 13, 2022 1:57:44 PM

---

Brian Oh & Staff:

I have specific concerns about information released in the DEIR regarding the land use, hydrology and water, and the methodology used and assumptions made.

1) In Article 64 the DEIR states that the property is "located in a local voter-approved Community Separator overlay that preserves lands with low densities between communities....to maintain natural (rural) character and low intensities of development in open spaces between cities and communities."

The SDC traditionally served as a buffer between the communities of Sonoma, El Verano, and Glen Ellen because of the open space between buildings and the land available for clear vistas and access. As noted in the DEIR, voters approved the preservation of open space specifically here now and until renewal in 2036. How can "the high density of the development" as stated later in the report regarding buildings, businesses, parking lots, water runoff and paving throughout the development along with bus stops with lights, shelters, and concrete pads in any way meet the criteria for open space?

2) Nowhere under Hydrology and Methodology (39.3.2) is the current state mandated Groundwater Study mentioned. Sonoma Valley is currently at the limit of groundwater usage and Russian River resources for the city of Sonoma. Aquifers are not recharging and have reached historic lows. All local wells are now being monitored. The four wells mentioned on the SDC property are subject to the same drought conditions as all the other wells in the valley. The County has just added new requirements for well permits. In this DEIR you state that "surface water diversions from local creeks supply the majority of water for domestic uses at the site such that groundwater supplies would not be interfered with substantially." How is this possible? Keep in mind that the reservoirs on the property are already earmarked by most water agencies four times over for emergency backup.

3) Your methodology and assumptions made regarding groundwater supply, water bodies, impervious surfaces, and drainage patterns seem to imply that developers or homeowners will be responsible for creating "drainage, permeable pavements, and the use of porous concrete" by providing them with educational materials about these alternatives. This is not credible.

The restraints on water, traffic, and the impacts this development will have on the cities around it deserve a realistic plan. This DEIR points it out.

Thank you for responding to my questions,

Linda Hale  
1500 Warm Springs Road  
Glen Ellen, CA 95442

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**From:** [Jan Clausen](#)  
**To:** [PlanningAgency](#)  
**Cc:** [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [BOS](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcguire@senate.ca.gov](mailto:senator.mcguire@senate.ca.gov)  
**Subject:** Public Comment on SDC Specific Plan and DEIR – Scale it Back!!  
**Date:** Wednesday, September 14, 2022 11:36:01 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
4. **Wildfire:** Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.
5. **Climate Crisis:** Given the County's Climate Crisis Resolution and commitments to reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.
6. **DEIR is Inadequate** While the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts, the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as "promote" or "encourage" or "if feasible." The DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program.

Best Regards,

Jan Clausen



Janice Clausen  
CCID, Inc.  
3791 Warm Springs Road  
Glen Ellen, CA 95442 USA

T+1.404.377.2332  
C+1.404.934.2620

[www.ccidesign.net](http://www.ccidesign.net)

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**From:** [Jan](#)  
**To:** [Brian Oh](#); [PlanningAgency](#)  
**Subject:** Comments on the DEIR  
**Date:** Tuesday, September 13, 2022 7:41:53 AM

---

I reject this Specific Plan, Appendix A, DEIR.

1. Scale back Size of Development to 400 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Reduction would prevent the emergency evacuation issues, traffic and lessen impact on, water, wildlife and climate. Eliminate the hotel, retail and commercial space which is already provided in Glen Ellen.

2. Support Historic Preservation Alternative as it is the most environmentally sound.

3. Protect Open Space by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.

a. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).

b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.

4. Wildfire: Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter- place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.

5. DEIR is Inadequate While the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts, the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as “promote” or “encourage” or “if feasible.” The DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program. Please DO NOT URBANIZE OUR SONOMA VALLEY.

Jan Humphreys  
P.O.Box 899 Boyes Springs  
Jhumphreys@vom.com  
707-935-7337

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**From:** [Jean Terschuren](#)  
**To:** [PlanningAgency](#)  
**Subject:** Public Comment on SDC Specific Plan and DEIR – Scale it Back!!  
**Date:** Wednesday, September 14, 2022 1:38:45 PM

---

Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
2. **Support Historic Preservation Alternative** as it is the most environmentally sound.
3. **Protect Open Space** by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.
  - a. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).
  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
4. **Wildfire:** Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.
5. **Climate Crisis:** Given the County's Climate Crisis Resolution and commitments to reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.
6. **DEIR is Inadequate** While the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts, the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as "promote" or "encourage" or "if feasible." The DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program.

Given the enormity of this ridiculous project and the harm it will bring to the citizens, including so many of my own family, of our beloved Sonoma County, I sincerely wish it will be rejected in its entirety!

Yours respectfully,

Jean Terschuren Devillers  
[j.terschuren@gmail.com](mailto:j.terschuren@gmail.com)

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**From:** [John Donnelly](#)  
**To:** [PlanningAgency](#); [Brian Oh](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcquire@senate.ca.gov](mailto:senator.mcquire@senate.ca.gov)  
**Subject:** SCALE IT BACK--Public Comment on SDC Specific Plan and DEIR  
**Date:** Wednesday, September 14, 2022 2:06:48 PM

---

Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
2. **Support Historic Preservation Alternative** as it is the most environmentally sound.
3. **Protect Open Space** by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.
  - a. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).
  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
4. **Wildfire:** Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.
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**Also, please consider this:**

Earlier this year, Governor Newsom announced that California's next fiscal year includes a surprising \$45.7 billion surplus. Given this huge unexpected budget windfall, the economic feasibility constraints the State has imposed on SDC planning should be renegotiated to allow for a significant scale back in the 1000 homes in the Specific plan.

The State can and should now pay at least \$100 million + for all the deferred maintenance the State left at the SDC site. The State has left the Sonoma Valley with all of its SDC run-down buildings and crumbling infrastructure. All are so below code that they are no longer candidates for renovation or re-purposing. This, of course, will entail massive destruction and removal costs. In short, the State has left Sonoma Valley a "super fund" SDC dump site and now wants to shift the clean up costs to the community to pay for all this with a new "economically feasible" SDC plan, one that calls for 1000 new homes! Let the State now pay its share to clean up the SDC dump site and scale back housing to 400-500.

Thank you.

John Donnelly  
578 7th St West  
Sonoma, CA 95476  
(707) 933-8128  
[donnelyj63@gmail.com](mailto:donnelyj63@gmail.com)

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**From:** [John Ferrando](#)  
**To:** [Brian Oh](#); [PlanningAgency](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcquiere@senate.ca.gov](mailto:senator.mcquiere@senate.ca.gov)  
**Subject:** Subject Line: Public Comment on SDC Specific Plan and DEIR – Scale it Back!!  
**Date:** Wednesday, September 14, 2022 9:24:51 AM

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Dear Planning Agency,

Note: I did not write the the comments below, however they express my feelings very well. I grew up here and it used to be a great place to live. It appears money has taken over with no consideration for quality of life.

" Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
2. **Support Historic Preservation Alternative** as it is the most environmentally sound.
3. **Protect Open Space** by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.
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  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
4. **Wildfire:** Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.

5. **Climate Crisis:** Given the County's Climate Crisis Resolution and commitments to reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.
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**Thank you,**

**John Ferrando**

[jmoonmtn@gmail.com](mailto:jmoonmtn@gmail.com)

1552 Moon Mountain Road, Sonoma, Ca 95476

Sent from my iPhone

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**From:** [Kelly Padula](#)  
**To:** [PlanningAgency](#); [Brian Oh](#)  
**Cc:** ["bos@sonoma-county.org\\_engage"@sdcspecificplan.com](#); ["Susan.Gorin@sonoma-county.org >>susan.gorin@sonoma-county.org\\_district3@sonoma-county.org\\_District4@sonoma-county.org\\_David.Rabbitt@sonoma-county.org\\_Lynda.Hopkins@sonoma-county.org\\_senator.dodd@senate.ca.gov\\_senator.mcguire"@senate.ca.gov](#)  
**Subject:** Public Comment on SDC Specific Plan and DEIR – Scale it Back!!  
**Date:** Wednesday, September 14, 2022 8:28:59 AM

---

Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. **By now, you must be aware of how unpopular it is with Sonoma County residents.** Please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
2. **Support Historic Preservation Alternative** as it is the most environmentally sound.
3. **Protect Open Space** by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.
  - a. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).
  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
4. **Wildfire:** Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.
5. **Climate Crisis:** Given the County's Climate Crisis Resolution and commitments to reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.
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**Signed,**

**Kelly Padula**

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**From:** [Ken Niehoff](#)  
**To:** [PlanningAgency](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcquiere@senate.ca.gov](mailto:senator.mcquiere@senate.ca.gov); [Brian Oh](#)  
**Subject:** SDC  
**Date:** Wednesday, September 14, 2022 1:05:44 PM

---

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
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  - a. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).
  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
4. **Wildfire:** Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.
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To your health  
Ken Niehoff

Sonoma Health Training  
17370 Buena Vista Ave  
Sonoma, 95476

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**From:** [Laura Chenel](#)  
**To:** [PlanningAgency](#); [Brian Oh](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcquiere@senate.ca.gov](mailto:senator.mcquiere@senate.ca.gov)  
**Subject:** Public Comment on SDC Specific Plan and DEIR – Scale it Back!!  
**Date:** Wednesday, September 14, 2022 7:55:28 AM

---

Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
2. **Support Historic Preservation Alternative** as it is the most environmentally sound.
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Sincerely,

Laura Chenel  
3748 Grove Street  
Sonoma, CA 95476

(707) 483-0976  
[laurachenel@icloud.com](mailto:laurachenel@icloud.com)

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**From:** [Linda Kay Hale](#)  
**To:** [PlanningAgency](#)  
**Subject:** DEIR  
**Date:** Wednesday, September 14, 2022 11:09:41 AM

---

Following are a few specific comments on the content and intent of the SDC's DEIR prior to tomorrow's meeting:

Brian Oh & Staff:

I have specific concerns about information released in the DEIR regarding the land use, hydrology and water, and the methodology used and assumptions made.

1) In Article 64 the DEIR states that the property is "located in a local voter-approved Community Separator overlay that preserves lands with low densities between communities....to maintain natural (rural) character and low intensities of development in open spaces between cities and communities."

The SDC traditionally served as a buffer between the communities of Sonoma, El Verano, and Glen Ellen because of the open space between buildings and the land available for clear vistas and access. As noted in the DEIR, voters approved the preservation of open space specifically here now and until renewal in 2036. How can "the high density of the development" as stated later in the report regarding buildings, businesses, parking lots, water runoff and paving throughout the development along with bus stops with lights, shelters, and concrete pads in any way meet the criteria for a Community Separator?

2) Nowhere under Hydrology and Methodology (39.3.2) is the current state mandated Groundwater Study mentioned. Sonoma Valley is currently at the limit of groundwater usage and Russian River resources for the city of Sonoma. Aquifers are not recharging and have reached historic lows. All local wells are now being monitored. The four wells mentioned on the SDC property are subject to the same drought conditions as all the other wells in the valley. Sonoma County just added new, stricter requirements for well permits. In this DEIR you state that "surface water diversions from local creeks supply the majority of water for domestic uses at the site such that groundwater supplies would not be interfered with substantially." How is this possible? Keep in mind that the reservoirs on the property are already earmarked by most water agencies four times over for emergency backup.

3) Your methodology and assumptions made regarding groundwater supply, water bodies, impervious surfaces, and drainage patterns seem to imply that developers or homeowners will be responsible for creating "drainage, permeable pavements, and the use of porous concrete" by providing them with educational materials about these alternatives. This is not credible.

The restraints on water, traffic, and the impacts this development will have on the cities around it deserve a realistic plan. This DEIR points that out.

Thank you for responding to my questions,

Linda Hale

[1500 Warm Springs Road](#)

[Glen Ellen, CA 95442](#)

Sent from my iPhone

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**From:** [LOREN RAYMOND](#)  
**To:** [PlanningAgency](#); [Brian Oh](#)  
**Cc:** [Susan Gorin](#)  
**Subject:** Public Comment - Developmental Center Property Plans  
**Date:** Wednesday, September 14, 2022 2:21:39 PM

---

Dear Ms., Sir., and Commission Members -

- The wider Sonoma County Community needs to be served by the decision on the SDC, not just the Business and Building Trade parts of that Community.
- Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma.
- Please DO protect open space and the environment as advocated by the Sonoma Land Trust and Sierra Club.
- No reasonable traffic plan can adequately protect members of a 3000 plus community on the former SDC property from threats to life under circumstances of wildfires like those we saw in 2017. Please support a plan that is scaled down from the Permit Sonoma Plan.

*Loren A. Raymond*

*Loren A. Raymond, Ph.D.*  
*Emeritus Professor of Geology & Sustainable Development*  
3327 Cypress Way  
Santa Rosa, CA 95405  
raymondla@bellsouth.net  
(707)-843-7215

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**From:** [Mark Speer](#)  
**To:** [PlanningAgency](#)  
**Subject:** SDC  
**Date:** Tuesday, September 13, 2022 8:35:13 AM

---

EXTERNAL

To whom it may concern,

I just wanted to convey how important it is to preserve the open space, along with keeping a wildlife corridor available at the former SDC campus. We have all studied the maps and have seen how critical this area is to protecting wildlife in Sonoma/Marin county! To allow corporate greed to take over, and destroy this precious habitat we have in Glen Ellen would be very sad for mankind.

Just the other day I saw two species cross the road in front of me on my way to Sonoma as I drove through the SDC campus. To choke them off through more development would be a mistake forever, and a true pity.

Thank you,

Sincerely:

Mark Speer, Glen Ellen.

Sent from my iPad

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**To:** [PlanningAgency](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcguire@senate.ca.gov](mailto:senator.mcguire@senate.ca.gov)  
**Subject:** Public Comment on SDC Specific Plan and DEIR – Scale it Back!!  
**Date:** Wednesday, September 14, 2022 8:43:05 AM

---

Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
2. **Support Historic Preservation Alternatives** as it is the most environmentally sound.
3. **Protect Open Space** by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.
  - a. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).
  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
4. **Wildfire:** Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.
5. **Climate Crisis:** Given the County's Climate Crisis Resolution and commitments to reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.
6. **DEIR is Inadequate** While the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts, the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as "promote" or "encourage" or "if feasible." The DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program.



**Signed,**

**Patricia O'Connor**

Sent from my iPhone

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**From:** [Patty](#)  
**To:** [PlanningAgency](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcquiere@senate.ca.gov](mailto:senator.mcquiere@senate.ca.gov)  
**Subject:** Public Comment on SDC Specific Plan and DEIR – Scale it Back!!  
**Date:** Wednesday, September 14, 2022 8:49:07 AM

---

Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
2. **Support Historic Preservation Alternatives** as it is the most environmentally sound.
3. **Protect Open Space** by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.
  - a. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).
  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
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prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as “promote” or “encourage” or “if feasible.” The DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program.

**Signed,**

**Patricia O'Connor**

7935 Covert Lane  
Sebastopol, CA 95472  
(415)307-2267

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# Vicki A. Hill

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## Land Use and Environmental Planning

3028 Warm Springs Road  
Glen Ellen, CA 95442  
(707) 935-9496  
Email: vicki\_hill@comcast.net

September 13, 2022

Sonoma County Planning Commissioners

RE: Preliminary Comments on Draft SDC Specific Plan and Draft EIR for 9/15/22 Meeting

Dear Planning Commissioners,

I am a land use planner and CEQA specialist in Sonoma County and have many concerns regarding the proposed large-scale SDC Specific Plan and the adequacy of the SDC Specific Plan Draft EIR. I am still reviewing the Plan and EIR and will submit detailed comments by the comment due date. However, I wanted to bring to your attention a few of the many issues that need to be addressed. Overall, the DEIR reflects a bias towards the proposed dense development and tends to dismiss the proposed plan's environmental disadvantages when comparing it to other reduced-scale alternatives. Substantial revisions are necessary to the EIR and Specific Plan to make the EIR adequate, under CEQA, and to create a plan that represents sound land use planning.

### **Specific Plan Scale**

The planning process has failed to result in a plan that even remotely resembles a community-supported alternative. The promised community-driven process has not occurred. Despite widespread, valid public concerns about the proposed high-density plan and the Board of Supervisors direction to evaluate a plan with 450 to 800 residential units, the proposed Specific Plan still includes an extreme amount of development (1000 plus homes, 410,000 square feet of commercial), which is totally out of scale for this location outside of an urban growth boundary and in the middle of the semi-rural village of Glen Ellen. There is no project comparable to this size in the entire Sonoma Valley. This urban sprawl development, including a 120-room hotel and potential conference center, will, in effect, create a new city, in direct conflict with good land use planning principles and County growth policies. Yes, we need and want housing, but there must be a balanced approach that factors in site constraints, impacts, surrounding land uses, historic resource values, and limited transportation network. This balanced approach is even reflected in the plan's guiding principles (see DEIR page 5-6) but the plan fails to conform to these principles. Project objectives to "balance redevelopment with existing land uses" and "balance development with historic resource conservation" have been ignored.

The Draft EIR identifies significant, unavoidable impacts on historic resources and traffic from the proposed Specific Plan due to its size. There is no mitigation identified for destroying so many historic buildings and converting the site to a new urban development. These issues could be addressed with a smaller alternative.

## **Environmentally Superior Alternative**

DEIR page 570 states: “Overall, the Historic Preservation Alternative is the environmentally superior alternative...” The text goes on to dismiss this alternative and minimize its environmental benefits. To say that the proposed plan’s impacts are “largely comparable” to the impacts of smaller alternatives is false and misleading. The types of impacts may be the same, but the magnitude of impacts on traffic, climate change, historic resources, noise, biological resources, public services and land use would be much less with a reduced-scale alternative. The Historic Preservation Alternative is feasible and its size and scale should be pursued as the preferred plan. Some modifications to this alternative could be incorporated to further reduce impacts, such as even more adaptive reuse and more compact development design. It appears that some impact-reducing elements included in the proposed plan were arbitrarily excluded from this alternative (e.g., the road connection to Highway 12 for emergency access), thus making this alternative appear less environmentally advantageous. Also, there is no reason to conclude that this alternative couldn’t achieve affordable housing goals. Compared to current and projected high construction costs for new development, adaptive reuse can be an effective strategy to reduce overall project **costs and impacts**.

## **Deferral of Analysis**

The Draft EIR defers analysis of impacts on some resources to a future time when individual projects are proposed. However, most if not all future projects will be exempt from CEQA under permit streamlining legislation so there will be no means to limit full buildout or implement much-needed future mitigation measures.

## **Specific Plan Phasing**

SDC Planning Advisory Team (PAT) members and public comments stressed the importance of project phasing to reduce impacts on the environment and on the community. There is only one requirement for phasing (Policy 4-3, which requires completion of at least 10,000 square feet of retail businesses and at least 200 housing units west of Arnold Drive before beginning construction of any housing east of Arnold Drive) and this policy does not reduce any environmental impacts. The Specific Plan itself has a section on “Recommended Phasing” but these provisions are advisory and not mandatory. The EIR must identify phasing as mitigation to help further reduce traffic and other impacts.

## **Need for Performance Standards**

Project phasing should be based on performance standards adopted for each environmental issue area. In this way, impacts can be monitored and additional mitigation measures developed, as needed. For example, there is no certainty that massive demolition and construction activities, as well as the introduction of a large mobile population to the site, will not dramatically affect the surrounding open space resources. Before proceeding with full buildout, it should be proven that the site can actually accommodate the projected buildout.

## **Specific Plan Policy Language and Enforceability**

Many of the policies in the proposed plan are intended to reduce/avoid impacts but the wording is such that it is not mandatory and many policies are not carried forward to Appendix A, Standard Conditions of Approval.

Thus, these policies cannot be relied on to be implemented and fully mitigate impacts. Any policy that does not have a strong “shall” statement is not enforceable.

### **Jobs/Housing Growth (DEIR Section 5.1.1.2)**

It is completely inaccurate to say that the proposed job growth of 940 jobs outside of an urban growth boundary is a “modest” number. The number of jobs cannot be compared to the county-wide number – this methodology purposefully minimizes the impact. Compared to the rest of Sonoma Valley, which is a distinct planning region, the addition of 940 jobs is significant and is growth-inducing. Also, there is no documentation of the need for these jobs in Sonoma Valley. The market study conducted as part of the Specific Plan alternatives report (November 2021, see [sdcspecificplan.com/documents](http://sdcspecificplan.com/documents)) determined that non-residential development did not generate overall revenues and did not contribute to financial feasibility. The alternatives report states: “Commercial and industrial uses may support building construction costs but are unlikely to have a significantly positive impact on overall development feasibility.” Also, the EIR (page 11) states: “...the market demand for non-residential uses (with the exception of a hotel) is limited and higher employment levels will reduce financial feasibility.”

While there is a large demand for affordable housing in Sonoma Valley, creating over 700 market-rate homes is definitely a significant growth-inducing impact because there is no existing demand for this high number. These housing units will not serve the existing Sonoma Valley population – they will attract people from outside the valley and outside of Sonoma County.

### **Comparison to Previous Institutional Use**

The EIR analysis, including the growth-inducing section as well as other sections, attempts to justify the large-scale plan by erroneously comparing the proposed plan population and employee growth to the previous institutional use and number of clients/employees. This comparison is invalid and should not be used as a basis for over-developing the site due to the fact that:

- As an institution, SDC tread very lightly on the environment and adjacent community. At its most populous, most of the residents of SDC did not leave the property. They did not drive cars, they didn’t go offsite to schools, doctors, restaurants, etc.
- Vehicle trips were primarily limited to employees divided into three shifts so that traffic was spread out, rather than concentrated at peak hours. There were no retail commercial uses or a hotel to generate trips.
- Because of the limited outdoor activities and absence of constant vehicle traffic onsite, people and cars did not interfere with wildlife movement; the campus was open, peaceful, and not occupied with uses that generated a substantial amount of traffic (e.g., hotel, restaurants, etc.).
- Employment and resident numbers at SDC reached a peak during a time over 50 years ago when there was very little cumulative growth in Sonoma Valley and both Arnold Drive and Highway 12 were still well-functioning roadways.

Nor is it valid to compare existing building square footage to proposed square footage in an attempt to minimize impacts, as it is the proposed **use** of the buildings that drives most of the impacts.



**EIR Traffic Assumptions**

There is no guarantee that people who live onsite will work there. That cannot be assumed for purposes of analyzing traffic impacts. Also, it cannot be assumed that the roadway connection to Highway 12 will be developed. Therefore, the traffic impacts are substantially underestimated in the EIR.

**Wildlife Corridor Impacts**

Despite many scoping comments, impacts on wildlife movement **through** the campus are not addressed in the EIR. The campus itself is part of the wildlife corridor and must be acknowledged as such. Furthermore, there is no overall prohibition or restrictions on fencing within the campus (only prohibition on wooden fences) so wildlife will likely be blocked from movement through the campus . There will be significant impacts on wildlife movement from the introduction of thousands of people and vehicles, as well as fences.

**No Project Alternative Definition**

Under the No Project alternative, it cannot be assumed that the state will take control of the site and that the county will have no land use authority. If the state proceeds with sale of the property, any private developer would be subject to county land use controls. The RFP issued by the State clearly states that the property is being offered for sale. The RFP contains no reference to the possibility for a long-term ground lease with private developers. Therefore, this is not a reasonable assumption.

**Financial Feasibility**

Despite making references to financial considerations, there is no definition or accurate assessment of the financial feasibility of the proposed plan or alternatives. While financial feasibility is required, there is no mandate to maximize revenues at the cost of other resources and values, or at the cost of reasonable land use planning.

Thank you for considering my comments. Please feel free to contact me if you have any questions or need clarification on any of these comments.

Regards,

  
Vicki A. Hill

Vicki Hill, MPA

**From:** [Richard St. Angelo](#)  
**To:** [PlanningAgency](#); [Brian Oh](#)  
**Cc:** [senator.mcguire@senate.ca.gov](#); [David Rabbitt](#); [senator.dodd@senate.ca.gov](#); [Susan Gorin](#); [Lynda Hopkins](#)  
**Subject:** Public Comment on SDC Specific Plan and DEIR – Scale it Back  
**Date:** Wednesday, September 14, 2022 11:25:32 AM

---

Dear Sonoma County Planning Commissioners,

The following is a polite response to Permit Sonoma's terrible proposed SDC Specific Plan and DEIR:

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
2. **Support Historic Preservation Alternative** as it is the most environmentally sound.
3. **Protect Open Space** by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.
  - a. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).
  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
4. **Wildfire:** Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.
5. **Climate Crisis:** Given the County's Climate Crisis Resolution and commitments to reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.
6. **DEIR is Inadequate** While the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts, the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as "promote" or "encourage" or "if feasible." The

DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program.

Richard St. Angelo, Architect  
218 Live Oak Drive  
Cloverdale CA 95425-3535  
(707) 894-5196

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**From:** [robertcherwink@icloud.com](mailto:robertcherwink@icloud.com)  
**To:** [PlanningAgency](#); [Brian Oh](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcquire@senate.ca.gov](mailto:senator.mcquire@senate.ca.gov)  
**Subject:** Public Comment on SDC Specific Plan and DEIR – Scale it Back!!  
**Date:** Wednesday, September 14, 2022 12:51:05 PM

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EXTERNAL

Dear Sonoma County Planning Commissioners,

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Scale Back Size of Development to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.

Support Historic Preservation Alternative as it is the most environmentally sound.

Protect Open Space by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.

In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).

Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.

Wildfire: Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.

Climate Crisis: Given the County's Climate Crisis Resolution and commitments to reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.

DEIR is Inadequate While the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts, the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as "promote" or "encourage" or "if feasible." The DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program.

Sincerely,

Robert Cherwink  
1515 Fowler Creek Rd  
Sonoma, CA 95476

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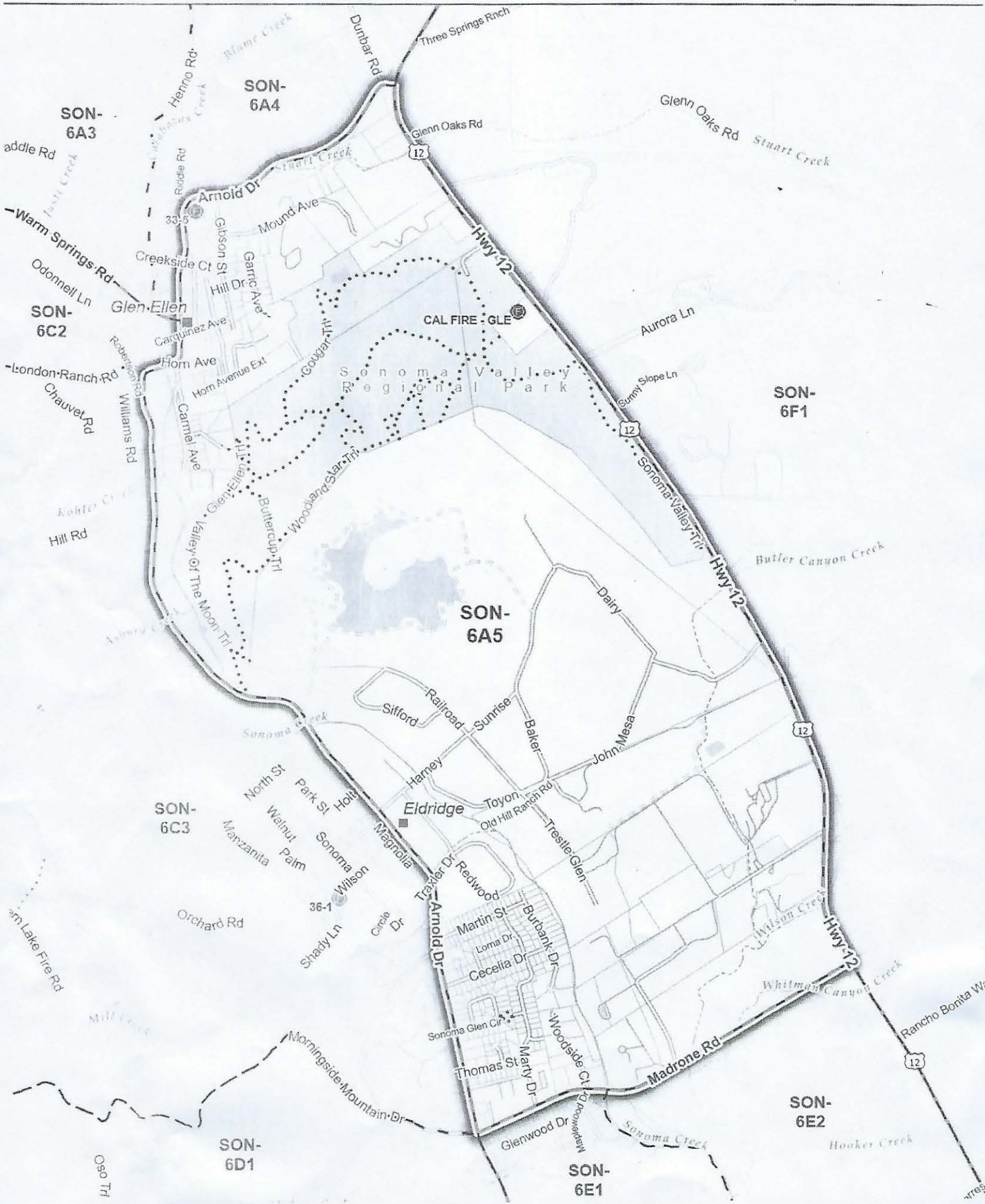


# EVACUATION ZONE: SON-6A3

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West of Highway 12



Published: 4/7/2022 12:51 PM







August 4, 2022

# Vision for Former Crownsville State Hospital Centers Nature and Healing

More:

Building Stronger Communities

By:

Kirsten Hower

*This post first appeared on the Chesapeake Bay Foundation's website [Link: [http://www.cbf.org/blogs/save-the-bay/2022/08/the-future-of-crownsville-state-hospital-as-a-center-for-nature-and-healing.html?utm\\_source=referral&utm\\_medium=website&utm\\_campaign=crownsville](http://www.cbf.org/blogs/save-the-bay/2022/08/the-future-of-crownsville-state-hospital-as-a-center-for-nature-and-healing.html?utm_source=referral&utm_medium=website&utm_campaign=crownsville)].*

As you drive through Crownsville, Maryland, travelers will likely come across several decaying Georgian buildings with little context beyond a sign stating they are part of the Crownsville State Hospital. Vacant since 2004, the site figures in a dark part of Maryland's history [Link: [/uncertain-future-crownsville-state-hospital](#)]. Originally opened as a mental hospital for the Black community, Crownsville became, by many accounts, a house of horrors that experimented on and abused patients. But a brighter future awaits now that the state has handed over the 544-acre property to Anne Arundel County.



While the next steps will take time, ideas are already circulated as to how best to use the site while honoring its history and the memory of those buried there. I recently spoke with Joi Howard, founding member of enBloom [Link: <https://www.enbloom.life/>], about her proposal to transform part of the Crownsville site with nature and healing as the centerpiece.



EnBloom would transform the historic Crownsville State Hospital into a site of healing and community.

## What drew you to the Crownsville site?

I moved to the area in 2015 and happened to pass the Crownsville Hospital Site one day in 2018. I felt drawn to the property in a way that I can't explain. Around this time, I was going through a rough period mentally, emotionally, and spiritually. I started digging into the site's history, even discovering that I had a family member who ended up at Crownsville. The history of the hospital and its patients, and ultimately the abandonment of the site, resonated with me in a way I wasn't prepared for [Link: <https://www.enbloom.life/our-stories/paintopprogress>].

In my digging, I came across Janice Hayes-Williams who has been vocal about the



history of the site and hosts an annual “Say My Name” event [Link: <https://www.capitalgazette.com/photos/ac-cn-crownsville-hospital-say-my-name-vg-20220430-2gbp436d3zhxnezeeviqqclaqi-photogallery.html>] that commemorates those who died at Crownsville. Eventually, I met with Williams and we discussed my interest in the property. She was immediately supportive of my interest in the site and invited me to attend her event.

I was, and continue to be, drawn to the site.

## **How did enBloom come to be?**

I had been exploring more holistic practices as well as how food and sustainability are tied to wellbeing. A few friends and I developed a vision for a sustainable, educational garden where people could learn about how nature, food, and wellness are intertwined. We wanted it to be an opportunity for the Black community to feel welcome in the world of agriculture and holistic healing.

The Crownsville State Hospital site provides a perfect opportunity for a project like this. The buildings were built by the patients, they grew their food on the property—it was designed to be a sustainable site. By situating enBloom at Crownsville, we would be reclaiming the narrative of the site. The history of it and the terrible things that happened there—experimentation, abuse, neglect [Link: <https://www.atlasobscura.com/places/crownsville-hospital-center>]—can never be erased, but a brighter future can literally grow out of that darkness.





EnviroCollab LLC

A second conceptual rendering of enBloom at Crownsville State Hospital.

## What are the goals of the enBloom project at the Crownsville site?

The possibilities are endless, but our main goals are to create a space that focuses on five elements:

1. **Climate-Smart Agriculture.** We want visitors to enjoy fresh, farm to fork eateries that will be supplied by an onsite working farm and experience firsthand the vitality that regenerative agriculture contributes to a holistically healthy community.
2. **A Healing Green Space.** Nature heals, plain and simple. Therapy and other healing treatments are cost-prohibitive for many even with medical insurance. The former hospital grounds are an ideal location to offer affordable, holistic wellness interventions to connect people with their inner strength and learn healthy techniques to manage life's challenges.



3. **Outdoor Learning.** We want to provide a space for people of all ages to acquire practical, sustainable living skills from climate-smart growing practices to valuable job training in innovative, green industries. We will also create a space for experiential education (e.g. camps, homeschool enrichment, school field trips) where students can gain valuable skills for immediate use in their daily lives.
4. **Resource Generation.** We are defining a mechanism to distribute wealth building, educational tools, and modalities equitably.
5. **A Market and Service Hub.** Local, environmentally responsible businesses and artisans will have a place to share their wellness products and services with visitors seeking an alternative to more traditional capitalist options.

Stuart McAlpine/Flickr/CC by 2.0

Exterior of a brick building with fencing around it.

Vacant since 2004, Crownsville State Hospital is looking towards a brighter future in the hands of Anne Arundel County.

## How can other organizations get involved?

EnBloom is the vision of a small team and will require the work and knowledge of so many to make it a reality. Rob Schnabel, the Maryland restoration specialist at the Chesapeake Bay Foundation, has been the ultimate cheerleader, advising on the current political climate of the county and offering to assist on incorporating regenerative agriculture practices [Link: [https://www.cbf.org/blogs/save-the-bay/2021/08/what-is-regenerative-agriculture-and-why-is-it-re-emerging-now.html?utm\\_source=referral&utm\\_medium=website&utm\\_campaign=crownsville](https://www.cbf.org/blogs/save-the-bay/2021/08/what-is-regenerative-agriculture-and-why-is-it-re-emerging-now.html?utm_source=referral&utm_medium=website&utm_campaign=crownsville)] into our work.

Established organizations can help by providing letters of support and partnership as we apply for grant funding and help in getting the word out to the community



about our current and future initiatives through blogs/articles, such as this. These same organizations can welcome community-led groups like enBloom to spaces where decisions are being made around Black health and wellness to hear our voices and ideas.

Most importantly, we need land. In 1910, Black farmers owned more than 16 million acres of land; in 2017, that number is just 4.7 million acres—roughly 0.5 percent of all farmland in the country [Link: <https://www.reuters.com/world/us/us-black-farmers-lost-326-bln-worth-land-20th-century-study-2022-05-02/>]. Healing and wellness powered by climate smart agriculture is challenging enough but without land to grow food and engage the community in environmental connection and stewardship the task is bleak.

## **Crownsville State Hospital has been vacant for nearly 20 years. Why is it important that this is happening now?**

Current events are certainly part of it. Our country is reckoning with a pandemic, racial injustice, and complicated history. Being able to convert a site with a terrible history—one that is ripe for change—into something beautiful and healing is perfect given the current conversations in our country.

**Looking Forward:** Anne Arundel County Executive Stuart Pittman has expressed his excitement for the opportunities the site presents. “I want to see that place as a center for healing, a place where mental health, and, really, all health is promoted and encouraged,” Pittman told WYPR in an October 2021 [Link:

## **Donate Today to Help Save the Places Where Our History Happened.**

Support the National Trust for Historic Preservation today and you'll be providing the courage, comfort, and inspiration of historic places now, when we need it most.



<https://www.wypr.org/2021-10-07/crownsville-turning-a-grim-site-from-marylands-past-into-a-jewel> ]

interview. It would be done “in a way that is fiscally responsible and tears down the buildings that should come down and that preserves some of the beautiful architecture that’s there, some of the historic buildings,” he said.

As the process to define the site’s future continues, we look forward to seeing projects like enBloom that address Crownsville’s history while creating a future that puts nature, healing, and important conversations at the forefront.

Kirsten Hower is a former member of the National Trust’s social media team. When she’s not helping save places, you’ll find her reading, wandering around art museums, or hiking along the Potomac River with her dog.

**From:** [gadfly@sonic.net](mailto:gadfly@sonic.net)  
**To:** [Brian Oh](#)  
**Subject:** comments from Sherry Smith for tomorrow's Planning Commission Meeting concerning the DEIR and SDC Site Specific Plan  
**Date:** Wednesday, September 14, 2022 7:37:50 AM  
**Attachments:** [SDCSitePlanSmith.pdf](#)

---

Hi Brian,

Here are my comments with an attachment concerning the DEIR.

Today, I'll deliver copies to your office for the Planning Commissioners and to the Board of Supervisors office for Susan Gorin, et al.

Sherry

Sherry Smith, LCSW  
PO Box 157  
Glen Ellen, CA 95442  
(707) 480-8191 [gadfly@sonic.net](mailto:gadfly@sonic.net)  
September 14, 2022

Brian Oh, Comprehensive Planning Manager

[Brian.Oh@sonoma-county.org](mailto:Brian.Oh@sonoma-county.org)

Permit Sonoma, County of Sonoma

2550 Ventura Avenue

Santa Rosa, CA 95403

Re: Draft Environmental Impact Report

Sonoma Developmental Center, 15000 Arnold Drive

Eldridge, CA

APN: 054-090-001

Dear Mr. Oh,

I was a social worker at Sonoma State Hospital (SDC) from 1979-1981 when over 1,000 employees, including Psychiatric Technicians, worked at least 4 different shifts to provide services and care to over 1,000 residents with developmental disabilities.

I oppose the development of 1,000 new homes and a hotel in Eldridge. I support the transfer of 765 acres for open space conservation to protect the wildlife corridor, historic Eldridge Cemetery, two lakes, and Camp Via. This would help meet both the federal and state goals for land and water protection. Organizations, including the Sonoma Ecology Center and Sonoma Land Trust, have previously discussed concerns about preservation and I believe their experts will further address the issues of aligning the County Specific Plan process and EIR only after the State of California announces the RFP selection.

The driving force behind the Site Specific Plan is to be "fiscally feasible." (Bradley Dunn, *The Sonoma Index-Tribune*, 8/17/22, page A9) Fiscal feasibility is linked to the State of California's plan to pass along to a developer approximately \$100 million in toxic clean-up costs at SDC.

The Site Specific Plan briefly mentions some of the past abuses to clients at SDC. Over 5,400

men, women, and children from ages 7 to 70 were sterilized without their consent. <https://ec.ac.lsa.umich.edu> The State apologized and offered \$25,000 to sterilized victims. <https://victims.ca.gov> ; <https://dredf.org> If none of the SDC victims apply for and collect compensation, perhaps because none of them are alive, I suggest that California allocate the \$100 million that should have compensated these victims to pay for the toxic clean-up at SDC. I don't know if the State apologized or compensated any clients for other violations of civil and legal rights and abuses at SDC during the past 100+ years. Another option might be to allocate \$100 million for affordable and accessible housing and services for people with developmental disabilities at SDC and infill housing in urban areas.

**Traffic:** The EIR should fully address the impact of increased traffic. I see no reference to traffic patterns when SDC was open. I observed traffic slowdowns on Arnold Drive during shift changes. Stop signs on Arnold Drive and surrounding streets within Eldridge slowed down rush hour traffic. During shifts, most employees walked between buildings. Staff who commuted by bicycle along Arnold Drive to SDC risked getting hit by cars since there were no bicycle lanes. In the past 40 years, though various groups have lobbied for more and better bike lanes, the County of Sonoma and Cal Trans haven't significantly improved Arnold Drive for bicyclists traveling between Glen Ellen and Boyes Hot Springs or on Highway 12.

The report recommends installing a new traffic light at Harney and Arnold in Eldridge, which might have reduced congestion during shift changes 40 years ago. Traffic lights are currently located at Arnold Drive and Highway 12 in Glen Ellen and a few miles down the road on Arnold Drive at Boyes Blvd in Boyes Hot Springs. A roundabout was installed at Aqua Caliente Road and Arnold Drive a few years ago.

During construction of new homes, businesses, etc. there are few mitigation measures suggested. Attached are photos of a construction site of what will be one new home on Chestnut Avenue in Aqua Caliente. Large trucks travel on several different narrow streets during the week. Neighbors hear the noise, dust is a problem, there's increased traffic, and a section of the road has been damaged. Imagine what Arnold Drive will be like if 1,000 homes are built in Eldridge.

**3.6 Energy and Greenhouse Gas Emissions:** The Summary of Impacts in the Draft EIR claims no mitigation measures are required for increased traffic and heavy equipment during construction, or when new buildings are completed. If each new home includes 1 car, the hotel is filled with over 100 guests, plus employees drive to work at the hotel and new businesses in Eldridge, unless everyone owns an electric vehicle or bicycles to the village, how can "none required" and "not applicable" be listed under the impact and mitigation measures for energy and greenhouse gas emissions?

**3.7-1 Earthquake:** "No mitigation measures required." I disagree. The report doesn't discuss the Rodgers Creek Fault in Sonoma County. Refer to <https://usgs.gov> which details a higher resolution map of this fault within the past few years. They predict a 33% chance of a "6.7 earthquake on the combined Rodgers Creek-Hayward fault system" sometime between now and 2043. **page 25, page 203**

To give an example of what might happen, during the October 17, 1989 Loma Prieta earthquake (magnitude of 6.9), 3,757 people reported injuries, 63 people died, buildings collapsed, infrastructure—pipelines, overpasses, bridges, and roadways—destroyed, and a

World Series game stopped.

**3.8-6 Emergency Response or emergency evacuation plan:** I disagree that no mitigation measures are required. Eldridge is part of Evacuation Zone SON-6A5. In past public comments, I mentioned that during the Nuns Fire evacuations in 2017, my friends drove for over four hours from Agua Caliente to reach a hotel in Rohnert Park. The drive normally takes between 30-45 minutes. With approximately 2,000+ new residents in Eldridge, it would take more than an extra minute or two for residents and employees to evacuate safely from Arnold Drive north to Highway 12, west to Bennett Valley Road, or south to Highway 161. A new road from Arnold to Highway 12 might not reduce evacuation times since the fires of 1964 (Hanly Fire, Nuns Canyon Fire), 1966 (Cavedale Fire) and 2017 (Tubbs and Nuns Canyon Fires) spread from the hills and the wind blew and spread the fire west. Cal Fire and the County of Sonoma can provide more details on emergency evacuation routes and historical data about past fires.

**3.8-7 Exposure to significant risk of loss, injury or death involving wildland fires**

**3.16 Wildfire:** I disagree that no mitigation measures are required. If there's no risk, then why has my insurance more than tripled since 2017? Will new home owners in Eldridge be able to purchase fire insurance? Even if "affordable homes" are built at Eldridge, the insurance policies may not be affordable because companies, including CSAA, State Farm, etc. are well aware of the future risks of wildland fires to the destruction of homes and property in Eldridge.

During the Nuns and Tubb Fires in 2017 and since then, residents have also been exposed to "pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire" each year. Climate change has increased risks throughout Sonoma Valley to the possibility of wildland fires in the future as well as smoke drifting into our region from fires in other areas of California.

**3-14 Transportation:** The County of Sonoma doesn't plan to increase bus service along Arnold Drive. There's no service overnight. Paratransit is an option for disabled residents, though not at night, on major holidays, and service is limited on other holidays.

Any new resident of Eldridge who doesn't have a vehicle would be at increased risk of injury or death during a disaster or evacuation. Many of the residents who died during the Tubbs and Nuns fires were elderly or disabled.

**Storm water and storm drain systems page 58:** My father was an engineer for the Water Resources Division of the United States Geological Survey. He measured gauges along rivers, streams, and creeks, and was knowledgeable about flooding. When my friend decided to purchase a house in Glen Ellen, he asked my father to give an opinion about the possibility of Sonoma Creek flooding in the future. My dad walked the property and explained where the creek had risen in the past. It was his professional opinion, as a retired engineer, that there wouldn't be a "100 year" storm flooding Sonoma Creek. My father was wrong.

In about 1997, Sonoma Creek flooded in Glen Ellen, then a catastrophic flood severely damaged my friend's home on New Year's Eve 2006/2007. He rebuilt. The *Sonoma Index-Tribune* followed the stories about the flooding. Supervisor Valerie Brown knew about this, as did the County of Sonoma Permit and Planning Department.



Any discussion about a possible “100-year storm” and Sonoma Creek not flooding is misguided because of Climate Change and past flooding in the region.

Storm drains are inadequate elsewhere in Sonoma Valley, including on Mountain Avenue. Homes have flooded and excess water pools on the street during heavy rainfall. Adding 1,000 homes, a hotel, and businesses will change both the surface and subsurface water flow in Eldridge. Infrastructure planning and construction needs to mitigate potential problems.

The USGS California Water Science Center and National Weather Service are perhaps the agencies most familiar with stream gauges along Sonoma Creek and the likelihood of flooding in the future.

**Historic Properties:** I oppose building a hotel on the site. Preserving historic properties at SDC could involve local labor and trade groups and nonprofits in providing Hands-On Preservation Experience (HOPE Crew) to young people interested in learning about preservation and historic trades. <https://www.preservationpriorities.org>

The Site Specific Plan suggests that the Historic Main Building might be part of a lobby within a new hotel. I doubt a developer would install a plaque on the Historic Main Building/the proposed hotel site explaining how the civil and legal rights of patients at SDC were violated for decades.

An example of a historic site transformed into a luxury hotel is the façade of the St. Louis Hotel, built about 1838. A plaque installed at the Omni Royal Orleans Hotel in the French Quarter of New Orleans mentions its historical significance. Black men, women, and children were auctioned on the block in the rotunda at the St. Louis Hotel. I doubt that few Omni Hotel guests today read the plaque or realize what really happened at the site during the 1800s or that newspapers and posters advertised sales of enslaved people every day, except Sunday. The New Orleans Slave Trade Marker and Tour App; <https://neworleanshistorical.org/items/show/926>

In March 2021, the Glen Ellen Historical Society presented a proposal for an historic center at SDC. They nominated the Sonoma Developmental Center for listing on the National Register of Historic Places. The Adaptive Reuse Potential Evaluation March 2021 Report assessed SDC buildings listed in Appendix C of the Site Specific Plan. The state of Maryland transferred Crownsville State Hospital to Anne Arundel County for preservation. This is one example of how a state, county, nonprofits, and individuals are transforming a former state institution. (refer to National Trust for Historic Preservation. 8/4/22 article attached)

I hope the state, county, nonprofits, Regional Centers, disability rights groups, individuals with developmental disabilities and their families, and other interested organizations and individuals will help transform the SDC site into a place everyone might enjoy in the future.

Sincerely,  
Sherry Smith, LCSW

Attachments: Photos of Chestnut Avenue construction site, Evacuation Zone SON-6A5,

Vision for Former Crownsville State Hospital Centers Nature and Healing.

cc: Sonoma County Planning Commissioners Carr, Ocana, McCaffery, Koenigshofer, Reed; Gerald McLaughlin, Project Manager, California Department of General Services, Asset Enhancement, Asset Management Branch, [Gerald.McLaughlin@dgs.ca.gov](mailto:Gerald.McLaughlin@dgs.ca.gov); Governor Gavin Newsom; Susan Gorin, District 1, David Rabbitt, District 2, Chris Coursey, District 3, James Gore, District 4, Lynda Hopkins, District 5, Sonoma County Board of Supervisors; Assembly member Cecilia Aguiar-Curry; State Senator Mike McGuire; North Bay Regional Center; Disability Rights California; DREDF; Doug Bosco, California Coastal Conservancy; Sonoma Land Trust; Sonoma Ecology Center; Sonoma City Council; Greg Sarris, Tribal Chairman of the Federated Indians of Graton Rancheria; Leonardo Lobato, Executive Director, La Luz; Sierra Club; Habitat for Humanity; Jack London State Park; Glen Ellen Historical Society; NASW; Justice in Aging

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**From:** [Susan Gorner](#)  
**To:** [PlanningAgency](#)  
**Subject:** Public comment on SDC Specific Plan and DEIR - PLEASE SCALE IT BACK!  
**Date:** Wednesday, September 14, 2022 8:43:20 AM

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EXTERNAL

Please do not urbanize this 945-acre open space and historic campus. Favor few homes and protect open space. Preserve public open space, increase setbacks on Sonoma Creek, riparian areas and the Sonoma Wildlife Corridor to at least 100 feet. Support the Historic Preservation Alternative.

Susan Gorner  
610 Mountain Ave.  
Sonoma, Ca.  
707.484.5096  
[suesnma@sonic.net](mailto:suesnma@sonic.net)

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**From:** [Vicki Hill](#)  
**To:** [PlanningAgency](#)  
**Subject:** Comments on SDC Specific Plan & Draft EIR for Planning Commission Meeting 9/15/22  
**Date:** Tuesday, September 13, 2022 2:56:54 PM  
**Attachments:** [Planning Commission letter 9-13-22-VH.pdf](#)

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Hello,

Please see attached comments for your consideration. Please distribute the comments to Planning Commissioners and staff in advance of Thursday's meeting.

Thank you,

Vicki A. Hill

(707) 935-9496

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**From:** [Will Shonbrun](#)  
**To:** [Brian Oh](#); [PlanningAgency](#)  
**Subject:** SDC Public Zoom Meeting: Comments on the DEIR  
**Date:** Monday, September 12, 2022 2:06:52 PM

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In its official Specific Plan/ DEIR, Permit Sonoma is proposing the building of 1000 houses, plus a hotel, plus an indeterminate number of businesses at the former Sonoma Developmental Center. This means anywhere from 2500 to 3000 people living there. All these people will be using cars. All these people will be needing goods & services. How many of these commercial businesses will also be on the SDC land or travelled to by homeowners daily? Many of these people will have pets. I'd like to know how all these fine folks and their adorable animals will safely evacuate their homes at SDC? **In the 2017 wildfire in the City of Sonoma and its environs it took an hour and a half to two hours to go a few miles on Hwy. 12 and Arnold Drive (the *only* roads going south in and out of Sonoma Valley). That's not anecdotal, that's a plain fact.** In this same Specific Plan, it boldly states that these additional 3000 folks and their cars will add 1 to 2 minutes travel time in that evacuation from a raging wildfire.

When questioned in a previous meeting about its projections about fire evacuation from the new town the county is proposing on Sonoma Mountain, its planners, Permit Sonoma, cite that its numbers and conclusions are all based on statistics they've compiled, regardless of the reality we have all experienced. So how does one logically argue with this?

This begs the question ... **why should we, the public, accept at face value anything stated in this Specific Plan, including their data regarding environmental impacts on the wildlife corridor, the traffic studies, the re-use of many buildings and the preservation of 750 acres of open space from future development?** In addition, how are our schools going to absorb another thousand or so students?

Will Shonbrun, Boyes Springs, 996-9678

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**From:** [Suzie Shield](#)  
**To:** [Brian Oh](#)  
**Subject:** Bennett Valley Traffic Impact  
**Date:** Monday, September 12, 2022 11:20:41 AM

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Hello Mr. Oh,

I am a resident living on Grange Rd., off of Bennett Valley Road. When we moved here 10 years ago, the traffic was fairly consistent but typically was heavier around the rush hours. In the last few years, it has gotten way worse! Our street is a shortcut to get to Petaluma Hill Road, and the traffic has definitely increased. According to reports and what my husband and I have observed, the proposed development at the Sonoma Developmental Center will significantly affect us as well as my neighbors. The amount of cars, trucks and semi's that travel Grange and the rate of speed that they drive is already ridiculous! I can't imagine how our quality of life will change if this plan moves forward. Not to mention what happens if we have another fire like we have had in recent years. Please, support the smaller project, the "Historic Preservation Alternative" plan which will allow more open space for wildlife, while also enriching the lives of residents and visitors, plus house 450 families! Keep Sonoma County a highly desirable place to live and visit.

Thank you for your time,

Suzie Shield  
4525 Grange Rd., Santa Rosa

*Gardening is like therapy.....but you get tomatoes!*

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**From:** [Patricia Dinner](#)  
**To:** [Susan Gorin](#); [Arielle Kubu-Jones](#); [Brian Oh](#)  
**Subject:** Eldridge Project  
**Date:** Monday, September 12, 2022 10:56:31 AM

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Dear Susan, Brian and Arielle,

I live off Bennett Valley Road which is already a busy conduit between Glen Ellen and Santa Rosa, and is becoming busier and more dangerous every year. Permit Sonoma even stated that increased traffic is “a significant and unavoidable impact” of the proposed development at the Sonoma Developmental Center.

After looking at the alternative proposals, I believe that the “Historic Preservation Alternative” is the appropriate choice to build more housing that is appropriate for this area.

Thank you very much.

Patricia Dinner  
5330 Enterprise Road  
Glen Ellen, CA 95442

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**From:** [Patrick Rafferty](#)  
**To:** [Brian Oh](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcquiere@senate.ca.gov](mailto:senator.mcquiere@senate.ca.gov)  
**Subject:** Public comment on SDC Specific Plan and DEIR- scale it back!  
**Date:** Saturday, September 10, 2022 12:54:29 PM

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Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. Scale Back Size of Development to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
2. Support Historic Preservation Alternative as it is the most environmentally sound.
3. Protect Open Space by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.
  - a. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).
  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
4. Wildfire: Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter- place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.
5. Climate Crisis: Given the County's Climate Crisis Resolution and commitments to reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.
6. DEIR is inadequate while the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts, the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as "promote" or

“encourage” or “if feasible.” The DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program.

Respectfully,

Patrick Rafferty  
Bennett Valley, Santa Rosa

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**From:** [Greg Englar](#)  
**To:** [Brian Oh](#)  
**Subject:** Public Comment on SDC Specific Plan and DEIR – Too Much  
**Date:** Saturday, September 10, 2022 11:56:38 AM

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RE:

Dear Sonoma County Planning Commissioners,  
I cannot support you unless you do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Although you've seen these proposals from the public.... Take it seriously and instead, please direct Permit Sonoma to:

1. Scale Back Size of Development to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
2. Support Historic Preservation Alternative as it is the most environmentally sound.
3. Protect Open Space by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.
  - a. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).
  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
4. Wildfire: Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter- place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.
5. Climate Crisis: Given the County's Climate Crisis Resolution and commitments to reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.
6. DEIR is inadequate while the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts, the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as "promote" or "encourage" or "if feasible." The DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and



Monitoring Program.

Signed,

Greg Englar  
4610 Ponderosa Dr.  
Santa Rosa, CA

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**From:** [Anna Narbutovskih](#)  
**To:** [PlanningAgency](#); [Brian Oh](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcquiere@senate.ca.gov](mailto:senator.mcquiere@senate.ca.gov)  
**Subject:** Public Comment on SDC Specific Plan and DEIR  
**Date:** Saturday, September 10, 2022 1:30:34 PM

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RE: Public Comment on SDC Specific Plan and DEIR – Scale it Back!!

Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. Scale Back Size of Development to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
2. Support Historic Preservation Alternative as it is the most environmentally sound.
3. Protect Open Space by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.
  - a. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).
  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
4. Wildfire: Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter- place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.
5. Climate Crisis: Given the County's Climate Crisis Resolution and commitments to reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.
6. DEIR is inadequate while the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts,

the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as “promote” or “encourage” or “if feasible.” The DEIR needs to be revised and the Conditions of Approval strengthened and moved into a legally enforceable Mitigation and Monitoring Program.

Anna Narbutovskih  
14288 Woodland Dr.  
Guerneville, CA 95446  
[narbutovskih@comcast.net](mailto:narbutovskih@comcast.net)  
707.869.9062

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**From:** [Michael Lockert](#)  
**To:** [Brian Oh](#); [Susan Gorin](#); [PlanningAgency](#)  
**Subject:** Response to DEIR and Specific Plan for SDC  
**Date:** Saturday, September 10, 2022 11:32:33 AM

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Dear Sonoma County Planning Commissioners,

As a 46 year resident of Sonoma Valley, I am infuriated by the total dismissal of public input and disregard for public safety reflected in the SDC Plan and Draft EIR. Virtually ALL of the public comments at various meetings over several years have been in support of a much smaller development, with a MAXIMUM of 400 (affordable) units, no hotel, little to no businesses, and honoring the historic significance of the site. The current proposal has so many problems I hardly know where to begin.

First and foremost, the impact on fire safety and emergency evacuation cannot be overstated. Valley residents well remember the 2017 wildfire which came into Glen Ellen, and forced the evacuation of hundreds of residents, who found themselves stuck in traffic, taking 2-3 hours just to get to Hwy 37. The idea that adding 2-3000 residents and their pets to the Eldridge area will not have a significant impact on that traffic would be laughable if it were not so potentially dangerous. Adding one connector between Arnold Drive and Hwy 12 will not seriously mitigate that problem. In my opinion, anybody approving the plan, as is, will have blood on their hands when the next wildfire happens. And it will.

Secondly, the impact on daily traffic is summarily dismissed as minimal, needing no mitigation whatsoever. I don't know where the authors of this report live, but it is not in Sonoma Valley. It's insane and ridiculous on its face. If we are adding 1000 units of housing, AND a hotel, we are talking about a daily increase of AT LEAST a couple thousand car trips daily without the hotel. The hotel will add who knows how many guests, and staff working 24/7. This will be true even if, decades from now, everyone will be driving electric cars.

Although that should lead us to a discussion of the Greenhouse Gas Emissions involved in such a plan, which are required to be considered by any EIR in California, I want to mention another factor that no one seems to be considering, namely the effect of all these residents having pets.

There is an explosion of the number of people owning dogs and cats in the USA, and I presume this will be the case for any residents of this project. Inevitably, many of these will escape, having a huge impact on the current and proposed wildlife corridor. Since 1970, the songbird population in the US has declined by 30%, and according to the American Bird Conservancy, cats are the leading cause of direct, human-caused bird mortality. The International Union for Conservation of Nature (IUCN) lists domestic cats as one of the [world's worst non-native invasive species](#).

Dogs, both on leash and off, will also have a negative impact on the wildlife corridor, but no one is even considering these impacts let alone recommending any mitigations.

Apparently, all of the meetings and requests for public input by the State and County have been a sham. Not one of our governmental representatives



has worked as public servants, taking the voice of the people to the halls of power. Not one of our state reps, for instance, has objected to the onerous burden of the estimated \$100 million cost of cleaning up the neglected water system and other sources of pollution, caused by the State of California, sole owner of the property for over 100 years. Shame on the Department of Governmental Services and shame on all our state and county representatives for betraying the public trust.

Yours sincerely,  
Michael Lockert  
20526 Birch Road  
Sonoma CA 95476

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**From:** [nrchrdsn@sonic.net](mailto:nchrdsn@sonic.net)  
**To:** [Brian Oh](#)  
**Subject:** SONOMA DEVELOPMENTAL CENTER - PUBLIC COMMENT  
**Date:** Saturday, September 10, 2022 3:58:05 PM

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**The Draft EIR for the Sonoma Developmental Center does not examine 1.increased traffic on Bennett Valley Road and 2. evacuation from wildfires using Bennett Valley Road.**

We are residents of Bennett Valley and often drive on Bennett Valley Road. It is a dangerous and narrow stretch of road after leaving the Woodside area and starting up the ridge. There are no berms and often deep ditches on both sides of the road. It is definitely sub-standard all the way to Glen Ellen. Many people already commute on this road which it is a major conduit between Glen Ellen, Sonoma and Santa Rosa. None of us who live in Bennett Valley would drive across town to take Hwy 12 which is out of the way and a poor choice because it is highly congested. For many years now there has been a sign near Grange Road advertising the number of auto accidents during the last six months and warning drivers to slow down. Bennett Ridge was burned out and folks had a hard time evacuating and had one direction to go. One resident died. Putting more residential units at the SDC campus would only increase the dangers.

Has the traffic increase on Bennett Valley Road been measured with increased residents at the SDC campus?

Nancy E. Richardson

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Sherry Smith, LCSW  
PO Box 157  
Glen Ellen, CA 95442  
(707) 480-8191 [gadfly@sonic.net](mailto:gadfly@sonic.net)  
September 14, 2022

Brian Oh, Comprehensive Planning Manager  
[Brian.Oh@sonoma-county.org](mailto:Brian.Oh@sonoma-county.org)  
Permit Sonoma, County of Sonoma  
2550 Ventura Avenue  
Santa Rosa, CA 95403

Re: Draft Environmental Impact Report  
Sonoma Developmental Center, 15000 Arnold Drive  
Eldridge, CA APN: 054-090-001

Dear Mr. Oh,

I was a social worker at Sonoma State Hospital (SDC) from 1979-1981 when over 1,000 employees, including Psychiatric Technicians, worked at least 4 different shifts to provide services and care to over 1,000 residents with developmental disabilities.

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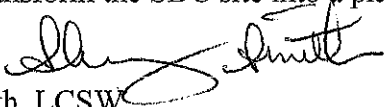
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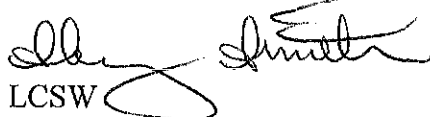
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In March 2021, the Glen Ellen Historical Society presented a proposal for an historic center at SDC. They nominated the Sonoma Developmental Center for listing on the National Register of Historic Places. The Adaptive Reuse Potential Evaluation March 2021 Report assessed SDC buildings listed in Appendix C of the Site Specific Plan. The state of Maryland transferred Crownsville State Hospital to Anne Arundel County for preservation. This is one example of how a state, county, nonprofits, and individuals are transforming a former state institution. (refer to National Trust for Historic Preservation. 8/4/22 article attached)

I hope the state, county, nonprofits, Regional Centers, disability rights groups, individuals with developmental disabilities and their families, and other interested organizations and individuals will help transform the SDC site into a place everyone might enjoy in the future.

Sincerely,   
Sherry Smith, LCSW

Attachments: Photos of Chestnut Avenue construction site, Evacuation Zone SON-6A5, Vision for Former Crownsville State Hospital Centers Nature and Healing.

cc: Sonoma County Planning Commissioners Carr, Ocana, McCaffery, Koenigshofer, Reed; Gerald McLaughlin, Project Manager, California Department of General Services, Asset Enhancement, Asset Management Branch, [Gerald.McLaughlin@dgs.ca.gov](mailto:Gerald.McLaughlin@dgs.ca.gov); Governor Gavin Newsom; Susan Gorin, District 1, David Rabbitt, District 2, Chris Coursey, District 3, James Gore, District 4, Lynda Hopkins, District 5, Sonoma County Board of Supervisors; Assembly member Cecilia Aguiar-Curry; State Senator Mike McGuire; North Bay Regional Center; Disability Rights California; DREDF; Doug Bosco, California Coastal Conservancy; Sonoma Land Trust; Sonoma Ecology Center; Sonoma City Council; Greg Sarris, Tribal Chairman of the Federated Indians of Graton Rancheria; Leonardo Lobato, Executive Director, La Luz; Sierra Club; Habitat for Humanity; Jack London State Park; Glen Ellen Historical Society; NASW; Justice in Aging

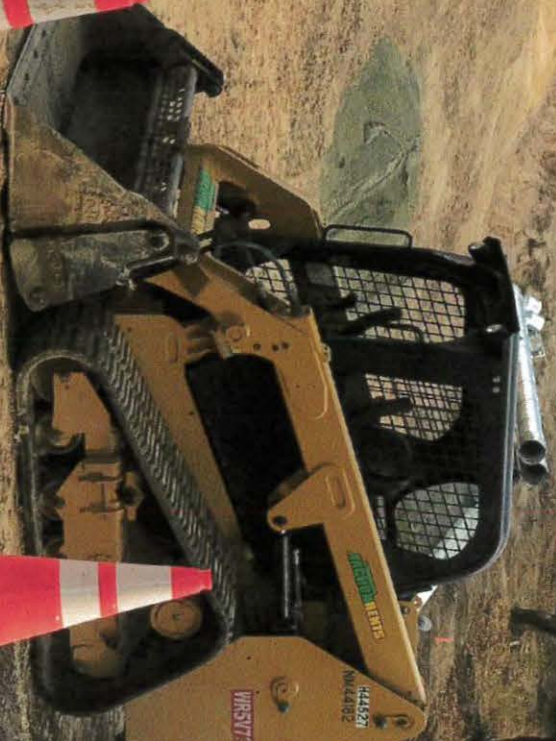












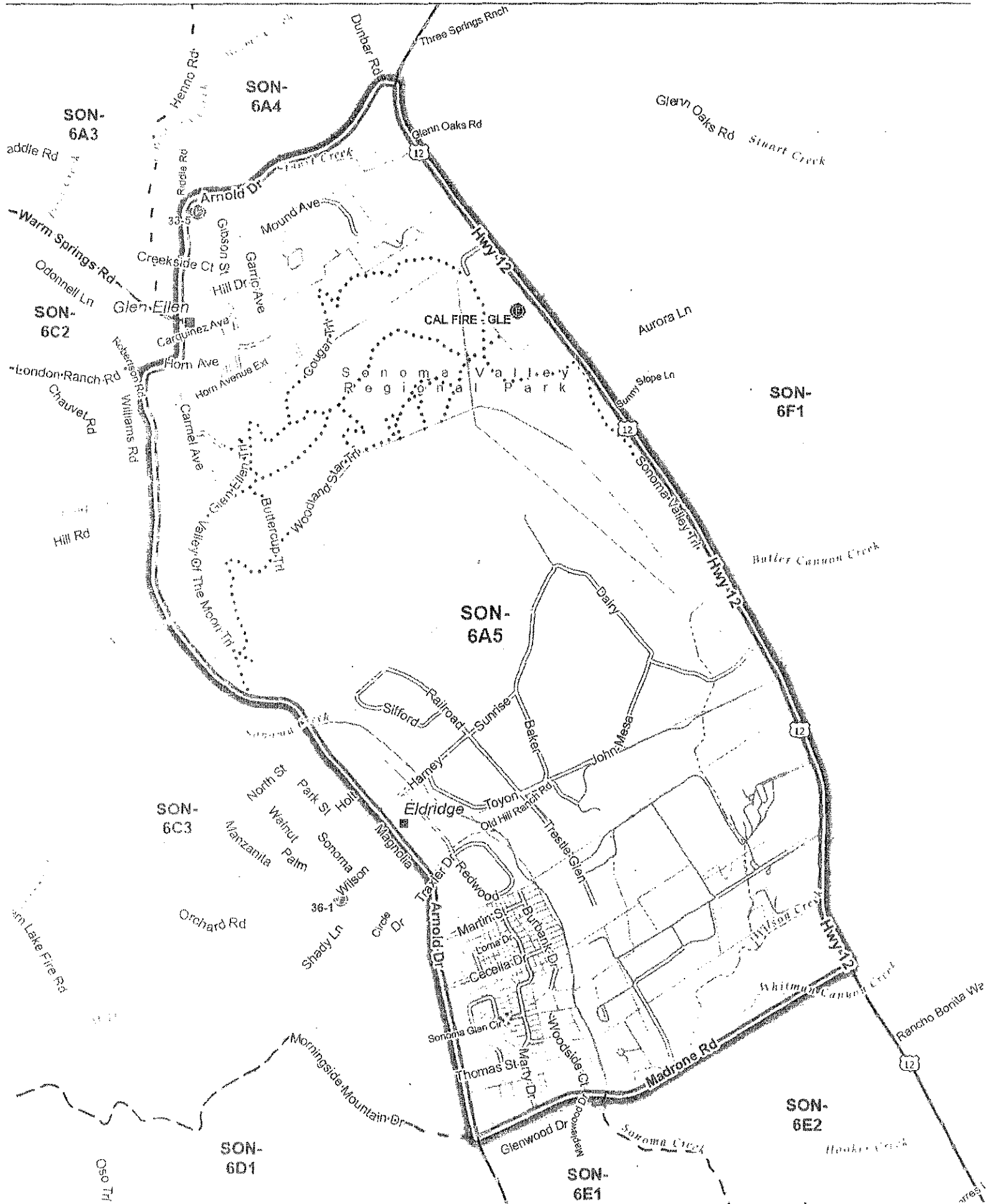
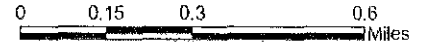


# EVALUATION ZONE: SON-0A3

North of Madrone Road • South and East of Arnold Drive  
West of Highway 12



Published: 4/7/2022 12:51 PM





August 4, 2022

# Vision for Former Crownsville State Hospital Centers Nature and Healing

More:

Building Stronger Communities

By:

Kirsten Hower

*This post first appeared on the Chesapeake Bay Foundation's website [Link: [http://www.cbf.org/blogs/save-the-bay/2022/08/the-future-of-crownsville-state-hospital-as-a-center-for-nature-and-healing.html?utm\\_source=referral&utm\\_medium=website&utm\\_campaign=crownsville](http://www.cbf.org/blogs/save-the-bay/2022/08/the-future-of-crownsville-state-hospital-as-a-center-for-nature-and-healing.html?utm_source=referral&utm_medium=website&utm_campaign=crownsville)].*

As you drive through Crownsville, Maryland, travelers will likely come across several decaying Georgian buildings with little context beyond a sign stating they are part of the Crownsville State Hospital. Vacant since 2004, the site figures in a dark part of Maryland's history [Link: [/uncertain-future-crownsville-state-hospital](#)]. Originally opened as a mental hospital for the Black community, Crownsville became, by many accounts, a house of horrors that experimented on and abused patients. But a brighter future awaits now that the state has handed over the 544-acre property to Anne Arundel County.

While the next steps will take time, ideas are already circulated as to how best to use the site while honoring its history and the memory of those buried there. I recently spoke with Joi Howard, founding member of enBloom [Link: <https://www.enbloom.life/>], about her proposal to transform part of the Crownsville site with nature and healing as the centerpiece.



EnBloom would transform the historic Crownsville State Hospital into a site of healing and community.

## **What drew you to the Crownsville site?**

I moved to the area in 2015 and happened to pass the Crownsville Hospital Site one day in 2018. I felt drawn to the property in a way that I can't explain. Around this time, I was going through a rough period mentally, emotionally, and spiritually. I started digging into the site's history, even discovering that I had a family member who ended up at Crownsville. The history of the hospital and its patients, and ultimately the abandonment of the site, resonated with me in a way I wasn't prepared for [Link: <https://www.enbloom.life/our-stories/paintopprogress>].

In my digging, I came across Janice Hayes-Williams who has been vocal about the



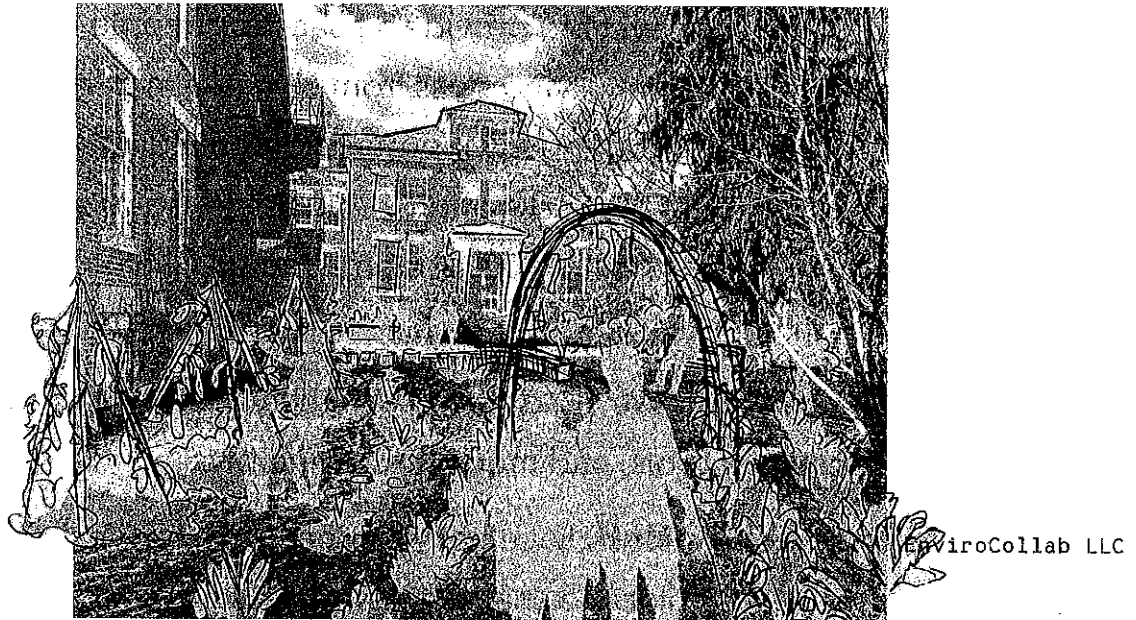
history of the site and hosts an annual “Say My Name” event [Link: <https://www.capitalgazette.com/photos/ac-cn-crownsville-hospital-say-my-name-vg-20220430-2gbp436d3zhxnezeviqqclaqi-photogallery.html>] that commemorates those who died at Crownsville. Eventually, I met with Williams and we discussed my interest in the property. She was immediately supportive of my interest in the site and invited me to attend her event.

I was, and continue to be, drawn to the site.

## **How did enBloom come to be?**

I had been exploring more holistic practices as well as how food and sustainability are tied to wellbeing. A few friends and I developed a vision for a sustainable, educational garden where people could learn about how nature, food, and wellness are intertwined. We wanted it to be an opportunity for the Black community to feel welcome in the world of agriculture and holistic healing.

The Crownsville State Hospital site provides a perfect opportunity for a project like this. The buildings were built by the patients, they grew their food on the property—it was designed to be a sustainable site. By situating enBloom at Crownsville, we would be reclaiming the narrative of the site. The history of it and the terrible things that happened there—experimentation, abuse, neglect [Link: <https://www.atlasobscura.com/places/crownsville-hospital-center>]—can never be erased, but a brighter future can literally grow out of that darkness.



A second conceptual rendering of enBloom at Crownsville State Hospital.

## What are the goals of the enBloom project at the Crownsville site?

The possibilities are endless, but our main goals are to create a space that focuses on five elements:

1. **Climate-Smart Agriculture.** We want visitors to enjoy fresh, farm to fork eateries that will be supplied by an onsite working farm and experience firsthand the vitality that regenerative agriculture contributes to a holistically healthy community.
2. **A Healing Green Space.** Nature heals, plain and simple. Therapy and other healing treatments are cost-prohibitive for many even with medical insurance. The former hospital grounds are an ideal location to offer affordable, holistic wellness interventions to connect people with their inner strength and learn healthy techniques to manage life's challenges.

3. **Outdoor Learning.** We want to provide a space for people of all ages to acquire practical, sustainable living skills from climate-smart growing practices to valuable job training in innovative, green industries. We will also create a space for experiential education (e.g. camps, homeschool enrichment, school field trips) where students can gain valuable skills for immediate use in their daily lives.
4. **Resource Generation.** We are defining a mechanism to distribute wealth building, educational tools, and modalities equitably.
5. **A Market and Service Hub.** Local, environmentally responsible businesses and artisans will have a place to share their wellness products and services with visitors seeking an alternative to more traditional capitalist options.

Stuart McAlpine/Flickr/CC by 2.0

Exterior of a brick building with fencing around it.

Vacant since 2004, Crownsville State Hospital is looking towards a brighter future in the hands of Anne Arundel County.

## How can other organizations get involved?

EnBloom is the vision of a small team and will require the work and knowledge of so many to make it a reality. Rob Schnabel, the Maryland restoration specialist at the Chesapeake Bay Foundation, has been the ultimate cheerleader, advising on the current political climate of the county and offering to assist on incorporating regenerative agriculture practices [Link: <https://www.cbf.org/blogs/save-the-bay/2021/08/what-is-regenerative-agriculture-and-why-is-it-re-emerging-now.html>?

utm\_source=referral&utm\_medium=website&utm\_campaign=crownsville] into our work.

Established organizations can help by providing letters of support and partnership as we apply for grant funding and help in getting the word out to the community

about our current and future initiatives through blogs/articles, such as this. These same organizations can welcome community-led groups like enBloom to spaces where decisions are being made around Black health and wellness to hear our voices and ideas.

Most importantly, we need land. In 1910, Black farmers owned more than 16 million acres of land; in 2017, that number is just 4.7 million acres—roughly 0.5 percent of all farmland in the country [Link: <https://www.reuters.com/world/us/us-black-farmers-lost-326-bln-worth-land-20th-century-study-2022-05-02/>]. Healing and wellness powered by climate smart agriculture is challenging enough but without land to grow food and engage the community in environmental connection and stewardship the task is bleak.

## **Crownsville State Hospital has been vacant for nearly 20 years. Why is it important that this is happening now?**

Current events are certainly part of it. Our country is reckoning with a pandemic, racial injustice, and complicated history. Being able to convert a site with a terrible history—one that is ripe for change—into something beautiful and healing is perfect given the current conversations in our country.

**Looking Forward:** Anne Arundel County Executive Steuart Pittman has expressed his excitement for the opportunities the site presents. “I want to see that place as a center for healing, a place where mental health, and, really, all health is promoted and encouraged,” Pittman told WYPR in an October 2021 [Link:

## **Donate Today to Help Save the Places Where Our History Happened.**

Support the National Trust for Historic Preservation today and you'll be providing the courage, comfort, and inspiration of historic places now, when we need it most.



<https://www.wypr.org/2021-10-07/crownsville-turning-a-grim-site-from-marylands-past-into-a-jewel> ] interview. It would be done “in a way that is fiscally responsible and tears down the buildings that should come down and that preserves some of the beautiful architecture that’s there, some of the historic buildings,” he said.

As the process to define the site’s future continues, we look forward to seeing projects like enBloom that address Crownsville’s history while creating a future that puts nature, healing, and important conversations at the forefront.

Kirsten Hower is a former member of the National Trust’s social media team. When she’s not helping save places, you’ll find her reading, wandering around art museums, or hiking along the Potomac River with her dog.

Sherry Smith, LCSW  
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(707) 480-8191 [gadfly@sonic.net](mailto:gadfly@sonic.net)  
September 14, 2022

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[Brian.Oh@sonoma-county.org](mailto:Brian.Oh@sonoma-county.org)  
Permit Sonoma, County of Sonoma  
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Re: Draft Environmental Impact Report  
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Eldridge, CA APN: 054-090-001

Dear Mr. Oh,

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The report recommends installing a new traffic light at Harney and Arnold in Eldridge, which might have reduced congestion during shift changes 40 years ago. Traffic lights are currently located at Arnold Drive and Highway 12 in Glen Ellen and a few miles down the road on Arnold Drive at Boyes Blvd in Boyes Hot Springs. A roundabout was installed at Aqua Caliente Road and Arnold Drive a few years ago.

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**Storm water and storm drain systems page 58:** My father was an engineer for the Water Resources Division of the United States Geological Survey. He measured gauges along rivers, streams, and creeks, and was knowledgeable about flooding. When my friend decided to purchase a house in Glen Ellen, he asked my father to give an opinion about the possibility of Sonoma Creek flooding in the future. My dad walked the property and explained where the creek had risen in the past. It was his professional opinion, as a retired engineer, that there wouldn't be a "100 year" storm flooding Sonoma Creek. My father was wrong.

In about 1997, Sonoma Creek flooded in Glen Ellen, then a catastrophic flood severely damaged my friend's home on New Year's Eve 2006/2007. He rebuilt. The *Sonoma Index-Tribune* followed the stories about the flooding. Supervisor Valerie Brown knew about this, as did the County of Sonoma Permit and Planning Department.

Any discussion about a possible "100-year storm" and Sonoma Creek not flooding is misguided because of Climate Change and past flooding in the region.

Storm drains are inadequate elsewhere in Sonoma Valley, including on Mountain Avenue. Homes have flooded and excess water pools on the street during heavy rainfall. Adding 1,000 homes, a hotel, and businesses will change both the surface and subsurface water flow in Eldridge. Infrastructure planning and construction needs to mitigate potential problems.

The USGS California Water Science Center and National Weather Service are perhaps the agencies most familiar with stream gauges along Sonoma Creek and the likelihood of flooding in the future.



**Historic Properties:** I oppose building a hotel on the site. Preserving historic properties at SDC could involve local labor and trade groups and nonprofits in providing Hands-On Preservation Experience (HOPE Crew) to young people interested in learning about preservation and historic trades. <https://www.preservationpriorities.org>

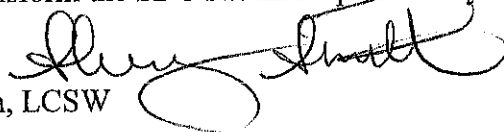
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Any new resident of Eldridge who doesn't have a vehicle would be at increased risk of injury or death during a disaster or evacuation. Many of the residents who died during the Tubbs and Nuns fires were elderly or disabled.

**Storm water and storm drain systems page 58:** My father was an engineer for the Water Resources Division of the United States Geological Survey. He measured gauges along rivers, streams, and creeks, and was knowledgeable about flooding. When my friend decided to purchase a house in Glen Ellen, he asked my father to give an opinion about the possibility of Sonoma Creek flooding in the future. My dad walked the property and explained where the creek had risen in the past. It was his professional opinion, as a retired engineer, that there wouldn't be a "100 year" storm flooding Sonoma Creek. My father was wrong.

In about 1997, Sonoma Creek flooded in Glen Ellen, then a catastrophic flood severely damaged my friend's home on New Year's Eve 2006/2007. He rebuilt. The *Sonoma Index-Tribune* followed the stories about the flooding. Supervisor Valerie Brown knew about this, as did the County of Sonoma Permit and Planning Department.

Any discussion about a possible "100-year storm" and Sonoma Creek not flooding is misguided because of Climate Change and past flooding in the region.

Storm drains are inadequate elsewhere in Sonoma Valley, including on Mountain Avenue. Homes have flooded and excess water pools on the street during heavy rainfall. Adding 1,000 homes, a hotel, and businesses will change both the surface and subsurface water flow in Eldridge. Infrastructure planning and construction needs to mitigate potential problems.

The USGS California Water Science Center and National Weather Service are perhaps the agencies most familiar with stream gauges along Sonoma Creek and the likelihood of flooding in the future.

**Historic Properties:** I oppose building a hotel on the site. Preserving historic properties at SDC could involve local labor and trade groups and nonprofits in providing Hands-On Preservation Experience (HOPE Crew) to young people interested in learning about preservation and historic trades. <https://www.preservationpriorities.org>

The Site Specific Plan suggests that the Historic Main Building might be part of a lobby within a new hotel. I doubt a developer would install a plaque on the Historic Main Building/the proposed hotel site explaining how the civil and legal rights of patients at SDC were violated for decades.

An example of a historic site transformed into a luxury hotel is the façade of the St. Louis Hotel, built about 1838. A plaque installed at the Omni Royal Orleans Hotel in the French Quarter of New Orleans mentions its historical significance. Black men, women, and children were auctioned on the block in the rotunda at the St. Louis Hotel. I doubt that few Omni Hotel guests today read the plaque or realize what really happened at the site during the 1800s or that newspapers and posters advertised sales of enslaved people every day, except Sunday. The New Orleans Slave Trade Marker and Tour App; <https://neworleanshistorical.org/items/show/926>

In March 2021, the Glen Ellen Historical Society presented a proposal for an historic center at SDC. They nominated the Sonoma Developmental Center for listing on the National Register of Historic Places. The Adaptive Reuse Potential Evaluation March 2021 Report assessed SDC buildings listed in Appendix C of the Site Specific Plan. The state of Maryland transferred Crownsville State Hospital to Anne Arundel County for preservation. This is one example of how a state, county, nonprofits, and individuals are transforming a former state institution. (refer to National Trust for Historic Preservation. 8/4/22 article attached)

I hope the state, county, nonprofits, Regional Centers, disability rights groups, individuals with developmental disabilities and their families, and other interested organizations and individuals will help transform the SDC site into a place everyone might enjoy in the future.

Sincerely,  
Sherry Smith, LCSW



Attachments: Photos of Chestnut Avenue construction site, Evacuation Zone SON-6A5, Vision for Former Crownsville State Hospital Centers Nature and Healing.

cc: Sonoma County Planning Commissioners Carr, Ocana, McCaffery, Koenigshofer, Reed; Gerald McLaughlin, Project Manager, California Department of General Services, Asset Enhancement, Asset Management Branch, [Gerald.McLaughlin@dgs.ca.gov](mailto:Gerald.McLaughlin@dgs.ca.gov); Governor Gavin Newsom; Susan Gorin, District 1, David Rabbitt, District 2, Chris Coursey, District 3, James Gore, District 4, Lynda Hopkins, District 5, Sonoma County Board of Supervisors; Assembly member Cecilia Aguiar-Curry; State Senator Mike McGuire; North Bay Regional Center; Disability Rights California; DREDF; Doug Bosco, California Coastal Conservancy; Sonoma Land Trust; Sonoma Ecology Center; Sonoma City Council; Greg Sarris, Tribal Chairman of the Federated Indians of Graton Rancheria; Leonardo Lobato, Executive Director, La Luz; Sierra Club; Habitat for Humanity; Jack London State Park; Glen Ellen Historical Society; NASW; Justice in Aging



**From:** [Arthur Dawson](#)  
**To:** [PlanningAgency](#)  
**Cc:** [Hannah Whitman](#)  
**Subject:** SDC Draft EIR Response letter; North Sonoma Valley Municipal Advisory Council  
**Date:** Wednesday, September 14, 2022 4:32:58 PM

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Dear Planning Commission,

In view of your meeting on the Sonoma Developmental Center Specific Plan draft EIR tomorrow, I would like to share a link to the comment letter being drafted by the North Sonoma Valley Municipal Advisory Council in response to this document. This is a draft and will be finalized at our next meeting on September 21:

<https://sonomacounty.ca.gov/Main%20County%20Site/Administrative%20Support%20%26%20Fiscal%20Services/BoS/BCCs/Documents/NSV%20Municipal%20Advisory%20Council/September%202022/NSV-MAC-DEIR-Comment-Letter-Draft4-09-12-22.pdf>

Given the timely nature of this letter we wanted to make sure you could review our draft. Once finalized I will submit our letter to Permit Sonoma and include the Planning Commission as a recipient.

Sincerely,

**Arthur Dawson, Chair**  
**North Sonoma Valley Municipal Advisory Council**  
(707) 509-9427; (707) 996-9967

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**From:** [Sharon Church](#)  
**To:** [Brian Oh](#); [PlanningAgency](#)  
**Cc:** [Susan Gorin](#); [Alice Horowitz](#)  
**Subject:** Comments on the SDC Specific Plan and DEIR  
**Date:** Wednesday, September 14, 2022 4:44:10 PM

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--[if !supportLists]-->• <!--[endif]-->**EVACUATIONS.** Can you certify and provide documentation that the traffic model referenced in the DEIR included the ***cumulative*** impacts of all development (including those not yet built) impacting Highway 12 from Santa Rosa to Sonoma and Arnold Drive, including special events?

Claims that adding up to 1,000 housing units (2,400 residents) with an estimated 2 vehicles per household plus 940 jobs in the commercial area (and special events) would not impact our ability to evacuate during the next emergency are irresponsible. The “models” used defy common sense, ignore the already burdened two lane roads (Highway 12 and Arnold Drive), paint a rosy picture of available public transportation and thus demand for vehicles and are clearly a transparent attempt to move past this life or death matter. The draft EIR clearly has not sufficiently considered the ***cumulative*** impact of development at the SDC, the Highway 12 corridor (from Santa Rosa to Sonoma), and Arnold Drive, including special events, on our ability to evacuate. A Highway 12 connector would only serve to send people toward the fire in a futile circle which could make evacuation even worse and removes an obstacle to growth in protected areas which would further exacerbate our ability to evacuate during a wildfire. ***Note that the Elnoka Senior Community project on Highway 12 in Santa Rosa was recently reduced by 60% (from 676 units to 272 units) to address concerns raised by the community and to address potential traffic impacts.***

“Shelter-in-place”, seems like a death warrant, given the extreme devastation caused by wildfires. That concept would certainly reduce vehicles exiting for your models and would also likely increase deaths. Why not address this matter honestly now?

--[if !supportLists]-->• <!--[endif]-->**CLIMATE CHANGE.** The Fire Hazard Severity Zone Map referenced in Figure 2.3-1 of the Specific Plan is undated—what is the date of the information you are relying upon?

Figure 2.3-1 of Specific Plan is inaccurate. It does not reflect the fire damage along Sonoma Creek to the nursery on Trestle Glen or the loss of a home and other structures along Burbank Drive in the 2017 Nuns Fire.

CalFire is updating the Fire Hazard Severity Zones Maps for the first time since 2007. The

new maps are to be released before the end of the year. Have these been taken into consideration? Climate change is here and affecting us now, with forecasts to get much worse. This must be addressed!

How can Risk Factor tell me that properties near Sonoma Creek have a MAJOR risk of flooding which is in direct conflict to the Statement in Section 2.3 of the draft Specific Plan and the 100-year flood plain in Figure 5.3-1 titled “Maximum Heights” that “all 100 year and 500 year floods can be accommodated within the banks of Sonoma Creek without additional flooding”. What recent analysis has been performed on flood risk or are you using old data? Last October, per Sonoma Water, an Atmospheric River brought 9” of rain on Sonoma Mountain, causing waste water collections systems to overflow in several locations, including all along Sonoma Creek and notably, at Burbank Drive in Glen Ellen. Is that public health hazard being addressed? The fact that so much water fell at one time is another piece of data pointing to climate change and the potential for flooding along Sonoma Creek.

--[if !supportLists]-->• <!--[endif]-->**PARKING.** How will you ensure that our Glen Ellen neighborhood on the South side of the SDC will not have to support parking for those seeking free parking not available at the campus?

Parking policy 3-27 in the draft Specific Plan says there will be NO free parking within the campus. Further, the plan is to provide less parking than would typically be required, to encourage biking and walking. What a disaster for the neighborhood to the South! People will park and store vehicles along Martin, Lorna, Cecelia, Burbank, Sonoma Glen Circle and Marty due to lack of parking spaces and to avoid charges. In addition, the concept of shared parking between residential and commercial is not realistic in practice. This will clearly burden an existing neighborhood to allow for increased development and profit for the developer and pretend there are fewer vehicles. Unacceptable!

--[if !supportLists]-->• <!--[endif]-->**GLEN ELLEN, NOT ELDRIDGE.** PLEASE explain why the Glen Ellen neighborhood South of the SDC continues to be disrespected by calling us Eldridge? Are you unilaterally deciding to change our name from Glen Ellen to Eldridge so you don't have to acknowledge that you are in fact dividing our Glen Ellen community? Reference Table 4.5-1, Summary of Impacts for Alternatives, Page 575, Item 3.9-1 (sic) which

is under 3.10 Land Use and Planning.

We are Glen Ellen. Our property tax bills say Glen Ellen, as do our driver's licenses and passports. Eldridge was the SDC campus only and they had their own post office. The SDC and post office are closed. As such, the SDC property is the donut hole of Glen Ellen and should be considered a part of Glen Ellen, not a new town to divide our Glen Ellen community. The development should be in scale that fits the character of the existing community and open space. The proposed scale is simply too much and would be appropriate for San Jose, not Glen Ellen.

I participated in the outreach over the years, believing the County was listening to the Community and that the County would embrace a reasonable plan that the Community could support. Instead, you are pushing for the maximum and driving an incompatible plan. Despite pushing an overbuilt plan, you are failing to provide the amount of affordable housing we would support. Clearly there is another agenda which has nothing to do with our Community and affordable housing. I ask that you scale back and restore our faith in our County government.

Thank you.

## **Sharon Church**

Proud 30-year resident of Glen Ellen

15241 Marty Drive

Glen Ellen, CA 95442

707-287-5299

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**From:** [Joe](#)  
**To:** [PlanningAgency](#); [Brian Oh](#)  
**Cc:** [BOS](#); [engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](mailto:senator.dodd@senate.ca.gov); [senator.mcquiere@senate.ca.gov](mailto:senator.mcquiere@senate.ca.gov)  
**Subject:** Public Comment on SDC Specific Plan and DEIR – Scale it Back!!  
**Date:** Wednesday, September 14, 2022 4:25:30 PM

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**Subject Line:** Public Comment on SDC Specific Plan and DEIR – Scale it Back!!

Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. Instead, please direct Permit Sonoma to:

1. **Scale Back Size of Development** to 450 or fewer homes and require that most of them be affordable to the majority of people who live in Sonoma Valley. Eliminate the hotel, retail and commercial space that is already provided in Glen Ellen.
2. **Support Historic Preservation Alternative** as it is the most environmentally sound.
3. **Protect Open Space** by providing enforceable timeline, boundaries and actions for permanently preserving open space and keeping it in public hands.
  - a. In the DEIR, analyze the impacts of and add enforceable measures to reduce impacts of proposed new uses in the open space including agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities (see Table 4-3 of Specific Plan).
  - b. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
4. **Wildfire:** Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives. Develop and add enforceable Conditions of Approval for Wildfire to reduce and prevent risk as there currently are none.
5. **Climate Crisis:** Given the County's Climate Crisis Resolution and commitments to reduce climate changing emissions (GHGS) from driving and other sources, revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as building fewer homes, reusing and demolishing fewer buildings, providing transit.
6. **DEIR is Inadequate** While the so-called self-mitigated Specific Plan contains many general policies, goals and conditions of approval to address environmental impacts, the DEIR falls short of CEQA requirements. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied as evidenced by few actual requirements and many vague words such as "promote" or "encourage" or "if feasible." The DEIR needs to be revised and the Conditions of Approval strengthened and



moved into a legally enforceable Mitigation and Monitoring Program.

Please make the right decision and get us off this collision course with over development and loss of wildlife habitat!!!!

**Joe LeBlanc**

[leblancjoe2@gmail.com](mailto:leblancjoe2@gmail.com)

**205 Ragle Ave South**

**Sebastopol, CA 95472**

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**From:** [Terry Harrison](#)  
**To:** [PlanningAgency](#); [BOS](#)  
**Subject:** Sonoma Developmental Center  
**Date:** Wednesday, September 14, 2022 4:39:39 PM

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We keep encouraging more people to come into Sonoma County without any long range plans concerning transit, roads, water, energy and food (as we drive up the price of farmland).

300 new residences is plenty for SDC. Recondition present ones if possible.

Regenerative grazing and wild animals and open space are compatible and exist in many parts of the world including the US. The sheep, cows or goats are within enclosed fields rotating from one to another, leaving plenty of open space where grasses and other feed have been consumed without destroying the plants which are recovering and getting ready for the next rotation. The upper part of SDC should be zoned for this.

Terry and Carolyn Harrison

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