

**From:** PlanningAgency  
**Subject:** RE: DEIR for Sonoma Developmental Center  
**Date:** Tuesday, October 25, 2022 1:18:49 PM

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**From:** [craigspencerharrison@gmail.com](mailto:craigspencerharrison@gmail.com) <[craigspencerharrison@gmail.com](mailto:craigspencerharrison@gmail.com)>  
**Sent:** Monday, October 24, 2022 2:44 PM  
**To:** Greg Carr <[Greg.Carr@sonoma-county.org](mailto:Greg.Carr@sonoma-county.org)>; Larry Reed <[Larry.Reed@sonoma-county.org](mailto:Larry.Reed@sonoma-county.org)>; Jacquelynne Ocana <[Jacquelynne.Ocana@sonoma-county.org](mailto:Jacquelynne.Ocana@sonoma-county.org)>; Kevin Deas <[Kevin.Deas@sonoma-county.org](mailto:Kevin.Deas@sonoma-county.org)>; Eric Koenigshofer <[Eric.Koenigshofer@sonoma-county.org](mailto:Eric.Koenigshofer@sonoma-county.org)>  
**Cc:** Tennis Wick <[Tennis.Wick@sonoma-county.org](mailto:Tennis.Wick@sonoma-county.org)>; Brian Oh <[Brian.Oh@sonoma-county.org](mailto:Brian.Oh@sonoma-county.org)>  
**Subject:** DEIR for Sonoma Developmental Center



October 24, 2022

Commissioners Greg Carr, Larry Reed, Jacquelynne Ocaña, Kevin Deas, and Eric Koenigshofer

Dear Commissioners:

The proposed specific plan inherently fails to mitigate any environmental impacts. In Bennett Valley, the County arbitrarily refuses to implement the Bennett Valley Area Plan, despite the requirement in Policy LU-1a of the General Plan whereby the more restrictive policies in a specific or area plan apply if there is a conflict with the General Plan. The Bennett Valley Area Plan forbids commercial development in Bennett Valley (Land Use Policy 2), yet the County supports and encourages commercial

cannabis development and operations there.

The area plan also requires that all new structures, including agricultural appurtenances, undergo design review to protect our viewsheds, but the County allows huge ugly hoop houses for cannabis to be erected without design review because they are taken down during winter. Thus, according to the PRMD and County Counsel, the viewsheds of Bennett Valley residents are protected only for six months of any year. This violates the Bennett Valley Area Plan and insults the intelligence of anyone who is not a county employee.

For these reasons, any mitigations in the proposed Specific Plan for the Sonoma Developmental Center fail to meet the requirements of CEQA. Mr. Brian Oh has assured me that PRMD will enforce all provisions as written. I believe that Mr. Oh is sincere, but is naïve about how County Counsel operates. County Counsel is a law unto itself and retains the authority to arbitrarily and capriciously rewrite any specific plan or area plan. County Counsel can and will order PRMD to change such requirements on a whim and dare the community to hire lawyers at great expense to sue the County if anyone disagrees.

We raise this in part to preserve this issue for litigation.

Sincerely,

Craig S. Harrison  
For Bennett Valley Residents for Safe Development

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**From:** PlanningAgency  
**Subject:** RE: SDC Specific Plan  
**Date:** Wednesday, October 26, 2022 4:43:47 PM

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**From:** SDC Campus Project <[sdccampusproject@gmail.com](mailto:sdccampusproject@gmail.com)>

**Sent:** Wednesday, October 26, 2022 1:19 PM

**To:** Greg Carr <[Greg.Carr@sonoma-county.org](mailto:Greg.Carr@sonoma-county.org)>; Jacquelynne Ocana <[Jacquelynne.Ocana@sonoma-county.org](mailto:Jacquelynne.Ocana@sonoma-county.org)>; Eric Koenigshofer <[Eric.Koenigshofer@sonoma-county.org](mailto:Eric.Koenigshofer@sonoma-county.org)>; [lawrence.reed@sonoma-county.org](mailto:lawrence.reed@sonoma-county.org) <[lawrence.reed@sonoma-county.org](mailto:lawrence.reed@sonoma-county.org)>; Shaun McCaffery <[Shaun.McCaffery@sonoma-county.org](mailto:Shaun.McCaffery@sonoma-county.org)>

**Subject:** SDC Specific Plan

To: Sonoma County Planning Commissioners  
From: SDC Campus Project  
Re: SDC Specific Plan

October 25,2022

Dear Commissioners Carr, Ocana, Koenigshofer, Reed, and McCaffery,

We ask that you consider our proposal for re-use of some of the residential buildings on the east side of the campus in your study of the SDC Specific Plan.

In 2020 the *SDC Campus Project* proposed to county staff to adaptively reuse five of the existing residential buildings on the east side of the SDC campus as low-income affordable

housing as soon as possible while the property is being redeveloped. Minimum wage earners, many of our essential workers, seniors, and some disabled people do not qualify

for current affordable housing projects. Their minimum wage earnings and fixed incomes are too low. The long waiting list for affordable housing is another block for secure homes.

This project supplies that housing.

Our proposal calls for five of the former residential buildings on the southeast corner of the

campus, on Railroad, to be adaptively reused for this purpose: Bemis, Judah, Cohen, Malone, and Corcoran. These H-Plan buildings will be converted into co-housing. In each building, fourteen large, separate apartments with private half-baths are located in three wings, with an ADA shower room down the hall, which is shared by three apartments.

The

remaining wing includes a laundry room, kitchen, dining hall, and rooms for libraries, reading

rooms, exercise,yoga, music studios, etc.

Rents will be scaled, based on income, and these units will be managed by a non-profit agency. Funding for building conversion comes from state and federal agencies.

Lawns surrounding the buildings will become organic food and pollinator gardens. Sustainable agriculture is an important element, with organic food crops to be grown in the southeast corner of the east open space, which is historic SDC agriculture land. This incorporates jobs creation, community food security, carbon sequestration and greenhouse gas emission reduction among its goals.

Another benefit of our proposal is preservation of the distinctive architecture of the buildings and respect for the historic legacy of SDC. These are where people lived and worked.

To assess the adaptive reuse of these buildings, refer to page 10 of the [Adaptive Reuse Potential Evaluation](#), compiled by the WRT report and consultants Dyett & Bhatia. Quote: "Residential wards are the primary buildings that supported the mission of Sonoma Developmental Center as a facility caring for individuals with developmental disabilities." "Potential Uses Include: conventional market-rate and age-restricted multifamily housing; workforce housing (smaller rental units); senior housing (independent living, assisted living, memory care); affordable housing; and community amenities."

WRT Report 2018: "Building Condition Overview: With few exceptions, the buildings at the Sonoma Developmental Center have been well-maintained and are in good or fair, serviceable condition....In general, buildings are clean and well cared for, both inside and out."

The SDC Specific Plan preferred by the county directs that all of the cement and tile roof buildings on the east side of Arnold Drive be demolished, and new buildings to be constructed. This is a waste of public resources and a massive contribution to greenhouse gas emissions. Adaptive reuse of buildings is being done successfully all over the world. The *Adaptive Reuse Potential Evaluation* shown above verifies the good condition and reuse potential of these buildings.

**Historic**

### **Preservation Alternative**

Our economy relies on our essential workers and they are priced out of the ability to live anywhere near where they work. Our hospital, restaurants, hotels, child care centers, farmers, wineries, and retailers are all losing employees because of the high cost of housing. Lower income housing is essential to our economy, and to the quality of life of every person.

Sincerely,  
*SDC Campus Project*  
Bonnie Brown, Chair  
Jerry Bernhaut  
Ann Wray,  
Norm Wray,  
Tom Conlon

Project details:

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

<https://sdccampusproject.wordpress.com>

**Subject:** RE: Sonoma Development Center EIR and proposal  
**Date:** Tuesday, October 25, 2022 1:21:13 PM

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**From:** Deborah Eppstein <[deppstein@gmail.com](mailto:deppstein@gmail.com)>  
**Sent:** Monday, October 24, 2022 9:36 AM  
**To:** Jacquelynne Ocana <[Jacquelynne.Ocana@sonoma-county.org](mailto:Jacquelynne.Ocana@sonoma-county.org)>  
**Subject:** Sonoma Development Center EIR and proposal

Dear Jacquelynne,

I and many others in the community, including many environmental organizations, have major concerns on the proposal from Permit Sonoma and the EIR prepared to support it. One overriding concern is fire safety and evacuation safety. Highway 12 already gets very clogged during major evacuations in this area. Even with the improvements made by the county on evacuation zones, this area still all evacuates onto Highway 12. In the 2020 Glass Fire it became a virtual parking lot with traffic only inching along. Adding 1000 new homes (thus ~2000 new vehicles), a hotel (with additional vehicles from guests) and over 900 jobs (thus over 900 more vehicles) will only make a bad situation worse, jeopardizing safety of existing residents, new residents and employees and fire fighters. Also, it is well established that people are the cause of ~95% of wildfires. Adding over 3000 new people to this area in Glen Ellen will increase the risk of new ignitions.

The evacuation analysis in the DEIR, which was not modified in the FEIR despite numerous concerns expressed in many letters from the public, is woefully inadequate and inaccurate. The FEIR incredibly states that adding over 3000 new people (and many more as hotel guests) that will almost quadruple the current population of Glen Ellen plus with over 3000 more vehicles, will only increase evacuation times by ~1 min! That is illogical and frankly defies science. In current situations with fast moving, wind driven fires, advance evacuation warning is minimal and does not allow for staged evacuations. We had one hour advance warning in the Glass Fire before fire was on both sides of Los Alamos Rd. The public has repeatedly asked for the evacuation study by Kittleson & Associates that the EIR cites, yet it has not yet been provided. We have now been told it will be provided this week- a month after the official public comment period on the DEIR was closed. Why has Permit Sonoma been so reluctant to provide this report, and why was it not originally included as an appendix in the DEIR? But even without seeing this report, we know that this analysis is flawed. What is reported for baseline evacuation times flies in the face of what occurred in real-life evacuations in recent years, as recently as the 2020 Glass Fire. Saying that adding over 3000 vehicles to a 2-lane road (highway 12) that is already clogged with thousands of other evacuating residents will only increase evacuation times by 1 minute is ludicrous.

I realize the county is under pressure to accept this EIR, but I don't see how it can be honestly accepted as adequate. The EIR is fatally flawed and should be rejected in current form. There were no changes made to this report based on the numerous concerns raised by many in the public on

wildfire safety and evacuation; why were these very important comments completely ignored? This has been rushed through without proper review and certainly, with only 3 weeks between close of public comment and release of the FEIR, no time for real consideration of the many in depth comments.

Please vote to modify the EIR to support a much smaller build-out, focused primarily on providing affordable housing with no hotel and only added commercial development as needed to support the new residents. For example, such a proposal was proposed by the Glen Ellen Historical Society. Adding 1000 new homes, a luxury hotel and over 900 jobs as per the Permit Sonoma proposal simply does not belong in such a fire-prone rural setting and the EIR falls far short in providing mitigations for this level of development and wildfire/evacuation risk. People need to be able to evacuate onto larger thoroughfares, such as Highway 101.

Thank you for your consideration of this critical issue.

With best regards,

Debby

Deborah Eppstein, PhD

801-556-5004

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

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While responding to the SDC Campus Project proposal for five existing residential buildings at SDC to be adaptively reused for low-income co-housing, the EIR must compare how these housing units compare to a typical local affordable housing project. They are Northern Star (Judah), Bemis, Corcoran, Cohen and Malone.

A typical affordable apartment building density is about 24 units per acre, such as Celestina Garden Apartments in Sonoma Valley. An acre encompasses 43,450 sq. ft. These five SDC buildings supply as much or more units per acre. Each building is approximately 19,000 sq. ft. By doubling that to accommodate parking and landscaping, the total is 38,000 sq. ft., less than an acre. Each of these buildings supply 23 units of housing in less than an acre.

### SDC Existing Residential Buildings – H Design

There are five residential buildings along Railroad and Harney that the SDC Campus Project proposes to adaptively reuse for low-income co-housing. These five can supply 23 units of rental apartments each, for a total of 115 units.

Each building consist of three residential wings around the main core and one wing with a kitchen and large dining room. Fourteen of the rooms have private half bathrooms with a shared shower down the hall. The other smaller rooms have a shared half bathroom in their wing and shared shower.

Each wing has a large family room and there are four activity rooms in one wing for study, yoga, music, or library, etc., laundry room and several storage rooms.

Below are the sizes of rooms:

14 apartments w/private half bathrooms, shared shower – 286 sq. ft. each

9 rooms w/shared half bathroom and shower – 120-360 sq.ft. each

3 family rooms -360-600 sq. ft.

5 activity rooms – 126-153 sq. ft.

dining room – 1218 sq. ft.

A typical building plan is shown on the next page.

sdccampusproject@gmail.com

C-II-37

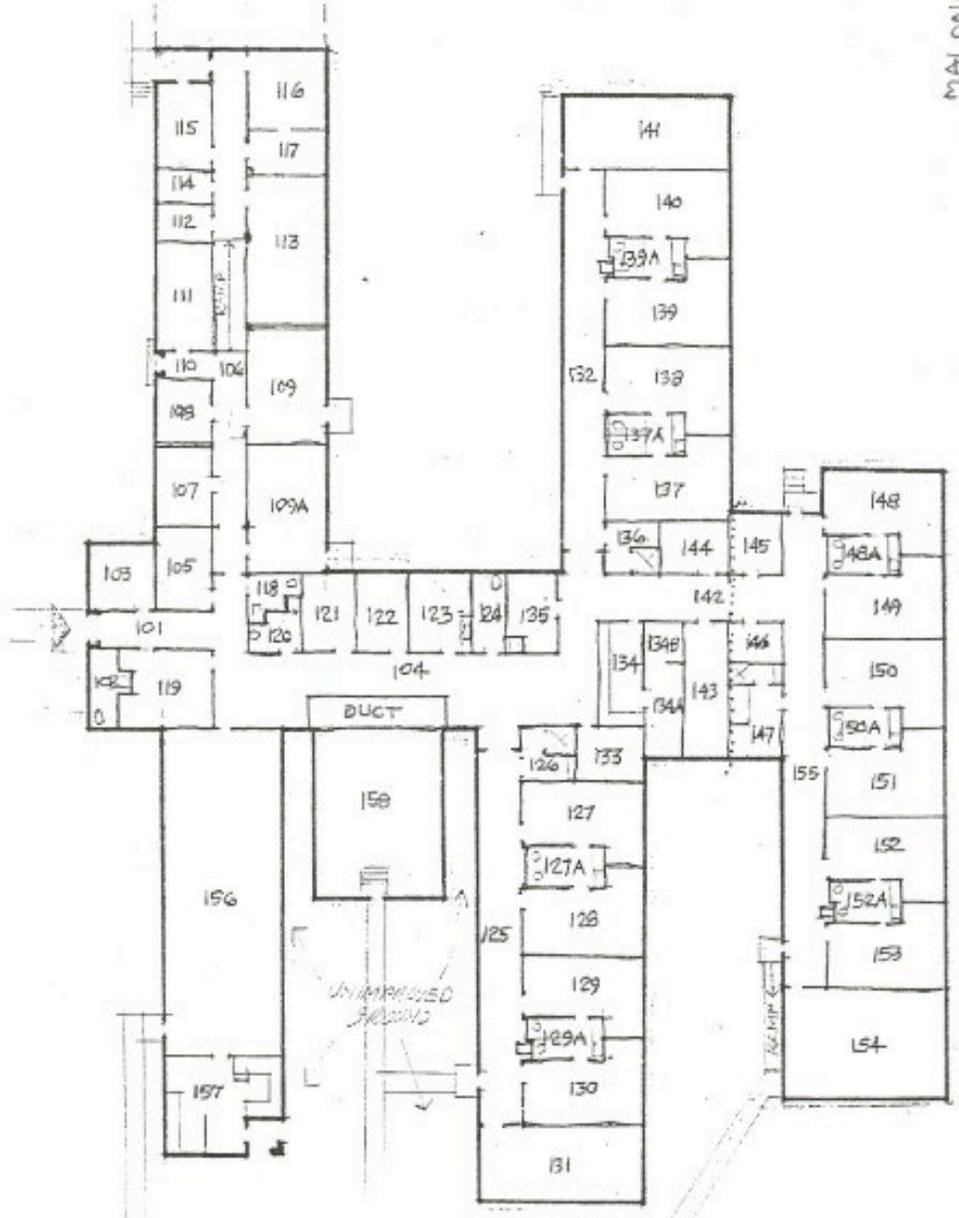
MALONE

Sonoma Developmental Center

SCALE: 1/8"=30'	APPROVED BY
DATE: 10/28/80	DRAWN BY: <i>BVG</i>
	REVISED: 3/87 <i>BVG</i>
	REV. 105 <i>BVG</i>

Floor Plan

-COHEN-



**From:** Will Shonbrun  
**To:** PlanningAgency; Brian Oh; BOS; Susan Gorin  
**Subject:** Why Specific Plan should be way scaled down. From professional land use planner and PAT member, Vicki Hill.  
**Date:** Wednesday, October 26, 2022 10:15:49 AM

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Kenwood Press News



## HOME NEWS

# Letters

### To the Editor, SDC Plan: Scale it down!

I am a professional environmental land use planner and a member of the Sonoma Developmental Center's (SDC) Planning Advisory Team.

The community was recently asked, again, by Sonoma County to identify what it wants at the SDC. Hundreds of Sonoma Valley residents, advisory commissions, and organizations have provided input in countless meetings over the past four years on the uses and densities that would fit the site. Although this was promised to be a "community-driven process," the proposed Specific Plan reflects very little of this input.

From a land-use perspective, at 1,000+ homes and over 400,000 square feet of commercial space, the recommended plan is entirely inconsistent with the semi-rural site location. The shoddy Environmental Impact Report (EIR) generated thousands of substantive comments, including such glaring errors as underestimating traffic by 50 to 100 percent. While apparently driven by the mantra of "economic feasibility," no economic feasibility study was conducted, and the state of California, which owns the property, remains silent as to what that means.

The community has not said "no development" or even "low develop-ment." The Valley community, including the Board of Supervisors' own Municipal Advisory Councils (MACs), has clearly said we want housing, including as much affordable housing as possible, on a scale that is consistent with realistic site constraints — including safe wildfire evacuation and wildlife corridor preservation. This translates to roughly 450 housing units, which is the amount contained in the EIR's "environmentally superior alternative," which was disregarded by county planners. This level of new housing would still make it perhaps the largest single development in the unincorporated county in our generation.

So, again, county staff and officials, consistent with sound land-use planning and the overwhelming majority of public comments (including comments from the North Sonoma Valley MAC, Springs MAC, and City of Sonoma), the community needs: – A substantially scaled-down plan, similar to the EIR's Historic Preservation Alternative (450 homes and downsized commercial area); – Maximum affordable housing possible within the reduced scope alternative; – Balanced development that includes historic resource protection and community benefits, as called for in the project objectives and that maintains the semi-rural character of Sonoma Valley; – A smaller hotel (or no hotel), to minimize vehicle trips and other impacts.

– True open space protection, with use restrictions to protect the critical wildlife corridor; – Limited commercial uses. Creating a new city/ job center in this semi-rural area, far from transit corridors and municipal infrastructure, is poor planning and inconsistent with the county's own city-centered growth and rural lands policies.

Stronger enforceable plan policies that will minimize impacts should include: – Prohibit "Big Box" developments; – Prohibit exclusionary fencing within the campus, to allow wildlife movement; – Establish mandatory project phasing so that housing development is prioritized over hotel/commercial development; – Establish performance standards to guide project phasing and monitor impacts; – Maximize building reuse to minimize demolition impacts; – Change policies from "should" to "shall" to make them mandatory; – Require hotel, resort, and conference center uses to obtain a conditional use permit and additional California Environmental Quality Act (CEQA) review.

Stop trying to justify the plan's size by unfairly comparing it to the previous SDC institutional use. SDC

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residents did not drive cars, there were no commercial uses generating vehicle trips, and employees were spread over three shifts.

The county's Planning Commission is being rushed to approve a poor plan, with the unfounded threat of the state "taking over" the property. We all need to urge local decision-makers to take the time necessary to modify the proposed SDC plan, rather than leave a legacy of oversized development, increased carbon emissions and fire risk, and destruction of one of the last remaining local and regional wildlife corridors.

**Vicki Hill, MPA, Glen Ellen Environmental land use planner**