

From: [Teri Shore](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [Susan Gorin](#); [BOS](#); [Greg Carr](#); [engage@sdcspecificplan.com](#)
Subject: Attachment Table 4-3 Re: SDC Specific Plan and DEIR Public Comment Planning Commission 9.15.22
Date: Thursday, September 8, 2022 6:16:54 PM
Attachments: [Permitted UsesPages from SDC Public Review Draft Specific PlanLR.pdf](#)

Please add this to my comments, forgot to attach.

On Thu, Sep 8, 2022 at 6:09 PM Teri Shore <terishore@gmail.com> wrote:

Dear Planning Commissioners and Brian Oh,

Please distribute these public comments on the SDC Specific Plan and DEIR to all Planning Commissioners for the 9.15.2022 public hearing AND include them in the public administrative record for public comment on both the Specific Plan and the DEIR. It contains both.

Comments are pasted below and attached.

Thank you for your consideration.

Teri Shore
515 Hopkins St.
Sonoma, CA 95476

Teri Shore
Environmentalist

515 Hopkins St.
Sonoma, CA 95476

Sent VIA EMAIL

September 9, 2022

To: Sonoma County Planning Commission, Permit Sonoma and Board of Supervisors

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

Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. I will be submitting more detailed comments by the deadline. At this time, I urge you to please direct Permit Sonoma to:

1. **REVISE DEIR TO MEET CEQA:** Revise and strengthen the Draft Environmental Impact Report to meet the requirements of California Environmental Quality Act by analyzing and preventing or reducing all negative environmental impacts by scaling

back project, avoiding impacts and providing legally enforceable mitigation measures in a Mitigation and Monitoring Program. As drafted the DEIR is not adequate to meet CEQA. It has zero mitigations for any environmental impacts, including two that are “significant and unavoidable:” historic preservation and VMTs.

- 2. REVISE SELF-MITIGATED SPECIFIC PLAN:** Revise and strengthen the Specific Plan Conditions of Approval to be legally enforceable requirements and recast as mitigation measures in the DEIR, as above. As drafted, the “self-mitigating” Specific Plan does not mitigate significant negative environmental impacts. The Conditions of Approval only apply to half of the environmental areas required for study under CEQA. And there are none for critical issues such as wildfire. Most of the C of As for biological resources apply only to construction, not operations or maintenance, and are based mostly on existing state law or Best Management Practices, which are not in statute.

All Specific Plan Goals and Policies need to be specific, strong and enforceable. Otherwise, they are practically meaningless. Please remove vague words such as “promote” or “encourage” or “if feasible.” Replace with “require”, “shall” or “must.” These strengthened Goals and Policies then need to be made Conditions of Approval and recast as Mitigations in the DEIR in a Mitigation and Monitoring Program.

If CofAs, policies or goals can’t be made specific, then remove them as they do not mitigate environmental impacts. Having a Self-Mitigated Plan is not part of CEQA and does not necessarily meet CEQA; and certainly not in the case of the SDC Specific Plan and DEIR.

- 3. SCALE BACK DEVELOPMENT AND CHANGE PREFERRED ALTERNATIVE:** **Scale back the 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. Change the Preferred Alternative to the Historic Preservation Alternative, which is the most environmentally sound.
- 4. DEVELOP A NEW ALTERNATIVE – Climate and Conservation:** All the alternatives are variations on a major mixed-use development that maximizes urban style use. In response to the public and elected officials, and to avoid and reduce significant environmental impacts per CEQA, the County of Sonoma must provide an alternative focused on keeping the entire property in public lands through donation or transfer to state or county parks, a non-profit, trust or other entity. This alternative would prioritize the permanent protection of the open space and the historic main campus to serve conservation, wildlife movement, natural resource protection, and climate benefits with no housing, no commercial development and no hotel or retail. The Marin Headlands and Presidio Trust are good examples of how public land was repurposed without overdevelopment.
- 5. PROVIDE SPECIFICS AND ADDRESS IMPACTS TO OPEN SPACE –** The Specific Plan and the DEIR mentions open space protection in general terms in several places, in various ways, but fails to provide a clear definition of “preserved open space,” or to give the exact boundaries (other than in one general overlay map), or give details on how or when it will be protected, transferred or managed. Please

direct Permit Sonoma to provide those details.

Preserved Open Space and Agriculture: The Specific Plan and DEIR make sweeping statements about “historic agriculture” but do not explain the extent of past agriculture in terms of types or amount of acreage. The impacts of allowing agriculture on open space that is currently not in agriculture must be analyzed and the environmental impacts avoided or mitigated in the DEIR.

Unacceptable New Uses in Preserved Open Space: Table 4-3 (attached) of the Land Use Section of the Specific Plan outlines many new uses in “preserved open space” including wine tasting rooms, timber conversion, wholesale nurseries, sports facilities and several others that have not been analyzed under CEQA or addressed at all in the goals, policies or C of As of the Specific Plan. These “permitted” new uses in Preserved Open space must be analyzed, avoided or prevented and mitigated as required under CEQA and in my view NOT ALLOWED OR PERMITTED in Preserved Open Space.

SHOULD NOT ALLOW AS PROPOSED THESE USES IN PRESERVED OPEN SPACE TABLE 4-2 SPECIFIC PLAN

Agricultural Crop Production and Cultivation
Agricultural Processing
Animal Keeping: Beekeeping
Animal Keeping: Confined Farm Animals
Animals
Animal Keeping: Farm Animals
Animal Keeping: Pet Fancier -
Farm Retail Sales
Farm Stands
Indoor Crop Cultivation
Mushroom Farming
Nursery, Wholesale
Timberland Conversions, Minor
Nursery, Wholesale
Tasting Rooms

SHOULD NOT ALLOW AS PROPOSED IN SPECIFIC PLAN WITH CONDITIONAL USE PERMIT

Recreation and Sports Facilities: Recreation Facility, Outdoor
Recreation and Sports Facilities: Rural Sports and Recreation

6. **SONOMA VALLEY WILDLIFE CORRIDOR AND RIPARIAN SETBACKS:**
Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.

7. **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.

8. **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. If the county is really serious about the climate emergency, it would not propose building a new town in the middle of open space and a high wildfire area. It should maintain its commitment to city-centered growth and open space protection.
9. **STATE STATUTE:** The County of Sonoma needs to revisit its interpretation of the state statute in respect to the Specific Plan and EIR as follows:

Housing: State Statute says the following:

It is the intent of the Legislature that priority be given to affordable housing in the disposition of the Sonoma Developmental Center state real property.

*The agreement shall require that housing be a priority in the planning process and that any housing proposal determined to be **appropriate for the property** shall include affordable housing. It is further the intent of the state that priority be given to projects that include housing that is **deed restricted to provide housing for individuals with developmental disabilities.***

Nowhere does the statute call for maximum urbanization of the SDC nor to create a new town, hotel, commercial or retail. The scale of housing and development is not appropriate for the rural property surrounded by ag land. Therefore, the County of Sonoma's Specific Plan and DEIR are not consistent with and misinterpret the state statute. Both need to be revised to align with state statute and public comment by scaling back the development, eliminating market rate housing and other development, and providing deed-restricted affordable housing to individuals with developmental disabilities.

Open Space: State Statute says the following:

The Department of General Services recognizes the exceptional open-space, natural resources, and wildlife habitat characteristics of the Sonoma Developmental Center.

*It is the intent of the Legislature that the lands outside the core developed campus and its related infrastructure be preserved as **public parkland and open space.***

*The disposition of the property or property interests shall provide for **the permanent protection of the open space and natural resources as a public resource to the greatest extent feasible and shall be upon terms and conditions the director deems to be in the best interests of the state.***

The state statute makes clear that the permanent protection of open space lands is for public parkland and natural resources as a public resource. The County's Specific Plan and DEIR are inconsistent with

state statute as they propose introducing agriculture, sports fields and other uses without consider the negative environmental impacts of doing so.

However, the state statute also conditions protection of the open space “to the extent feasible” and to “be in the best interests of the state.” That is why the county Specific Plan and DEIR must provide details on how, when and with what entities that the open space will be protected. If not, then the state legislature will need to act to ensure the protection of the open space and that none of it is sold off for development or other inappropriate use.

Economic Feasibility: State Statute says the following:

The planning process shall facilitate the disposition of the property by amending the general plan of the county and any appropriate zoning ordinances, completing any environmental review, and addressing the economic feasibility of future development.

The County of Sonoma’s entire Specific Plan and DEIR is tied to this one mention of economic feasibility to the exclusion of just about everything else. The state did not mandate that the project be economically feasible or financially feasible but to address it. Economic feasibility changes constantly with market conditions. Specific Plans and General Plans are written for long periods of time when economic feasibility is certain to change. The County is misinterpreting state statute to maximize urban development at the SDC site. The proposal could also be economically feasible if, for example, the state paid to clean up the site, then transferred it to state parks or another public conservation entity. A bond measure or initiative could be written. However, the County looked at only one option or alternative: making profits for a private developer. This lacks vision and is inconsistent with state statute and CEQA

The Planning Commission must direct Permit Sonoma to revise the Specific Plan and DEIR to be consistent with state statute and public comment and provide new alternatives that don’t focus entirely on urbanization and developer profits.

Well, that’s about it from me for now. Thanks for your consideration.

Sincerely yours,

A handwritten signature in cursive script that reads "Teri Shore".

Teri Shore

terishore@gmail.com

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From: [Linda Hale](#)
To: [PlanningAgency](#)
Subject: FW: Draft EIR Comments: SDC Specific Plan
Date: Sunday, August 21, 2022 1:34:37 PM

From: [Linda Hale](#)
Sent: Saturday, August 20, 2022 5:27 PM
To: Gerald.McLaughlin@dgs.ca.gov
Subject: FW: Draft EIR Comments: SDC Specific Plan

From: [Linda Hale](#)
Sent: Saturday, August 20, 2022 12:08 PM
To: Brian.Oh@sonoma-county.org
Subject: Draft EIR Comments: SDC Specific Plan

The following letter was sent to Governor Gavin Newsom and the DGS via Gerald McLaughlin. This letter was also sent to the Sonoma County Board of Supervisors, Senators Mike McGuire and Bill Dodd, and the Sonoma Index Tribune.

This letter is written in support of the Sonoma Land Trust's request to engage in meaningful planning for the SDC by aligning the County Specific Plan with the State's request for development proposals. Stating that no specific plan has been selected and that no mitigations are available for water, traffic, and wildlife is not a viable EIR.

To the Office of Governor Gavin Newsom:

The Office of the California DGS has rescinded its earlier premature offering of the Sonoma Developmental Center to a developer prior to the completion of an EIR. The 894 acre property has been held as a public trust to benefit both the disabled and the community. It also serves as the major water recharge shed for Sonoma Valley and is directly in the path of Sonoma Creek which crosses Sonoma Valley and exits through Petaluma to the San Francisco Bay. The community recognizes the need for affordable housing, but the proposed 1,000+ home development with only 250 affordable units, a high end hotel, and visitor services as businesses on site ignores the public input and will be an environmental disaster for Sonoma Valley.

The EIR process was fast tracked when the DGS released the property for sale. This is against the law since no project has been designated by the Board of Supervisors nor had the EIR process even been started. The EIR findings were released with the following legal concerns:

1. Where is the Response to Public Comments in the Draft EIR?
2. Where in the DEIR are the actual Specific Plan mitigations listed? (Executive Summary refers to Appendix A, but mitigations are not included)

3. The county is using a "Self-Mitigating Plan" approach. What is the rationale for doing this? How will implementation of mitigations work, since they won't appear in the EIR itself but only as a "condition" of moving forward with development?

4. How, when, and through what mechanism will the open space lands at SDC be permanently protected and kept in public hands?

Also Permit Sonoma states: "Public participation identified three key areas of concern among the 16 areas studied: open space and wildlife, water, and wildfire risk and evacuation routes. The draft Environmental Impact Report finds that the proposed specific plan would not create significant and unavoidable impacts in these areas." The problem is that the impacts are significant and unavoidable.

There is really no proposed specific plan. The traffic and water studies were done when the SDC was permanently closed by the state, so no impacts were shown due to low traffic and water use in the area. Permit Sonoma has done the EIR only allowing public comments via zoom and the US Mail with no responses to critical concerns.

Sonoma Valley is congested. It has two main roads and one of them had to evacuate 1,000s of Oakmont residents by bus during the last fire since there are no exit routes that can handle evacuation traffic. Three other major developments are now permitted between the city of Sonoma and Santa Rosa and in process along the Highway 12 corridor. Traffic in Sonoma Valley is already impacted, especially in the Boyes Springs area and the city of Sonoma with only one road out. People say that they no longer come to Sonoma because of the traffic. And Sonoma County has been sued for not meeting its own emission standards.

Sonoma Valley is already in a state mandated Groundwater Study with well restrictions in place for commercial growth and homeowners' wells being monitored throughout the valley. We have asked for a reduction to 450 homes and no hotel. Please intervene before this goes any further. We need the State of California to come forward to protect what makes Sonoma Valley the destination it is and to protect local resources. This development will add a new city to the valley floor, deplete our vanishing water sources, and create urban sprawl. Please consider resources and action to protect a California resource.

Thank you for being the Governor of California!

Linda Hale

1500 Warm Springs Road

Glen Ellen, CA 95442

Sent from [Mail](#) for Windows



Virus-free www.avg.com

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Table 4-3: Permitted Uses

| <i>Land Use</i> | <i>Low/Medium Density Residential</i> | <i>Medium/Flex Density Residential</i> | <i>Flex Zone</i> | <i>Institutional</i> | <i>Utilities</i> | <i>Hotel Overlay</i> | <i>Parks and Recreation</i> | <i>Buffer Open Space</i> | <i>Preserved Open Space</i> |
|---|---------------------------------------|--|------------------|----------------------|------------------|----------------------|-----------------------------|--------------------------|-----------------------------|
| <i>Agriculture and Resource-Based Land Use</i> | | | | | | | | | |
| Agricultural Crop Production and Cultivation | P | P | P | - | - | P | - | P | P |
| Agricultural Processing | C | C | P | - | - | C | - | P | P |
| Animal Keeping: Beekeeping | P | P | P | - | - | C | - | P | P |
| Animal Keeping: Confined Farm Animals | C | - | P | - | - | - | - | - | P |
| Animal Keeping: Farm Animals | P | P | P | - | - | - | - | P | P |
| Animal Keeping: Pet Fancier | P | P | P | - | - | - | - | - | - |
| Farm Retail Sales | C | C | P | - | - | - | - | - | P |
| Farm Stands | C | C | P | - | - | - | - | - | P |
| Indoor Crop Cultivation | C | C | P | - | - | - | - | - | P |
| Mushroom Farming | C | C | P | - | - | - | - | - | P |
| Nursery, Wholesale | - | - | P | - | - | - | - | - | P |
| Timberland Conversions, Minor | - | - | P | - | - | - | - | - | P |
| Nursery, Wholesale | - | - | P | - | - | - | - | - | P |
| Tasting Rooms | - | - | P | - | - | P | - | - | P |
| <i>Industrial, Manufacturing, Processing and Storage</i> | | | | | | | | | |
| Animal Product Processing | - | - | C | - | - | - | - | - | - |
| Fertilizer Plants | - | - | C | - | - | - | - | - | - |
| Laboratories | - | - | C | - | - | - | - | - | - |
| Laundry Plants | - | - | C | - | - | - | - | - | - |
| Manufacturing/Processing, Light | - | - | C | - | - | - | - | - | - |
| Manufacturing/Processing, Medium | - | - | C | - | - | - | - | - | - |
| P Permitted - Not Permitted C Conditional Use Permit | | | | | | | | | |

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|--|---------------------------------------|--|------------------|----------------------|------------------|----------------------|-----------------------------|--------------------------|-----------------------------|
| Recreation, Education and Public Assembly Land Use Category | | | | | | | | | |
| Camp, Organized | - | - | - | - | - | - | C | - | C |
| Campgrounds | - | - | - | - | - | - | C | - | C |
| Civic Institution | P | P | P | P | - | P | P | - | - |
| Community Meeting Facilities | P | P | P | P | - | P | P | - | - |
| Country Club | - | - | P | - | - | - | - | - | - |
| Educational Institutions: Colleges and Universities | - | - | - | P | - | - | - | - | - |
| Educational Institutions: Elementary and Secondary Schools | P | P | P | P | - | P | P | - | - |
| Educational Institutions: Specialized Education and Training | - | - | P | P | - | - | C | - | - |
| Periodic Special Events | - | - | P | P | - | P | P | - | - |
| Recreation and Sports Facilities: Health/Fitness Facility | - | - | P | P | - | P | C | - | - |
| Recreation and Sports Facilities: Recreation Facility, Indoor | - | - | P | P | - | P | C | - | - |
| Recreation and Sports Facilities: Recreation Facility, Outdoor | P | P | P | P | - | P | P | C | C |
| Recreation and Sports Facilities: Rural Sports and Recreation | P | P | P | P | - | P | P | C | C |
| Sports and Entertainment Assembly | - | - | P | P | - | P | - | - | - |
| Studios for Art Crafts, Dance, Music | - | - | P | P | - | P | - | - | - |
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|---|---------------------------------------|--|------------------|----------------------|------------------|----------------------|-----------------------------|--------------------------|-----------------------------|
| <i>Services Land Use Category</i> | | | | | | | | | |
| Banks and Financial Institutions | - | - | P | - | - | - | - | - | - |
| Business Support Services | - | - | P | - | - | - | - | - | - |
| Commercial Kennels | - | - | C | - | - | - | - | - | - |
| Day Care Center | - | - | C | - | - | - | - | - | - |
| Cemeteries | - | - | C | - | - | - | - | - | - |
| Commercial Cannabis Uses | - | - | C | - | - | - | - | - | - |
| Commerical Horse Facilities | - | - | C | - | - | - | - | - | - |
| Homeless Shelter, Emergency | - | - | C | - | - | - | - | - | - |
| Homeless Shelter, Small Scale | - | - | C | - | - | - | - | - | - |
| Horse Boarding | - | - | C | - | - | - | - | - | - |
| Lodging: Bed and Breakfast (B&B) | - | - | P | - | - | P | - | - | - |
| Lodging: Hosted Rental | - | - | P | - | - | P | - | - | - |
| Lodging: Hotel, Motel, and Resort | - | - | P | - | - | P | - | - | - |
| Maintenance and Repair Service, Non-Vehicular | - | - | C | - | - | - | - | - | - |
| Medical Services: Hospitals | - | - | C | P | - | - | - | - | - |
| Medical Services: Offices and Out-patient Care | - | - | C | P | - | - | - | - | - |
| Personal Services | - | - | P | - | - | - | - | - | - |
| Professional Office | - | - | P | P | - | - | - | - | - |
| Veterinary Clinic | - | - | P | P | - | - | - | - | - |
| <i>Transportation, Energy, Public Facilities Land Use Category</i> | | | | | | | | | |
| Dispatch Facility | - | - | P | P | P | - | - | - | - |
| Low Temperature Geothermal Resource Development | - | - | - | - | P | - | - | - | P |
| Parking Facilities | P | P | P | P | P | P | P | P | P |
| Public Safety Facilities | P | P | P | P | P | - | P | - | - |
| Public Utility Facilities | - | - | - | - | P | - | P | P | P |
| Renewable Energy Facilities | P | P | P | P | P | P | P | - | - |
| Telecommunications Facilities | - | - | - | - | P | - | - | - | - |
| P Permitted - Not Permitted C Conditional Use Permit | | | | | | | | | |

4.2 Affordable Housing

Affordable housing is an integral part of the land use program for SDC. Mandated by State legislation and Sonoma County inclusionary housing requirements, and stressed as a priority by community members in project workshops, deed-restricted affordable housing will make up a significant portion of development at SDC.

In order to meet the pressing needs for affordable housing and provide a range of options in Sonoma Valley, affordable housing at the site must take on a variety of different forms. Inclusionary housing, which is mandated as a percentage of the total market-rate housing, is intended for residents that meet certain income limits. Sonoma County defines these categories, including Extremely Low Income (ELI), Very Low Income (VLI), Low Income (LI), and Moderate Income (MI) as percentages of Area Median Income (AMI), the median annual income in Sonoma County, which adjusts by the number of persons in a household and is updated each year. Inclusionary housing for households in the ELI, VLI, and LI categories is subsidized by the sale or rental of market rate housing units, and under Sonoma County Code (SCC) Sec. 26-89-04, developers are required to build 20 percent income-restricted units for ownership projects and 15 percent for rental projects, with at least half of those units reserved as LI. Developers and home builders also have an option under the county code to pay in lieu fees to the County fund for affordable housing instead of building the income-re-

stricted units at the project site. When developers build units for the ELI and VLI categories, they become eligible under SCC Sec. 26-89-050 for county density bonuses that increase the total numbers of market rate units they are eligible to build. Sponsors may also qualify for State density bonuses for supplying additional affordable housing. Density bonuses may change overall percentages of income-restricted affordable housing in a project but would not reduce the total number of income-restricted units.

Under this specific plan, project sponsors at the site will be required to provide inclusionary required income-restricted units at 25 percent for both rental and ownership projects, and will be required to build all income-restricted units within the SDC campus. All other density bonuses and inclusionary requirements included in the County municipal code will apply, and developers are encouraged to build housing at the ELI and VLI levels to satisfy the County's pressing need for affordable housing at this time. At least one additional income-restricted affordable housing project of around 100 units will be developed beyond the inclusionary housing; these units are anticipated to result from a County-led partnership with local affordable housing developers and the site developer.

By building smaller units on smaller lots, designing for efficiency and simple but high-quality finishes, and building a mix of multifamily, attached single family, and detached single family homes with various numbers of bedrooms, the Planning Area will be able to accommodate a diverse range of individuals

From: [Teri Shore](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [Susan Gorin](#); [BOS](#); [Greg Carr](#); engage@sdcspecificplan.com
Subject: SDC Specific Plan and DEIR Public Comment Planning Commission 9.15.22
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Teri Shore
515 Hopkins St.
Sonoma, CA 95476

Teri Shore Environmental

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Sent VIA EMAIL

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Unacceptable New Uses in Preserved Open Space: Table 4-3 (attached) of the Land Use Section of the Specific Plan outlines many new uses in “preserved open space” including wine tasting rooms, timber conversion, wholesale nurseries, sports facilities and several others that have not been analyzed under CEQA or addressed at all in the goals, policies or C of As of the Specific Plan. These “permitted” new uses in Preserved Open space must be analyzed, avoided or prevented and mitigated as required under CEQA and in my view NOT ALLOWED OR PERMITTED in Preserved Open Space.

SHOULD NOT ALLOW AS PROPOSED THESE USES IN PRESERVED OPEN SPACE TABLE 4-2 SPECIFIC PLAN

Agricultural Crop Production and Cultivation
Agricultural Processing
Animal Keeping: Beekeeping
Animal Keeping: Confined Farm Animals
Animal Keeping: Farm Animals
Animal Keeping: Pet Fancier -
Farm Retail Sales
Farm Stands
Indoor Crop Cultivation
Mushroom Farming
Nursery, Wholesale
Timberland Conversions, Minor
Nursery, Wholesale
Tasting Rooms

SHOULD NOT ALLOW AS PROPOSED IN SPECIFIC PLAN WITH CONDITIONAL USE PERMIT

Recreation and Sports Facilities: Recreation Facility, Outdoor
Recreation and Sports Facilities: Rural Sports and Recreation

6. SONOMA VALLEY WILDLIFE CORRIDOR AND RIPARIAN SETBACKS:

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

- 7. 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.

8. **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. If the county is really serious about the climate emergency, it would not propose building a new town in the middle of open space and a high wildfire area. It should maintain its commitment to city-centered growth and open space protection.
9. **STATE STATUTE:** The County of Sonoma needs to revisit its interpretation of the state statute in respect to the Specific Plan and EIR as follows:

Housing: State Statute says the following:

It is the intent of the Legislature that priority be given to affordable housing in the disposition of the Sonoma Developmental Center state real property.

*The agreement shall require that housing be a priority in the planning process and that any housing proposal determined to be **appropriate for the property** shall include affordable housing.*

*It is further the intent of the state that priority be given to projects that include housing that is **deed restricted to provide housing for individuals with developmental disabilities.***

Nowhere does the statute call for maximum urbanization of the SDC nor to create a new town, hotel, commercial or retail. The scale of housing and development is not appropriate for the rural property surrounded by ag land. Therefore, the County of Sonoma’s Specific Plan and DEIR are not consistent with and misinterpret the state statute. Both need to be revised to align with state statute and public comment by scaling back the development, eliminating market rate housing and other development, and providing deed-restricted affordable housing to individuals with developmental disabilities.

Open Space: State Statute says the following:

The Department of General Services recognizes the exceptional open-space, natural resources, and wildlife habitat characteristics of the Sonoma Developmental Center.

*It is the intent of the Legislature that the lands outside the core developed campus and its related infrastructure be preserved as **public parkland and open space.***

*The disposition of the property or property interests shall provide for **the permanent protection of the open space and natural resources as a public resource to the greatest extent feasible** and shall be upon terms and conditions the director deems to **be in the best interests of the state.***

The state statute makes clear that the permanent protection of open space lands is for public parkland and natural resources as a public resource. The County’s Specific Plan and DEIR are inconsistent with state statute as they propose introducing agriculture, sports fields and other uses without consider the negative environmental impacts of doing so.

However, the state statute also conditions protection of the open space “to the extent feasible” and to “be in the best interests of the state.” That is why the county Specific Plan and DEIR must provide details on how, when and with what entities that the open space will be protected. If not, then the state legislature will need to act to ensure the protection of the open

space and that none of it is sold off for development or other inappropriate use.

Economic Feasibility: State Statute says the following:

The planning process shall facilitate the disposition of the property by amending the general plan of the county and any appropriate zoning ordinances, completing any environmental review, and addressing the economic feasibility of future development.

The County of Sonoma's entire Specific Plan and DEIR is tied to this one mention of economic feasibility to the exclusion of just about everything else. The state did not mandate that the project be economically feasible or financially feasible but to address it. Economic feasibility changes constantly with market conditions. Specific Plans and General Plans are written for long periods of time when economic feasibility is certain to change. The County is misinterpreting state statute to maximize urban development at the SDC site. The proposal could also be economically feasible if, for example, the state paid to clean up the site, then transferred it to state parks or another public conservation entity. A bond measure or initiative could be written. However, the County looked at only one option or alternative: making profits for a private developer. This lacks vision and is inconsistent with state statute and CEQA

The Planning Commission must direct Permit Sonoma to revise the Specific Plan and DEIR to be consistent with state statute and public comment and provide new alternatives that don't focus entirely on urbanization and developer profits.

Well, that's about it from me for now. Thanks for your consideration.

Sincerely yours,

A handwritten signature in cursive script that reads "Teri Shore".

Teri Shore
terishore@gmail.com

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Teri Shore Environmentalist

515 Hopkins St.
Sonoma, CA 95476

Sent VIA EMAIL



September 9, 2022

To: Sonoma County Planning Commission, Permit Sonoma and Board of Supervisors

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

Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma. I will be submitting more detailed comments by the deadline. At this time, I urge you to please direct Permit Sonoma to:

1. **REVISE DEIR TO MEET CEQA:** Revise and strengthen the Draft Environmental Impact Report to meet the requirements of California Environmental Quality Act by analyzing and preventing or reducing all negative environmental impacts by scaling back project, avoiding impacts and providing legally enforceable mitigation measures in a Mitigation and Monitoring Program. As drafted the DEIR is not adequate to meet CEQA. It has zero mitigations for any environmental impacts, including two that are “significant and unavoidable:” historic preservation and VMTs.
2. **REVISE SELF-MITIGATED SPECIFIC PLAN:** Revise and strengthen the Specific Plan Conditions of Approval to be legally enforceable requirements and recast as mitigation measures in the DEIR, as above. As drafted, the “self-mitigating” Specific Plan does not mitigate significant negative environmental impacts. The Conditions of Approval only apply to half of the environmental areas required for study under CEQA. And there are none for critical issues such as wildfire. Most of the C of As for biological resources apply only to construction, not operations or maintenance, and are based mostly on existing state law or Best Management Practices, which are not in statute.

All Specific Plan Goals and Policies need to be specific, strong and enforceable. Otherwise, they are practically meaningless. Please remove vague words such as “promote” or “encourage” or “if feasible.” Replace with “require”, “shall” or “must.” These strengthened Goals and Policies then need to be made Conditions of Approval and recast as Mitigations in the DEIR in a Mitigation and Monitoring Program.

If CofAs, policies or goals can't be made specific, then remove them as they do not mitigate environmental impacts. Having a Self-Mitigated Plan is not part of CEQA and does not necessarily meet CEQA; and certainly not in the case of the SDC Specific Plan and DEIR.

3. **SCALE BACK DEVELOPMENT AND CHANGE PREFERRED ALTERNATIVE: Scale back the 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. Change the Preferred Alternative to the Historic Preservation Alternative, which is the most environmentally sound.
4. **DEVELOP A NEW ALTERNATIVE – Climate and Conservation:** All the alternatives are variations on a major mixed-use development that maximizes urban style use. In response to the public and elected officials, and to avoid and reduce significant environmental impacts per CEQA, the County of Sonoma must provide an alternative focused on keeping the entire property in public lands through donation or transfer to state or county parks, a non-profit, trust or other entity. This alternative would prioritize the permanent protection of the open space and the historic main campus to serve conservation, wildlife movement, natural resource protection, and climate benefits with no housing, no commercial development and no hotel or retail. The Marin Headlands and Presidio Trust are good examples of how public land was repurposed without overdevelopment.
5. **PROVIDE SPECIFICS AND ADDRESS IMPACTS TO OPEN SPACE –** The Specific Plan and the DEIR mentions open space protection in general terms in several places, in various ways, but fails to provide a clear definition of “preserved open space,” or to give the exact boundaries (other than in one general overlay map), or give details on how or when it will be protected, transferred or managed. Please direct Permit Sonoma to provide those details.

Preserved Open Space and Agriculture: The Specific Plan and DEIR make sweeping statements about “historic agriculture” but do not explain the extend of past agriculture in terms of types or amount of acreage. The impacts of allowing agriculture on open space that is currently not in agriculture must be analyzed and the environmental impacts avoided or mitigated in the DEIR.

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8. **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. If the county is really serious about the climate emergency, it would not propose building a new town in the middle of open space and a high wildfire area. It should maintain its commitment to city-centered growth and open space protection.
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The Planning Commission must direct Permit Sonoma to revise the Specific Plan and DEIR to be consistent with state statute and public comment and provide new alternatives that don't focus entirely on urbanization and developer profits.

Well, that's about it from me for now. Thanks for your consideration.

Sincerely yours,

A handwritten signature in cursive script that reads "Teri Shore".

Teri Shore
terishore@gmail.com

From: [Anna Narbutovskih](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [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
Date: Saturday, September 10, 2022 1:30:35 PM

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.
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narbutovskih@comcast.net
707.869.9062

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From: [Patrick Rafferty](#)
To: [PlanningAgency](#)
Subject: Public Comment on SDC Specific Plan and DEIR- Scale it Back!
Date: Saturday, September 10, 2022 12:50:27 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:

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Respectfully,

Patrick Rafferty
Bennett Valley, Santa Rosa.

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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 11:32:34 AM

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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