

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.

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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
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Timberland Conversions, Minor
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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,



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	-	-	-	-
LowTemperature 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	-	-	-	-
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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](#)
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Recreation and Sports Facilities: Rural Sports and Recreation

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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:

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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.

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*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.

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 WILDLIRE 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.
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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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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

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.
Guerneville, CA 95446
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.

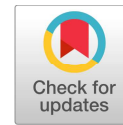
Apparently, all of the meetings and requests for public input by the State and County have been a sham. Not one of our governmental representatives

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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Toward Simulating Dire Wildfire Scenarios

Thomas J. Cova¹; Dapeng Li²; Laura K. Siebeneck³;
and Frank A. Drews⁴

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.

¹Professor, Center for Natural and Technological Hazards, Dept. of Geography, Univ. of Utah, Salt Lake City, UT 84108 (corresponding author). Email: cova@geog.utah.edu

²Assistant Professor, Dept. of Geography, South Dakota State Univ., Brookings, SD 57007.

³Associate Professor, Emergency Management and Disaster Science, Univ. of North Texas, Denton, TX 76203.

⁴Professor, Dept. of Psychology, Univ. of Utah, Salt Lake City, UT 84108.

Note. This manuscript was submitted on September 8, 2020; approved on January 20, 2021; published online on April 21, 2021. Discussion period open until September 21, 2021; separate discussions must be submitted for individual papers. This technical note is part of the *Natural Hazards Review*, © ASCE, ISSN 1527-6988.

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			
Routine (<= 0.0)	Dire (> 0.0)	Very Dire (> 0.5)	Extremely Dire (> 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.

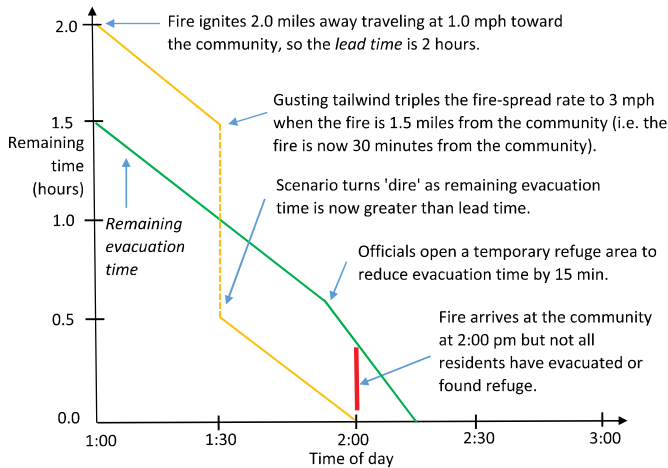


Fig. 2. (Color) Anatomy of a dire scenario due to a sudden increase in fire spread rate.

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	Red
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.



SAFRR

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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 Committee¹. *“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 Covaⁱⁱ 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 timesⁱⁱ).

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) or phone (801-556-5004).

Sincerely,



Deborah A Eppstein, PhD

Director

State Alliance for Firesafe Road Regulations (SAFRR)

ⁱ 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

ⁱⁱ 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



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

From: [Angus Parker](#)
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: Tuesday, September 13, 2022 2:58:46 PM

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

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

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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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,

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; [Susan Gorin](#); [district4](#); [district3](#); [David Rabbitt](#); [Lynda Hopkins](#); 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

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 at 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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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

existing buildings, demolishing fewer buildings, and 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,

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; [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; 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

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

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From: [Christine Montalto](#)
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 – 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

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](#); [Jacquelynne 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](#)

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) 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
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; [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 9:12:32 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.
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,

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:

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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Respectfully Submitted,

Edward Dillon

Ned Dillon

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From: [Erick Theilen](#)
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 – Scale the project back
Date: Wednesday, September 14, 2022 9:39:31 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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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,

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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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; [BOS](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; senator.mcquire@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](#)



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.

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

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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).
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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.
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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

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From: [John Donnelly](#)
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: 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:

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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

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From: [John Ferrando](#)
To: [Brian Oh](#); [PlanningAgency](#)
Cc: [BOS](#); engage@sdcspecificplan.com; [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; 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

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.
 - 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. "

Thank you,

John Ferrando

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.
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Signed,

Kelly Padula

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From: [Ken Niehoff](#)
To: [PlanningAgency](#)
Cc: [BOS](#); engage@sdcspecificplan.com; [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; senator.mcquire@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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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; [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; senator.mcquire@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.
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Sincerely,

Laura Chenel
3748 Grove Street
Sonoma, CA 95476

(707) 483-0976
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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From: [Patty](#)
To: [PlanningAgency](#)
Cc: [BOS](#); engage@sdcspecificplan.com; [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); 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 8:43:05 AM

Dear Sonoma County Planning Commissioners,

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Signed,

Patricia O'Connor

Sent from my iPhone

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From: [Patty](#)
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
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:

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Signed,

Patricia O'Connor

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

Sent from my iPhone

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Vicki A. Hill

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) 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
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [BOS](#); engage@sdcspecificplan.com; [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; 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

EXTERNAL

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:

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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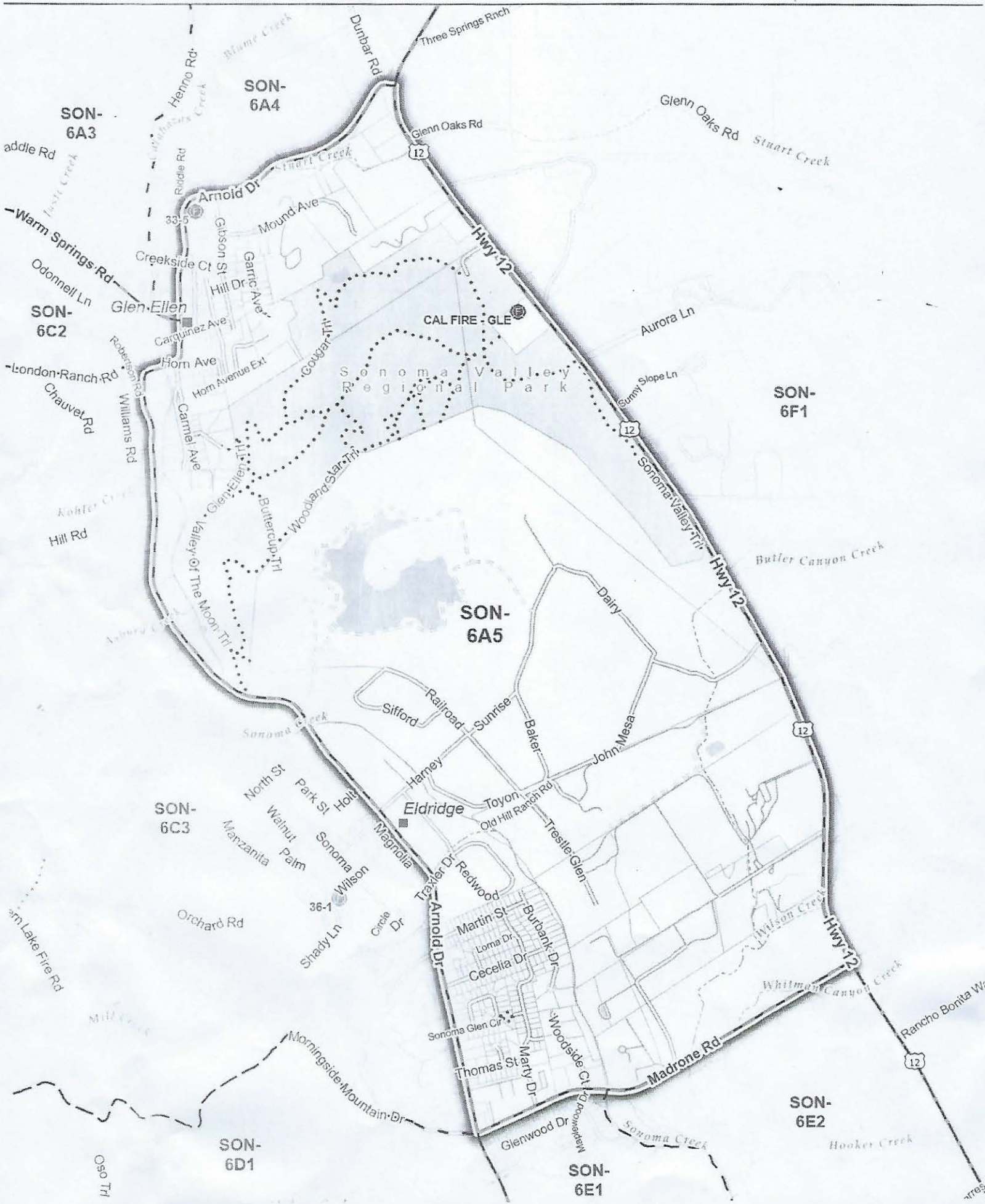
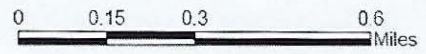


EVACUATION ZONE: SON-6A3

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].

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.



EnviroCollab LLC

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.



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 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
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
September 14, 2022

Brian Oh, Comprehensive Planning Manager

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; 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

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

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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](#)

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



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

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

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; [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: Saturday, September 10, 2022 12:54:29 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.

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

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.
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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; [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; senator.mcquire@senate.ca.gov
Subject: Public Comment on SDC Specific Plan and DEIR
Date: Saturday, September 10, 2022 1:30:34 PM

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

Dear Sonoma County Planning Commissioners,

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Anna Narbutovskih
14288 Woodland Dr.
Guerneville, CA 95446
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

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

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
September 14, 2022

Brian Oh, Comprehensive Planning Manager
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. p. 25, p. 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; 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

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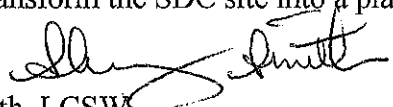
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Sherry Smith, LCSW
PO Box 157
Glen Ellen, CA 95442
(707) 480-8191 gadfly@sonic.net
September 14, 2022

Brian Oh, Comprehensive Planning Manager
Brian.Oh@sonoma-county.org

Permit Sonoma, County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

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Sonoma Developmental Center, 15000 Arnold Drive
Eldridge, CA APN: 054-090-001

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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.

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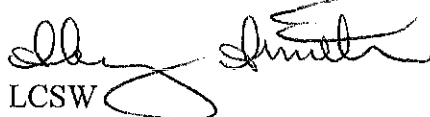
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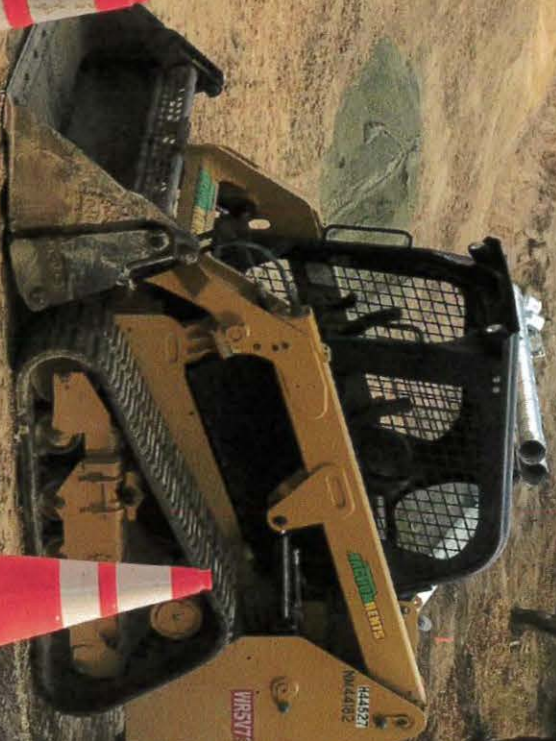
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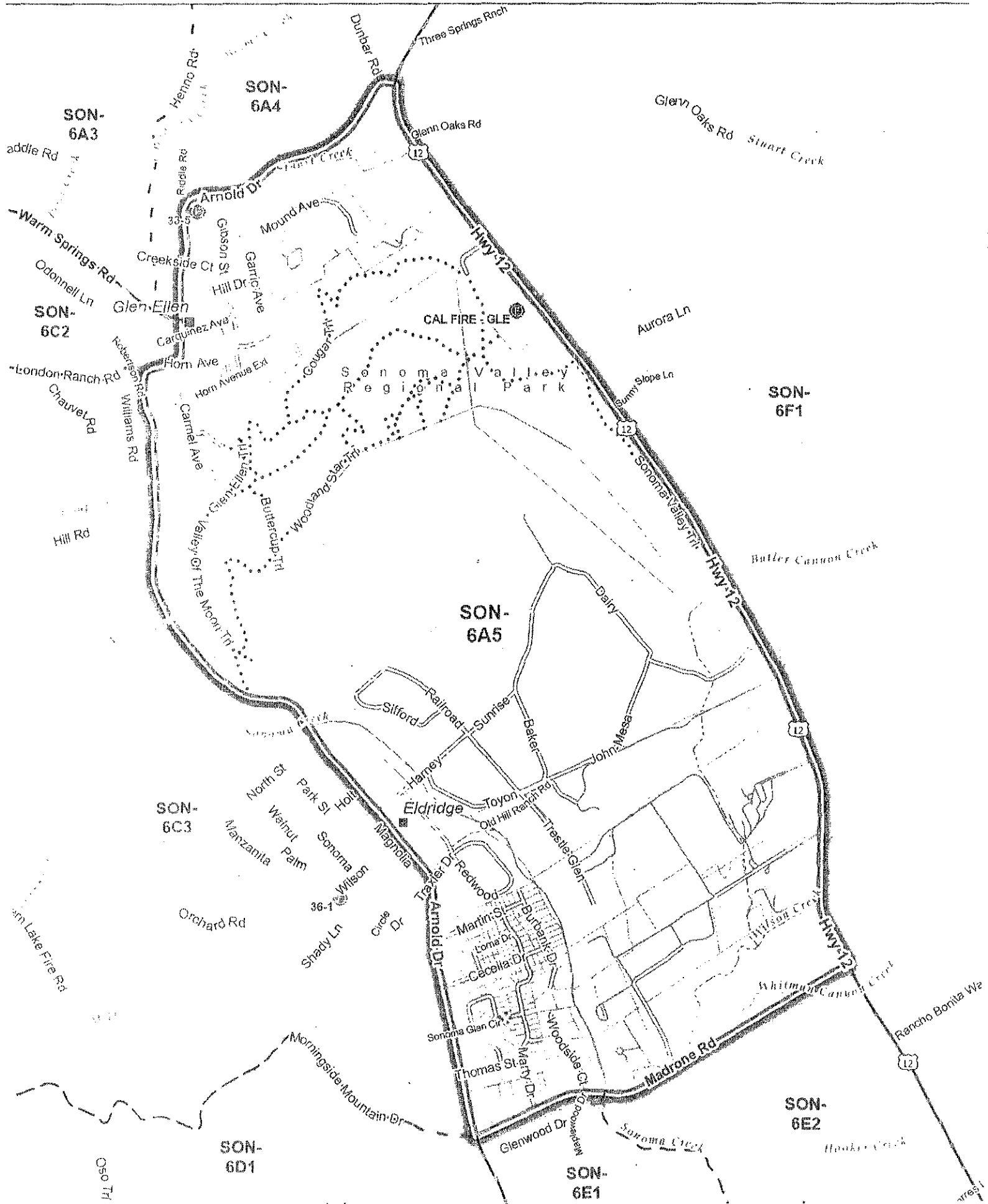
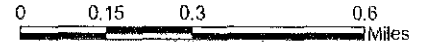


EVALUATION ZONE: SON-6A3

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].

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

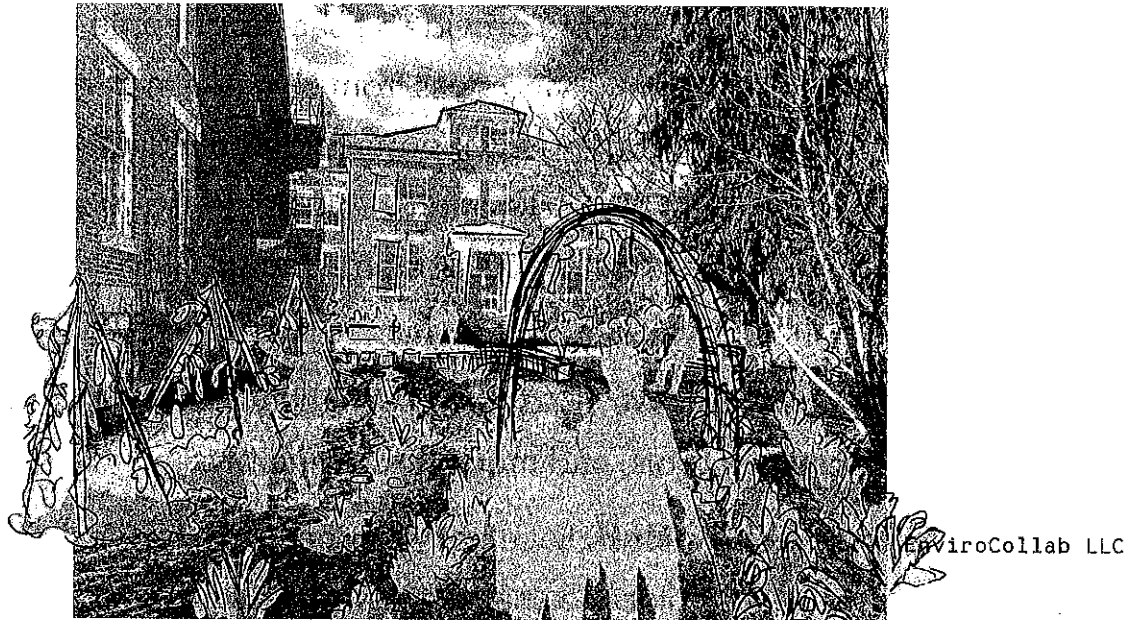
history of the site and hosts an annual “Say My Name” event [Link: <https://www.capitalgazette.com/photos/ac-cn-crownsville-hospital-say-my-name-vg-20220430-2gbp436d3zhxnezeviqqclaqi-photogallery.html>] that commemorates those who died at Crownsville. Eventually, I met with Williams and we discussed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

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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.

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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.

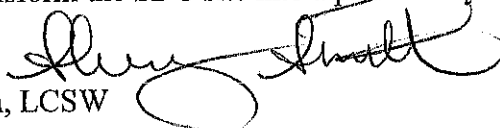
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I hope the state, county, nonprofits, Regional Centers, disability rights groups, individuals with developmental disabilities and their families, and other interested organizations and individuals will help transform the SDC site into a place everyone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

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

Brian Oh, Comprehensive Planning Manager
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. p. 225, p. 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.

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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

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

--[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; [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; senator.mcquire@senate.ca.gov
Subject: Public Comment on SDC Specific Plan and DEIR – Scale it Back!!
Date: Wednesday, September 14, 2022 4:25:30 PM

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

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

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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From: [Charesa Harper](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [BOS](#); engage@sdcspecificplan.com; [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; senator.mcquire@senate.ca.gov
Subject: Public comment on SDC Specific Plan and DEIR. Scale it back!
Date: Thursday, September 15, 2022 11:59:36 AM

Dear Sonoma County Planning Commissioners,

Please protect the wildlife at SDC and surrounding the property! Please do not build on the wild land surrounding SDC. We need land for wildlife desperately. There is already a lack of land, please don't decrease it further! My family and I lived by SDC in Glen Ellen for 8 years and love hiking on the property and being surrounded by wildlife. Please don't fragment the habitat even more for the mountain lions and all the other wildlife. Don't destroy Glen Ellen! All the people that move there and stay as tourists will destroy the beautiful, serene area. Keep it as is. Only build where the current buildings are.

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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Sincerely,

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Napa, ca

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From: [doris](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [BOS](#); engage@sdcspecificplan.com; [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; senator.mcquire@senate.ca.gov; [charlie estudillo](#); [Alice Horowitz](#); patricia.garcia@dol.gov
Subject: Reject the Over Development of the Sonoma Developmental Center
Date: Wednesday, September 14, 2022 7:54:05 PM

Dear Elected Officials,

I have lived in the Sonoma Valley for 43 years. I ask you to reject any level of development that exceeds the limited capacity of the SDC site. Glen Ellen has some 600 residences and it is not reasonable to double or triple the size of this little pocket community by approving a thousand or more housing units. I don't think that the Supervisors would want to have 1000 or more new housing units added to their neighborhood. This level of development will ruin the existing community.

Arnold Drive is a small country road and the speed limit currently is 25 miles per hour across the SDC. If you jam the proposed number of new people into this limited space, it will create an unsafe and unhealthy condition as people will greatly exceed the speed limit. There is very limited public transportation on Arnold Drive, so the amount of car traffic will multiply many times. The traffic estimates of increased travel time of 1 minute does not pass the giggle test. Whoever wrote that is out of touch with reality.

I volunteer for Living With Lions, and mountain lions and other wildlife travel from Lake County to Marin County through the SDC wildlife corridor. You will greatly harm the vibrant wildlife of the Valley if you approve the proposed number of new housing. Unless the wildlife corridor is greatly enhanced, you will find many more roadkill deer, mountain lions and other wildlife on the roads. There should be a wide wildlife corridor on both sides of the creek to allow migration of wildlife. The western hills should be annexed to Jack London Park or made a Regional Park and the Highway 12 side of Arnold drive should be annexed and preserved in part to the Regional Park.

The housing shortage that we have was caused over years and is partly due to excessive permit fees. You cannot solve Sonoma County's housing situation by building a new city or town in Glen Ellen/Eldridge. Any housing that is approved should be zoned to prevent second and third homes and should be restricted to home owner residents only. There should be no vacation rentals or VRBO or PICASO or other rental - these rentals are ruining our communities. In my neighborhood, fully one-third of the homes are 2nd or 3rd homes for people living in San Francisco, who only visit these houses a few times per year. Approving housing without restricting vacation rentals only drives up the cost of housing and it does not alleviate the housing shortage. There should be a "first time home buyer" provision for many of the homes that are approved so that our children and grandchildren can afford to live here.

Glen Ellen is the Jewel of the Sonoma Valley. Don't ruin this very special place by overbuilding as they have done in San Jose and other places ruined by over development. Having gone through the fires in this Valley since 2017, I know that jamming the number of houses proposed will create a severe evacuation problem.

The buildings, warehouses and shops should be donated per the Presidio model and used for apprenticeship programs. We need sheet metal workers, electricians, plumbers and other well trained trades persons. We will miss a tremendous opportunity to use these grounds and facilities to train our young men and women in the kind of work that is so critically needed.

We have a chance to get this right. Lets not approve more housing, hotels and other commercial buildings

that exceed what the area can handle. Please listen to the thoughtful comments made by the North Valley MAC, Eldridge for All, the Sonoma Land Trust, the Ecology Center and the voices of so many citizens and residents of the area who are saying to limit the new housing to a much lower number. Glen Ellen/Eldridge cannot shoulder the housing burden for the county. Any growth should be proportional to the existing community.

Respectfully,

Charles and Doris Estudillo
17681 Arnold dr
Sonoma, CA

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From: [Chris Hanlin](#)
To: [PlanningAgency](#)
Subject: SDC planned development
Date: Thursday, September 15, 2022 12:54:28 PM

My name is Chris Hanlin, I am a homeowner, taxpayer and voter here in the Sonoma/El Verano area. I must vigorously state my opposition to the proposed plan for the development of the SDC in Eldridge, just a few miles north of my home.

The plan as is will be incredibly disruptive for both residents and wildlife in the area. It needs to be scaled back by at least half. The sheer number of proposed new houses to be constructed is absurd for such a rural area. It will over stress our road and water infrastructures. It may also open up the County to terrible tragedy (and potential litigation) in the event of a wildfire, if large numbers of residents are trapped during an emergency. This is not hyperbole, given recent fire events in the area over the last 5 years.

I urge the Commission to adopt the more realistic plans advocated for by our wonderful local Supervisor, Susan Gorin.

This current plan is insanity.

Chris Hanlin
(707)935-0500

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From: [Dawn Bryan](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [BOS](#); engage@sdcspecificplan.com; [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; senator.mcquire@senate.ca.gov
Subject: Public Comment on SDC Specific Plan and DEIR – Scale it Back!!
Date: Wednesday, September 14, 2022 9:38:32 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.
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,

DAWN BRYAN

she/her

4048 MATCH POINT AVE

SANTA ROSA CA 95407

707-888-0096

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From: [ALVARADO BURKETT](#)
To: [PlanningAgency](#)
Cc: [Brian Oh](#); [BOS](#); [Lynda Hopkins](#); [engage@sdcspecificplan.com](#); [senator.dodd@senate.ca.gov](#); [senator.mcguire@senate.ca.gov](#)
Subject: SDC Specific plan
Date: Wednesday, September 14, 2022 10:38:46 PM

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.
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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,
Emerson Burkett
14750 Cherry St.
Guerneville, Ca. 95446
707-869-3229
emerson-maria@comcast.net

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From: [G. Mugele](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [BOS](#); [engage@sdcspecificplan.com](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](#); [senator.mcquire@senate.ca.gov](#)
Subject: Please don't destroy Glen Ellen and Sonoma Valley
Date: Thursday, September 15, 2022 12:33:44 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.
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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.
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enforceable Mitigation and Monitoring Program.

Gerald and Lilly Mugele
PO Box 813
Glen Ellen, CA 95442

707 938-2134

MewGull@mugele.net

G. Mugele
MewGull@mugele.net

*** “Teaching a child not to step on a caterpillar is as valuable to the child as it is to the caterpillar.” — Bradley Miller

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From: [jennyb](#)
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: SDC Specific Plan and DEIR Public Comment Planning Commission 9.15.22
Date: Thursday, September 15, 2022 11:08:12 AM

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.
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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.

Signed,

Jenny Blaker
8166 Arthur St., Cotati, CA 94931

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From: [Julie Skinner](#)
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: Scale it Back!!
Date: Wednesday, September 14, 2022 9:42:59 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.
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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.

Signed,

Julie Skinner

PO BOX 524

Glen Ellen, CA

95442

707-889-9624

jrskinner1@mac.com

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From: [Karen Davis](#)
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; [James Gore](#)
Subject: Public comment on SDC specific plan. Scale it way back!
Date: Wednesday, September 14, 2022 5:55:19 PM

Dear Sonoma County Planning Commissioners,

I worked at SDC 2000-2010. It is a beautiful rural property that is rich in wildlife, which I and my colleagues regularly saw at lunchtime walks. There is a wildlife crossing corridor running through it, which is very important for biologic diversity in Sonoma County.

I strongly support scaling back any development to a small number of affordable apartments, strategically placed in a dense configuration. The vast majority of the property should be reserved for public hiking trails, community events and wildlife habitats. This is a rich treasure for Sonoma County, which once developed, is lost forever.

I strongly support the points from the Sierra Club that are listed below.

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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Thank you,
Karen Davis, MD
1076 Palomino Road
Cloverdale, CA 95425
707-894-4188

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From: nancyeverskirwan@gmail.com
To: [Tracy Salcedo](#)
Cc: [Brian Oh](#); [Greg Carr](#); [Caitlin Cornwall](#); [Pat Gilardi](#); [Larry Reed](#); [Gina Belforte](#); [Jacquelynne Ocana](#); [Shaun McCaffery](#); Belen.Grady@sonoma-county.org; [PlanningAgency](#); Logan.Pitts@sen.ca.gov; Senator.McGuire@senate.ca.gov; Senator.Dodd@senate.ca.gov; [Wachsberg, Rebecca](#); [Chaaban, Ezra](#); Cecilia.Aguiar-Curry@asm.ca.gov; Gerald.McLaughlin@dgs.ca.gov; [district4](#); [James Gore](#); [district5](#); [Susan Gorin](#); [David Rabbitt](#); [SDC Specific Plan](#); [Hannah Whitman](#); [Arielle Kubu-Jones](#); [Rebecca Hermosillo](#); [Rep. Mike Thompson](#)
Subject: Re: Comments on DEIR and Preferred Specific Plan for SDC
Date: Wednesday, September 21, 2022 10:22:00 AM
Attachments: [SMP_DEIR_letter_FINAL_9-21-22.pdf](#)

Thank you Tracy for your hard work, time and effort in putting this comment together for Sonoma Mountain Preservation. We are all hopeful that Permit Sonoma will in fact take community input seriously and consider the amount of oft repeated volunteer effort and informed and educated thought that went into most all the comments. After all it is our lives that will be impacted by this misconceived and miscalculated DEIR and Specific Plan.

Gratefully,
Nancy Kirwan

NEK

On Sep 21, 2022, at 10:36 AM, Tracy Salcedo <laughingwaterink@gmail.com> wrote:

Hi Brian,

On behalf of Sonoma Mountain Preservation, I have attached our comments on the draft environmental impact statement and preferred specific plan for the Sonoma Developmental Center.

Thank you for your consideration. We all hope, with the incorporation of community input into a plan that is truly community driven, we will create a wholesome, viable future for this very special place and for the people who love it.

Kindly, Tracy

Tracy Salcedo
Director
Sonoma Mountain Preservation

(707) 246-0694
laughingwaterink@gmail.com / laughink@vom.com
laughingwaterink.com

Sincerely,

Megan F. Coffey
172 Valparaiso Ave, Apt 5
Cotati CA 94931
415-408-8771
megansonya@aol.com

Sent from Coast Miwok ancestral land

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From: [Nancy August](#)
To: [PlanningAgency](#); [Brian Oh](#); [BOS](#); [engage@sdcspecificplan.com](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [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 9:12:55 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.
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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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Nancy August
1898 Mountain View Ave
Petaluma CA 94952
707.529.3973
ix-chel@comcast.net

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From: [patricia brown](#)
To: [PlanningAgency](#)
Subject: Sonoma Development Center
Date: Thursday, September 15, 2022 9:17:39 AM

EXTERNAL

I am extremely concerned about the current plan for the Sonoma Developmental Center project. 1,000 homes is far too many and the impact on traffic, car emissions, water usage and wildlife would be horrendous. I understand we cannot expect the property to remain undeveloped, but far fewer homes seems more reasonable. Sonoma County has been a leader in environmental issues and we need to continue to support building projects with the least impact on our climate. Please reconsider the current plans.

Thank you,

Patricia Brown
4821 Glencannon St.
Santa Rosa

Sent from my iPhone

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From: [robert.raven](#)
To: [PlanningAgency](#)
Subject: Sonoma Development Center
Date: Wednesday, September 14, 2022 10:48:42 PM



Please protect the wildlife corridor, build fewer homes. There is no water? Traffic?

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From: [Sonya Karabel](#)
To: [PlanningAgency](#)
Subject: UNITE HERE Sonoma Developmental Center Letter
Date: Thursday, September 15, 2022 11:37:05 AM
Attachments: [Planning commission letter.docx](#)

Sonoma County Planning Commission,

Sonoma County's economy has multiple, deeply interrelated problems: extreme inequality, with many businesses that cater to ultrawealthy tourists while exploiting their largely immigrant workforce; displacement of low-income residents due to skyrocketing rents and housing prices; increased wildfire caused by global warming; and mounting pressure to develop historically protected open space. This system isn't working for anyone. UNITE HERE Local 2's members, workers in the hotel and hospitality industry, live at the center of these multiple crises. Sonoma Developmental Center cannot be more of the same old development that creates profit for the owners at the expense of the people and environment around it. SDC is an opportunity for a different kind of development, which works to solve, not exacerbate the issues that the Sonoma Valley faces and advance equity. In other words, the SDC project should include much-needed community benefits.

Developers have agreed to provide community benefits on a wide variety of projects over the last few decades, especially projects on public land and with major planning approvals like the SDC. These benefits can vary from affordable housing to open space preservation to providing a grocery store in a food desert to living wages for workers to free childcare. Our union, UNITE HERE, has been involved in negotiating for community benefits in Santa Rosa, Oakland, San Francisco, San Diego, Concord, and more. For SDC, county residents, particularly in the Sonoma Valley could determine what is most important based on community needs and particulars of the project once a developer is identified. For example, we could push the developer to commit to high levels of affordable and workforce housing, good, living wage jobs, protecting wildlife corridors, supportive and accessible housing for disabled people, and much more.

A Development Agreement between the future developer and the County could and should include community benefits in exchange for vesting development rights. If the developer requests a development agreement, which is likely for a project of this scale, they should be required to include affordable housing, environmental protections, good jobs policies, and disability justice measures. Once the developer is selected and presents a concrete project proposal, the public can assess the impacts, decide on community benefits priorities, and advocate to the County to make an agreement for an equitable project. Then, the Board of Supervisors will have to vote to approve the deal. By requiring community benefits terms in any development agreement, we can make SDC a truly sustainable development.

Best,

Sonya Karabel
Researcher
UNITE HERE Local 2

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From: [TOM BENTHIN](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [BOS](#); engage@sdcspecificplan.com; [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; senator.mcguire@senate.ca.gov
Subject: Our Public Comment on SDC Specific Plan and DEIR – Please SCALE IT BACK
Date: Thursday, September 15, 2022 11:31:53 AM

Dear Sonoma County Planning Commissioners,

We live in Glen Ellen and are asking you to please ***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.

We are asking this as residents whose home burned in the 2017 fires and who have rebuilt. Having had to flee the Nunn Canyon fire, we are intimately aware of the dangers posed by a greatly increased population here to evacuation, since there are only two roads leading out of the Valley to the south and one to the north. We are already concerned about our ability to have adequate water from our well due to the ongoing climate crisis-fueled drought. We are concerned about plans that would massively increase the population and traffic, leading to

dramatic changes to our town. Imagine if we proposed more than doubling the size of the town *you* lived in. And we are concerned about the ecological impact on our wildlife and watershed area.

Sincerely,

Stephanie, Tom, Julian, and Gioia Benthin

12600 Dunbar Rd
Glen Ellen, CA 95442
cell 707-363-5867

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From: [Ann Gutierrez](#)
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
Subject: : Public Comment on SDC Specific Plan and DEIR – Scale it Back!!
Date: Monday, September 19, 2022 4:35:07 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 200 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,

Ann Gutierrez and Teresa Seward
356 Oak Leaf Circle, Santa Rosa, CA. 95409
Ahgtks@sbcglobal.net

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APPENDIX to North Sonoma Valley Municipal Advisory Council Letter of 01/06/22.

This appendix provides additional details in support of the concepts presented in the main body of the NSV MAC letter dated January 6, 2022. These details are a compilation of information provided in public comments on the SDC Specific Plan Alternatives Report (November 2021), a community survey, and NSV MAC input. These details should be addressed in the Specific Plan policies and design guidelines.

All “community survey” references below are to the non-affiliated survey conducted by Sonoma Valley resident Dr. Shannon Lee, Biology Department Faculty at Sonoma State University, in December 2021 ([link](#)).

OPEN SPACE:

General Information:

- Community input consistently emphasizes the singular opportunity the SDC campus represents in terms of protecting the open space and wildlife corridor in the context of a vibrant, sustainable community.
- Over 90% of the community survey respondents ranked “preservation of open space” as of the highest priority.

The Community Supports:

- Prioritizing the transfer of park-adjacent properties to Sonoma Valley Regional, Jack London State Historic parks, or a potential land trust with continued public access to trails and open space.
- Protecting the wildlife corridors, their permeability and related natural resources from the wide range of impacts associated with over-development of the campus.
- The wildlife corridors are not separate from SDC campus—animals are not cognizant of boundaries—and their protection is integral to all aspects of the site plan.
- Pursuing the development of performance standards to support housing and other development, as outlined in the Sonoma Land Trust’s memo to the NSV MAC, Springs MAC and Sonoma Valley Citizens Advisory Council in follow-up of the November 18, 2021 joint meeting.

HOUSING DENSITY:

General Information:

- The SDC site is outside of an urban growth area and surrounded by community separator lands and the rural village of Glen Ellen.
- Based on current United States’ census definitions, the Eldridge “census designated place,” including the SDC campus and the Glen Ellen community just south of the SDC, could add approximately 450 housing units, i.e., through redevelopment of the SDC campus, and still be within a rural (vs. urban) designation, assuming average occupancy in Sonoma County of 2.61 people per dwelling unit.
- Maintaining a rural designation for the site’s development is consistent with the Guiding Principles established for the site plan in that new development must complement the surrounding communities of Glen Ellen and Eldridge/Glen Ellen.

The Community Supports:

- The creation of additional housing on the SDC site, particularly affordable housing, *however at a substantially lower density—450 or fewer housing units—than in any of the draft alternatives published to date. (The number of housing units in all three plan alternatives is 990 or greater.)*



- 89% of community survey respondents support no more than 450 housing units; 65% of those supporting between 400-450 units, and 24%, less than 400 units.
- Related to this and to complementary community development as mentioned above, 87% of community survey respondents cited “preserving the rural character of Glen Ellen” as “very important.”
- The community does not prioritize market rate housing.

AFFORDABLE HOUSING:

The Community Supports:

- A higher percentage of mixed level affordable housing than the 25% of the published alternatives. Specifically:
- 76% of community survey respondents think that 25-50% (or more) of the SDC housing should be affordable; 49% of all respondents would push that percentage higher, with at least 50-75% of housing units affordable. Over half of that 49% would prefer that 75%+ of all housing be affordable.
- Housing to include housing for individuals with developmental disabilities (as indicated in state statute); community comments also support senior and veterans housing and related services.
- Housing should be fully accessible (to disabled), as outlined in letters from representatives of the disabled community.
- The survey showed little support for estate homes (81% of respondents opposed) or 3-story apartment buildings (68% opposed), however during the NSV MAC discussion of 12/15/21 it was acknowledged that 3-story housing may need to be considered to achieve higher levels of affordable housing.
- Adaptive re-use of existing buildings (see below) may alleviate need for 3-story structures.
- The community generally agrees that clustered housing and integrated affordability level housing should be considered.
- **The state of California has prioritized the creation of affordable housing, as has Sonoma County. The state must reconcile this priority with its fiscal responsibility with respect to the SDC property by defraying the significant site remediation costs.**
- Housing clusters and siting should be designed to support open space priorities as identified above.
- Housing should be located away from Arnold Drive to preserve the existing visual and historic character and density of the SDC campus.

Potential funding sources:

- Federal Infrastructure Investment and Jobs Act

ADAPTIVE REUSE OF EXISTING BUILDINGS:

General Information:

- ALL responsible structural studies of the single-story buildings on the east side of the SDC campus indicate that re-use of the buildings is both financially feasible, and a likely positive use of existing resources.
- It is important to note that all of the studies related to the re-use option were conducted using old financial data. Local new construction costs have escalated sharply in the past few years, and particularly in the past 12 months.
- The discussions of adaptive re-use have focused on perceived low demand, and the potential unwillingness of people to live in buildings that have been re-designed. However, there are examples of creative, livable residential re-use designs throughout urban environments both locally,



and in other regions of the US, including lofts in old train stations, apartments in old manufacturing facilities, etc.

- Additionally, those discussions regarding design do not take into account the changes we have seen in the past couple of years alone. Tiny houses, re-purposed shipping containers, etc., are designs that are now considered livable and comfortable despite the out-of-date view of such designs.

Community Benefits:

- The re-use option will reduce greenhouse gases associated with demolition and construction. It will reduce air quality problems since the impacts of dismantling of concrete, wood and toxics will be considerably reduced as compared to that of demolished whole buildings.
- The roadways will not be further burdened by the weight and number of overloaded trucks.
- Public safety will be improved due to reduced traffic flows.
- The unique and beautiful architectural nature of the existing buildings will be preserved.
- The re-use of the buildings will be less expensive, and less time consuming, resulting in a more rapid occupancy schedule.
- Local job creation will increase with the use of adaptive re-use of existing buildings due to the nature of the specialty construction skills required for the work.
- "Proof of concept," or the demonstration project aspect of the work, will serve as a model for additional other communities or similar projects.

The Community Supports:

- The community survey found that 49% of all respondents find **adaptive reuse of buildings to serve at-risk populations** to be of highest or high priority combined.
- In addition, a total of 64% of all respondents find **adaptive reuse of buildings to serve special needs populations** to be of highest or high priority combined.
- In addition, the community has indicated support for alternative housing types, e.g., co-housing, that could be implemented to make reuse financially feasible.

Potential funding sources:

- Grants
- Developer funds

UTILITY INFRASTRUCTURE:

Sewer Treatment / Water Recycling

General Information:

- The Sonoma Valley County Sanitation District Treatment Facility is located approximately 13 miles from the SDC Campus. The area surrounding the current treatment facility, located at the end of 8th Street East, routinely floods during the wet season.
- Untreated effluent is discharged into Nathanson Creek during flood events.
- Climate change, and associated sea level rise, will result in operations at the current location becoming increasingly difficult to maintain and sustain.
- Flood events will increase as groundwater levels rise.
- Discharges into Nathanson Creek will increase.
- Currently the Sanitation District pays a fine every time it has to dump overflow into the Nathanson Creek system. This happens multiple times a year. Adding additional homes to the sanitation system design will likely cause more frequent overflow problems.



Community Benefits:

- A sewage treatment facility could be sited on the SDC site—a location in the Sonoma Valley which is resistant to the impacts of climate change and sea level rise.
- Localized water recycling makes re-use financially feasible since the Sonoma Valley County Sanitation District does not, and will not, have the funds to create a large-scale water recycling program from its current location at the end of 8th St. East.
- Localized water recycling and storage is part of a fire resiliency plan.
- Wetlands associated with water treatment could be associated with a wildlife preserve and fire break, adding to climate resiliency.
- Groundwater recharge in the upper Sonoma Valley would benefit the groundwater plan requirements.
- Infrastructure requirements associated with SDC development would require an upgraded sewer treatment and water recycling plan.

Potential funding sources:

- Grants
- Reduced penalties for discharges into the Nathanson Creek system could be applied to the construction of a treatment facility.
- Recycled water sales.
- Local sewer district fees including SDC development, the existing town of Glen Ellen and potential expansion into areas that are currently served by underperforming septic systems.
- Developer funds.
- Federal Infrastructure Investment and Jobs Act

Energy Resiliency / Microgrid Construction

General Information:

- An energy sustainability plan and microgrid design should accompany any SDC development.
- Community Choice Aggregation is available in 23 municipalities and counties in California, serving 11 million customers.
- The Climate Center, located in Santa Rosa, is among the main organizing and lobbying organizations responsible for the development and adoption of Community Choice Aggregation.
- PG&E has shown itself to be an increasingly unreliable source for the electric grid.

Community Benefits:

- A move towards a localized, sustainable energy infrastructure can serve as an emergency preparedness resource.
- Reduced greenhouse gas emissions.
- Lower energy costs will attract potential commercial interests, and reduce operating costs for a sewage treatment plant, public school, etc.
- Local job creation will increase due the highly skilled workers required for construction, and the administration and monitoring of the system.

Potential funding sources:

- Grants
- Local rate payers
- Federal Infrastructure Investment and Jobs Act



FIRE SAFETY / CLIMATE RESILIENCY:

Fire Safety / Protections

General Information:

- Many of our appendix items address this indirectly, including water treatment and wetlands as fire protection; microgrid as protection against large scale electrical grid failure or neglect; adaptive reuse of the reinforced concrete buildings and the open space designation as fire protection. A community center could be used for any number of emergencies.
- Additionally, fire protection building code and WUI (Wildlands Urban Interface) requirements are codified.
- Evacuation plans and roadway emergency preparedness are big questions; it's our understanding that the EIR will address these issues.

Climate Resiliency

General Information:

- The Sonoma Valley wildlife corridor on the SDC campus is critical to maintain the quality of our water, forests, and wildlife in a rapidly changing and warming environment.
- Keeping landscapes connected via habitat linkages or corridors is the most frequently recommended approach to maintain ecosystem resilience in the face of climate change as it provides an "escape route" for plants and animals to relocate when their habitats are no longer viable.
- Linking also allows resources, including water and nutrients, to pass between habitats that are increasingly confined by human development to maintain ecosystem health for humans and wild residents.
- In 2015, when the SDC was still operational, a [paper prepared for Sonoma Land Trust](#) by researchers from the University of California, Berkeley, not only documented how the SDC's wildlife corridor maintains connectivity, but also addressed what it will take to ensure its integrity.
- The SDC "has high potential for landscape permeability and therefore is expected to allow for free passage of wildlife if left undisturbed," the researchers wrote. They also cited a state mandate—"a cornerstone of California's State Wildlife Action Plan"—that places a priority on making sure development does not encroach on such corridors.
- The researchers noted that protecting the corridor "will require preventing further development, especially in the northern portion of the SDC; as well as reduction in traffic speeds, artificial lighting, invasive species and domestic animal control, limiting human access, and a move toward wildlife-friendly fencing throughout the corridor."
- Aligns with the state's 30x30 goals.

Community Benefits:

- Clean and abundant water: connected creek corridors protect our streams and groundwater.
- Reduced wildfire risk: well-managed landscapes have less fuel to carry and spread flames.
- Climate change resilience: plants and animals can move through corridors to cooler places.
- Room to roam: connected landscapes maintain healthy flows of plants, animals, and resources.

HISTORIC PRESERVATION:

General Information:

- The community supports and recognizes the importance of preserving the historic, architectural, and aesthetic character of the SDC campus, including permanent protection, preservation and management of selected buildings and structures,



- This would include the historic cemetery, and related landscapes that sit within the boundary of the historic district of Sonoma Developmental Center.
- Inclusion of a museum, archival research center, library, and visitor center (The Gateway to Sonoma Mountain) on the grounds linked with and complementary to the Historic Cemetery, Open Space and Wildlife Corridor.
- This management structure is compatible with the goals of the Sonoma Land Trust, co-housing advocates, disability rights supporters, the numerous stakeholders that contributed to past community forums, and the recent community survey conducted and presented to the NSV MAC.

Community Benefits:

- In addition to bringing people together through public events, lectures and workshops, a museum will help provide a sense of community and place by celebrating our collective heritage.
- Museums educate, inspire, foster dialogue, curiosity, self- reflection and serve to help future generations comprehend their history and recognize the achievements of those who came before.
- Fosters partnerships and collaboration with the larger community and other non-profits
- Adaptive reuse of buildings to house research, museum and visitor centers will be effective in reducing our carbon footprint preparing for a future of fire safety, climate resiliency and sustainability of Sonoma Valley
- Historic preservation and reuse of historic buildings reduces resource and material consumption, puts less waste in landfills and consumes less energy than demolishing entire buildings and constructing new ones. Destruction of historic buildings unleashes vast amounts of embodied carbon into the atmosphere contributing to an already overtaxed and warming planet and adding to our carbon footprint.
- An historic district ensures that we are protecting and revitalizing the character of our town and ensuring that the most iconic and diverse collection of architectural buildings, sites and object are preserved for future generations
- Documentation supports that well preserved and revitalized historic districts are an economic boon to a community and affect property values in a very positive way.
- Historic districts are a vibrant, social and economic center for towns and are regarded as world class destinations.

The Community Supports:

- Preservation and rehabilitation of historically significant buildings, structures, landscapes and historic cemetery. These buildings include Sonoma House, McDougall, Oak Lodge, Hatch, PEC and King.
- Preservation of the SDC Library and other sources of written knowledge.
- Preservation of historic artifacts and digital archives currently stored on campus.
- Preservation of the knowledge possessed by individuals associated with SDC, Eldridge and Glen Ellen.

Potential Funding Sources:

- Glen Ellen Historical Society has already received grants and funding from private philanthropists to support a museum and visitor center.
- The Board of Directors of GEHS and general membership include experienced legal, development, grant writing, fundraising and cultural heritage professionals engaged in raising funding for the project.
- Establishment of "Friends of Glen Ellen Historic District" will be instrumental in organizing fundraisers and events providing financial assistance. Modeled after the Friends of Jack London, this



will have a self-generating funding source which includes an event/community center, museum, visitor center that includes historic tours and a world class archival and research hub

- Federal and State Grants
- State Historic Preservation Office Funding
- National Park Service Historic Preservation Funding
- National Trust for Historic Preservation Funding
- Privately Funded Grants
- Scholarships and Research Fellowships
- Governor Newsom's 2021 Executive Order for 30 x 30 State Funding

COMMERCIAL SPACE / JOB CREATION:

The Community Supports:

- The community has expressed support for innovative or educational use of commercial space at a scale that is compatible with the semi-rural Valley. Vocational training center is a popular idea.
- Although it is the NSV MAC's understanding that it is premature to designate too specifically, community suggestions have included a non-profit hub and a trade skills vocational center.
- Community comments have also noted that we have no identified tenants for commercial space at this time, and that the level of demand for commercial space is uncertain, reflective of significant changes in work patterns.
- Community comments have also noted that it's not clear that we have a shortage of jobs in Sonoma Valley—versus a shortage of affordable housing—and that *the scale of the commercial space designation needs to be appropriate for this rural community*.
- Commercial space ranked second lowest for “not important / neutral” as a re-development priority in the community survey.
- However, when survey respondents were asked to prioritize commercial development, a Community Center was the most popular (77% of survey respondents supporting), following by an Innovation/Research /Climate Hub at 60%.
- Hotel / Resort was the least popular with 10% support from community survey respondents.

Potential funding sources:

- Federal Infrastructure Investment and Jobs Act
- Legislative job training bill

COMMUNITY-ORIENTED COMMERCIAL:

The community is supportive of commercial space to be set aside for community-oriented usage to potentially include:

Community Center

General Information:

- Glen Ellen currently does not have a community center.

Community benefits:

- Potential uses and needs: emergency shelter, temporary emergency health clinic, community meetings, live performances.
- Provides a great boost to the local economy, providing jobs, both in the building and running of the facility. It also provides opportunities for the town to raise money through events, performances and weddings.



- Provides an opportunity for youth to congregate in a safe space promoting strong relationships through sports and recreational activities.
- Can be associated with the local Dunbar School for general assemblies, meetings, and activities, resulting in reduced project costs.

Potential funding sources:

- Grants
- Community fundraising
- Adaptive re-use of an existing building as a cost-saving measure

Relocate Dunbar School to SDC campus

General Information:

- Dunbar school currently serves grades K-5 and is located 3.5 miles from the SDC Campus. The current Dunbar campus is aged and located in a rural setting which requires either busing or car transportation for the commute.
- It is acknowledged that the Sonoma Valley Unified School District would need to run demographic and other feasibility studies as part of any determination to relocate.

Community Benefits:

- Job creation for the SDC development through school administration, maintenance, and enhanced school campus use by the public.
- The relocation allows for greater use of foot traffic to school from the proposed SDC campus development and the south Glen Ellen area.
- Reduced bus and individual car trips through Glen Ellen.
- Reduced greenhouse gases.
- Reduced bus maintenance and fuel costs.
- Multiple studies have indicated that school campus proximity to neighborhoods and housing promotes increased school campus use and greater neighborhood/ community continuity.
- Modernized Dunbar School campus

Potential funding sources:

- Grants
- Local school construction bonds
- Sale of existing Dunbar school campus as surplus land
- Developer funds. Most developments of the scale proposed for the SDC campus would require new school construction.

SITE GOVERNANCE:

General Information:

- Many members of the public have requested consideration of establishing a trust to implement the Specific Plan rather than a private developer. A trust would open opportunities for financing and site management that would broaden the potential for successful redevelopment AND community compatibility.
- The model of the Land/ Government-owned Trust for SDC governance and development was introduced at the first public meeting in 2016. Local community response was supportive of the Trust model for SDC governance.



- The SDC Planning Resource Committee was convened to consider the feasibility of forming a “State-Owned” trust, and to examine the required land disposition, land planning, development management, and infrastructure improvements issues.
- In 2018, the SDC Planning Resource Committee received a proposal from WRT Consulting for a financial assessment study of SDC site development potential, with an emphasis on: conservation of wildlife habitat and open space areas, protection and re-use of historic structures, adaptive re-use of existing buildings, and potential redevelopment off-setting revenue uses for the central SDC campus.
- It is important to note WRT Consulting performed the original Existing Conditions Assessment of the SDC site under a contract with the California State Department of General Services.
- An example of a successful community land trust model: OPAL Community Land Trust

Community Benefits:

- The non-profit government trust model reduces the profit incentives associated with private developers. Development companies generally generate a 25-30% profit on a specific project.
- Local trust governance allows for far more development financing opportunities. Public funding (governmental in nature), private funding (traditional lending sources: banks, pension funds, insurance companies), private non-profit funding (land trusts, housing trusts, other types of trust related grants).
- Local trust governance may allow for affordable housing occupancy formulas which enable a larger percentage of local workers and residents to live in the newly constructed homes. A private developer cannot make the housing available ONLY to local residents and workers. Any applicant, no matter their location of residency or occupation, is eligible for occupancy.
- A community housing trust-based model would only be responsible for the work associated with SDC campus development.

Potential funding sources:

- Private non-profit grants
- Private fund raising
- Governmental grants
- Traditional developer fund resources
- Income from commercial development



January 6, 2022

Sonoma County Board of Supervisors
575 Administration Drive, Room 102A
Santa Rosa, California
Via email:

Dear Sonoma County Board of Supervisors:

The North Sonoma Valley Municipal Advisory Council (NSV MAC) has prepared this letter for consideration by the Board of Supervisors (Board) and Sonoma County planning staff regarding the proposed land use and design alternatives for the SDC Specific Plan. The primary purpose of this letter is to summarize public input received by the NSV MAC in response to the SDC Specific Plan Alternatives Report prepared by Dyett & Bhatia and published by the County in early November 2021.

This letter incorporates the extensive community input from public meetings on November 17, 2021, December 15, 2021 and January 5, 2022, the Sonoma Valley community survey, as well as written correspondence and NSV MAC comments, and synthesizes this information into several main themes to create the framework for a community-supported land use alternative. **The intent of this exercise is to provide sufficient information to enable the Board to direct Permit Sonoma staff to develop a preferred alternative that truly reflects the community vision for SDC as articulated in the January 2021 Draft Vision and Guiding Principles.**

As reflected in the hundreds of comments received since publication of the Alternatives Report, the Sonoma Valley community does not support any of the three alternatives proposed by the County; 71% of participants rejected all three alternatives when polled during the SDC Alternatives Workshop on November 13, 2021. We also reference a non-affiliated Sonoma Valley survey (community survey) conducted by Sonoma Valley resident Dr. Shannon Lee, Biology Department Faculty at Sonoma State University in December 2021. The survey received 672 responses, 95% of which were from Sonoma Valley and Sonoma County residents. The SDC is not suitable as an “urban infill site” and the community’s rejection of the proposed alternatives reflects the incompatibility of the scale of proposed development with the adjacent Glen Ellen communities and the site’s environmental constraints.

Request for Community-Driven Process for Preferred Alternative

On behalf of the community, the NSV MAC requests the Board to delay the initiation of the California Environmental Quality Act (CEQA) process to prepare an Environmental Impact Report (EIR) for a preferred alternative until after a new alternative reflective of site constraints and community input is developed as promised in the December 17, 2019 agreement between the State of California and Sonoma County. The NSV MAC requests the Board to direct staff to pursue this new alternative as outlined in this letter.

Community Input as Framework for a Preferred Alternative

The community continues to support the January 2021 Vision and Guiding Principles that have underpinned community workshops, Sonoma County requests for proposals for preparation of the Specific Plan, and related efforts during this multi-year SDC redevelopment process. These principles are most recently expressed on pages 10-11 of the Specific Plan Alternatives Report. The community feedback conveyed in this letter reflects these principles through an integrated vision of development at an appropriate scale, with an intention to balance affordable, inclusive housing and related commercial development with the protection of SDC’s open space (a California public trust resource), the Sonoma Valley Wildlife Corridor, the historic district portions of the SDC campus, fire safety and climate resiliency, and the rural character of the surrounding region. An alternative with substantially reduced



density is necessary to ensure that the negative impacts of development on traffic, public safety, wildlife corridors, water/water treatment, and related issues do not cause environmental and social harm.

The nine community priorities are summarized below and detailed in the Appendix to this letter.

OPEN SPACE. Community input consistently emphasizes the singular opportunity the SDC campus represents in terms of protecting the open space and wildlife corridor in the context of a vibrant, sustainable community. Over 90% of community survey respondents ranked “preservation of open space” as the highest priority; this is consistent with the state’s 30x30 goals.

This concern goes beyond setting aside open space lands and creating creek and sensitive habitat setbacks. The density of development planned within the SDC campus must not exceed the carrying capacity of the site’s resources. In other words, it must not result in overuse of open space resources or interference with wildlife movement and permeability.

HOUSING DENSITY. The community unequivocally supports the creation of additional housing on the SDC site, particularly affordable housing, however at a lower density (450 or fewer housing units) than that included in any of the alternatives published to date. Higher housing density will move the surrounding communities from a “rural” to “urban” designation based on current U.S. census definitions (see Appendix) and is a primary driver of unacceptable impacts, including environmental, infrastructure, traffic and related public safety issues.

AFFORDABLE HOUSING. The community supports a considerably higher percentage of affordable housing than the approximately 25% included in the published alternatives, **with 76% of community survey respondents indicating a preference for 50-75% (or more) affordable units.** Use of available funding mechanisms and incentives—including revisiting the State’s obligations for SDC site cleanup and remediation—must be included in the financial feasibility assumptions to maximize the affordable housing percentage (see Site Governance / Funding below).

ADAPTIVE REUSE OF EXISTING BUILDINGS. Public and NSV MAC member comments indicate that the County should revisit the potential reuse of existing buildings to satisfy some of the housing needs on the East Side of the SDC campus.

UTILITY INFRASTRUCTURE. An energy sustainability plan, including a microgrid design, should accompany any SDC development, as should a thorough review of the potential benefits of an on-site sewage treatment facility in light of the challenges to the existing Sonoma Valley infrastructure.

FIRE SAFETY/ CLIMATE RESILIENCY: Fire safety and climate resiliency will be impacted by the other elements of the site plan—water use/recycling, energy grids, housing density—and their impacts on traffic and public safety. These interconnected factors must be more intentionally considered in any preferred alternative for this site. The Sonoma Valley community has expressed particular concern that fire risk, evacuations and related community preparations have evolved significantly during the course of the SDC re-development process. 71% of community survey respondents indicated that the County has not adequately addressed fire hazard, traffic and other impacts to the community in the proposed alternatives.

HISTORIC PRESERVATION. The community recognizes the importance of preserving the historic, architectural, and aesthetic character of the SDC campus, and envisions permanent protection, preservation and management of selected buildings and structures within the historic district. More specifically, the community has consistently supported the preservation of an historic district on the



west side of the SDC campus which could include a museum, library, research hub and visitor center, all of which would be linked with the cemetery and open space.

COMMERCIAL SPACE / JOB CREATION: The community supports innovative use of commercial space (education, training, research) and inclusive job creation at a scale suitable for this semi-rural site. In addition, the community wants to see commercial space set aside for **COMMUNITY**-oriented functions, e.g., a community center or school, and is prepared to explore funding options for these uses.

SITE GOVERNANCE / FINANCING: Many members of the public have requested consideration of establishing a trust or similar management entity to oversee redevelopment and implementation of the Specific Plan rather than a private developer. A trust mechanism would open opportunities for public financing and site management that would broaden the potential for successful redevelopment AND community compatibility. In fact, the Board’s April 2019 resolution “Supporting a Land Use Planning process and considerations for disposition of the Sonoma Developmental Center Site,” states:

“Be it further resolved that the Board may also consider in the future a Joint Powers Authority, Trust or other mechanism to facilitate the disposition and transition of the site to meet the desired outcomes.”

Community members have clearly articulated the conflict inherent in creating a plan that is both appropriate for Sonoma Valley and financially feasible, with these economics driven in large part by the dilapidated infrastructure and environmental cleanup liabilities left by the State. The State must help defray the significant costs to clean up the site that it has left in poor condition to ensure that the plan is not merely driven by economic factors. 89% of community residents surveyed believe that the State should be responsible for clean-up and other remedial maintenance of the site.

Conclusions

The Sonoma Valley community’s reasons for rejection of the proposed alternative plans are aligned and consistent. The alternatives do not reflect the themes heard over and over in multiple Valley-wide workshops regarding the appropriate size and scale of development, and adequate protection of the wildlife corridor and surrounding open space. None of the current alternatives reflect the many environmental constraints on the site, nor do any strike a balance between financial interests, affordable housing, and environmental and community well-being.

The community has spoken clearly. On its behalf, the NSV MAC respectfully reiterates its request that the Sonoma County Board of Supervisors direct staff to work with the community to develop an alternative using the framework as outlined above and detailed in the accompanying Appendix.

Sincerely,

Arthur Dawson

Chair, North Sonoma Valley Municipal Advisory Council

cc: Permit Sonoma, Sonoma City Council Mayor Jack Ding, Congressman Thompson, Senator McGuire, Senator Dodd, Gov. Gavin Newsom, Wade Crowfoot, local media, Assemblymember Aguiar-Curry, Springs MAC, SVCAC, Sonoma County Regional Parks, Agricultural Preservation and Open Space District, Sonoma County Historical Society

From: [Chlele Gummer](#)
To: [PlanningAgency](#)
Subject: Against Development
Date: Sunday, September 18, 2022 2:34:17 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.
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.

Sincerely,

Chlele Gummer, Santa Rosa

--

Chlele Payne Gummer

chlelegummer.com

707-292-0535

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From: [Tracy Salcedo](#)
To: [Brian Oh](#)
Cc: [Greg Carr](#); [Caitlin Cornwall](#); [Pat Gilardi](#); [Larry Reed](#); [Gina Belforte](#); [Jacquelynn Ocana](#); [Shaun McCaffery](#); [Belen.Grady@sonoma-county.org](#); [PlanningAgency](#); [Logan.Pitts@sen.ca.gov](#); [Senator.McGuire@senate.ca.gov](#); [Senator.Dodd@senate.ca.gov](#); [Wachsberg, Rebecca](#); [Chaaban, Ezra](#); [Cecilia.Aguiar-Curry@asm.ca.gov](#); [gerald.mclaughlin@dgs.ca.gov](#); [district4](#); [James Gore](#); [district5](#); [Susan Gorin](#); [David Rabbitt](#); [SDC Specific Plan](#); [Hannah Whitman](#); [Arielle Kubu-Jones](#); [Rebecca Hermosillo](#); [Rep. Mike Thompson](#)
Subject: Comments on DEIR and Preferred Specific Plan for SDC
Date: Wednesday, September 21, 2022 9:39:19 AM
Attachments: [SMP DEIR letter FINAL 9-21-22.pdf](#)
Importance: High

Hi Brian,

On behalf of Sonoma Mountain Preservation, I have attached our comments on the draft environmental impact statement and preferred specific plan for the Sonoma Developmental Center.

Thank you for your consideration. We all hope, with the incorporation of community input into a plan that is truly community driven, we will create a wholesome, viable future for this very special place and for the people who love it.

Kindly, Tracy

Tracy Salcedo
Director
Sonoma Mountain Preservation

(707) 246-0694
laughingwaterink@gmail.com / laughink@vom.com
laughingwaterink.com

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From: support@megbeeler.com
To: Brian Oh
Cc: district4; James Gore; district4; Susan Gorin; David Rabbitt; engage@sdcspecificplan.com; PlanningAgency; Greg Carr; Caitlin Cornwall; Pat Gilardi; Larry Reed; Jacquelynn Ocana; Gina Belforte; Kevin Deas; Shaun McCaffery; Belen.Grady@sonoma-county.org
[Melissa F Dowling; Chase Hunter; jim.sweeney@gresdemocrat.com](mailto:Melissa.F.Dowling; Chase.Hunter; jim.sweeney@gresdemocrat.com)
Subject: Comments on Draft EIR and Specific Plan for SDC, 9.21.22, Meg Beeler
Date: Wednesday, September 21, 2022 3:16:40 PM
Attachments: [Screen Shot 2022-09-20 at 4:30:48 PM.png](#)
[I-DEIR_9.21.22_Meg Beeler.pdf](#)

Mr. Brian Oh, Comprehensive Planning Manager, Permit Sonoma
County of Sonoma
2550 Ventura Avenue Santa Rosa, CA 95403

Brian.Oh@sonoma-county.org

Sent via email; PDF attached

Re: Comments on Draft EIR and Specific Plan for SDC

Dear Mr. Oh,

Like many in the community, I believe the County has a once in a lifetime opportunity to stand out and lead at SDC in these times of climate crisis.

Yet the DEIR fails in significant ways to offer clear goals and standards (policies) for protecting the riparian corridors, the rights of nature, and our precious natural resources. In fact, *there are no stated goals for the creeks, wetlands, or beautiful lakes on the property*, and minimal policies are included. The DEIR needs *significant* modifications to be used as a tool for systematic implementation, *as required by the State*. I'd like your help with this.

I am commenting as a neighbor (living five minutes south of campus), a long-time hiker and passionate defender of the property, and a participant in the planning process for nearly 10 years in my role as Chair of Sonoma Mountain Preservation. Thank you for the opportunity.

Water is life, and *by setting goals and policies* to protect wetlands and riparian zones as a resource and respite for the community, and to protect migrating Coho and Steelhead, *both the DEIR and Specific Plan can be enhanced, set precedent, and lead the State*. Two specific goal-setting areas are central: Elevate creek protection and wildlife corridor flexibility by expanding buffers significantly; and enhance and protect rare, vulnerable wetlands and species there through setting them aside and abandoning the road through them. Just because buildings and asphalt were placed too close to the creeks in the past, there is no justifiable reason to continue outmoded practices. We know better, and the lack of studies done during this process is no excuse either.

If there were goals and policies that supported wetlands, there would be no proposed new road from Arnold Drive to Highway 12. A road will create substantive, adverse effects: on the protected wetlands that support documented endangered species, the wildlife corridor, and fire egress in the face of Diablo winds coming from the East (the road will be in the direct path of 2017 fires.)^[1] **These impacts are not mentioned or addressed in the DEIR; goals do not support the wetlands, and “best practices” do not address the cumulative effects of such a road; or the fact that roads and wildlife corridors do not mix well.** The approach of “We’ll do needed studies later” gives developers no clear direction up front, and does not guarantee wetland and species protection or mitigation policy.

Riparian zone protection also lacks goals and policies to prioritize riparian protection.

The DEIR ignores current studies that say creek setbacks should be up to 325 feet.^[2] In addition, the DEIR and Specific Plan are in conflict. Sometimes they propose a 50-foot setback next to Sonoma Creek; sometimes they refer to existing County standards of 30-foot setbacks; sometimes they ignore Mill Creek setbacks entirely (P 41 people/wildlife interface policies). In fact, some of the proposed “Institutional development” (map 2.4-1) is right on top of Mill Creek.

I request that you please:

- 1) Analyze current studies relating to riparian protection, wetlands protection, and related groundwater sustainability to conform to State and County climate goals and best environmental practices.
- 2) Set goals and policies for protection.
- 3) Cite studies used to support your decisions on creek buffers, wetlands incursions, wildlife travel, and lake protection.
- 4) Analyze the cumulative impacts and potential degradation of floral and faunal habitats, groundwater supply, and riparian zones caused by the increased housing density, noise, construction, traffic, and demolition proposed under the Preferred Plan. Provide analysis of the impacts of redevelopment on migratory fish species, such as coho and steelhead salmon. Also analyze whether these impacts would be mitigated by a smaller redevelopment such as the HPA.
- 5) In the DEIR, add creeks/riparian zones and wetlands to goals, significance criteria, and section 3.1.3.3 relevant policies, implementing actions, and policies. Note that in section 3.4.1.3, local land use regulations, Sonoma County General Plan 2020, the DEIR mentions policy LU10-a for establishing maximum densities and siting standards for wetlands, sensitive natural communities, and areas of essential habitat connectivity, yet the same DEIR offers none of these.
- 6) Adhering to the above studies, delineate—in both the Preferred Plan and the DEIR—clear boundaries for riparian setbacks, identify the entities that a developer must work with to facilitate creek and wetland protection, or explicitly require a developer to ensure that redevelopment of the core campus be done in such a way, and with sufficient buffers, as to protect the natural values of the open space.
- 7) Add specific, enforceable guidelines for riparian and wetland protections, specifying acreages and minimum boundaries on both the east and west sides of Arnold Drive, and limit allowed uses on these acreages to passive recreational uses such as hiking, mountain biking, horseback riding, photography, etc. If agricultural or commercial uses are permitted, ensure mitigations are identified and enforceable.
- 8) Please make sure that policies in the Specific Plan are consistent in Wildlife Corridor Policies (p40), People/Wildlife Interface (p 41), and policy 2-25 (p 42).
- 9) Please ensure that policies in the DEIR, notably policies 2-21, 2-23, 2-25, 2-27, and 2-30 are consistent.

I appreciate the work done to date. As a private citizen reading the documents and preparing this letter, I have recently spent over ten hours, so I fully support Commissioner Carr's imperative that more time is needed for the Planning Commission to do its job. I know that with the political will to make this project right, in line with community values, we can succeed together.

Sincerely,

Meg Beeler

^[1] See DEIR map 3.16-2, page 681, for path of 2017 fire and “constraints.” See Specific Plan map 3.4-1 for 30 acres of wetlands that are contiguous with the proposed road, and Tables 3.4-1, 3.4-2, 3.4-3 for sensitive species, pp. 230 to 243.

^[2] See “Center for Biological Diversity SDC Specific Plan NOP” dated 3.4.22, referenced in full at the end of this letter.

Addendum Center for Biological Diversity SDC Specific Plan NOP” dated 3.4.22:

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A literature review found that recommended buffers around aquatic resources for wildlife often far exceeded 100 meters (~325 feet), well beyond the largest buffers implemented in practice (Robins, 2002). For example, Kilgo et al. (1998) recommend more than 1,600 feet of riparian buffer to sustain bird diversity. In addition, amphibians, which are considered environmental health indicators, have been found to migrate over 1,000 feet between aquatic and terrestrial habitats through multiple life stages (Cushman, 2006; Fellers & Kleeman, 2007; Semlitsch & Bodie, 2003; Trenham & Shaffer, 2005). For example, California red-legged frogs have been found to migrate about 600 feet between breeding ponds and non-breeding upland habitat and streams, with some individuals roaming over 4,500 feet from the water (Fellers & Kleeman, 2007). Newts have been documented traveling up to a mile from breeding ponds (Trenham, 1998). Western pond turtle nests have been found up to 1,919 feet from aquatic habitats and individuals have been documented to move regularly between aquatic habitats with long-distance movements of up to 2,018 feet (Sloan, 2012). Accommodating the more long-range dispersers is vital for continued survival of species populations and/or recolonization following a local extinction (Cushman, 2006; Semlitsch & Bodie, 2003).

In addition, more extensive buffers provide resiliency in the face of climate change-driven alterations to these habitats, which will cause shifts in species ranges and distributions (Cushman et al., 2013; Heller & Zavaleta, 2009; Warren et al., 2011). This emphasizes the need for sizeable upland buffers around streams and other aquatic resources, as well as connectivity corridors between heterogeneous habitats. Again, the EIR must adequately assess and mitigate impacts to local, regional, and global wildlife movement and habitat connectivity.

CC: Senator Mark McGuire, Senator Bill Dodd, Assemblyperson Cecelia Aguiar-Curry, Sonoma County Board of Supervisors

district4@sonoma-county.org, james.gore@sonoma-county.org, district5@sonoma-county.org

susan.gorin@sonoma-county.org, david.rabbitt@sonoma-county.org, engage@sdespecificplan.com, _____

Commissioner Greg Carr _____, Commissioner Caitlin Cornwall _____, Commissioner Patricia Gilardi _____, Commissioner Lawrence Reed _____, Commissioner Jacquelyne Oceana _____, Commissioner Gina Belforte _____, Commissioner Kevin A. Deas Kevin.Deas@sonoma-county.org, Commissioner Shaun McCaffery _____, Commissioner Belen Grady Belen.Grady@sonoma-county.org, Kenwood Press, Sonoma Index Tribune, Santa Rosa Press Democrat, SF Chronicle, Eldridge for All

From: [connie miatech](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [BOS](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@sonoma-county.org](#); [senator.mcquire@sonoma-county.org](#)
Subject: DEIR PUBLIC COMMENT
Date: Thursday, September 15, 2022 6:41:49 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.

Signed,

Connie Miatech, Kings Circle, Cloverdale, Ca 95425

conniemiatech@yahoo.com, 707-771-1829

[Sent from Yahoo Mail on Android](#)

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From: [Diana Sanson](#)
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: DRAFT EIR comment
Date: Wednesday, September 21, 2022 8:42:36 AM

Dear Permit Sonoma,

I have lived in Glen Ellen for 16 years and have very specific, real world comments on the DEIR regarding emergency evacuation.

On Oct 8/9, 2017 it took us 2.5 hours, in the middle of the night, to escape the Tubbs fires. We are two active, completely competent 53 yr olds who had an evacuation plan for our home already in place. We lived on Warm Springs Road, near the Bennett Valley Intersection, so we *should* have had 3 easy ways to evacuate. But we did not. There was only ONE way out that was not blocked - and that was north thru Kenwood (Bennett Valley Rd was on fire/blocked; Glen Ellen was in huge flames). This route beyond Kenwood on Hwy 12 took 2.5 hrs to get into south Santa Rosa, driving through active fires along the side of the road. It took more time to reach 101, which was a parking lot. This DEIR report on emergency evacuations along Hwy 12 is just not based on the wildfire reality of our topography, existing roads and current population. To add 1000 homes/about 4,000 more people exiting in an emergency on Hwy 12 is just not sensible. It will create a fire trap. We realize with NIXLE and the other new advance warning systems it may be slightly better, but you still have a large volume of people trying to get out on 2-lane Hwy 12, ALL of which are in fire prone areas as this is a rural area. If it was 2.5 hrs in 2017, imagine what it will be like with several thousand more people in Eldridge trying to evacuate at the same time.

There is no predicting exactly what other emergencies nature has in store for us BUT we do know this is right next to the WUI areas and more fires are likely requiring mass evacuations. We do have the capacity to plan better for what we know is likely coming.

Thank you,

Diana Sanson and Ben Compton

--

Respect science, respect nature and respect each other. It is the only glue that will keep us together.

- Thomas Friedman

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From: [BOS](#)
To: [PlanningAgency](#)
Subject: FW: Comment for SDC Draft EIR and Specific Plan
Date: Thursday, September 15, 2022 4:14:54 PM
Attachments: [SDC EIR Response.pdf](#)

From: Susan Gorin <Susan.Gorin@sonoma-county.org>
Sent: Thursday, September 15, 2022 4:14 PM
To: BOS <BOS@sonoma-county.org>
Subject: Fwd: Comment for SDC Draft EIR and Specific Plan

Susan Gorin | 1st District Sonoma County Supervisor
575 Administration Drive, Room 100A
Santa Rosa, CA. 95403
Office 707-565-2241 | Cell 707-321-2788

From: Mary Poppic-Reeves <mpr4mpr@gmail.com>
Sent: Wednesday, September 14, 2022 4:23:37 PM
To: Brian Oh <Brian.Oh@sonoma-county.org>
Cc: Susan Gorin <Susan.Gorin@sonoma-county.org>
Subject: Comment for SDC Draft EIR and Specific Plan

EXTERNAL

Mr. Oh,

Please accept our correspondence into the record for the Sonoma County Planning Commission's consideration of the Sonoma Developmental Center Draft EIR and Specific Plan. Feel free to reach out if you have questions.

Sincerely,

Mary Poppic-Reeves and Brian Reeves

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Meg Beeler
16100 Sobre Vista Court
Sonoma, CA
September 21, 2022

Mr. Brian Oh, Comprehensive Planning Manager, Permit Sonoma
County of Sonoma
2550 Ventura Avenue Santa Rosa, CA 95403
Brian.Oh@sonoma-county.org
Sent via email

Re: Comments on Draft EIR and Specific Plan for SDC

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I am commenting as a neighbor (living five minutes south of campus), a long-time hiker and passionate defender of the property, and a participant in the planning process for nearly 10 years in my role as Chair of Sonoma Mountain Preservation. Thank you for the opportunity.

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I request that you please:

- 1) Analyze current studies relating to riparian protection, wetlands protection, and related groundwater sustainability to conform to State and County climate goals and best environmental practices.
- 2) Set goals and policies for protection.
- 3) Cite studies used to support your decisions on creek buffers, wetlands incursions, wildlife travel, and lake protection.

¹ See DEIR map 3.16-2, page 681, for path of 2017 fire and “constraints.” See Specific Plan map 3.4-1 for 30 acres of wetlands that are contiguous with the proposed road, and Tables 3.4-1, 3.4-2, 3.4-3 for sensitive species, pp. 230 to 243.

² See “Center for Biological Diversity SDC Specific Plan NOP” dated 3.4.22, referenced in full at the end of this letter.

- 4) Analyze the cumulative impacts and potential degradation of floral and faunal habitats, groundwater supply, and riparian zones caused by the increased housing density, noise, construction, traffic, and demolition proposed under the Preferred Plan. Provide analysis of the impacts of redevelopment on migratory fish species, such as coho and steelhead salmon. Also analyze whether these impacts would be mitigated by a smaller redevelopment such as the HPA.
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- 7) Add specific, enforceable guidelines for riparian and wetland protections, specifying acreages and minimum boundaries on both the east and west sides of Arnold Drive, and limit allowed uses on these acreages to passive recreational uses such as hiking, mountain biking, horseback riding, photography, etc. If agricultural or commercial uses are permitted, ensure mitigations are identified and enforceable.
- 8) Please make sure that policies in the Specific Plan are consistent in Wildlife Corridor Policies (p40), People/Wildlife Interface (p 41), and policy 2-25 (p 42).
- 9) Please ensure that policies in the DEIR, notably policies 2-21, 2-23, 2-25, 2-27, and 2-30 are consistent.

I appreciate the work done to date. As a private citizen reading the documents and preparing this letter, I have recently spent over ten hours, so I fully support

Commissioner Carr's imperative that more time is needed for the Planning Commission to do its job. I know that with the political will to make this project right, in line with community values, we can succeed together.

Sincerely,

Meg Beeler

Addendum Center for Biological Diversity SDC Specific Plan NOP" dated 3.4.22:

A literature review found that recommended buffers around aquatic resources for wildlife often far exceeded 100 meters (~325 feet), well beyond the largest buffers implemented in practice (Robins, 2002). For example, Kilgo et al. (1998) recommend more than 1,600 feet of riparian buffer to sustain bird diversity. In addition, amphibians, which are considered environmental health indicators, have been found to migrate over 1,000 feet between aquatic and terrestrial habitats through multiple life stages (Cushman, 2006; Fellers & Kleeman, 2007; Semlitsch & Bodie, 2003; Trenham & Shaffer, 2005). For example, California red-legged frogs have been found to migrate about 600 feet between breeding ponds and non-breeding upland habitat and streams, with some individuals roaming over 4,500 feet from the water (Fellers & Kleeman, 2007). Newts have been documented traveling up to a mile from breeding ponds (Trenham, 1998). Western pond turtle nests have been found up to 1,919 feet from aquatic habitats and individuals have been documented to move regularly between aquatic habitats with long-distance movements of up to 2,018 feet (Sloan, 2012). Accommodating the more long-range dispersers is vital for continued survival of species populations and/or recolonization following a local extinction (Cushman, 2006; Semlitsch & Bodie, 2003).

In addition, more extensive buffers provide resiliency in the face of climate change-driven alterations to these habitats, which will cause shifts in species ranges and distributions (Cushman et al., 2013; Heller & Zavaleta, 2009; Warren et al., 2011). This emphasizes the need for sizeable upland buffers around streams and other aquatic resources, as well as connectivity corridors between heterogeneous habitats. Again, the EIR must adequately assess and mitigate impacts to local, regional, and global wildlife movement and habitat connectivity.

CC: Senator Mark McGuire, Senator Bill Dodd, Assemblyperson Cecelia Aguiar-Curry, Sonoma County Board of Supervisors district4@sonoma-county.org, james.gore@sonoma-county.org, district5@sonoma-county.org, susan.gorin@sonoma-county.org, david.rabbitt@sonoma-county.org, engage@sdcspecificplan.com, _____, Commissioner Greg Carr _____, Commissioner Caitlin Cornwall _____, Commissioner Patricia Gilardi _____, Commissioner Lawrence Reed _____, Commissioner Jacquelynne Ocana _____, Commissioner Gina Belforte _____, Commissioner Kevin A. Deas Kevin.Deas@sonoma-county.org, Commissioner Shaun McCaffery _____, Commissioner Belen Grady Belen.Grady@sonoma-county.org
Kenwood Press, Sonoma Index Tribune, Santa Rosa Press Democrat, SF Chronicle

From: [Steve Schramm](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [David Rabbitt](#); senator.mcquiere@senate.ca.gov; [Lynda Hopkins](#); senator.dodd@senate.ca.gov; [district4](#); [district3](#); [Susan Gorin](#); [BOS](#); engage@sdcspecificplan.com
Subject: Public Comment on SDC Specific Plan and DEIR – Scale it Back!!
Date: Saturday, September 17, 2022 6:05:29 PM

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

Where is the water for any proposed project coming from.?

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.

Sincerely,

Steve Schrammn
198 Fair Street
Petaluma, CA 94852
Reelsafari@gmail.com
707 953 9263 cell

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From: [Lorie Silver](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [BOS](#); [engage@sdcspecificplan.com](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](#); [senator.mcguire@senate.ca.gov](#)
Subject: Public Comment on SDC Specific Plan and DEIR – Scale it Back!!
Date: Tuesday, September 20, 2022 8:08:05 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 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.

Thank you for your consideration,

Lorie Silver
4621 Maddocks Rd.
Sebastopol, CA 95472
707 696-0412
garryoakbay@gmail.com

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From: [Deb Pool](#)
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; gerald.mclaughlin@dgs.ca.gov; jason.kenney@dgs.ca.gov; Cecilia.Aguiar-Curry@asm.ca.gov
Subject: Public Comment on SDC Specific Plan and DEIR
Date: Sunday, September 18, 2022 12:37:00 PM

September 18, 2022

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

RE: Public Comment on SDC Specific Plan and DEIR

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 support the ***Historic Preservation Alternative*** as “it is the most environmentally sound” and reflects largely what the public, NVMAC, Springs MAC, and Sonoma Land Trust has repletely imputed as an alternative to Permit Sonoma.

Specifically, please direct Permit Sonoma to take these steps:

1. Reduce the size of development to 450 or fewer homes and require that the majority of them be affordable ***for the people who already actually live and work in Sonoma Valley*** and ***for people with disabilities***. Eliminate the hotel, and do not duplicate retail and commercial space that is already provided in Glen Ellen. Keep in mind, this is ***a rural community***.
2. Riparian areas are crucial when it comes to Open Space. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
3. 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 but not limited to agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities.

4. Wildfire: Revise wildfire evacuation impacts to reflect actual experiences which occurred during recent wildfires using new county wildfire risk and hazard maps. Adding 11/2 minutes

to the timeline of evacuation is meaningless!

5. Climate Crisis: Think 30X30 Initiative, which California embraces.

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 and permanently securing the maximum amount of Open Space.

6. The DEIR falls short of CEQA requirements. The DEIR is inadequate and the so-called self-mitigated Specific Plan contains **many weak** general policies, goals and conditions of approval, to address the environmental impacts.

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 "should" or "could occur" "may result" 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.

There is still so much work to do with the Specific Plan and the DEIR.

I support Commissioner Carr's request (Planning Commissioners Meeting 9/15/22) for additional time to get this right. He repeatedly stated that in order for the Planning Commission to do their job with integrity, they would need addition time to go page by page. This was even at the expense of more frequent meetings to accomplish the task, getting it to the Board of Supervisors as soon as is possible. There is a willingness to do the hard work, we just need the courage to take the bold steps, and do the right thing for the future.

Sincerely,

Deb McElroy Pool
13588 Railroad, Glen Ellen
707-486-7134
debjmpool@gmail.com

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From: [Lauren Reed](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [senator.mcguire@senate.ca.gov](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](#); [BOS](#); [engage@sdcspecificplan.com](#)
Subject: Public Comment on SDC Specific Plan and DEIR
Date: Thursday, September 15, 2022 2:37:24 PM

Sonoma County Planning Commissioners,

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

Scale back size of development to 450 or fewer homes and require that most or all 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.

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.

Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps.

Revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as reusing and demolishing fewer buildings and providing transit.

Signed,

Lauren Reed

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From: [Andrea Davis](#)
To: [PlanningAgency; engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com)
Subject: Public comment on SDC specific plan
Date: Friday, September 16, 2022 9:30:17 AM

Dear Sonoma Planning Commissioners,

My mom worked at SDC 2000-2010, and I have spent a lot of time with her there. It is a beautiful place, that supports local wildlife and biodiversity. Preserving their habitat is not only important for the individual animals, but because we are all connected, preserving biodiversity is critical to our own survival and quality of life as well.

I strongly support scaling back development to only affordable housing, placed in a dense configuration. Climate change, reduced air quality, other environmental health concerns, and our own social nature as a species have shown that we need to build densely for the future. The vast majority of the property can be reserved for public hiking trails, community events, and wildlife habitat. This would benefit the wildlife, but also the quality of life of the residents, and build community. The current property is priceless as a thriving ecosystem. Once developed, it is lost forever.

In general, I strongly support building more housing, and am a member of YIMBY SF. But building should be in underdeveloped urban and suburban environments, which are vastly underutilized with a great deal of wasted space. We can solve the housing crisis by building more densely, not by encroaching further on wildlife habitat. When we build at the urban-wildlife interface, we put ourselves at greater risk for fire and other environmental disasters.

I support the points from the Sierra Club, below:

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.

Thank you,
Andréa Davis
3233 Noriega St.
San Francisco, CA 94122
707-486-4980
(prior resident of Cloverdale, CA)

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From: nancyeverskirwan@gmail.com
To: [Tracy Salcedo](#)
Cc: [Brian Oh](#); [Greg Carr](#); [Caitlin Cornwall](#); [Pat Gilardi](#); [Larry Reed](#); [Gina Belforte](#); [Jacquelynne Ocana](#); [Shaun McCaffery](#); Belen.Grady@sonoma-county.org; [PlanningAgency](#); Logan.Pitts@sen.ca.gov; Senator.McGuire@senate.ca.gov; Senator.Dodd@senate.ca.gov; [Wachsberg, Rebecca](#); [Chaaban, Ezra](#); Cecilia.Aguiar-Curry@asm.ca.gov; Gerald.McLaughlin@dgs.ca.gov; [district4](#); [James Gore](#); [district5](#); [Susan Gorin](#); [David Rabbitt](#); [SDC Specific Plan](#); [Hannah Whitman](#); [Arielle Kubu-Jones](#); [Rebecca Hermosillo](#); [Rep. Mike Thompson](#)
Subject: Re: Comments on DEIR and Preferred Specific Plan for SDC
Date: Wednesday, September 21, 2022 10:22:00 AM
Attachments: [SMP_DEIR_letter_FINAL_9-21-22.pdf](#)

Thank you Tracy for your hard work, time and effort in putting this comment together for Sonoma Mountain Preservation. We are all hopeful that Permit Sonoma will in fact take community input seriously and consider the amount of oft repeated volunteer effort and informed and educated thought that went into most all the comments. After all it is our lives that will be impacted by this misconceived and miscalculated DEIR and Specific Plan.

Gratefully,
Nancy Kirwan

NEK

On Sep 21, 2022, at 10:36 AM, Tracy Salcedo <laughingwaterink@gmail.com> wrote:

Hi Brian,

On behalf of Sonoma Mountain Preservation, I have attached our comments on the draft environmental impact statement and preferred specific plan for the Sonoma Developmental Center.

Thank you for your consideration. We all hope, with the incorporation of community input into a plan that is truly community driven, we will create a wholesome, viable future for this very special place and for the people who love it.

Kindly, Tracy

Tracy Salcedo
Director
Sonoma Mountain Preservation

(707) 246-0694
laughingwaterink@gmail.com / laughink@vom.com
laughingwaterink.com

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Subject: RE: SDC Program Draft EIR Comments
Date: Wednesday, September 21, 2022 9:00:13 AM

From: Thomas Ells <thomasells40@gmail.com>
Sent: Sunday, September 18, 2022 3:22 PM
To: Brian Oh <Brian.Oh@sonoma-county.org>
Subject: SDC Program Draft EIR Comments

Dear Brian Oh, SDC Comprehensive Planning Manager, Sonoma County,

Please see attached, additional SDC Program Draft EIR Comments (1a & 2a).

No where in the Sept 15th Planning Commission meeting comments did I see my original set of Draft EIR comments, which were emailed to you, and which you responded "no problem" you would include them in with all the other comments at that time. I saw none of those prior comments. Please respond.

Your Humble Servant
Thomas C. Ells, RCE 40656
Anthropologist
Environmentalist

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TCE

ENGINEERING

Thomas C Ells, RCE 40656
MS Tax, MS Fin, MS Acc
ED, Galen's Gardens/SHS

Investment Securities § Stocks* § Agency* & Municipal Bonds*
Real Estate Consulting § Property Management*

154 Butterfly Ln, #232 Santa Rosa, CA 95407 Phn 707-508-8011 thomasells40@gmail.com

Formerly NASD Series 7 & 63 Registered Rep, & Series 66 Financial Advisor.
Securities Not Available

Mr Brian Oh, Comprehensive Planning Manager, SDC
Permit Sonoma, County of Sonoma
2550 Ventura Ave.
Santa Rosa, CA 95403

Regarding: Sonoma Developmental Center (SDC) Specific Plan (SP) & Program Draft EIR (EIR)

Sept 18, 2022

Dear : Too Whom This May Concern; for Preliminary Discussions,

Though Permit Sonoma worked hard, produced >4000pgs, & created many potential alternatives within their Specific Plan/EIR process, they have overshot the mark creating a plan for the past, "fighting the last war" as we often do, and not taking advantage of the opportunity to present a plan for the future.

Why does it appear the SDC EIR and associated Specific Plan (characterized by the County's preferred Proposed Project Alternative) have defined and committed the County of Sonoma, as Lead Agency under CEQA, to a series of specific decisions, plans, and/or alternatives without fully considering other acceptable plans (under legislation 14670.10.5), alternatives, mitigation measures, and the Null Project.

Please explain why the County (Permit Sonoma) has allowed the EIR to be produced which does not address the mitigatable cumulative effects of waste generated by the proposed alternative over the Null Project hypothesis, to the extent where recommended building demolition of ~1.2M sq-ft produces a minimum of 161,000 cy of debris equal to 67 years of operation of the Proposed Project Alternative in addition to the equal amount of debris produced by the eventual demolition of the Proposed 1.2M sq-ft Project ($\Sigma=322,000$ cy, or 134 years at the rate of the Proposed Project at completion); together with the project waste there will be an average cumulative waste of 19.8 tons/day or 1.5% of daily averages (2016-2020, per SP pg 603) ? Since we are already transferring all our solid waste away from Sonoma County because we do not have local landfill capacity, and our waste charges (\$135/ton) are double the charge for Hazardous Waste (\$50.97/ton asbestos waste) taken to Kettleman Hills landfill, this must be considered a significant mitigatable impact by Reuse and Historic Preservation of the existing buildings. At the local waste costs, this represents >\$960,000/yr = ~\$65M over the 67 years, from these 3 sources.

Why is no mention made in the EIR or SP of GHG's which were imbedded and carried within the existing constructed buildings which will be released into the atmosphere by their demolition, nor is any mention made of the GHG emissions which are imbedded in the production of the new materials and resources which are expected to replace the demolished SDC buildings, these are significant long term mitigatable cumulative effects? Why has the EIR not addressed either of these cumulative GHG effects, from demolition, neither the before demolition GHG emissions sequestered in the existing buildings which will be released, nor the GHG emissions released in the production of the replacement 1.2M sq-ft of buildings together with their own lifecycle emissions released upon their demolition? These GHG's must be considered a significant mitigatable impact by their (building) Reuse.

Why is no mention made in the EIR or SP of the cumulative effects of the opportunity lost to lead this community and the Global Community in re-visioning the future, from the past that we have, into the future that we need while using the existing buildings and infrastructure you demolish?

Why is Historic Preservation of the existing buildings considered by the EIR & SP to be financially infeasible and unmitigatable? This is not a fact, nor is it a reasonable conjecture from any basic set of reasonable assumptions, other than a prejudice against Historic Buildings in preference to the Cult-of-the-New. Historical Preservation and Reuse of these buildings is relatively simple. In particular, historic lumber is dimensionally greater and structurally superior, providing more insulative cavity, and other materials were more dense historically. History teaches us that the oldest buildings are the most energy efficient for their locations; such as Kiva & Adobe Structures of the America Southwest are stone or adobe to insulate against the heat, raised pole structures in the Indus Valley Civilization and Mounded Structures of the Mississippian Culture prevent flood inundation, Northern Long Houses of the Iroquois in the East and the Suquamish of the West are large multifamily dwellings and made of wood frames and bark covering to insulate against the cold, even Igloos of the Eskimo. Why have you neglected the consideration that almost every older building uses less energy than that which replaces it, despite the efficiency of the New Building?

Why is scant consideration, even superficial avoidance, of the topic of Hazardous Materials mitigation and removal given within the EIR and SP as a direct consequence of the building demolition, as opposed to "In-Situ" mitigation in place through reuse and Historic Preservation of the existing buildings; Diesel Tanks, Film Development, Chemical Storage, Paint Shops, Corporate Yards and Transportation buildings, all have significant potential for Hazardous Materials impacts, as well as, the asbestos insulation and lead based paint in the housing, hospital, and office buildings? Lack of consideration of this impact has direct impacts of needlessly and costly filling existing hazardous waste landfills, both individually and cumulatively, though mitigatable.

Each of the above considerations, taken individually are significant impacts not covered by the EIR and SP, but there is also a cumulative effect of the above neglectful preparation of the EIR and SP, "a death by 1000 cuts" to the Historic Preservation (stated to be unmitigatable). Why has the cumulative effect of this neglectful preparation not been addressed within the EIR and SP, which then augers for and streamlines the process for replacement by the preferred Proposed Project Alternative as opposed to Historic Preservation (HP)? Can you explain how you are mitigating these neglected impacts which should be further compared to the environmentally preferred HP, in producing a cycle of demolition and reconstruction which has a cumulative effect due to volume of waste, and on the environment due to exploitative expectations, the expectation that 'everything I have should be new', 'we need the new', 'I need the new'? Again, why does the EIR and SP neglect the positive environmental impact the development could have by leading, rather than following old worn-out traditions of thinking, that have cumulatively placed us in our Climate Crisis?

Your Humble Servant

Thomas Chase Ells, ED, Galen's Gardens/Samaritan Housing Society
Anthropologist, RCE 40655, MS Tax Law, MS Fin, MS Acc.
UCI Administrative Law Certificate in Hazardous Materials & Emergency Management

TCE

ENGINEERING

Thomas C Ells, RCE 40656
MS Tax, MS Fin, MS Acc
ED, Galen's Gardens/SHS

Investment Securities § Stocks* § Agency* & Municipal Bonds**
Real Estate Consulting § Property Management

154 Butterfly Ln, #232 Santa Rosa, CA 95407 Phn 707-508-8011 thomasells40@gmail.com

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Mr Brian Oh, Comprehensive Planning Manager, SDC
Permit Sonoma, County of Sonoma
2550 Ventura Ave.
Santa Rosa, CA 95403

Regarding: Sonoma Developmental Center (SDC) Specific Plan (SP) & Program Draft EIR (EIR) Comments 2

Sept 18, 2022

Dear : Brian Oh, & Too Whom This May Concern;

Why has County Staff/Consultants done the following, and what are your mitigation recommendations?:

The EIR & SP preparation violates BPC6731, without a Civil Engineer in responsible charge of Planning?

The EIR has committed the County to a course of action, new development, prior to EIR's Certification?

Historic Reuse appears proper, yet each price consequence results in expanded project impacts.

What is the economic obsolescence impact to the Springs/Glen Ellen of the proposed project?

The EIR and SP propose demolition of 1.2M sq-ft of buildings, along with the 1M+0.35M gal fresh water tanks, see Figure 4.3-1: "Historic Assets", without reference to local Wildfire protection. Why?

The EIR & SP propose demolition of Historic Firehouse (c1932) without wildfire impact consideration?

EIR & SP neglect wildfire consideration, as not "High Fire Risk", though analysis excluded SDC?

Why does EIR & SP use uncalibrated (unrealistic) models, eg without reference to actual fire evacuation?

The EIR develops a series of conclusions as analysis, beginning after point in time of project completion?

The EIR assumes no cumulative effects to the proposed project; eg. GHG's and solid waste, but

does not include project specific demolition, nor constructed lifecycle, GHG's & wastes? Why?

The EIR assumes no cumulative effects from combining the proposed project wastewater into a downstream waste treatment facility when a historic facility is located on site to recharge the wetlands/creek.

SDC is an Historic opportunity to propose and develop an integrated environmental & climate protective response to wildfire, in a traumatized and sensitized area, without which this proposal has a significant cumulative negative impact to the local & regional environment due to unrealized wildfire protections.

Why is EIR & SP preparation biased in favor of Standard-Operating-Procedure for new development?

There is, at great expense, no Professional caliber analysis within these documents, explain?

Your Humble Servant

Thomas Chase Ells, ED, Galen's Gardens/Samaritan Housing Society
Anthropologist, RCE 40655, MS Tax Law, MS Fin, MS Acc.
UCI Administrative Law Certificate in Hazardous Materials & Emergency Management

From: [Ann Gutierrez](#)
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
Subject: : Public Comment on SDC Specific Plan and DEIR – Scale it Back!!
Date: Monday, September 19, 2022 4:35:07 PM

EXTERNAL

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 200 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,

Ann Gutierrez and Teresa Seward
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Ahgtks@sbcglobal.net

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APPENDIX to North Sonoma Valley Municipal Advisory Council Letter of 01/06/22.

This appendix provides additional details in support of the concepts presented in the main body of the NSV MAC letter dated January 6, 2022. These details are a compilation of information provided in public comments on the SDC Specific Plan Alternatives Report (November 2021), a community survey, and NSV MAC input. These details should be addressed in the Specific Plan policies and design guidelines.

All “community survey” references below are to the non-affiliated survey conducted by Sonoma Valley resident Dr. Shannon Lee, Biology Department Faculty at Sonoma State University, in December 2021 ([link](#)).

OPEN SPACE:

General Information:

- Community input consistently emphasizes the singular opportunity the SDC campus represents in terms of protecting the open space and wildlife corridor in the context of a vibrant, sustainable community.
- Over 90% of the community survey respondents ranked “preservation of open space” as of the highest priority.

The Community Supports:

- Prioritizing the transfer of park-adjacent properties to Sonoma Valley Regional, Jack London State Historic parks, or a potential land trust with continued public access to trails and open space.
- Protecting the wildlife corridors, their permeability and related natural resources from the wide range of impacts associated with over-development of the campus.
- The wildlife corridors are not separate from SDC campus—animals are not cognizant of boundaries—and their protection is integral to all aspects of the site plan.
- Pursuing the development of performance standards to support housing and other development, as outlined in the Sonoma Land Trust’s memo to the NSV MAC, Springs MAC and Sonoma Valley Citizens Advisory Council in follow-up of the November 18, 2021 joint meeting.

HOUSING DENSITY:

General Information:

- The SDC site is outside of an urban growth area and surrounded by community separator lands and the rural village of Glen Ellen.
- Based on current United States’ census definitions, the Eldridge “census designated place,” including the SDC campus and the Glen Ellen community just south of the SDC, could add approximately 450 housing units, i.e., through redevelopment of the SDC campus, and still be within a rural (vs. urban) designation, assuming average occupancy in Sonoma County of 2.61 people per dwelling unit.
- Maintaining a rural designation for the site’s development is consistent with the Guiding Principles established for the site plan in that new development must complement the surrounding communities of Glen Ellen and Eldridge/Glen Ellen.

The Community Supports:

- The creation of additional housing on the SDC site, particularly affordable housing, *however at a substantially lower density—450 or fewer housing units—than in any of the draft alternatives published to date. (The number of housing units in all three plan alternatives is 990 or greater.)*



- 89% of community survey respondents support no more than 450 housing units; 65% of those supporting between 400-450 units, and 24%, less than 400 units.
- Related to this and to complementary community development as mentioned above, 87% of community survey respondents cited “preserving the rural character of Glen Ellen” as “very important.”
- The community does not prioritize market rate housing.

AFFORDABLE HOUSING:

The Community Supports:

- A higher percentage of mixed level affordable housing than the 25% of the published alternatives. Specifically:
- 76% of community survey respondents think that 25-50% (or more) of the SDC housing should be affordable; 49% of all respondents would push that percentage higher, with at least 50-75% of housing units affordable. Over half of that 49% would prefer that 75%+ of all housing be affordable.
- Housing to include housing for individuals with developmental disabilities (as indicated in state statute); community comments also support senior and veterans housing and related services.
- Housing should be fully accessible (to disabled), as outlined in letters from representatives of the disabled community.
- The survey showed little support for estate homes (81% of respondents opposed) or 3-story apartment buildings (68% opposed), however during the NSV MAC discussion of 12/15/21 it was acknowledged that 3-story housing may need to be considered to achieve higher levels of affordable housing.
- Adaptive re-use of existing buildings (see below) may alleviate need for 3-story structures.
- The community generally agrees that clustered housing and integrated affordability level housing should be considered.
- **The state of California has prioritized the creation of affordable housing, as has Sonoma County. The state must reconcile this priority with its fiscal responsibility with respect to the SDC property by defraying the significant site remediation costs.**
- Housing clusters and siting should be designed to support open space priorities as identified above.
- Housing should be located away from Arnold Drive to preserve the existing visual and historic character and density of the SDC campus.

Potential funding sources:

- Federal Infrastructure Investment and Jobs Act

ADAPTIVE REUSE OF EXISTING BUILDINGS:

General Information:

- ALL responsible structural studies of the single-story buildings on the east side of the SDC campus indicate that re-use of the buildings is both financially feasible, and a likely positive use of existing resources.
- It is important to note that all of the studies related to the re-use option were conducted using old financial data. Local new construction costs have escalated sharply in the past few years, and particularly in the past 12 months.
- The discussions of adaptive re-use have focused on perceived low demand, and the potential unwillingness of people to live in buildings that have been re-designed. However, there are examples of creative, livable residential re-use designs throughout urban environments both locally,



and in other regions of the US, including lofts in old train stations, apartments in old manufacturing facilities, etc.

- Additionally, those discussions regarding design do not take into account the changes we have seen in the past couple of years alone. Tiny houses, re-purposed shipping containers, etc., are designs that are now considered livable and comfortable despite the out-of-date view of such designs.

Community Benefits:

- The re-use option will reduce greenhouse gases associated with demolition and construction. It will reduce air quality problems since the impacts of dismantling of concrete, wood and toxics will be considerably reduced as compared to that of demolished whole buildings.
- The roadways will not be further burdened by the weight and number of overloaded trucks.
- Public safety will be improved due to reduced traffic flows.
- The unique and beautiful architectural nature of the existing buildings will be preserved.
- The re-use of the buildings will be less expensive, and less time consuming, resulting in a more rapid occupancy schedule.
- Local job creation will increase with the use of adaptive re-use of existing buildings due to the nature of the specialty construction skills required for the work.
- “Proof of concept,” or the demonstration project aspect of the work, will serve as a model for additional other communities or similar projects.

The Community Supports:

- The community survey found that 49% of all respondents find **adaptive reuse of buildings to serve at-risk populations** to be of highest or high priority combined.
- In addition, a total of 64% of all respondents find **adaptive reuse of buildings to serve special needs populations** to be of highest or high priority combined.
- In addition, the community has indicated support for alternative housing types, e.g., co-housing, that could be implemented to make reuse financially feasible.

Potential funding sources:

- Grants
- Developer funds

UTILITY INFRASTRUCTURE:

Sewer Treatment / Water Recycling

General Information:

- The Sonoma Valley County Sanitation District Treatment Facility is located approximately 13 miles from the SDC Campus. The area surrounding the current treatment facility, located at the end of 8th Street East, routinely floods during the wet season.
- Untreated effluent is discharged into Nathanson Creek during flood events.
- Climate change, and associated sea level rise, will result in operations at the current location becoming increasingly difficult to maintain and sustain.
- Flood events will increase as groundwater levels rise.
- Discharges into Nathanson Creek will increase.
- Currently the Sanitation District pays a fine every time it has to dump overflow into the Nathanson Creek system. This happens multiple times a year. Adding additional homes to the sanitation system design will likely cause more frequent overflow problems.



Community Benefits:

- A sewage treatment facility could be sited on the SDC site—a location in the Sonoma Valley which is resistant to the impacts of climate change and sea level rise.
- Localized water recycling makes re-use financially feasible since the Sonoma Valley County Sanitation District does not, and will not, have the funds to create a large-scale water recycling program from its current location at the end of 8th St. East.
- Localized water recycling and storage is part of a fire resiliency plan.
- Wetlands associated with water treatment could be associated with a wildlife preserve and fire break, adding to climate resiliency.
- Groundwater recharge in the upper Sonoma Valley would benefit the groundwater plan requirements.
- Infrastructure requirements associated with SDC development would require an upgraded sewer treatment and water recycling plan.

Potential funding sources:

- Grants
- Reduced penalties for discharges into the Nathanson Creek system could be applied to the construction of a treatment facility.
- Recycled water sales.
- Local sewer district fees including SDC development, the existing town of Glen Ellen and potential expansion into areas that are currently served by underperforming septic systems.
- Developer funds.
- Federal Infrastructure Investment and Jobs Act

Energy Resiliency / Microgrid Construction

General Information:

- An energy sustainability plan and microgrid design should accompany any SDC development.
- Community Choice Aggregation is available in 23 municipalities and counties in California, serving 11 million customers.
- The Climate Center, located in Santa Rosa, is among the main organizing and lobbying organizations responsible for the development and adoption of Community Choice Aggregation.
- PG&E has shown itself to be an increasingly unreliable source for the electric grid.

Community Benefits:

- A move towards a localized, sustainable energy infrastructure can serve as an emergency preparedness resource.
- Reduced greenhouse gas emissions.
- Lower energy costs will attract potential commercial interests, and reduce operating costs for a sewage treatment plant, public school, etc.
- Local job creation will increase due the highly skilled workers required for construction, and the administration and monitoring of the system.

Potential funding sources:

- Grants
- Local rate payers
- Federal Infrastructure Investment and Jobs Act



FIRE SAFETY / CLIMATE RESILIENCY:

Fire Safety / Protections

General Information:

- Many of our appendix items address this indirectly, including water treatment and wetlands as fire protection; microgrid as protection against large scale electrical grid failure or neglect; adaptive reuse of the reinforced concrete buildings and the open space designation as fire protection. A community center could be used for any number of emergencies.
- Additionally, fire protection building code and WUI (Wildlands Urban Interface) requirements are codified.
- Evacuation plans and roadway emergency preparedness are big questions; it's our understanding that the EIR will address these issues.

Climate Resiliency

General Information:

- The Sonoma Valley wildlife corridor on the SDC campus is critical to maintain the quality of our water, forests, and wildlife in a rapidly changing and warming environment.
- Keeping landscapes connected via habitat linkages or corridors is the most frequently recommended approach to maintain ecosystem resilience in the face of climate change as it provides an "escape route" for plants and animals to relocate when their habitats are no longer viable.
- Linking also allows resources, including water and nutrients, to pass between habitats that are increasingly confined by human development to maintain ecosystem health for humans and wild residents.
- In 2015, when the SDC was still operational, a [paper prepared for Sonoma Land Trust](#) by researchers from the University of California, Berkeley, not only documented how the SDC's wildlife corridor maintains connectivity, but also addressed what it will take to ensure its integrity.
- The SDC "has high potential for landscape permeability and therefore is expected to allow for free passage of wildlife if left undisturbed," the researchers wrote. They also cited a state mandate—"a cornerstone of California's State Wildlife Action Plan"—that places a priority on making sure development does not encroach on such corridors.
- The researchers noted that protecting the corridor "will require preventing further development, especially in the northern portion of the SDC; as well as reduction in traffic speeds, artificial lighting, invasive species and domestic animal control, limiting human access, and a move toward wildlife-friendly fencing throughout the corridor."
- Aligns with the state's 30x30 goals.

Community Benefits:

- Clean and abundant water: connected creek corridors protect our streams and groundwater.
- Reduced wildfire risk: well-managed landscapes have less fuel to carry and spread flames.
- Climate change resilience: plants and animals can move through corridors to cooler places.
- Room to roam: connected landscapes maintain healthy flows of plants, animals, and resources.

HISTORIC PRESERVATION:

General Information:

- The community supports and recognizes the importance of preserving the historic, architectural, and aesthetic character of the SDC campus, including permanent protection, preservation and management of selected buildings and structures,



- This would include the historic cemetery, and related landscapes that sit within the boundary of the historic district of Sonoma Developmental Center.
- Inclusion of a museum, archival research center, library, and visitor center (The Gateway to Sonoma Mountain) on the grounds linked with and complementary to the Historic Cemetery, Open Space and Wildlife Corridor.
- This management structure is compatible with the goals of the Sonoma Land Trust, co-housing advocates, disability rights supporters, the numerous stakeholders that contributed to past community forums, and the recent community survey conducted and presented to the NSV MAC.

Community Benefits:

- In addition to bringing people together through public events, lectures and workshops, a museum will help provide a sense of community and place by celebrating our collective heritage.
- Museums educate, inspire, foster dialogue, curiosity, self-reflection and serve to help future generations comprehend their history and recognize the achievements of those who came before.
- Fosters partnerships and collaboration with the larger community and other non-profits
- Adaptive reuse of buildings to house research, museum and visitor centers will be effective in reducing our carbon footprint preparing for a future of fire safety, climate resiliency and sustainability of Sonoma Valley
- Historic preservation and reuse of historic buildings reduces resource and material consumption, puts less waste in landfills and consumes less energy than demolishing entire buildings and constructing new ones. Destruction of historic buildings unleashes vast amounts of embodied carbon into the atmosphere contributing to an already overtaxed and warming planet and adding to our carbon footprint.
- An historic district ensures that we are protecting and revitalizing the character of our town and ensuring that the most iconic and diverse collection of architectural buildings, sites and objects are preserved for future generations
- Documentation supports that well preserved and revitalized historic districts are an economic boon to a community and affect property values in a very positive way.
- Historic districts are a vibrant, social and economic center for towns and are regarded as world class destinations.

The Community Supports:

- Preservation and rehabilitation of historically significant buildings, structures, landscapes and historic cemetery. These buildings include Sonoma House, McDougall, Oak Lodge, Hatch, PEC and King.
- Preservation of the SDC Library and other sources of written knowledge.
- Preservation of historic artifacts and digital archives currently stored on campus.
- Preservation of the knowledge possessed by individuals associated with SDC, Eldridge and Glen Ellen.

Potential Funding Sources:

- Glen Ellen Historical Society has already received grants and funding from private philanthropists to support a museum and visitor center.
- The Board of Directors of GEHS and general membership include experienced legal, development, grant writing, fundraising and cultural heritage professionals engaged in raising funding for the project.
- Establishment of "Friends of Glen Ellen Historic District" will be instrumental in organizing fundraisers and events providing financial assistance. Modeled after the Friends of Jack London, this



will have a self-generating funding source which includes an event/community center, museum, visitor center that includes historic tours and a world class archival and research hub

- Federal and State Grants
- State Historic Preservation Office Funding
- National Park Service Historic Preservation Funding
- National Trust for Historic Preservation Funding
- Privately Funded Grants
- Scholarships and Research Fellowships
- Governor Newsom's 2021 Executive Order for 30 x 30 State Funding

COMMERCIAL SPACE / JOB CREATION:

The Community Supports:

- The community has expressed support for innovative or educational use of commercial space at a scale that is compatible with the semi-rural Valley. Vocational training center is a popular idea.
- Although it is the NSV MAC's understanding that it is premature to designate too specifically, community suggestions have included a non-profit hub and a trade skills vocational center.
- Community comments have also noted that we have no identified tenants for commercial space at this time, and that the level of demand for commercial space is uncertain, reflective of significant changes in work patterns.
- Community comments have also noted that it's not clear that we have a shortage of jobs in Sonoma Valley—versus a shortage of affordable housing—and that *the scale of the commercial space designation needs to be appropriate for this rural community*.
- Commercial space ranked second lowest for “not important / neutral” as a re-development priority in the community survey.
- However, when survey respondents were asked to prioritize commercial development, a Community Center was the most popular (77% of survey respondents supporting), following by an Innovation/Research /Climate Hub at 60%.
- Hotel / Resort was the least popular with 10% support from community survey respondents.

Potential funding sources:

- Federal Infrastructure Investment and Jobs Act
- Legislative job training bill

COMMUNITY-ORIENTED COMMERCIAL:

The community is supportive of commercial space to be set aside for community-oriented usage to potentially include:

Community Center

General Information:

- Glen Ellen currently does not have a community center.

Community benefits:

- Potential uses and needs: emergency shelter, temporary emergency health clinic, community meetings, live performances.
- Provides a great boost to the local economy, providing jobs, both in the building and running of the facility. It also provides opportunities for the town to raise money through events, performances and weddings.



- Provides an opportunity for youth to congregate in a safe space promoting strong relationships through sports and recreational activities.
- Can be associated with the local Dunbar School for general assemblies, meetings, and activities, resulting in reduced project costs.

Potential funding sources:

- Grants
- Community fundraising
- Adaptive re-use of an existing building as a cost-saving measure

Relocate Dunbar School to SDC campus

General Information:

- Dunbar school currently serves grades K-5 and is located 3.5 miles from the SDC Campus. The current Dunbar campus is aged and located in a rural setting which requires either busing or car transportation for the commute.
- It is acknowledged that the Sonoma Valley Unified School District would need to run demographic and other feasibility studies as part of any determination to relocate.

Community Benefits:

- Job creation for the SDC development through school administration, maintenance, and enhanced school campus use by the public.
- The relocation allows for greater use of foot traffic to school from the proposed SDC campus development and the south Glen Ellen area.
- Reduced bus and individual car trips through Glen Ellen.
- Reduced greenhouse gases.
- Reduced bus maintenance and fuel costs.
- Multiple studies have indicated that school campus proximity to neighborhoods and housing promotes increased school campus use and greater neighborhood/ community continuity.
- Modernized Dunbar School campus

Potential funding sources:

- Grants
- Local school construction bonds
- Sale of existing Dunbar school campus as surplus land
- Developer funds. Most developments of the scale proposed for the SDC campus would require new school construction.

SITE GOVERNANCE:

General Information:

- Many members of the public have requested consideration of establishing a trust to implement the Specific Plan rather than a private developer. A trust would open opportunities for financing and site management that would broaden the potential for successful redevelopment AND community compatibility.
- The model of the Land/ Government-owned Trust for SDC governance and development was introduced at the first public meeting in 2016. Local community response was supportive of the Trust model for SDC governance.



- The SDC Planning Resource Committee was convened to consider the feasibility of forming a “State-Owned” trust, and to examine the required land disposition, land planning, development management, and infrastructure improvements issues.
- In 2018, the SDC Planning Resource Committee received a proposal from WRT Consulting for a financial assessment study of SDC site development potential, with an emphasis on: conservation of wildlife habitat and open space areas, protection and re-use of historic structures, adaptive re-use of existing buildings, and potential redevelopment off-setting revenue uses for the central SDC campus.
- It is important to note WRT Consulting performed the original Existing Conditions Assessment of the SDC site under a contract with the California State Department of General Services.
- An example of a successful community land trust model: OPAL Community Land Trust

Community Benefits:

- The non-profit government trust model reduces the profit incentives associated with private developers. Development companies generally generate a 25-30% profit on a specific project.
- Local trust governance allows for far more development financing opportunities. Public funding (governmental in nature), private funding (traditional lending sources: banks, pension funds, insurance companies), private non-profit funding (land trusts, housing trusts, other types of trust related grants).
- Local trust governance may allow for affordable housing occupancy formulas which enable a larger percentage of local workers and residents to live in the newly constructed homes. A private developer cannot make the housing available ONLY to local residents and workers. Any applicant, no matter their location of residency or occupation, is eligible for occupancy.
- A community housing trust-based model would only be responsible for the work associated with SDC campus development.

Potential funding sources:

- Private non-profit grants
- Private fund raising
- Governmental grants
- Traditional developer fund resources
- Income from commercial development



January 6, 2022

Sonoma County Board of Supervisors
575 Administration Drive, Room 102A
Santa Rosa, California
Via email:

Dear Sonoma County Board of Supervisors:

The North Sonoma Valley Municipal Advisory Council (NSV MAC) has prepared this letter for consideration by the Board of Supervisors (Board) and Sonoma County planning staff regarding the proposed land use and design alternatives for the SDC Specific Plan. The primary purpose of this letter is to summarize public input received by the NSV MAC in response to the SDC Specific Plan Alternatives Report prepared by Dyett & Bhatia and published by the County in early November 2021.

This letter incorporates the extensive community input from public meetings on November 17, 2021, December 15, 2021 and January 5, 2022, the Sonoma Valley community survey, as well as written correspondence and NSV MAC comments, and synthesizes this information into several main themes to create the framework for a community-supported land use alternative. **The intent of this exercise is to provide sufficient information to enable the Board to direct Permit Sonoma staff to develop a preferred alternative that truly reflects the community vision for SDC as articulated in the January 2021 Draft Vision and Guiding Principles.**

As reflected in the hundreds of comments received since publication of the Alternatives Report, the Sonoma Valley community does not support any of the three alternatives proposed by the County; 71% of participants rejected all three alternatives when polled during the SDC Alternatives Workshop on November 13, 2021. We also reference a non-affiliated Sonoma Valley survey (community survey) conducted by Sonoma Valley resident Dr. Shannon Lee, Biology Department Faculty at Sonoma State University in December 2021. The survey received 672 responses, 95% of which were from Sonoma Valley and Sonoma County residents. The SDC is not suitable as an “urban infill site” and the community’s rejection of the proposed alternatives reflects the incompatibility of the scale of proposed development with the adjacent Glen Ellen communities and the site’s environmental constraints.

Request for Community-Driven Process for Preferred Alternative

On behalf of the community, the NSV MAC requests the Board to delay the initiation of the California Environmental Quality Act (CEQA) process to prepare an Environmental Impact Report (EIR) for a preferred alternative until after a new alternative reflective of site constraints and community input is developed as promised in the December 17, 2019 agreement between the State of California and Sonoma County. The NSV MAC requests the Board to direct staff to pursue this new alternative as outlined in this letter.

Community Input as Framework for a Preferred Alternative

The community continues to support the January 2021 Vision and Guiding Principles that have underpinned community workshops, Sonoma County requests for proposals for preparation of the Specific Plan, and related efforts during this multi-year SDC redevelopment process. These principles are most recently expressed on pages 10-11 of the Specific Plan Alternatives Report. The community feedback conveyed in this letter reflects these principles through an integrated vision of development at an appropriate scale, with an intention to balance affordable, inclusive housing and related commercial development with the protection of SDC’s open space (a California public trust resource), the Sonoma Valley Wildlife Corridor, the historic district portions of the SDC campus, fire safety and climate resiliency, and the rural character of the surrounding region. An alternative with substantially reduced



density is necessary to ensure that the negative impacts of development on traffic, public safety, wildlife corridors, water/water treatment, and related issues do not cause environmental and social harm.

The nine community priorities are summarized below and detailed in the Appendix to this letter.

OPEN SPACE. Community input consistently emphasizes the singular opportunity the SDC campus represents in terms of protecting the open space and wildlife corridor in the context of a vibrant, sustainable community. Over 90% of community survey respondents ranked “preservation of open space” as the highest priority; this is consistent with the state’s 30x30 goals.

This concern goes beyond setting aside open space lands and creating creek and sensitive habitat setbacks. The density of development planned within the SDC campus must not exceed the carrying capacity of the site’s resources. In other words, it must not result in overuse of open space resources or interference with wildlife movement and permeability.

HOUSING DENSITY. The community unequivocally supports the creation of additional housing on the SDC site, particularly affordable housing, however at a lower density (450 or fewer housing units) than that included in any of the alternatives published to date. Higher housing density will move the surrounding communities from a “rural” to “urban” designation based on current U.S. census definitions (see Appendix) and is a primary driver of unacceptable impacts, including environmental, infrastructure, traffic and related public safety issues.

AFFORDABLE HOUSING. The community supports a considerably higher percentage of affordable housing than the approximately 25% included in the published alternatives, **with 76% of community survey respondents indicating a preference for 50-75% (or more) affordable units.** Use of available funding mechanisms and incentives—including revisiting the State’s obligations for SDC site cleanup and remediation—must be included in the financial feasibility assumptions to maximize the affordable housing percentage (see Site Governance / Funding below).

ADAPTIVE REUSE OF EXISTING BUILDINGS. Public and NSV MAC member comments indicate that the County should revisit the potential reuse of existing buildings to satisfy some of the housing needs on the East Side of the SDC campus.

UTILITY INFRASTRUCTURE. An energy sustainability plan, including a microgrid design, should accompany any SDC development, as should a thorough review of the potential benefits of an on-site sewage treatment facility in light of the challenges to the existing Sonoma Valley infrastructure.

FIRE SAFETY/ CLIMATE RESILIENCY: Fire safety and climate resiliency will be impacted by the other elements of the site plan—water use/recycling, energy grids, housing density—and their impacts on traffic and public safety. These interconnected factors must be more intentionally considered in any preferred alternative for this site. The Sonoma Valley community has expressed particular concern that fire risk, evacuations and related community preparations have evolved significantly during the course of the SDC re-development process. 71% of community survey respondents indicated that the County has not adequately addressed fire hazard, traffic and other impacts to the community in the proposed alternatives.

HISTORIC PRESERVATION. The community recognizes the importance of preserving the historic, architectural, and aesthetic character of the SDC campus, and envisions permanent protection, preservation and management of selected buildings and structures within the historic district. More specifically, the community has consistently supported the preservation of an historic district on the



west side of the SDC campus which could include a museum, library, research hub and visitor center, all of which would be linked with the cemetery and open space.

COMMERCIAL SPACE / JOB CREATION: The community supports innovative use of commercial space (education, training, research) and inclusive job creation at a scale suitable for this semi-rural site. In addition, the community wants to see commercial space set aside for **COMMUNITY**-oriented functions, e.g., a community center or school, and is prepared to explore funding options for these uses.

SITE GOVERNANCE / FINANCING: Many members of the public have requested consideration of establishing a trust or similar management entity to oversee redevelopment and implementation of the Specific Plan rather than a private developer. A trust mechanism would open opportunities for public financing and site management that would broaden the potential for successful redevelopment AND community compatibility. In fact, the Board’s April 2019 resolution “Supporting a Land Use Planning process and considerations for disposition of the Sonoma Developmental Center Site,” states:

“Be it further resolved that the Board may also consider in the future a Joint Powers Authority, Trust or other mechanism to facilitate the disposition and transition of the site to meet the desired outcomes.”

Community members have clearly articulated the conflict inherent in creating a plan that is both appropriate for Sonoma Valley and financially feasible, with these economics driven in large part by the dilapidated infrastructure and environmental cleanup liabilities left by the State. The State must help defray the significant costs to clean up the site that it has left in poor condition to ensure that the plan is not merely driven by economic factors. 89% of community residents surveyed believe that the State should be responsible for clean-up and other remedial maintenance of the site.

Conclusions

The Sonoma Valley community’s reasons for rejection of the proposed alternative plans are aligned and consistent. The alternatives do not reflect the themes heard over and over in multiple Valley-wide workshops regarding the appropriate size and scale of development, and adequate protection of the wildlife corridor and surrounding open space. None of the current alternatives reflect the many environmental constraints on the site, nor do any strike a balance between financial interests, affordable housing, and environmental and community well-being.

The community has spoken clearly. On its behalf, the NSV MAC respectfully reiterates its request that the Sonoma County Board of Supervisors direct staff to work with the community to develop an alternative using the framework as outlined above and detailed in the accompanying Appendix.

Sincerely,

Arthur Dawson

Chair, North Sonoma Valley Municipal Advisory Council

cc: Permit Sonoma, Sonoma City Council Mayor Jack Ding, Congressman Thompson, Senator McGuire, Senator Dodd, Gov. Gavin Newsom, Wade Crowfoot, local media, Assemblymember Aguiar-Curry, Springs MAC, SVCAC, Sonoma County Regional Parks, Agricultural Preservation and Open Space District, Sonoma County Historical Society

From: [Chlele Gummer](#)
To: [PlanningAgency](#)
Subject: Against Development
Date: Sunday, September 18, 2022 2:34:17 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.
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.

Sincerely,

Chlele Gummer, Santa Rosa

--

Chlele Payne Gummer

chlelegummer.com

707-292-0535

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From: [connie miatech](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [BOS](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@sonoma-county.org](#); [senator.mcguire@sonoma-county.org](#)
Subject: DEIR PUBLIC COMMENT
Date: Thursday, September 15, 2022 6:41:49 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.

Signed,

Connie Miatech, Kings Circle, Cloverdale, Ca 95425

conniemiatech@yahoo.com, 707-771-1829

[Sent from Yahoo Mail on Android](#)

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From: [BOS](#)
To: [PlanningAgency](#)
Subject: FW: Comment for SDC Draft EIR and Specific Plan
Date: Thursday, September 15, 2022 4:14:54 PM
Attachments: [SDC EIR Response.pdf](#)

From: Susan Gorin <Susan.Gorin@sonoma-county.org>
Sent: Thursday, September 15, 2022 4:14 PM
To: BOS <BOS@sonoma-county.org>
Subject: Fwd: Comment for SDC Draft EIR and Specific Plan

Susan Gorin | 1st District Sonoma County Supervisor
575 Administration Drive, Room 100A
Santa Rosa, CA. 95403
Office 707-565-2241 | Cell 707-321-2788

From: Mary Poppic-Reeves <mpr4mpr@gmail.com>
Sent: Wednesday, September 14, 2022 4:23:37 PM
To: Brian Oh <Brian.Oh@sonoma-county.org>
Cc: Susan Gorin <Susan.Gorin@sonoma-county.org>
Subject: Comment for SDC Draft EIR and Specific Plan

EXTERNAL

Mr. Oh,

Please accept our correspondence into the record for the Sonoma County Planning Commission's consideration of the Sonoma Developmental Center Draft EIR and Specific Plan. Feel free to reach out if you have questions.

Sincerely,

Mary Poppic-Reeves and Brian Reeves

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From: [Steve Schramm](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [David Rabbitt](#); senator.mcquiere@senate.ca.gov; [Lynda Hopkins](#); senator.dodd@senate.ca.gov; [district4](#); [district3](#); [Susan Gorin](#); [BOS](#); engage@sdcspecificplan.com
Subject: Public Comment on SDC Specific Plan and DEIR – Scale it Back!!
Date: Saturday, September 17, 2022 6:05:29 PM

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

Where is the water for any proposed project coming from.?

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.

Sincerely,

Steve Schrammn
198 Fair Street
Petaluma, CA 94852
Reelsafari@gmail.com
707 953 9263 cell

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From: [Lorie Silver](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [BOS](#); [engage@sdcspecificplan.com](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](#); [senator.mcguire@senate.ca.gov](#)
Subject: Public Comment on SDC Specific Plan and DEIR – Scale it Back!!
Date: Tuesday, September 20, 2022 8:08:05 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 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.

Thank you for your consideration,

Lorie Silver
4621 Maddocks Rd.
Sebastopol, CA 95472
707 696-0412
garryoakbay@gmail.com

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From: [Deb Pool](#)
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; gerald.mclaughlin@dgs.ca.gov; jason.kenney@dgs.ca.gov; Cecilia.Aguiar-Curry@asm.ca.gov
Subject: Public Comment on SDC Specific Plan and DEIR
Date: Sunday, September 18, 2022 12:37:00 PM

September 18, 2022

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

RE: Public Comment on SDC Specific Plan and DEIR

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 support the ***Historic Preservation Alternative*** as “it is the most environmentally sound” and reflects largely what the public, NVMAC, Springs MAC, and Sonoma Land Trust has repeatedly imputed as an alternative to Permit Sonoma.

Specifically, please direct Permit Sonoma to take these steps:

1. Reduce the size of development to 450 or fewer homes and require that the majority of them be affordable ***for the people who already actually live and work in Sonoma Valley*** and ***for people with disabilities***. Eliminate the hotel, and do not duplicate retail and commercial space that is already provided in Glen Ellen. Keep in mind, this is ***a rural community***.
2. Riparian areas are crucial when it comes to Open Space. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed.
3. 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 but not limited to agriculture, agricultural processing, tasting rooms, farm stands, recreation, parking lots, geothermal development and sports facilities.

4. Wildfire: Revise wildfire evacuation impacts to reflect actual experiences which occurred during recent wildfires using new county wildfire risk and hazard maps. Adding 11/2 minutes

to the timeline of evacuation is meaningless!

5. Climate Crisis: Think 30X30 Initiative, which California embraces.

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 and permanently securing the maximum amount of Open Space.

6. The DEIR falls short of CEQA requirements. The DEIR is inadequate and the so-called self-mitigated Specific Plan contains **many weak** general policies, goals and conditions of approval, to address the environmental impacts.

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 "should" or "could occur" "may result" 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.

There is still so much work to do with the Specific Plan and the DEIR.

I support Commissioner Carr's request (Planning Commissioners Meeting 9/15/22) for additional time to get this right. He repeatedly stated that in order for the Planning Commission to do their job with integrity, they would need addition time to go page by page. This was even at the expense of more frequent meetings to accomplish the task, getting it to the Board of Supervisors as soon as is possible. There is a willingness to do the hard work, we just need the courage to take the bold steps, and do the right thing for the future.

Sincerely,

Deb McElroy Pool
13588 Railroad, Glen Ellen
707-486-7134
debjmpool@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: [Lauren Reed](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [senator.mcguire@senate.ca.gov](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](#); [BOS](#); [engage@sdcspecificplan.com](#)
Subject: Public Comment on SDC Specific Plan and DEIR
Date: Thursday, September 15, 2022 2:37:24 PM

Sonoma County Planning Commissioners,

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

Scale back size of development to 450 or fewer homes and require that most or all 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.

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.

Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new county wildfire risk and hazard maps.

Revise the Specific Plan and DEIR with legally enforceable measures to reduce climate emissions, such as reusing and demolishing fewer buildings and providing transit.

Signed,

Lauren Reed

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From: [Andrea Davis](#)
To: [PlanningAgency; engage@sdcspecificplan.com](mailto:engage@sdcspecificplan.com)
Subject: Public comment on SDC specific plan
Date: Friday, September 16, 2022 9:30:17 AM



Dear Sonoma Planning Commissioners,

My mom worked at SDC 2000-2010, and I have spent a lot of time with her there. It is a beautiful place, that supports local wildlife and biodiversity. Preserving their habitat is not only important for the individual animals, but because we are all connected, preserving biodiversity is critical to our own survival and quality of life as well.

I strongly support scaling back development to only affordable housing, placed in a dense configuration. Climate change, reduced air quality, other environmental health concerns, and our own social nature as a species have shown that we need to build densely for the future. The vast majority of the property can be reserved for public hiking trails, community events, and wildlife habitat. This would benefit the wildlife, but also the quality of life of the residents, and build community. The current property is priceless as a thriving ecosystem. Once developed, it is lost forever.

In general, I strongly support building more housing, and am a member of YIMBY SF. But building should be in underdeveloped urban and suburban environments, which are vastly underutilized with a great deal of wasted space. We can solve the housing crisis by building more densely, not by encroaching further on wildlife habitat. When we build at the urban-wildlife interface, we put ourselves at greater risk for fire and other environmental disasters.

I support the points from the Sierra Club, below:

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.

Thank you,
Andréa Davis
3233 Noriega St.
San Francisco, CA 94122
707-486-4980
(prior resident of Cloverdale, CA)

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**Mary & Brian Reeves
15421 Woodside Court
Glen Ellen, CA 95442**

Sonoma County Planning Commission
c/o Brian Oh, Comprehensive Planning Manager,
Permit Sonoma
County of Sonoma
2550 Ventura Avenue Santa Rosa, CA 95403

September 14, 2022

RE: SDC Draft EIR and Specific Plan

To the Sonoma County Planning Commission:

We have lived within a mile of the Sonoma Developmental Center for over 20 years. We have raised our two children here, walking its streets and trails while appreciating the truly special place it is, from its diverse community of residents, to its rich wildlife population, and its verdant landscape. It is a unique resource for our community--- for the entire North Bay, that requires a well-considered, thoughtful approach to its transition.

While the process may have started out this way, this push to approve an inadequate, nonspecific and unenforceable Draft EIR and Specific Plan is a dangerous and unconscionable rush to judgement. Undertaking this process simultaneous to the State's Request for Proposal is a waste of precious resources; these tools should react to a *specific* development proposal that has yet to be produced. The Draft EIR and Specific Plan before you makes it clear the process is out of order. Simply, the cart has been placed before the horse.

Your overarching question has to be: What happens if the RFP generates a proposal that this Draft EIR and Specific Plan doesn't *specifically* address, or worse, is so broad that the room for interpretation allows a full range of unintended and unacceptable consequences? The requisite comprehensive detail

of this proposal mandates an EIR and Specific Plan that analyzes point by point all the merits and drawbacks of this enormously complicated project.

3.4 Biological Resources

To bring development to the SDC necessitates adding additional roadways to handle the traffic associated with such an overload of residential and commercial units. A new Arnold Drive to Highway 12 connector is proposed—one that would cut a path right through the critical Valley of the Moon Wildlife Corridor. How can this have a “less than significant impact” on the black bears, mountain lions, bobcats, and dozens of other species that have all been documented in the area? If left undisturbed, studies have shown the Wildlife Corridor through the SDC can continue to provide critical connectivity. If development is more important to our environment, what is the plan to mitigate this unrecoverable loss?

3.9 Hydrology and Water Quality

Where is the water coming from to support 2,400 new residents? The Draft EIR suggests there will be no impact on groundwater. For those who have been asked to conserve water because of a local dwindling supply, development on this scale makes no sense. How will this undeniable impact during a drought emergency be mitigated?

3.10 Land Use and Planning

How can we know that “development under the Proposed Plan would not physically divide an established community” if the Draft EIR isn’t even reacting to a specific development proposal? Those of us on the southside of Glen Ellen would argue any type of major development in the SDC corridor could sever our connection to the village on the north side of Glen Ellen. The project should work to unify, not divide, our historic community, but without specifics, we cannot know what impacts might occur and how they might be mitigated.

3.12 Population and Housing

While we are aware how much Sonoma County needs affordable housing (with two sons who’ve regretfully had to settle elsewhere to afford their homes), using the SDC to resolve this issue is unrealistic. From a practical standpoint, this

project's horizon is not even within ABAG's Regional Housing Needs Allocation time frame (2040 vs. 2023-2030). As broadly conceived as it is now, the Draft EIR and Specific Plan can't even ensure development that complies with the requirements that new housing be firesafe, reduce environmental impacts and traffic, and mitigates the drought emergency.

Right now, there are about 700 dwelling units in the Village and 350 in the concentrated southside. You don't need an expert to see that doubling—not to mention potentially tripling, the housing units in Glen Ellen by building them all in the acres between the two will have an impact. Even the lowest increase of 450 units in the Historic Preservation Plan would represent a 45% increase and have an impact of at least equal measure. Trying to solve Sonoma County's housing crisis all in one project located in a narrow Valley with one road in and out is poor planning pure and simple; *nothing* in this Draft EIR suggests how the attendant problems of this scale of development might be resolved.

3.14 Transportation

Again: one road in, one road out. Then layer in at least one car in every new garage. Even in its heyday in the 1950's the SDC didn't have as much traffic as this scale of development will generate, and the Valley of the Moon, had a much lower surrounding population back then. Adding 1,000 homes could easily add as many cars, particularly given the limited public transportation and limited services in the area. These new residents will need cars and they will need a great deal more time for commuting when they are stuck on that one road in, one road out. Adding another crossing between Arnold Drive and Highway 12 will still place all these cars, a substantial increase, on two two-lane roads that are already heavily travelled—and have a devastating record for traffic fatalities in this very area. There will be a transportation impact regardless of the scope of the project—it must be comprehensively and specifically analyzed and the impacts duly mitigated.

3.16 Wildfire

In 2017, we packed up our family and pets as we were ordered to evacuate our home due to the Nuns Fire and were stuck in gridlock on Arnold Drive for *hours* as we joined our neighbors attempting to flee the flames. The suggestion that

adding 2,400 residents would not “not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan,” would be laughable, if the consequences were not so frightening. The location proposed for an additional crossing between Arnold Drive and Highway 12? In 2017, it was *in flames*.

We urge you to set this process aside and wait the short time until a development proposal has been chosen by the State. Then a Draft EIR and Specific Plan can be prepared to react to specific issues, impacts can be better analyzed and reasonable mitigation measures proposed. Please do not make a rush to judgement; this resource is too valuable to put at risk.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mary Poppic-Reeves', with a long, sweeping underline that extends to the right.

Mary Poppic-Reeves

A handwritten signature in black ink, appearing to read 'Brian Reeves', with a long, horizontal underline that extends to the right.

Brian Reeves

Cc: Susan Gorin
Mike Thompson

From: [Arthur Dawson](#)
To: [PlanningAgency](#)
Cc: [Hannah Whitman](#)
Subject: Sonoma Valley Municipal Advisory Council letter to Supervisors
Date: Thursday, September 15, 2022 5:08:38 PM
Attachments: [0 NSV-MACLettertoBoS_FINAL_01-06-22_signed.pdf](#)
[0 APPENDIX-FINAL_01-06-22.pdf](#)

Dear Planning Commissioners,

As Chair of the North Sonoma Valley MAC I'm attaching the letter and appendix that was approved by our council and sent to the Supervisors in January pertaining to SDC. This letter details the community's vision for SDC, which has remained quite consistent since the first large community meeting in 2015 and represents years of thinking and work by hundreds of people. Its broad support has been demonstrated by a petition circulated early in the year, which at the time (January) had been signed by a thousand people, the vast majority in Sonoma Valley and elsewhere in the County. It now has over 2500 signatures.

The MAC is intended to serve as our community's voice and this is a strong and clear expression of that voice. Thank you for taking this letter under serious consideration as you deliberate the Sonoma Developmental Center Specific Plan and EIR.

Sincerely,

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

From: Arthur Dawson <baseline@vom.com>
Sent: Wednesday, September 14, 2022 4:33 PM
To: 'PlanningAgency@sonoma-county.org' <PlanningAgency@sonoma-county.org>
Cc: 'Hannah Whitman' <Hannah.Whitman@sonoma-county.org>
Subject: SDC Draft EIR Response letter; North Sonoma Valley Municipal Advisory Council

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%20Fisca>

[/Services/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: [Arthur Dawson](#)
To: [PlanningAgency](#)
Cc: [Hannah Whitman](#)
Subject: Sonoma Valley Municipal Advisory Council letter to Supervisors
Date: Thursday, September 15, 2022 5:17:27 PM

Dear Planning Commissioners, Addendum:

Note that the MAC letter included with the email below was endorsed by the Sonoma City Council, Sonoma Land Trust, Valley of the Moon Association, Sonoma Valley Citizens Advisory Commission, Sonoma Mountain Preservation, Glen Ellen Historical Society, Painter Preservation, the Oakmont Village Association as well as Steve Akre, Fire Chief, Sonoma Valley District.

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

From: Arthur Dawson <baseline@vom.com>
Sent: Thursday, September 15, 2022 5:08 PM
To: 'PlanningAgency@sonoma-county.org' <PlanningAgency@sonoma-county.org>
Cc: 'Hannah Whitman' <Hannah.Whitman@sonoma-county.org>
Subject: Sonoma Valley Municipal Advisory Council letter to Supervisors

Dear Planning Commissioners,

As Chair of the North Sonoma Valley MAC I'm attaching the letter and appendix that was approved by our council and sent to the Supervisors in January pertaining to SDC. This letter details the community's vision for SDC, which has remained quite consistent since the first large community meeting in 2015 and represents years of thinking and work by hundreds of people. Its broad support has been demonstrated by a petition circulated early in the year, which at the time (January) had been signed by a thousand people, the vast majority in Sonoma Valley and elsewhere in the County. It now has over 2500 signatures.

The MAC is intended to serve as our community's voice and this is a strong and clear expression of that voice. Thank you for taking this letter under serious consideration as you deliberate the Sonoma Developmental Center Specific Plan and EIR.

Sincerely,

Arthur Dawson, Chair

North Sonoma Valley Municipal Advisory Council

(707) 509-9427; (707) 996-9967

From: Arthur Dawson <baseline@vom.com>

Sent: Wednesday, September 14, 2022 4:33 PM

To: 'PlanningAgency@sonoma-county.org' <PlanningAgency@sonoma-county.org>

Cc: 'Hannah Whitman' <Hannah.Whitman@sonoma-county.org>

Subject: SDC Draft EIR Response letter; North Sonoma Valley Municipal Advisory Council

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: [Teri Shore](#)
To: [Brian Oh](#); [engage@sdcspecificplan.com](#); [Susan Gorin](#)
Cc: [Greg Carr](#); [Caitlin Cornwall](#); [Pat Gilardi](#); [Larry Reed](#); [Jacquelyne Ocana](#); [Shaun McCaffery](#); [Belen.Grady@sonoma-county.org](#); [PlanningAgency](#); [Pitts, Logan](#); [Senator.McGuire@senate.ca.gov](#); [Senator.Dodd@senate.ca.gov](#); [Rebecca](#); [Ezrah](#); [Cecilia.Aguiar-Curry@asm.ca.gov](#); [Gerald McLaughlin](#); [district4](#); [James Gore](#); [district5](#); [David Rabbitt](#); [Hannah Whitman](#); [Arielle Kubu-Jones](#); [Rebecca Hermosillo](#); [Rep. Mike Thompson](#)
Subject: SDC DEIR Specific Plan Public Comment - Please add to official administrative record
Date: Wednesday, September 21, 2022 1:46:04 PM
Attachments: [ShoreSDC.DEIRFinalCommentsAll9.26.22.pdf](#)

Dear Sonoma County Board of Supervisors, Planning Commissioners, Permit Sonoma (with copies to state elected officials),

Please find below and attached my official detailed public comments on the SDC Draft Environmental Report and Specific Plan to be entered into the public record and administrative record. Looking forward to the county's responses.

It consists of 12 pages of a letter; 20 pages of a table with comments; and 8 pages of an article. Please include all.

Thanks for your consideration.

Teri Shore
515 Hopkins St.
Sonoma, CA 95476

Teri Shore
Environmentalist

515 Hopkins St.
Sonoma, CA 95476

Sent VIA EMAIL

September 21, 2022

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

Copies to: Senators Mike McGuire and Bill Dodd

RE: Public Comments on Sonoma Developmental Center Draft Environmental Impact Report (DEIR) and Specific Plan – Revise EIR to Meet CEQA, Scale it Back and Protect Open Space!!

Dear Permit Sonoma, Board of Supervisors and Sonoma County Planning Commission,

As a long-time resident of Sonoma Valley who cares deeply about the lands, wildlife and people who live here, I do not support the Sonoma Developmental Center (SDC) Specific Plan as proposed by Permit Sonoma and find that the DEIR is inadequate to meet the requirements of the California Environmental Quality Act. Please see my general comments followed by comments on the DEIR and a detailed table with more detailed comments.

GENERAL COMMENTS on SDC DEIR, Specific Plan and Planning Process

Reversal of County Land Use Policies: The proposed SDC Specific Plan and DEIR comprise a complete reversal on decades of city centered growth and open space protection in Sonoma County. Instead of providing a visionary plan that addresses climate change and environmental protection while providing appropriate affordable housing, the County of Sonoma is deciding to forever urbanize the heart of rural and agricultural Sonoma Valley. Whether or not the Specific Plan is implemented or not, the rezoning of these lands for residential, hotel, commercial, retail and other new land uses will forever transform these lands.

Public Land for Public Good: This public land has always served the public good. For decades, everyone from local residents to county elected officials to open space agencies and the general public have envisioned these lands for protected open space and serving the needs of people with developmental disabilities and others who may need housing and services. So, it is extremely heartbreaking to realize that the county is instead intent on building a giant new subdivision here despite the many other options that have been forwarded by the community and stakeholders. The state statute is being willfully misinterpreted by the County of Sonoma to the detriment of the people of California who own these lands. Turning public lands over to private developers for profit is simply wrong when there are many models for repurposing public lands without doing so, such as Marin Headlands, Presidio Trust, and Mare Island.

Open Space: My comments are primarily focused on the open space lands surrounding the campus. These lands are critical for conservation, biodiversity and habitat linkage at a regional and state level. These lands qualify for and are prioritized for recognition in Governor Newsom's 30 X 30 Executive Order among environmental leaders such as Sierra Club, Sonoma Land Trust and Sonoma Mountain Preservation.

It is unfortunate that the DEIR and Specific Plan do not give these treasured lands the level of analysis and protection as the development on the historic campus. Definitions are unclear and there are no requirements or details on how, when or through what process the open space will be permanently protected in public ownership.

No doubt it is because the primary focus has been on urban planning. It might be a very good urban plan for a town or city but not for the center of the Sonoma Valley Wildlife Corridor and open space that provides easy access to nature and quiet recreation for all, across the income spectrum. Here the urban plan constitutes old fashioned sprawl.

Housing: While we all recognize the need for affordable housing, we also know that we can't build our way out of it. Just look to the rest of the Bay Area and places like Los Angeles where affordable housing is even more scarce. There is room in existing cities and towns to provide affordable housing for the people who need it. But of course, we need to change the way we provide housing; build-baby-build isn't it. The SDC lands are the wrong place for massive housing development comprised primarily of market rate housing. This will simply create another high-end wine country enclave and profits for private developers.

Timeline: While I don't have any confidence that the county intends to change course, I do request that the county provides the public, Planning Commission and Board of Supervisors adequate and appropriate time to review and finalize the DEIR and Specific Plan. The County must ask the State of California for more time to accomplish this important planning process. The County and State should not adopt a plan just to meet an arbitrary deadline. There is no rush given that the SDC property will be in transition for decades to come.

DEIR COMMENTS

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 generated by the proposed Specific Plan 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 (CofAs) 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 CofAs 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 and therefore not legally enforceable.

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 in scale with the rural character of the property; utilize existing buildings, preserve historic features. Require that 100 percent of the homes be affordable to low, very low- and moderate-income working people and to individuals with developmental disabilities. Require that all homes and buildings meet Visitability Standards for access by Americans with Disabilities (ADA), prioritizing those who currently live in Sonoma Valley.

- Eliminate the hotel, retail and commercial space that is not needed as those services already exist nearby in Sonoma Valley.
- Change the Preferred Alternative to the Historic Preservation Alternative, which is the most environmentally sound, and amend to reflect the requirements above.

4. ANALYZE OPEN SPACE AND PUBLIC INSTITUTION ALTERNATIVES:

All the alternatives studied by the County of Sonoma are variations on a major mixed-use development that maximizes urban style use. The scaled back Historic Alternative is the closest to what the public and community has asked for over the years. However, the Open Space and Public Institution Alternatives that were dismissed by the County of Sonoma offer significantly difference alternatives that deserve further analysis. The Marin Headlands and Presidio Trust are good examples of how public land was repurposed without overdevelopment that could be analyzed further in the Open Space Alternative.

Providing more details on the Historic, Open Space and Public Institution Alternatives will

serve to meet CEQA criteria to provide the public and decisionmakers with a true range of alternatives.

While the DEIR claims that these alternatives were dismissed due lack of consistency with state statute, I would argue that the various development alternatives that were presented are too narrow and also inconsistent with state statute. State statute calls for housing as appropriate on the SDC site and to prioritize affordable housing and housing for developmentally disabled individuals. What's present is very much out of scale and not appropriate for rural land. In addition, the DEIR and Specific Plan calls for the introduction of commercial agriculture throughout the preserved open space areas, which was never mentioned in state statute. Many other new land uses never mentioned in state statute are also proposed.

In there any legal, statutory or other reason why County of Sonoma should not analyze and provide more details on the Historic, Open Space and Public Institution Alternatives?

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.

Vague Goals and Policies contained the Specific Plan and DEIR do not suffice, such as *“future developers at the site must work with the County to ensure proper management and stewardship”* and *“Work with Sonoma County to dedicate the preserved open space as regional parkland.”* Not resolving these issues is likely to create confusion and conflict later for all involved, as elected officials, agency staff and developers change over time.

The DEIR and Specific Plan cannot rely on state statute to protect the open space lands as that language is vague, only as “feasible” and in the “best interests of the state.”^[1]

These inadequacies need to be resolved in the DEIR and Specific Plan by adding clear descriptions of the open space lands with exact boundaries; likely mechanisms for transferring the lands and to what possible entities or types of entities; a timeline; and how the lands will be managed and under what authority. Environmental impacts and mitigations for impacts to the open space lands from development of the campus and ongoing operations must be provided.

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 commercial 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 CofAs 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 WILDLIRE CORRIDOR MAPPING 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. Explain why 50 feet is adequate to protect riparian areas and the wildlife corridor. In this section, I will defer to comments by the experts, including the Sonoma Land Trust and Center for Biological Diversity.

Mapping: Neither the DEIR nor the Specific Plan provides an accurate map of the Sonoma Valley Wildlife Corridor. The DEIR refers to Figure 1.6-3, which does not appear in the DEIR. The Specific Plan Figure 1.6-3 is a map of Existing Vegetation.

In the Specific Plan Figure 1.6-2 titled “Wildlife Constraints,” something that appears to represent the Sonoma Wildlife Corridor consists of two wavy green lines labeled as “Critical Wildlife Linkage Marin Blue Ridge.” However, that term is not defined, does not contain the words “Sonoma Valley Wildlife Corridor” and is never used anywhere else in the Specific Plan or DEIR. And, in fact, the Sonoma Valley Wildlife Corridor does not appear to be specifically mapped anywhere in the Specific Plan or DEIR that I could find.

To meet CEQA by providing the public and decisionmakers with accurate information, the Sonoma Wildlife Corridor needs to be clearly mapped and defined with consistent terms. You must revise the DEIR and Specific Plan to specifically map and describe the boundaries of the Sonoma Valley Wildlife Corridor.

7. **WILDFIRE:** There are no mitigation conditions of approval for wildfire; and the goals and policies are based on a future Emergency Response Plan that will be developed at some point. This is inadequate under CEQA. The DEIR and Self-Mitigating SDC Specific Plan do not eliminate risk or wildfire hazard to insignificant levels. Develop and add enforceable Mitigations in the DEIR and Conditions of Approval in the Specific Plan for Wildfire to reduce and prevent risk as there currently are none.

The Evacuation Time analysis seems unrealistic and not based on fact as it suggests that “added times” for travel during an evacuation range from 1 or 2 minutes to 37 minutes to get to Napa. It took people HOURS to evacuate from Kenwood and Sonoma Valley during recent fires.

Also, the DEIR calls for the “requirement” for a shelter-in-place facility at SDC after 200 homes are built. There is no proven rationale for sheltering in place particularly in a High Fire Risk Area. Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new state and county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives.

The DEIR and Specific Plan must also consider a wildfire mitigation that includes retreat from wildfire areas. Please see attached article in Bay Nature from experts on land use and wildfire which explains why developing in high wildfire areas is no longer appropriate or safe.

Please include by reference the comments on wildfire and evacuation from the State Alliance for Firesafe Road Regulations and other commenters with expertise on these issues.

8. **CLIMATE CRISIS and VMTs:** The DEIR finds that the proposed Specific Plan will produce “significant and unavoidable” environmental impacts due to huge increases in Vehicle Miles Traveled that will be generated primarily by new residents driving to and from the SDC site. The DEIR offers no mitigations or conditions of approval to reduce or avoid the amount of driving.

The DEIR finds that the proposed SDC Specific Plan will undermine local, regional and state policies and commitments to address the climate crisis as it found significant and unavoidable impacts in the areas of vehicle miles traveled. That means that there is NO WAY to offset or mitigate the extra driving generated by all the new housing, retail, commercial development proposed at SDC. The County must not approve this project as proposed with these impacts if it is serious about addressing the climate crisis.

Taking this approach fails to meet the standards contained in CEQA because VMTs can be avoided and reduced by building fewer homes, reusing and demolishing fewer buildings, requiring public transit, and other measures that were never considered. The DEIR and Specific Plan must be revised to analyze and provide mitigations and measures to reduce VMTs.

9. **CONFLICTS WITH EXISTING COUNTY AND VOTER APPROVED POLICIES:** Statements in the DEIR and Specific Plan that the proposals do not conflict

with existing county policies are inaccurate. The proposed Specific Plan is a complete reversal of land use policy in the County of Sonoma dating back to the original General Plan in 1989. It constitutes urbanization of rural and open space lands not seen since the 1970s; and the type of development that paved over places such as Silicon Valley.

As proposed, the DEIR and Specific Plan violates decades of city-centered growth policies adopted and supported by the voters of Sonoma County and contained in the General Plan. Until now, the County of Sonoma has mostly upheld policies to grow inside existing cities and towns, honor voter-approved Urban Growth Boundaries, protect greenbelts and open space, and respect voter-approved community separators. The voters of Sonoma County have taxed themselves to create the Ag + Open Space District, the SMART Train, and provide expanded funding to Sonoma County Regional Parks.

The DEIR must analyze and mitigate the impacts to these long-standing land use and open space protection policies and voter-approved measures from the proposed Specific Plan and complete reversal of land use policy in order to comply with CEQA.

10. HOUSING AND POPULATION

New housing at SDC is not required or necessary for the County of Sonoma to meet its state mandated Regional Housing Needs Allocation of 3,881 housing units for the next 8-year cycle (2023-2031), as cited in the DEIR. ^[2] In fact, housing at SDC was never considered as part of the RHNA process because the property's future remains uncertain and is currently zoned for public facilities, not housing.

The DEIR cites the Association of Bay Area Governments (which also assigns RHNA numbers) that between 2020 and 2040, the number of housing units in Sonoma County will grow by 15 percent, while the population grows by 9 percent. These facts indicate that adequate housing units will be provided if housing units grow twice as fast as population. These projections of housing and population indicate that housing needs are likely to be met without building 1,000 units at SDC. In addition, the DEIR discloses that unincorporated Sonoma County is in fact losing population.

It is clear that the housing numbers proposed in the Specific Plan and analyzed in the DEIR do not reflect actual official population or housing needs. It is based solely on Permit Sonoma's assumptions about how to make the development profitable for developer. This is the wrong baseline and approach.

The DEIR fails to consider that Sonoma County Transportation Authority has previously determined that the county and cities could build at least 30,000 new and rebuilt (post fire) housing units without expanding outside of UGBs or existing USAs. SDC was neither referenced nor considered as a location for housing. ^[3]

The DEIR fails to make note that the City of Sonoma has adequate room to meet and exceed its RHNA allocations for the next 8-year cycle; or that according to the Springs Specific Plan Notice of Preparation of an EIR, there is potential for 700 new housing units there. The county Housing Rezone EIR has also identified parcels for higher density housing in the Springs and around the unincorporated county which would result in additional housing.

With these facts in mind, the DEIR must analyze and mitigate the growth inducing impacts of adding 1,000 extra housing units to Sonoma Valley and the County of Sonoma. One alternative the DEIR should consider is putting those 1,000 units into existing towns and cities, possible through a Transfer of Development Rights agreement with cities and the county of Sonoma itself.

11. ENDANGERED, THREATENED SPECIES

The DEIR and Specific Plan fail to adequately analyze or mitigate the negative environmental impacts to endangered and threatened species on the SDC lands. The mitigations, goals, policies and Conditions of Approval are inadequate because they are weak with unenforceable actions, rely primarily on existing laws that have to be followed anyway, and/or rely on future studies and assessments as assessments – all of which fail to meet CEQA.

In addition, the DEIR and Specific Plan fail to provide any analysis or even discuss the fact that mountain lions and bears and other predators utilize the SDC lands; or any of the research on this wildlife and others that is published or available. The DEIR and Specific Plan must recognize and provide details on this wildlife and provide analysis and mitigations to reduce negative environmental impacts; and prevent human-wildlife interactions – at the least.

I will defer to comments on this section to the experts including Center for Biological Diversity and Sonoma Land Trust.

12. COMMUNITY BENEFITS AGREEMENTS

The DEIR and Specific Plan need to consider and analyze the benefits of the use of a Community Benefits Agreements at SDC with the community, labor, and public and appropriate stakeholders as a way to provide certainty that the mitigations and measures to protect the environment and community are upheld over the decades as SDC is being transformed.

For example, county residents, particularly in the Sonoma Valley could determine what is most important based on community needs and particulars of the project once a property owner or manager is identified. For example, we could require the property owner or manager to commit to high levels of affordable and workforce housing, good, living wage jobs, protecting wildlife corridors, supportive and accessible housing for disabled people, and much more. We could fill in the gaps that the DEIR and Specific Plan don't provide, particularly if the state choose a different plan and/or the county never adopts or implements the Specific Plan.

13. 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.

There are many other concerns that I have regarding the DEIR and Specific Plan, but these are what I am able to provide with the time and energy that I have at this time.

PLEASE SEE DETAILED TABLE OF COMMENTS BELOW AS WELL AS ARTICLE MENTIONED ABOUT WILDFIRE RETREAT.

Sincerely yours,

Teri Shore
terishore@gmail.com

Shore Detailed Comments Focused on Open Space Related Definitions, Goals, Policies and CofAs from DEIR

DEIR	Comment or Question	Action Requested
Open Space Related Definitions, Goals, Policies and CofAs from DEIR	<p>The permanent preservation of open space lands in public ownership in perpetuity is not fully addressed nor the impacts to those lands adequately analyzed or mitigated by the DEIR and Specific Plan.</p> <p>While there is extensive discussion of the core campus, the open space is treated with vague and conflicting terms; even though it comprises the most acreage in the Specific Plan at 755 acres. Open Space definitions inconsistent, confusing. Agriculture is included in</p>	<ol style="list-style-type: none"> 1. Fully address, analyze and mitigate impacts to prioritized preservation of open space lands in public ownership in perpetuity as priority in the DEIR and Specific Plan, where now very little if any attention is given to the 755 acres outside the core campus development. 2. Provide clear, consistent definition for open space, preserved open space, permanent protections, open

some places, not others, and never clearly defined in DEIR. Neither state nor community ever envisioned commercial agriculture in protected public open space. State statute never mentions agriculture or commercial agriculture. How when and by what mechanisms the open space lands will be permanently protected in public hands is never adequately described.

space in core campus, parks, paseos.

3. Open space should be defined as all the lands outside the core campus that will be permanently protected for natural resources, wildlife habitat, the Sonoma Wildlife Corridor, riparian corridors, wetlands, passive recreation and no development; other than maintaining and operating existing dams and improving trails.

4. Open space definition needs to include terms “public lands” as in “permanently protected as public lands in public hands for the public good.” Make clear that open space will not be in developer or other private hands.

5. Remove agriculture and commercial agricultural uses from definition of open space; and/or conduct analysis of impacts to open space from new commercial agricultural land uses that is now completely missing from DEIR.

6. Provide details on how, when and by what mechanisms the open space lands will be protected in perpetuity in public ownership.

Page 3 – ES 1.1	755 acres of contiguous open space, and the 11-acre non-contiguous Camp Via grounds within Jack London State Historic Park.	Is 11-acre Camp Via part of open space? Seems it should have a separate definition as a former camp. Unless intention is to remove and restore camp.	Define Camp Via as separate from public open space; or analyze impacts from removing and restoring as open space and deeding to Jack London State Park.
	Open space includes many acres of valuable wildlife habitat, former agricultural land, recreational uses, and the Eldridge Cemetery, as well as an existing network of trails and access roads	Here open space includes agriculture and the cemetery. The extent of historic agriculture is never defined. Commercial agriculture never existed on site, only for food for facility clients and staff. Cemetery is separate entity. State statute never mentions agriculture or commercial agriculture.	Remove agriculture from definition of public open space; or conduct analysis of impacts to open space from new commercial agricultural land uses that is now completely missing from DEIR. Define actual uses and acreage of historic agricultural uses; and commercial ag if it existed. Define Cemetery separately from open space.
Page 5 – ES3.1	preserved open space and parkland	Here preserved open space and parkland and mentioned together, but not defined. What parkland? Where?	Provide clear definition of preserved open space and parkland.
Page 10 ES 3.1	open space in the Core Campus	What? Open space in the Core Campus? Does that count toward the 755 acres of open space? Very confusing.	Define open space in the Core Campus as something other than open space to avoid confusion; and because a park next to buildings is not really open space but more like a park.
Page 11 ES3.1	preserved open space	Needs to be defined.	Define; remove agriculture from definition per above.
Page 11 ES3.2	Active open space areas (parks, paseos).	Active open space area is a new term introduced here with no definition. Same for parks and paseos.	Define active open space areas, parks, paseos.
Page 12 ES3.3	reclaimed as open space	What? This suggests that buildings will be removed and reclaimed as open space. That would not be open space. Maybe a park or greenspace?	Define reclaimed areas where buildings have been removed other than as open space.
Page 55 2.1.2.3	contiguous open space		Define what you mean by contiguous open space.

<p>Page 55 2.1.2.3</p>	<p>Open space includes former agricultural land, recreational uses, the Eldridge Cemetery, and many acres of valuable wildlife habitat.</p>	<p>Here open space includes agriculture and the cemetery. The extent of historic agriculture is never defined. Commercial agriculture never existed on site, only for food for facility clients and staff. State statute never mentions agriculture or commercial agriculture. Cemetery is separate entity.</p>	<p>Remove agriculture from definition of public open space; or conduct analysis of impacts to public open space from new commercial agricultural land uses that is now completely missing from DEIR. Define Cemetery separately from open space.</p>
	<p>Embedded in the open space is an existing network of trails and access roads as well as a water system consisting of two surface water reservoirs, aqueducts, spring head, storage tanks, treatment plant, pipelines and a water intake in Sonoma Creek.</p>		<p>Analyze and mitigate how maintenance and operations of existing infrastructure in open space as described will impact the open space, habitat, wetlands and other natural resources.</p>
<p>Page 61 2.2.1</p>	<p>The legislation recognizes the exceptional open-space, natural resources, and wildlife characteristics of SDC, and it is the intent of the legislature that the lands outside of the core developed campus and its related infrastructure be preserved as public parkland and opens space.</p>	<p>Here for the first time the DEIR uses the terms “preserved as public parkland and opens space.” Is open space the same as parkland? How much will be open space and how much parkland?</p>	<p>Define preserved open space as above; and define public parkland. Describe how much land will be open space and how much parkland. My recommendation is that all open space be designated as parkland.</p>
<p>Page 63 2.3</p>	<p>surrounding open space, recreational, and agricultural areas,</p>	<p>Here open space, recreation and agriculture are lumped together as if one. State statute never mentions agriculture or commercial agriculture.</p>	<p>Remove agriculture and define separately. If the intention is to allow commercial agriculture, then analyze and mitigate the impacts and provide land use and zoning over areas that county wants open to ag.</p>
	<p>The surrounding open spaces flourish as natural habitats and</p>	<p>Here open space, recreation and agriculture are lumped together as if</p>	<p>Remove agriculture and define separately. If the intention is to allow</p>

	as agricultural and recreational land linked to regional parks and open space systems.	one. State statute never mentions agriculture or commercial agriculture.	commercial agriculture, then analyze and mitigate the impacts and provide land use and zoning over areas that county wants open to ag. Analyze and mitigate the impacts to introducing ag into open space.
	vast protected open space of oak woodlands, native grasslands, wetlands, forests, creeks, and lakes that provide habitats and wildlife movement corridors; agricultural land; and recreational open space integrated with the surrounding park systems.	This seems to be a more accurate definition for preserved open space, except for reference to agriculture.	Remove agriculture and define separately. If the intention is to allow commercial agriculture, then analyze and mitigate the impacts and provide land use and zoning over areas that county wants open to ag. Analyze and mitigate the impacts to introducing ag into open space.
Page 68 2.4.3 Key Planning Strategies	Further, the campus will be surrounded by a vast network of permanently preserved open spaces.	Yes, this is the most accurate and correct description. But doesn't define permanently protected or by what means.	Define permanently preserved open spaces and describe by what means they will be permanently protected.
Page 70 2.4.3.1 Land Use Classifications	Single-Family Detached. Single-family units that are detached from any other buildings (with the exception of accessory dwelling units) and have open space on all four sides.	Inaccurate use of open space. The green spaces between dwelling units are typically called yards. If it is for communal use, then use and define an appropriate term such as green space, park, pocket park or something.	Define areas around buildings as yards, green space, park, pocket park or something other than open space, which refers to the lands outside the core campus.
Page 72	The Institutional designation accommodates adaptive reuse and new construction of a retreat/conference center located at the southern terminus of Sonoma Avenue, this area is envisioned as making use of the open spaces and scenic setting to support a conference center.	Not clear what open space is being referred to here. If it is green areas between buildings, then define and describe as above. Or if the conference and retreat center is making use of public open space.	Clarify use of public open space by private retreat or conference center; and/or redefine area around buildings in core campus as parks, greenways or appropriate term.
	<i>Parks and Recreation</i>	Does Parks and	Clarify that Parks and

	<p>The Parks and Recreation designation provides for parks, recreation fields, and landscaped trails and pathways, and associated infrastructure structures. Park spaces may be active or passive, and could include dog parks, play areas, and other uses. These areas are intended to primarily consist of outdoor spaces, but they may contain support structures such as restrooms or small utility buildings. Park and recreation areas may have a secondary function as stormwater treatment and infiltration areas.</p>	<p>Recreation designation apply only in core campus? Please make clear. It should not apply to public open space.</p>	<p>Recreation designation does not apply in public open space.</p>
	<p><i>Buffer Open Space</i> The Buffer Open Space designation encompasses managed open space areas that create transitions between open space habitat and development. Along the edges of the Core Campus, the Buffer Open Space is intended as a defensible fire buffer area, with fire resilient landscaping that protects buildings from fire, along the creeks, the Buffer Open Space creates floodable areas for stormwater management and ensures adequate riparian corridors for wildlife movement. Agricultural and active recreation uses are allowed within this designation as long as they are located further than 50 feet away from the top of Sonoma Creek's</p>	<p>Agriculture is allowed in Buffer Open Space, but the impacts are never analyzed or mitigated. Why is 50 feet adequate to protect riparian areas from agriculture? Why isn't 100 feet a more adequate setback. Why not mitigate by prohibiting agriculture in open space buffer. Does Open Space Buffer overlap with preserved public open space? Agriculture is never mentioned in state statute.</p>	<p>Analyze and mitigate impacts of introducing agriculture into Open Space Buffer Areas. Explain whether this new land use and land use designation overlaps with preserved public open space; and mitigate and analyze the impacts.</p>

	banks. Within the Buffer Open Space areas, built elements should be limited to trails and planters, permeable fencing, and informational signage.		
	<i>Preserved Open Space</i> The Preserved Open Space designation is intended to preserve open spaces outside of the Core Campus for habitat, recreation, ecological services, water resources, and agricultural uses. This space also contains some infrastructure, including water infrastructure, that is important for the continued functioning of local water systems.	Neither state nor community ever envisioned commercial agriculture in protected public open space. State statute never mentions agriculture or commercial agriculture.	Remove agriculture and commercial agricultural uses from definition of open space; and/or conduct analysis of impacts to open space from new commercial agricultural land uses that is now completely missing from DEIR.
Page 75	western open space	What is this? First time that term is used.	Define western open space.
Page 76	<i>Agrihood</i> The Agrihood District is envisioned as a new neighborhood that is a nod to historic agricultural lands, with physical and visual connections to the historic agricultural areas, low-impact development at a lower intensity, and a smooth visual transition between higher intensities to the west and the agricultural open space at the east.	See comments above about agriculture. The Agrihood appears to overlap with preserved public open space and community separator lands. What the heck is agricultural open space?????	Conduct analysis and mitigate impacts to preserved public open space from new commercial agricultural land uses that is now completely missing from DEIR. Conduct analysis and mitigate impacts to preserved public open space from new "agrihood." Describe how the agrihood overlaps with community separators; and how a vote of the people is likely to be required as it intensifies development. Define this new term: agricultural open space.

Goals and Policies	Open Space Related	Comment or Question	Action Requested
<p>Page 94 3.1.3.3 Relevant Policies and Implementing Actions</p>			
<p><i>Pg 94, 131 Open Space and Resources and Hazards</i></p>	<p>2-A Open Space: Preserve the open space surrounding the core campus in public ownership in perpetuity, preventing further development in undeveloped areas and ensuring ongoing stewardship in partnership with neighboring State and regional parks and other institutions and organizations.</p>	<p>While I support this, there is no analysis, description or detail or how or when this will be accomplished. This language is far too vague to provide adequate mitigation. It needs to be more detailed and added to Conditions of Approval. The DEIR needs to provide specifics such as naming prioritized entities such as California State Parks, Sonoma County Regional Parks, Sonoma County Open Space District, California Coastal Conservancy and other “conservation” institutions and “non-profit” and “public” organizations. How will it be accomplished, such as through conservation easements, fee-title, inter-agency transfer or other mechanisms. A timeline, such as within three years of the adoption of the DEIR. Right now, there is nothing in writing; and the state statute is vague, conditional on “feasibility.”</p>	<p>Add specific details for how, when and through what mechanisms the preservation of the open space in public ownership in perpetuity will be accomplished, and provide detailed options, as well as a timeline. Preservation of open space in public ownership in perpetuity needs to be added as a DEIR Mitigation and a Condition of Approval in the Specific Plan.</p>
	<p>2-B Balance: Promote a balance of habitat conservation, agriculture, and recreational open space, reflecting the recent historic use of the surrounding open space.</p>	<p>Balance and Promotion is not an action or requirement. Does not serve as an enforceable mitigation or condition of approval. Agriculture needs to be removed or analyzed and mitigated as a new land use. Define historic use. Recreational</p>	<p>Either remove this entirely as “balance” and “promote” have no enforceability to serve as a mitigation or condition of approval; or change to “require habitat conservation and protection of natural resources of open space in</p>

		use is another new term introduced here without definition.	public ownership in perpetuity.” Remove agriculture. Remove or define “historic use.” Remove or define “recreational open space.”
	Policies 2-1 Work with Sonoma County to dedicate the preserved open space as regional parkland.	Work with is vague and meaningless. Who is supposed to work with Sonoma County? Isn't this a Sonoma County document? This needs detailed description of how, when and by what mechanisms that the preserved open space will be dedicated for public ownership in perpetuity. Here you say it will be parkland. In other places you say it will be agriculture. I support making it all parkland. But what does regional parkland mean? Does that prevent the land from going to state parks?	Add specific details for how, when and through what mechanisms the preservation of the open space in public ownership in perpetuity will be accomplished, and provide detailed options, as well as a timeline. Preservation of open space in public ownership in perpetuity needs to be added as a DEIR Mitigation and a Condition of Approval in the Specific Plan. Define what you mean by “regional parkland.”
	2-7 Prohibit lights within the wildlife corridor and along the creek corridor.	Support.	
	2-11 Implement “dark skies” standards for all public realm lighting and all new buildings on the site, including by requiring that all outdoor fixtures are fully shielded, that outdoor lights have a color temperature of no more than 3,000 Kelvins, and that lighting for outdoor recreational facilities be prohibited after 11pm.	Support.	
Page 95	2-20 Require that new development preserve existing trees to the fullest extent feasible. Locate new construction and public	Inadequate. “As feasible” is unenforceable. This does nothing to save a single tree, nor does it provide any information	The DEIR needs a full assessment of the trees and tree canopy; and needs to require protection of mature trees

	realm improvements around existing landscaping features.	on the tree canopy that exists at SDC or the conservation or climate benefits they provide.	and by size and species and historic value. The conservation and climate values of the existing trees need to be analyzed.
	2-20 Require that new development preserve existing trees to the fullest extent feasible . Locate new construction and public realm improvements around existing landscaping features.	Inadequate. "Fullest extent feasible" is unenforceable. The use of the word "require" is meaningless here.	The DEIR needs a full assessment of the trees and tree canopy; and needs to require protection of mature trees and by size and species and historic value. The conservation and climate values of the existing trees need to be analyzed.
Pg 101 Standard Conditions of Approval	MOB-2 Construction of the Highway 12 connector should avoid damage to scenic and open space resources such as trees, rock outcroppings, and historic buildings to the greatest extent feasible .	Inadequate. "Fullest extent feasible" is unenforceable. The use of the word "require" is meaningless here.	Provide actual requirements and conditions of approval to prevent damage to scenic and open space resources such as trees, rock outcroppings and historic buildings.
Page 102	Preserved Open Space land use designation is intended to preserve open spaces outside of the Core Campus for habitat, recreation, and agricultural uses.	Remove agriculture from definition of preserved open space. Agriculture is never mentioned in state statute.	Remove agriculture from definition of preserved open space; and/or conduct analysis and mitigations for introducing ag into open space, and land use designations as described above.
Page 105	preserving the site's open space framework	Define open space framework. Is that just a map?	Define and describe the open space framework.
Page 123 3.2.2.4 Planning Area Overview			
Agricultural Resources	The Planning Area is a located in a rural setting within the vastly agricultural area of unincorporated Sonoma County. Parcels immediately to the south of the Planning Area in the eastern portions are	Inadequate. Vague. Unclear.	Define amount of acreage and actual agriculture uses at SDC. Clarify whether they are commercial ag uses or just for growing food for residents and staff at SDC.

	currently being used as vineyards. In this rural context, there is some land within SDC that was historically used for agriculture within the Planning Area.		
	This area contained historic agriculture uses, including animal husbandry and grazing, orchards, vineyards, crop production and the former Sunrise Industries farm.	Inadequate. Vague.	Define amount of acreage and actual agriculture uses at SDC. Clarify whether they are commercial ag uses or just for growing food for residents and staff at SDC.
	The presence of rich soils and the mandate to preserve open space on the SDC site suggests that agricultural uses could again become an important land use on the SDC site.	Commercial agriculture as the Specific Plan and DEIR propose is a new land use compared to the food and farming conducted at SDC for residents and staff.	As above, either remove agriculture or conduct an analysis of the impacts of introducing commercial agriculture into open space. Define amount of acreage and actual agriculture uses at SDC. Clarify whether they are commercial ag uses or just for growing food for residents and staff at SDC.
Page 124	Approximately 610 acres within the Planning Area is designated as Grazing Land and 98 acres is designated as Farmland of Local Importance.	Yes, but there is no commercial grazing or agriculture being conducted on site; and it is unlikely there ever was.	See above.
	However, there are no current grazing activities occurring within the Planning Area.	Exactly.	Introduction of grazing is a new land use that requires analysis and mitigation in the DEIR.
	No land within the Planning Area is currently zoned as Agricultural in the Sonoma County General Plan; the entire Planning Area is currently zoned as Public Facilities. The only agricultural and resource-based land use permitted in	Exactly.	Introduction of new commercial agricultural uses as proposed requires analysis and mitigation in the EIR.

	<p>this zone is beekeeping, and agricultural processing is conditionally permitted.</p>		
<p>Page 131 3.2.3.3 Relevant Policies and Implementing Actions The following relevant policies and implementing actions of the Proposed Plan address agriculture and forestry resources:</p>	<p>2-D Biological Resources: Promote conservation of existing habitat, including creeks, groundwater recharge areas, and open spaces, through intentional water and energy conservation, sustainable food production, top-tier sustainable building practices, and aggressive waste reduction strategies in order to protect natural resources and critical wildlife habitat, maintain wildlife linkages, and foster environmental stewardship.</p>	<p>Inadequate. Promote is not adequate to protect or mitigate environmental harm to biological resources.</p>	<p>Change promote to “require” and provide some actual mitigations.</p>
	<p>Policies 2-1 Work with Sonoma County to dedicate the preserved open space as regional parkland.</p>	<p>Inadequate. Vague. Unclear. “Work with” has no clear definition. Given this is one of the most important assets and elements of the Specific Plan and state statute, the DEIR needs to provide far more detail and actual requirements, mitigations and enforceable measures and conditions of approval to meet CEQA.</p>	<p>Add specific details for how, when and through what mechanisms the preservation of the open space in public ownership in perpetuity will be accomplished, and provide detailed options, as well as a timeline. Preservation of open space in public ownership in perpetuity needs to be added as a DEIR Mitigation and a Condition of Approval in the Specific Plan.</p>
	<p>2-2 Work with agricultural community partners and local farmers to reintroduce agricultural uses in the agrihood and within the managed landscape buffer to promote local production and regenerative farming practices, honoring the site’s history and enhancing the site’s connection to the land.</p>	<p>As above, “work with” is an inadequate term to meet CEQA mitigation requirements. New land uses including the agrihood and agriculture need to be analyzed and mitigated. If the intent is to prioritize regenerative farming and local production, that needs to be made clear. Commercial agriculture is not that.</p>	<p>Analyze and mitigate impacts to open space lands from new land use of “agrihood.” See comments above about agrihood, community separators and agriculture in general.</p>

	2-21 Preserve and enhance the wetlands east of the core campus as a fire break, groundwater recharge, and habitat area.	Required by law to protect wetlands. Therefore, this is not a mitigation.	Analyze and mitigate impacts to wetlands as use as fire break and groundwater recharge area, which are new land uses for wetlands that are protected by federal law.
	2-26 Prohibit the use of all pesticides, rodenticides, and poisons in materials and procedures used in landscaping, construction, and site maintenance within the Planning Area. This restriction should be included in all Declarations of Covenants, Conditions and Restrictions (CC&Rs) to ensure that future homeowners are aware of the requirements.	Support.	Support.
	The proposed Agrihood District (Goal 5-M) would support new agricultural uses, with physical and visual connections to the historic agricultural areas, low-impact development at a lower intensity, and a smooth visual transition between higher intensities to the west and the agricultural open space at the east. It is also noted that the County's Zoning Code would be concurrently amended to incorporate the Proposed Plan's new and modified land use districts and overlays, use and development standards, and density and intensity limits, if the Proposed Plan is adopted.	Exactly. And the impacts of this have not been analyzed or mitigated in the DIER.	Analyze and mitigate impacts of Agrihood on open space lands that is currently missing from DEIR.
	Given that the Proposed	This is nonsensical	Explain.

	Plan supports agricultural uses as permitted by existing zoning and that the Planning Area does not include any Williamson Act contract lands, this impact would be less than significant	conclusion. What does it even mean?	
Page 136	The Proposed Plan would introduce new and modified land use districts and overlays that will accommodate proposed land use classifications including residential, employment center, flex zone, institutional, utilities, parks and recreation, buffer open space, preserved open space, and a hotel overlay zone.	Exactly. And the impacts from all that on open space lands are not adequately analyzed or mitigated.	Fully analyze and mitigate all the environmental impacts to open space lands and Sonoma Valley from Proposed Specific Plan, which has not been adequately done in the DEIR, as comments show.
	In addition, the proposed Agrihood District (Goal 5-M) is planned on the eastern side of the Core Campus and would support new agricultural uses in recognition of the Farmland of Local Importance, which historically supported agricultural uses on the eastern portion of the site.	New land use.	See above on agriculture as a new land use at SDC and on open space lands.
	In addition, the proposed Agrihood District (Goal 5-M) is planned on the eastern side of the Core Campus and would support new agricultural uses in recognition of the Farmland of Local Importance, which historically supported agricultural uses on the eastern portion of the site.	New land use.	As above, new land use needs to be analyzed and mitigated in DEIR.
Page 196 3.3 Air	It is noted that quantified	Inadequate analysis. This	Analyze and mitigate

<p>Quality</p>	<p>operational emissions do not include potential agricultural uses that would be allowed in the Agrihood district and Buffer Open Space and Permanent Open Space designations of the Proposed Plan. However, as discussed in the Methodology and Assumptions section above, these uses would be located away from future sensitive uses including residential areas (i.e., outside the Core Campus), and permitted agricultural activities are unlikely to occur on a scale that would result in daily operational emissions of the Proposed Plan (Table 3.3-8) exceeding BAAQMD’s thresholds for particulate matter.</p>	<p>is giant leap. The DEIR needs to analyze and mitigate, not make giant assumptions based on no facts or evidence.</p>	<p>impacts of potential new ag uses on open space and SDC property, future and current residents of the area. Provide actual mitigations that are enforceable.</p>
	<p>Limited agricultural uses would be allowed in the Agrihood district as well as the Buffer Open Space and Preserved Open Space areas outside of the Core Campus.</p>	<p>What are the limited agriculture uses.</p>	<p>Analyze and mitigate new agriculture uses.</p>
<p>Page 237 3.4.3.3 Relevant Policies and Implementing Actions <i>Open Space and Resources and Hazards</i></p>	<p>Goals 2-D Biological Resources: Promote conservation of existing habitat, including creeks, groundwater recharge areas, and open spaces, through intentional water and energy conservation, sustainable food production, top-tier sustainable building practices, and aggressive waste reduction strategies in order to protect natural</p>	<p>Promote is not an adequate mitigation.</p>	<p>See comments above to require actual requirements and mitigations, replace “promote” with actionable and enforceable measures.</p>

	resources and critical wildlife habitat, maintain wildlife linkages, and foster environmental stewardship.		
	2-E Wildlife Corridor: Maintain and enhance the size and permeability of the Sonoma Valley Wildlife Corridor (as shown in Figure 1.6-3) by ensuring a compact development footprint at the SDC site and by minimizing impacts to wildlife movement and safety from human activity and development at the campus.	Inadequate. How exactly will impacts be minimized to wildlife movement and safety from human activity and development at the campus.	Provide adequate analysis and mitigations for minimizing impacts to wildlife movement and safety from human activity and development at the campus.
	2-7 Prohibit lights within the wildlife corridor and along the creek corridor.	Support.	Support
	2-8 Maintain wildlife crossing structures by periodically checking for and clearing debris, vegetation overgrowth, and other blockages from culvert and bridge crossing structures; within the Core Campus, the Project Sponsor should develop and execute a maintenance	Inadequate. What does periodically mean? Who will do the checking? How is a project sponsor equipped to develop and execute a maintenance program? The word should needs to be "shall."	Provide an enforceable requirement for maintaining wildlife crossing structures.
	2-9 Within the wildlife corridor, meet but do not exceed the defensible space requirements of the County Fire Department to maintain wildlife habitat while maximizing fire safety.	Inadequate. What the heck does this mean exactly?	Explain and define what this means exactly; and who would be responsible.
	2-14 Prohibit all unleashed outdoor cats, and restrict off-leash dogs and other domestic animals to private fenced yards and designated areas.	Support.	Support.

	<p>2-15 Collaborate with local wildlife protection groups to create and distribute educational information and regulations for residents and employees to guide safe interactions with wildlife onsite. Materials should be accessible to all ages and abilities and could include posted signs, disclosures, fliers, or informational sessions, among other things.</p>	<p>Inadequate. Collaborate does not constitute and enforceable mitigation.</p>	<p>Change collaborate to “require SDC property owner and open space managers to”</p>
	<p>2-17 Adhere to residential nighttime noise standards to the extent feasible.</p>	<p>Inadequate. Meaningless.</p>	<p>Provide actual enforceable noise mitigations.</p>
	<p>2-20 Require that new development preserve existing trees to the fullest extent feasible. Locate new construction and</p>	<p>Inadequate. Meaningless.</p>	<p>Provide actual enforceable tree preservation mitigations.</p>
<p>Page 239</p>	<p>2-25 Include protective buffers of at least 50 feet along Sonoma and Mill creeks, as measured from the top-of-bank and as shown on Figure 2.2-1: Open Space Framework, to protect wildlife habitat and species diversity, facilitate movement of stream flows and ground water recharge, improve water quality, and maintain the integrity and permeability of the Sonoma Valley Wildlife Corridor, and the ability of wildlife to use and disperse through the SDC site. Manage protective buffers so that they support continuous stands of healthy native plant communities.</p>	<p>Inadequate. Why does 50 feet provide adequate protection? Why not 100 feet? What is the Open Space Framework? Just a map? Manage how?</p>	<p>Provide adequate analysis and mitigations for protective buffers, define and describe open space framework, and explain how protective buffers will be managed.</p>

	2-27 Ensure that all development adheres to Sonoma County Municipal Code Sec 26-65 on riparian corridor protection.	Following existing law is not a mitigation or measure. It is required by law. How will you ensure it is followed?	How will county ensure that the riparian corridor protection regulations will be followed and enforced; and by whom?
	2-28 Prior to the commencement of the approval of any specific project in the Proposed Plan area, Project Sponsors shall contract a qualified biologist to conduct studies identifying the presence of special-status species and sensitive habitats at proposed development sites and ensure implementation of appropriate mitigation measures to reduce impacts to sensitive habitat or habitat function to a less than significant level.	Inadequate. Future studies do not provide mitigation.	Inadequate.
Page 240 3.4.3.4 Impacts Summary of Proposed Plan	The existing undeveloped portions of the Planning Area would be designated as Preserved Open Space land use. Development is not proposed to occur within Preserved Open Space, where current daytime recreational uses would continue. Impact 3.4-1 Implementation of the Proposed Plan would not	So here the DIER states that the Preserved Open Space Land Use would remain undeveloped and not be developed, except for recreational daytime uses. Agricultural use and development are not mentioned here. I support that, but it is inconsistent with other parts of the DEIR and Specific Plan. Remove agriculture to be consistent. You can't say there is no impact when the impacts of agriculture haven't been analyzed.	Remove agriculture from preserved open space.
Page 242	Outside of the developed areas, the Proposed Plan establishes dedicated open space areas. Managed open space in these areas would preserve and, in some cases,	Support, but needs more detail and explanation on how the open space will be managed and how it will enhance habitats and wildlife. I agree that preservation would be	Reconcile definition and use of preserved open space throughout DEIR and Specific Plan; remove agriculture.

	<p>enhance the quality of sensitive habitats such as wetlands, native grasslands and oak woodlands.</p> <p>Several special-status wildlife and some plant species would be positively impacted by the preservation of these habitats. The open space would preserve the Sonoma Valley Wildlife Corridor and maintain its permeability for the movement of wildlife at a regional scale.</p>	<p>beneficial. But once again, the issue of agriculture is not addressed, which could be extremely harmful to everything here.</p>	
Page 254	<p>The Proposed Plan is intended to contain development within the already developed area (Core Area) and protect open space for recreational and preservation uses. The</p>	<p>Exactly. No agriculture.</p>	<p>See previous comments on agriculture.</p>
Page 255	<p>Because the Proposed Plan preserves the overwhelming majority of the SDC parcel in open space, it ensures continuation of regional connectivity for wildlife, serving as a conduit for transit of wildlife between significant habitat blocks to the east and west.</p>	<p>Inadequate. Just preserving the 755 acres of open space in itself does not protect the natural resources or ensure connectivity for wildlife. Plus, there is a huge amount of inconsistency on how open space is defined and a lack of specificity on how it will be preserved.</p>	<p>Explain in detail how the Proposed Plan ensures continuation of regional connectivity for wildlife, serving as a conduit for transit of wildlife between significant habitat blocks to the east and west.</p>
Page 257	<p>Moreover, the 750 acres of Planning Area that will be preserved as open space will help offset some of the emissions generated by development under the Proposed Plan, though not necessarily on a magnitude sufficient to achieve carbon neutrality for the Planning Area. Nevertheless, this</p>	<p>What? Please provide detailed analysis and assumptions on this point. Looks like another great leap. Particularly since there is no plan for protecting trees, and there is no analysis of the impacts of introducing commercial agriculture.</p>	<p>Please provide detailed analysis and assumptions on this point. Looks like another great leap with very little actual evidence.</p>

	<p>significant source of carbon sequestration supports the 2022 Scoping Plan’s emphasis on natural and working lands.</p>		
<p>Page 307 3.10.1.1 Historical Land Use</p>	<p>SDC operations made use of the significant open space for recreation and agriculture, with programs that made use of the land to support the clients. Institutional decline in the 1970s and 1980s led to the eventual transfer of several hundred acres of what was identified as surplus land to the county and state park system, including approximately 600 acres that were transferred to the adjacent Jack London State Historic Park in 2002. With its remaining 945 acres, the SDC continued to operate agriculture and recreation programs on the property and kept much of the land in active use until the State announced closure of developmental centers in 2015 and closed the SDC in late 2018.</p>		
<p>Page 319</p>	<p>As described in the Biological Resources Chapter, the campus will be surrounded by a vast network of permanently preserved open spaces to protect natural resources, foster environmental stewardship, and maintain and enhance the permeability of the Sonoma Valley Wildlife Corridor for safe wildlife</p>	<p>It is not clear how the Specific Plan and DEIR will adequately accomplish this.</p>	

	movement throughout the site.		
Page 396	<p>Policies</p> <p>2-1 Work with Sonoma County to dedicate the preserved open space as regional parkland.</p> <p>2-4 Streamline the existing trail system by mapping, improving, and clearly marking designated trails for recreational use in order to minimize negative effects on the open space from recreational use.</p>	<p>As above, “work with” is not an enforceable mitigation.</p> <p>How will streamlining the trail system improve and mitigate impacts from recreation use?</p>	<p>See comments above about this policy and use of term “work with.”</p> <p>Explain how streamlining the trail system will improve and mitigate impacts from recreation use.</p>
	<p>2-5 Consider creating a designated area for water recreation at Suttonfield Lake, such as an access point near the trail from Arnold Drive with rail fencing and clearly marked signage and rules for swimming, dogs, and non-motorized boating.</p>	<p>Not a good idea. That will require a huge amount of supervision, new fences and roads, lighting and all kinds of things that are not conducive to preserving open space, natural resources and wildlife habitat. Plus, it is drinking water.</p>	<p>Remove this concept.</p>
Page 397 Community Design	<p>5-16 Develop a cohesive and integrated system of parks and open spaces, to fulfill the active and passive recreational needs of the community, building on the overall framework outlined in Figure 5.1-1.</p>	<p>Is the entire framework based on one map?</p> <p>How, who and when will a cohesive and integrated system of parks and open spaces, to fulfill the active and passive recreational needs of the community be accomplished?</p>	<p>Explain the framework. Describe in detail how, who and when will a cohesive and integrated system of parks and open spaces, to fulfill the active and passive recreational needs of the community be accomplished.</p>
Page 403	<p>Moreover, 755 acres of the Planning Area will be retained as open space that will be publicly accessible and integrated into the regional parks system (proposed Policy 2-1).</p>	<p>Yes. Support, but many elements of the Specific Plan and DEIR conflict with this and fail to address impacts from new land uses such as agriculture. Also, why limit to regional park system? What about state?</p>	<p>Explain why regional parks and not state parks?</p> <p>Explain how the 755 acres of open space will be “retained” and by whom, when and by what mechanisms.</p>
Page 524	<p>Full Open Space and Public/Institutional Use alternatives were also</p>	<p>While I appreciate that these alternatives were considered, they could</p>	<p>Provide more analysis and detail on the Full Open Space and</p>

	<p>considered; however, for reasons discussed in Section 4.3, these alternatives were determined to be inconsistent with project objectives and infeasible, and therefore not analyzed in detail.</p>	<p>have been more fully analyzed and evaluated to provide public and decision makers with another option for the SDC property. While it is true that this option is not specifically mentioned in state statute, when it comes to housing, it states “as appropriate.” The Specific Plan goes far beyond “appropriate” for housing. It also introduces agriculture which was never mentioned in state statute.</p>	<p>Public/Institutional Use alternatives to provide the public and decision makers with additional options for the future of SDC.</p>
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Wildfire smoke near Mineral, California. (Photo by Mark Gunn,

Flickr

)

Fire

A Case for Retreat in the Age of Fire as Dozens of Wildfires Threaten Homes in the West

by Emily E. Schlickman

,

Brett Milligan

and

Stephen M. Wheeler

September 15, 2022

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After the 2018 wildfire in Paradise, Calif., many fire-damaged homes were razed.

Justin Sullivan/Getty Images

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More than

90 large fires

were burning across the parched Western U.S. landscape in mid-September 2022 following a record-setting heat wave, and thousands of people were under evacuation orders. One wildfire had

burned about 100 homes

and buildings in the Northern California town of Weed. As fire risk rises, is it time to consider managed retreat? The environmental design and sustainability experts explore the options.

A case for retreat in the age of fire

Wildfires in the American West are getting

larger, more frequent and more severe

. Although efforts are underway to create fire-adapted communities, it's important to realize that we cannot simply design our way out of wildfire – some communities will need to begin planning retreat.

Paradise, California,

worked for decades to reduce

its fire risk by removing dry grasses, brush and forest overgrowth in the surrounding wildlands. It built firebreaks to prevent fires from spreading, and

promoted defensible space

around homes.

But in 2018, a fire sparked by wind-damaged power lines swept up the ravine and destroyed over 18,800 structures.

Eighty-five people died

. It's just one example.

Across the American West and in other fire-risk countries, thousands of communities like Paradise

are at risk. Many, if not most, are in the wildland-urban interface, a zone between undeveloped land and urban areas where both wildfires and unchecked growth are common. From 1990 to 2010, new housing in the wildland-urban interface in the continental U.S.

grew by 41%

. By 2020,

more than 16

million homes

were in fire-prone areas in the West.

Whether in the form of large, master-planned communities or incremental, house-by-house construction, developers have been placing new homes in danger zones.

Assessing fire risk at the local level can help communities understand and prepare. The map reflects the probability wildfire will occur in an area in 2022.

First Street Foundation Wildfire Model

It has been nearly four years since the Paradise fire, and the town's population is now less than 30% of what it once was

. This makes Paradise one of the first documented cases of voluntary retreat in the face of wildfire risk. And while the notion of wildfire retreat is controversial, politically fraught and not yet endorsed by the general public, as experts in urban planning and environmental design, we believe the necessity for retreat will become increasingly unavoidable.

But retreat isn't only about wholesale moving. Here are four forms of retreat being used to keep people out of harm's way.

Limiting future development

On one end of the wildfire retreat spectrum are development-limiting policies that

create stricter standards for new construction. These might be employed in moderate-risk areas or communities disinclined to change.

An example is San Diego's steep hillside guidelines that restrict construction in areas with significant grade change, as wildfires burn faster uphill. In the guidelines, steep hillsides have a gradient of at least 25% and a vertical elevation of at least 50 feet. In most cases, new buildings cannot encroach into this zone and must be located at least 30 feet from the hillside.

While development-limiting policies like this prevent new construction in some of the most hazardous conditions, they often cannot eliminate fire risk.

Development-limiting policies can include stricter construction standards. The illustration shows the difference between a home on a steep, wooded hillside that is hard to defend from fire and one farther from the slope. Emily Schlickman

Halting new construction

Further along the spectrum are construction-halting measures, which prevent new construction to manage growth in high-risk parts of the wildland-urban interface.

These

first two levels of action could both be implemented using basic urban planning tools, starting with county and city general plans and zoning, and subdivision ordinances.

For example, Los Angeles County recently updated its general plan to limit new sprawl in wildfire hazard zones.

Urban growth boundaries could also be adopted locally, as many suburban communities north of San Francisco have done, or could be mandated by states, as Oregon did in 1973.

Halting construction and managing growth in high-risk parts of the wildland-urban interface is another retreat tool. Emily Schlickman

To assist the process, states and the federal government could designate fire

re-risk areas

, similar to Federal Emergency Management Agency flood maps.

California already designates zones

with three levels of fire risk: moderate, high and very high.

They

could also develop fire-prone landscape zoning acts, similar to legislation that has helped limit new development along coasts

, on wetlands

and

along earthquake faults

Incentives for local governments to adopt these frameworks could be provided through planning and technical assistance grants or preference for infrastructure funding. At the same time, states or federal agencies could refuse funding for local authorities that enable development in severe-risk areas.

In some cases, state officials might turn to the courts

to stop county-approved projects to prevent loss of life and property and reduce the costs that taxpayers might pay to maintain and protect at-risk properties.

Th
ree
high-profile
projects

in California's wildland-urban interface have been stopped in the courts because their environmental impact reports fail to adequately address the increased wildfire risk that the projects create. (Full disclosure: For a short time in 2018, one of us, Emily Schlickman, worked as a design consultant on one of these – an experience that inspired this article.)

Incentives to encourage people to relocate

In severe risk areas, the technique of “incentivized relocating” could be tested to help people move out of wildfire's way through programs such as voluntary buyouts. Similar programs have been used after floods.

Local governments would work with FEMA to offer eligible homeowners the pre-disaster value of their home

in exchange for not rebuilding

. To date, this type of federally backed buyout program has yet to be implemented for wildfire areas, but some vulnerable communities have developed their own.

Th

e city of Paradise created a buyout program funded with nonprofit grant money and donations. However, only

300 acres of patchworked parcels have been acquired

, suggesting that stronger incentives and more funding may be required.

Removing government-backed fire insurance plans or instituting variable fire insurance rates based on risk could also encourage people to avoid high-risk areas.

Another potential tool is a “transferable development rights” framework. Under such a framework, developers wishing to build more intensively in lower-risk town centers could purchase development rights from landowners in rural areas where fire-prone land is to be preserved or returned to unbuilt status. The rural landowners are thus compensated for the lost use of their property. These frameworks have been used for growth management purposes in Montgomery County, Maryland

, and in

Massachusetts

and

Colorado

.

Incentivized relocating can be used in severe risk areas by subsidizing the movement of some people out of wildfire's way. The illustrations show what before and after might look like.

Emily Schlickman

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Moving entire communities, wholesale

Vulnerable communities may want to relocate but don't want to leave neighbors and friends. “Wholesale moving” involves managing the entire resettlement of a vulnerable community.

While this technique has yet to be implemented for wildfire-prone areas, there is a long history of its use

after catastrophic floods

. One place it is currently being used is Isle de Jean Charles, Louisiana, which has lost 98% of its land mass since 1955 because of erosion and sea level rise

. In 2016, the community received a federal grant to plan a retreat to higher ground, including the design of a

new community center
40 miles north and upland of the island.

Th

is technique, though, has drawbacks – from the complicated logistics and support needed to move an entire community to the time frame needed to develop a resettlement plan to potentially overloading existing communities with those displaced.

In extreme risk areas, wholesale moving could be an approach – managing the resettlement of an entire vulnerable community to a safer area. Emily Schlickman

Even with ideal landscape management, wildfire risks to communities will continue to increase, and retreat from the wildland-urban interface will become increasingly necessary. The primary question is whether that retreat will be planned, safe and equitable, or delayed, forced and catastrophic.

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Secrets from the

•

[1] *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.*

[2] According to the Final 2023–2031 RHNA, ABAG has Sonoma Developmental Center Specific Plan determined that unincorporated Sonoma County’s fair share of regional housing need for the 2023 to 2031 period would be 3,881 units. Approximately 1,632 of these units would be allocated as housing affordable to very low- and low-income households.⁹³ The ABAG Executive Board adopted the Final RHNA Plan in December 2021. It should be noted that while the present RHNA allocation is for the next eight years, full development of the SDC Specific Plan would occur over a longer time horizon, over multiple RHNA cycles.

[3] Sonoma County Transportation Authority/Regional Climate Protection Authority Board Meeting Packet, October 14, 2019, 4.3.2. Housing – update on pipeline projects (REPORT)*

Sonoma County Transportation Authority/Regional Climate Protection Authority Board Meeting Packet, September 10, 2018, 4.5. SCTA Planning Item 4.5.1. Housing – housing projects in the pipeline and update on housing items (REPORT)*

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**Mary & Brian Reeves
15421 Woodside Court
Glen Ellen, CA 95442**

Sonoma County Planning Commission
c/o Brian Oh, Comprehensive Planning Manager,
Permit Sonoma
County of Sonoma
2550 Ventura Avenue Santa Rosa, CA 95403

September 14, 2022

RE: SDC Draft EIR and Specific Plan

To the Sonoma County Planning Commission:

We have lived within a mile of the Sonoma Developmental Center for over 20 years. We have raised our two children here, walking its streets and trails while appreciating the truly special place it is, from its diverse community of residents, to its rich wildlife population, and its verdant landscape. It is a unique resource for our community--- for the entire North Bay, that requires a well-considered, thoughtful approach to its transition.

While the process may have started out this way, this push to approve an inadequate, nonspecific and unenforceable Draft EIR and Specific Plan is a dangerous and unconscionable rush to judgement. Undertaking this process simultaneous to the State's Request for Proposal is a waste of precious resources; these tools should react to a *specific* development proposal that has yet to be produced. The Draft EIR and Specific Plan before you makes it clear the process is out of order. Simply, the cart has been placed before the horse.

Your overarching question has to be: What happens if the RFP generates a proposal that this Draft EIR and Specific Plan doesn't *specifically* address, or worse, is so broad that the room for interpretation allows a full range of unintended and unacceptable consequences? The requisite comprehensive detail

of this proposal mandates an EIR and Specific Plan that analyzes point by point all the merits and drawbacks of this enormously complicated project.

3.4 Biological Resources

To bring development to the SDC necessitates adding additional roadways to handle the traffic associated with such an overload of residential and commercial units. A new Arnold Drive to Highway 12 connector is proposed—one that would cut a path right through the critical Valley of the Moon Wildlife Corridor. How can this have a “less than significant impact” on the black bears, mountain lions, bobcats, and dozens of other species that have all been documented in the area? If left undisturbed, studies have shown the Wildlife Corridor through the SDC can continue to provide critical connectivity. If development is more important to our environment, what is the plan to mitigate this unrecoverable loss?

3.9 Hydrology and Water Quality

Where is the water coming from to support 2,400 new residents? The Draft EIR suggests there will be no impact on groundwater. For those who have been asked to conserve water because of a local dwindling supply, development on this scale makes no sense. How will this undeniable impact during a drought emergency be mitigated?

3.10 Land Use and Planning

How can we know that “development under the Proposed Plan would not physically divide an established community” if the Draft EIR isn’t even reacting to a specific development proposal? Those of us on the southside of Glen Ellen would argue any type of major development in the SDC corridor could sever our connection to the village on the north side of Glen Ellen. The project should work to unify, not divide, our historic community, but without specifics, we cannot know what impacts might occur and how they might be mitigated.

3.12 Population and Housing

While we are aware how much Sonoma County needs affordable housing (with two sons who’ve regretfully had to settle elsewhere to afford their homes), using the SDC to resolve this issue is unrealistic. From a practical standpoint, this

project's horizon is not even within ABAG's Regional Housing Needs Allocation time frame (2040 vs. 2023-2030). As broadly conceived as it is now, the Draft EIR and Specific Plan can't even ensure development that complies with the requirements that new housing be firesafe, reduce environmental impacts and traffic, and mitigates the drought emergency.

Right now, there are about 700 dwelling units in the Village and 350 in the concentrated southside. You don't need an expert to see that doubling—not to mention potentially tripling, the housing units in Glen Ellen by building them all in the acres between the two will have an impact. Even the lowest increase of 450 units in the Historic Preservation Plan would represent a 45% increase and have an impact of at least equal measure. Trying to solve Sonoma County's housing crisis all in one project located in a narrow Valley with one road in and out is poor planning pure and simple; *nothing* in this Draft EIR suggests how the attendant problems of this scale of development might be resolved.

3.14 Transportation

Again: one road in, one road out. Then layer in at least one car in every new garage. Even in its heyday in the 1950's the SDC didn't have as much traffic as this scale of development will generate, and the Valley of the Moon, had a much lower surrounding population back then. Adding 1,000 homes could easily add as many cars, particularly given the limited public transportation and limited services in the area. These new residents will need cars and they will need a great deal more time for commuting when they are stuck on that one road in, one road out. Adding another crossing between Arnold Drive and Highway 12 will still place all these cars, a substantial increase, on two two-lane roads that are already heavily travelled—and have a devastating record for traffic fatalities in this very area. There will be a transportation impact regardless of the scope of the project—it must be comprehensively and specifically analyzed and the impacts duly mitigated.

3.16 Wildfire

In 2017, we packed up our family and pets as we were ordered to evacuate our home due to the Nuns Fire and were stuck in gridlock on Arnold Drive for *hours* as we joined our neighbors attempting to flee the flames. The suggestion that

adding 2,400 residents would not “not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan,” would be laughable, if the consequences were not so frightening. The location proposed for an additional crossing between Arnold Drive and Highway 12? In 2017, it was *in flames*.

We urge you to set this process aside and wait the short time until a development proposal has been chosen by the State. Then a Draft EIR and Specific Plan can be prepared to react to specific issues, impacts can be better analyzed and reasonable mitigation measures proposed. Please do not make a rush to judgement; this resource is too valuable to put at risk.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mary Poppic-Reeves', with a long, sweeping underline that extends to the right.

Mary Poppic-Reeves

A handwritten signature in black ink, appearing to read 'Brian Reeves', with a long, horizontal underline that extends to the right.

Brian Reeves

Cc: Susan Gorin
Mike Thompson

Teri Shore
Environmentalist

515 Hopkins St.
Sonoma, CA 95476

Sent VIA EMAIL



September 21, 2022

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

Copies to: Senators Mike McGuire and Bill Dodd

RE: Public Comments on Sonoma Developmental Center Draft Environmental Impact Report (DEIR) and Specific Plan – Revise EIR to Meet CEQA, Scale it Back and Protect Open Space!!

Dear Permit Sonoma, Board of Supervisors and Sonoma County Planning Commission,

As a long-time resident of Sonoma Valley who cares deeply about the lands, wildlife and people who live here, I do not support the Sonoma Developmental Center (SDC) Specific Plan as proposed by Permit Sonoma and find that the DEIR is inadequate to meet the requirements of the California Environmental Quality Act. Please see my general comments followed by comments on the DEIR and a detailed table with more detailed comments.

GENERAL COMMENTS on SDC DEIR, Specific Plan and Planning Process

Reversal of County Land Use Policies: The proposed SDC Specific Plan and DEIR comprise a complete reversal on decades of city centered growth and open space protection in Sonoma County. Instead of providing a visionary plan that addresses climate change and environmental protection while providing appropriate affordable housing, the County of Sonoma is deciding to forever urbanize the heart of rural and agricultural Sonoma Valley. Whether or not the Specific Plan is implemented or not, the rezoning of these lands for residential, hotel, commercial, retail and other new land uses will forever transform these lands.

Public Land for Public Good: This public land has always served the public good. For decades, everyone from local residents to county elected officials to open space agencies and the general public have envisioned these lands for protected open space and serving the needs of people with developmental disabilities and others who may need housing and services. So, it is extremely heartbreaking to realize that the county is instead intent on building a giant new subdivision here despite the many other options that have been forwarded by the community and stakeholders. The state statute is being willfully misinterpreted by the County of Sonoma to the detriment of the people of California who own these lands. Turning public lands over to private developers for profit is simply wrong when there are many models for repurposing public lands without doing so, such as Marin Headlands, Presidio Trust, and Mare Island.

Open Space: My comments are primarily focused on the open space lands surrounding the campus. These lands are critical for conservation, biodiversity and habitat linkage at a regional and state level. These lands qualify for and are prioritized for recognition in Governor Newsom's 30 X 30 Executive Order among environmental leaders such as Sierra Club, Sonoma Land Trust and Sonoma Mountain Preservation.

It is unfortunate that the DEIR and Specific Plan do not give these treasured lands the level of analysis and protection as the development on the historic campus. Definitions are unclear and there are no requirements or details on how, when or through what process the open space will be permanently protected in public ownership.

No doubt it is because the primary focus has been on urban planning. It might be a very good urban plan for a town or city but not for the center of the Sonoma Valley Wildlife Corridor and open space that provides easy access to nature and quiet recreation for all, across the income spectrum. Here the urban plan constitutes old fashioned sprawl.

Housing: While we all recognize the need for affordable housing, we also know that we can't build our way out of it. Just look to the rest of the Bay Area and places like Los Angeles where affordable housing is even more scarce. There is room in existing cities and towns to provide affordable housing for the people who need it. But of course, we need to change the way we provide housing; build-baby-build isn't it. The SDC lands are the wrong place for massive housing development comprised primarily of market rate housing. This will simply create another high-end wine country enclave and profits for private developers.

Timeline: While I don't have any confidence that the county intends to change course, I do request that the county provides the public, Planning Commission and Board of Supervisors adequate and appropriate time to review and finalize the DEIR and Specific Plan. The County must ask the State of California for more time to accomplish this important planning process. The County and State should not adopt a plan just to meet an arbitrary deadline. There is no rush given that the SDC property will be in transition for decades to come.

DEIR COMMENTS

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 generated by the proposed Specific Plan 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 (CofAs) 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 CofAs 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 and therefore not legally enforceable.

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 in scale with the rural character of the property; utilize existing buildings, preserve historic features. Require that 100 percent of the homes be affordable to low, very low- and moderate-income working people and to individuals with developmental disabilities. Require that all homes and buildings meet Visitability Standards for access by Americans with Disabilities (ADA), prioritizing those who currently live in Sonoma Valley.
 - Eliminate the hotel, retail and commercial space that is not needed as those services already exist nearby in Sonoma Valley.
 - Change the Preferred Alternative to the Historic Preservation Alternative, which is the most environmentally sound, and amend to reflect the requirements above.
4. **ANALYZE OPEN SPACE AND PUBLIC INSTITUTION ALTERNATIVES:** All the alternatives studied by the County of Sonoma are variations on a major mixed-use development that maximizes urban style use. The scaled back Historic Alternative is the closest to what the public and community has asked for over the years. However, the Open Space and Public Institution Alternatives that were dismissed by the County of Sonoma offer significantly difference alternatives that deserve further analysis. The Marin Headlands and Presidio Trust are good examples of how public land was repurposed without overdevelopment that could be analyzed further in the Open Space Alternative.

Providing more details on the Historic, Open Space and Public Institution Alternatives will serve to meet CEQA criteria to provide the public and decisionmakers with a true range of alternatives.

While the DEIR claims that these alternatives were dismissed due lack of consistency with state statute, I would argue that the various development alternatives that were presented are too narrow and also inconsistent with state statute. State statute calls for housing as appropriate on the SDC site and to prioritize affordable housing and housing for developmentally disabled individuals. What's present is very much out of scale and not appropriate for rural land. In addition, the DEIR and Specific Plan calls for the introduction of commercial agriculture throughout the preserved open space areas, which was never mentioned in state statute. Many other new land uses never mentioned in state statute are also proposed.

In there any legal, statutory or other reason why County of Sonoma should not analyze and provide more details on the Historic, Open Space and Public Institution Alternatives?

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.

Vague Goals and Policies contained the Specific Plan and DEIR do not suffice, such as “*future developers at the site must work with the County to ensure proper management and stewardship*” and “*Work with Sonoma County to dedicate the preserved open space as regional parkland.*” Not resolving these issues is likely to create confusion and conflict later for all involved, as elected officials, agency staff and developers change over time.

The DEIR and Specific Plan cannot rely on state statute to protect the open space lands as that language is vague, only as “feasible” and in the “best interests of the state.”¹

These inadequacies need to be resolved in the DEIR and Specific Plan by adding clear descriptions of the open space lands with exact boundaries; likely mechanisms for transferring the lands and to what possible entities or types of entities; a timeline; and how the lands will be managed and under what authority. Environmental impacts and mitigations for impacts to the open space lands from development of the campus and ongoing operations must be provided.

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 commercial 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 CofAs 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.

¹ *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.*

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 MAPPING 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. Explain why 50 feet is adequate to protect riparian areas and the wildlife corridor. In this section, I will defer to comments by the experts, including the Sonoma Land Trust and Center for Biological Diversity.

Mapping: Neither the DEIR nor the Specific Plan provides an accurate map of the Sonoma Valley Wildlife Corridor. The DEIR refers to Figure 1.6-3, which does not appear in the DEIR. The Specific Plan Figure 1.6-3 is a map of Existing Vegetation.

In the Specific Plan Figure 1.6-2 titled “Wildlife Constraints,” something that appears to represent the Sonoma Wildlife Corridor consists of two wavy green lines labeled as “Critical Wildlife Linkage Marin Blue Ridge.” However, that term is not defined, does not contain the words “Sonoma Valley Wildlife Corridor” and is never used anywhere else in the Specific Plan or DEIR. And, in fact, the Sonoma Valley

Wildlife Corridor does not appear to be specifically mapped anywhere in the Specific Plan or DEIR that I could find.

To meet CEQA by providing the public and decisionmakers with accurate information, the Sonoma Wildlife Corridor needs to be clearly mapped and defined with consistent terms. You must revise the DEIR and Specific Plan to specifically map and describe the boundaries of the Sonoma Valley Wildlife Corridor.

7. **WILDFIRE:** There are no mitigation conditions of approval for wildfire; and the goals and policies are based on a future Emergency Response Plan that will be developed at some point. This is inadequate under CEQA. The DEIR and Self-Mitigating SDC Specific Plan do not eliminate risk or wildfire hazard to insignificant levels. Develop and add enforceable Mitigations in the DEIR and Conditions of Approval in the Specific Plan for Wildfire to reduce and prevent risk as there currently are none.

The Evacuation Time analysis seems unrealistic and not based on fact as it suggests that “added times” for travel during an evacuation range from 1 or 2 minutes to 37 minutes to get to Napa. It took people HOURS to evacuate from Kenwood and Sonoma Valley during recent fires.

Also, the DEIR calls for the “requirement” for a shelter-in-place facility at SDC after 200 homes are built. There is no proven rationale for sheltering in place particularly in a High Fire Risk Area. Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new state and county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives.

The DEIR and Specific Plan must also consider a wildfire mitigation that includes retreat from wildfire areas. Please see attached article in Bay Nature from experts on land use and wildfire which explains why developing in high wildfire areas is no longer appropriate or safe.

Please include by reference the comments on wildfire and evacuation from the State Alliance for Firesafe Road Regulations and other commenters with expertise on these issues.

8. **CLIMATE CRISIS and VMTs:** The DEIR finds that the proposed Specific Plan will produce “significant and unavoidable” environmental impacts due to huge increases in Vehicle Miles Traveled that will be generated primarily by new residents driving to and from the SDC site. The DEIR offers no mitigations or conditions of approval to reduce or avoid the amount of driving.

The DEIR finds that the proposed SDC Specific Plan will undermine local, regional and state policies and commitments to address the climate crisis as it found significant and unavoidable impacts in the areas of vehicle miles traveled. That means that there is NO WAY to offset or mitigate the extra driving generated by all the new housing, retail, commercial development proposed at SDC. The County must not approve this project as proposed with these impacts if it is serious about addressing the climate crisis.

Taking this approach fails to meet the standards contained in CEQA because VMTs can be avoided and reduced by building fewer homes, reusing and demolishing fewer buildings, requiring public transit, and other measures that were never considered. The DEIR and Specific Plan must be revised to analyze and provide mitigations and measures to reduce VMTs.

- 9. CONFLICTS WITH EXISTING COUNTY AND VOTER APPROVED POLICIES:** Statements in the DEIR and Specific Plan that the proposals do not conflict with existing county policies are inaccurate. The proposed Specific Plan is a complete reversal of land use policy in the County of Sonoma dating back to the original General Plan in 1989. It constitutes urbanization of rural and open space lands not seen since the 1970s; and the type of development that paved over places such as Silicon Valley.

As proposed, the DEIR and Specific Plan violates decades of city-centered growth policies adopted and supported by the voters of Sonoma County and contained in the General Plan. Until now, the County of Sonoma has mostly upheld policies to grow inside existing cities and towns, honor voter-approved Urban Growth Boundaries, protect greenbelts and open space, and respect voter-approved community separators. The voters of Sonoma County have taxed themselves to create the Ag + Open Space District, the SMART Train, and provide expanded funding to Sonoma County Regional Parks.

The DEIR must analyze and mitigate the impacts to these long-standing land use and open space protection policies and voter-approved measures from the proposed Specific Plan and complete reversal of land use policy in order to comply with CEQA.

10. HOUSING AND POPULATION

New housing at SDC is not required or necessary for the County of Sonoma to meet its state mandated Regional Housing Needs Allocation of 3,881 housing units for the next 8-year cycle (2023-2031), as cited in the DEIR.² In fact, housing at SDC was never considered as part of the RHNA process because the property's future remains uncertain and is currently zoned for public facilities, not housing.

The DEIR cites the Association of Bay Area Governments (which also assigns RHNA numbers) that between 2020 and 2040, the number of housing units in Sonoma County will grow by 15 percent, while

² According to the Final 2023–2031 RHNA, ABAG has Sonoma Developmental Center Specific Plan determined that unincorporated Sonoma County's fair share of regional housing need for the 2023 to 2031 period would be 3,881 units. Approximately 1,632 of these units would be allocated as housing affordable to very low- and low-income households.⁹³ The ABAG Executive Board adopted the Final RHNA Plan in December 2021. It should be noted that while the present RHNA allocation is for the next eight years, full development of the SDC Specific Plan would occur over a longer time horizon, over multiple RHNA cycles.

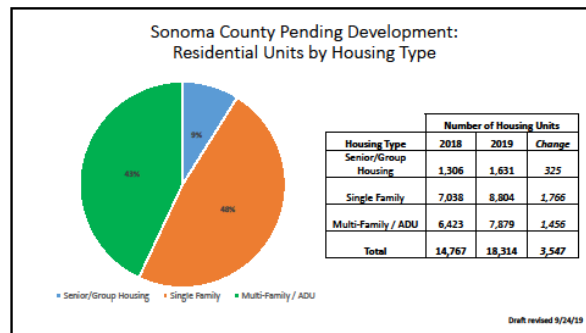
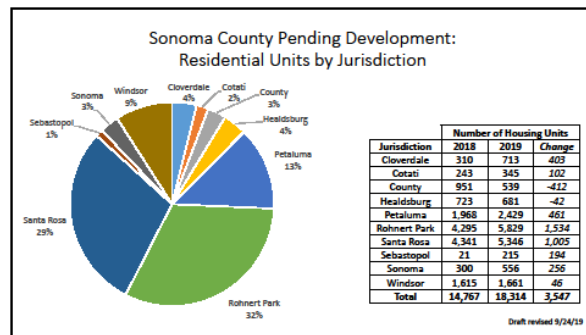
the population grows by 9 percent. These facts indicate that adequate housing units will be provided if housing units grow twice as fast as population. These projections of housing and population indicate that housing needs are likely to be met without building 1,000 units at SDC. In addition, the DEIR discloses that unincorporated Sonoma County is in fact losing population.

It is clear that the housing numbers proposed in the Specific Plan and analyzed in the DEIR do not reflect actual official population or housing needs. It is based solely on Permit Sonoma's assumptions about how to make the development profitable for developer. This is the wrong baseline and approach.

The DEIR fails to consider that Sonoma County Transportation Authority has previously determined that the county and cities could build at least 30,000 new and rebuilt (post fire) housing units without expanding outside of UGBs or existing USAs. SDC was neither referenced nor considered as a location for housing.³

³ Sonoma County Transportation Authority/Regional Climate Protection Authority Board Meeting Packet, October 14, 2019, 4.3.2. Housing – update on pipeline projects (REPORT)*

Sonoma County Transportation Authority/Regional Climate Protection Authority Board Meeting Packet, September 10, 2018, 4.5. SCTA Planning Item 4.5.1. Housing – housing projects in the pipeline and update on housing items (REPORT)*



The DEIR fails to make note that the City of Sonoma has adequate room to meet and exceed its RHNA allocations for the next 8-year cycle; or that according to the Springs Specific Plan Notice of Preparation of an EIR, there is potential for 700 new housing units there. The county Housing Rezone EIR has also identified parcels for higher density housing in the Springs and around the unincorporated county which would result in additional housing.

With these facts in mind, the DEIR must analyze and mitigate the growth inducing impacts of adding 1,000 extra housing units to Sonoma Valley and the County of Sonoma. One alternative the DEIR should consider

is putting those 1,000 units into existing towns and cities, possible through a Transfer of Development Rights agreement with cities and the county of Sonoma itself.

11. ENDANGERED, THREATENED SPECIES

The DEIR and Specific Plan fail to adequately analyze or mitigate the negative environmental impacts to endangered and threatened species on the SDC lands. The mitigations, goals, policies and Conditions of Approval are inadequate because they are weak with unenforceable actions, rely primarily on existing laws that have to be followed anyway, and/or rely on future studies and assessments as assessments – all of which fail to meet CEQA.

In addition, the DEIR and Specific Plan fail to provide any analysis or even discuss the fact that mountain lions and bears and other predators utilize the SDC lands; or any of the research on this wildlife and others that is published or available. The DEIR and Specific Plan must recognize and provide details on this wildlife and provide analysis and mitigations to reduce negative environmental impacts; and prevent human-wildlife interactions – at the least.

I will defer to comments on this section to the experts including Center for Biological Diversity and Sonoma Land Trust.

12. COMMUNITY BENEFITS AGREEMENTS

The DEIR and Specific Plan need to consider and analyze the benefits of the use of a Community Benefits Agreements at SDC with the community, labor, and public and appropriate stakeholders as a way to provide certainty that the mitigations and measures to protect the environment and community are upheld over the decades as SDC is being transformed.

For example, county residents, particularly in the Sonoma Valley could determine what is most important based on community needs and particulars of the project once a property owner or manager is identified. For example, we could require the property owner or manager to commit to high levels of affordable and workforce housing, good, living wage jobs, protecting wildlife corridors, supportive and accessible housing for disabled people, and much more. We could fill in the gaps that the DEIR and Specific Plan don't provide, particularly if the state choose a different plan and/or the county never adopts or implements the Specific Plan.

13. **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.

There are many other concerns that I have regarding the DEIR and Specific Plan, but these are what I am able to provide with the time and energy that I have at this time.

PLEASE SEE DETAILED TABLE OF COMMENTS BELOW AS WELL AS ARTICLE MENTIONED ABOUT WILDFIRE RETREAT.

Sincerely yours,

A handwritten signature in black ink that reads "Teri Shore". The signature is written in a cursive, flowing style.

Teri Shore
terishore@gmail.com

Shore Detailed Comments Focused on Open Space Related Definitions, Goals, Policies and CofAs from DEIR

DEIR		Comment or Question	Action Requested
<p>Open Space Related Definitions, Goals, Policies and CofAs from DEIR</p>		<p>The permanent preservation of open space lands in public ownership in perpetuity is not fully addressed nor the impacts to those lands adequately analyzed or mitigated by the DEIR and Specific Plan.</p> <p>While there is extensive discussion of the core campus, the open space is treated with vague and conflicting terms; even though it comprises the most acreage in the Specific Plan at 755 acres. Open Space definitions inconsistent, confusing. Agriculture is included in some places, not others, and never clearly defined in DEIR. Neither state nor community ever envisioned commercial agriculture in protected public open space. State statute never mentions agriculture or commercial agriculture.</p> <p>How when and by what mechanisms the open space lands will be permanently protected in public hands is never adequately described.</p>	<ol style="list-style-type: none"> 1. Fully address, analyze and mitigate impacts to prioritized preservation of open space lands in public ownership in perpetuity as priority in the DEIR and Specific Plan, where now very little if any attention is given to the 755 acres outside the core campus development. 2. Provide clear, consistent definition for open space, preserved open space, permanent protections, open space in core campus, parks, paseos. 3. Open space should be defined as all the lands outside the core campus that will be permanently protected for natural resources, wildlife habitat, the Sonoma Wildlife Corridor, riparian corridors, wetlands, passive recreation and no development; other than maintaining and operating existing dams and improving trails. 4. Open space definition needs to include terms “public lands” as in “permanently protected as public lands in public hands for the public good.” Make clear that open space will not be in developer or other private hands. 5. Remove agriculture and commercial

			<p>agricultural uses from definition of open space; and/or conduct analysis of impacts to open space from new commercial agricultural land uses that is now completely missing from DEIR.</p> <p>6. Provide details on how, when and by what mechanisms the open space lands will be protected in perpetuity in public ownership.</p>
Page 3 – ES 1.1	755 acres of contiguous open space, and the 11-acre non-contiguous Camp Via grounds within Jack London State Historic Park.	Is 11-acre Camp Via part of open space? Seems it should have a separate definition as a former camp. Unless intention is to remove and restore camp.	Define Camp Via as separate from public open space; or analyze impacts from removing and restoring as open space and deeding to Jack London State Park.
	Open space includes many acres of valuable wildlife habitat, former agricultural land, recreational uses, and the Eldridge Cemetery, as well as an existing network of trails and access roads	Here open space includes agriculture and the cemetery. The extent of historic agriculture is never defined. Commercial agriculture never existed on site, only for food for facility clients and staff. Cemetery is separate entity. State statute never mentions agriculture or commercial agriculture.	Remove agriculture from definition of public open space; or conduct analysis of impacts to open space from new commercial agricultural land uses that is now completely missing from DEIR. Define actual uses and acreage of historic agricultural uses; and commercial ag if it existed. Define Cemetery separately from open space.
Page 5 – ES3.1	preserved open space and parkland	Here preserved open space and parkland and mentioned together, but not defined. What parkland? Where?	Provide clear definition of preserved open space and parkland.
Page 10 ES 3.1	open space in the Core Campus	What? Open space in the Core Campus? Does that count toward the 755 acres of open space? Very confusing.	Define open space in the Core Campus as something other than open space to avoid confusion; and because a park next to buildings is not really open space but more like a park.
Page 11 ES3.1	preserved open space	Needs to be defined.	Define; remove agriculture from definition per above.

Page 11 ES3.2	Active open space areas (parks, paseos).	Active open space area is a new term introduced here with no definition. Same for parks and paseos.	Define active open space areas, parks, paseos.
Page 12 ES3.3	reclaimed as open space	What? This suggests that buildings will be removed and reclaimed as open space. That would not be open space. Maybe a park or greenspace?	Define reclaimed areas where buildings have been removed other than as open space.
Page 55 2.1.2.3	contiguous open space		Define what you mean by contiguous open space.
Page 55 2.1.2.3	Open space includes former agricultural land, recreational uses, the Eldridge Cemetery, and many acres of valuable wildlife habitat.	Here open space includes agriculture and the cemetery. The extent of historic agriculture is never defined. Commercial agriculture never existed on site, only for food for facility clients and staff. State statute never mentions agriculture or commercial agriculture. Cemetery is separate entity.	Remove agriculture from definition of public open space; or conduct analysis of impacts to public open space from new commercial agricultural land uses that is now completely missing from DEIR. Define Cemetery separately from open space.
	Embedded in the open space is an existing network of trails and access roads as well as a water system consisting of two surface water reservoirs, aqueducts, spring head, storage tanks, treatment plant, pipelines and a water intake in Sonoma Creek.		Analyze and mitigate how maintenance and operations of existing infrastructure in open space as described will impact the open space, habitat, wetlands and other natural resources.
Page 61 2.2.1	The legislation recognizes the exceptional open-space, natural resources, and wildlife characteristics of SDC, and it is the intent of the legislature that the lands outside of the core developed campus and its related infrastructure be preserved as public parkland and opens space.	Here for the first time the DEIR uses the terms “preserved as public parkland and opens space.” Is open space the same as parkland? How much will be open space and how much parkland?	Define preserved open space as above; and define public parkland. Describe how much land will be open space and how much parkland. My recommendation is that all open space be designated as parkland.
Page 63 2.3	surrounding open space, recreational, and agricultural areas,	Here open space, recreation and agriculture are lumped together as if one. State statute never	Remove agriculture and define separately. If the intention is to allow commercial agriculture,

		mentions agriculture or commercial agriculture.	then analyze and mitigate the impacts and provide land use and zoning over areas that county wants open to ag.
	The surrounding open spaces flourish as natural habitats and as agricultural and recreational land linked to regional parks and open space systems.	Here open space, recreation and agriculture are lumped together as if one. State statute never mentions agriculture or commercial agriculture.	Remove agriculture and define separately. If the intention is to allow commercial agriculture, then analyze and mitigate the impacts and provide land use and zoning over areas that county wants open to ag. Analyze and mitigate the impacts to introducing ag into open space.
	vast protected open space of oak woodlands, native grasslands, wetlands, forests, creeks, and lakes that provide habitats and wildlife movement corridors; agricultural land; and recreational open space integrated with the surrounding park systems.	This seems to be a more accurate definition for preserved open space, except for reference to agriculture.	Remove agriculture and define separately. If the intention is to allow commercial agriculture, then analyze and mitigate the impacts and provide land use and zoning over areas that county wants open to ag. Analyze and mitigate the impacts to introducing ag into open space.
Page 68 2.4.3 Key Planning Strategies	Further, the campus will be surrounded by a vast network of permanently preserved open spaces.	Yes, this is the most accurate and correct description. But doesn't define permanently protected or by what means.	Define permanently preserved open spaces and describe by what means they will be permanently protected.
Page 70 2.4.3.1 Land Use Classifications	Single-Family Detached. Single-family units that are detached from any other buildings (with the exception of accessory dwelling units) and have open space on all four sides.	Inaccurate use of open space. The green spaces between dwelling units are typically called yards. If it is for communal use, then use and define an appropriate term such as green space, park, pocket park or something.	Define areas around buildings as yards, green space, park, pocket park or something other than open space, which refers to the lands outside the core campus.
Page 72	The Institutional designation accommodates adaptive reuse and new construction of a retreat/conference center located at the southern terminus of Sonoma Avenue, this area is envisioned as making use of the open spaces and	Not clear what open space is being referred to here. If it is green areas between buildings, then define and describe as above. Or if the conference and retreat center is making use of public open space.	Clarify use of public open space by private retreat or conference center; and/or redefine area around buildings in core campus as parks, greenways or appropriate term.

	<p>scenic setting to support a conference center.</p>		
	<p><i>Parks and Recreation</i> The Parks and Recreation designation provides for parks, recreation fields, and landscaped trails and pathways, and associated infrastructure structures. Park spaces may be active or passive, and could include dog parks, play areas, and other uses. These areas are intended to primarily consist of outdoor spaces, but they may contain support structures such as restrooms or small utility buildings. Park and recreation areas may have a secondary function as stormwater treatment and infiltration areas.</p>	<p>Does Parks and Recreation designation apply only in core campus? Please make clear. It should not apply to public open space.</p>	<p>Clarify that Parks and Recreation designation does not apply in public open space.</p>
	<p><i>Buffer Open Space</i> The Buffer Open Space designation encompasses managed open space areas that create transitions between open space habitat and development. Along the edges of the Core Campus, the Buffer Open Space is intended as a defensible fire buffer area, with fire resilient landscaping that protects buildings from fire, along the creeks, the Buffer Open Space creates floodable areas for stormwater management and ensures adequate riparian corridors for wildlife movement. Agricultural and active recreation uses are allowed within this designation as long as they are located further than 50 feet away from</p>	<p>Agriculture is allowed in Buffer Open Space, but the impacts are never analyzed or mitigated. Why is 50 feet adequate to protect riparian areas from agriculture? Why isn't 100 feet a more adequate setback. Why not mitigate by prohibiting agriculture in open space buffer. Does Open Space Buffer overlap with preserved public open space? Agriculture is never mentioned in state statute.</p>	<p>Analyze and mitigate impacts of introducing agriculture into Open Space Buffer Areas. Explain whether this new land use and land use designation overlaps with preserved public open space; and mitigate and analyze the impacts.</p>

	the top of Sonoma Creek’s banks. Within the Buffer Open Space areas, built elements should be limited to trails and planters, permeable fencing, and informational signage.		
	<i>Preserved Open Space</i> The Preserved Open Space designation is intended to preserve open spaces outside of the Core Campus for habitat, recreation, ecological services, water resources, and agricultural uses. This space also contains some infrastructure, including water infrastructure, that is important for the continued functioning of local water systems.	Neither state nor community ever envisioned commercial agriculture in protected public open space. State statute never mentions agriculture or commercial agriculture.	Remove agriculture and commercial agricultural uses from definition of open space; and/or conduct analysis of impacts to open space from new commercial agricultural land uses that is now completely missing from DEIR.
Page 75	western open space	What is this? First time that term is used.	Define western open space.
Page 76	<i>Agrihood</i> The Agrihood District is envisioned as a new neighborhood that is a nod to historic agricultural lands, with physical and visual connections to the historic agricultural areas, low-impact development at a lower intensity, and a smooth visual transition between higher intensities to the west and the agricultural open space at the east.	See comments above about agriculture. The Agrihood appears to overlap with preserved public open space and community separator lands. What the heck is agricultural open space?????	Conduct analysis and mitigate impacts to preserved public open space from new commercial agricultural land uses that is now completely missing from DEIR. Conduct analysis and mitigate impacts to preserved public open space from new “agrihood.” Describe how the agrihood overlaps with community separators; and how a vote of the people is likely to be required as it intensifies development. Define this new term: agricultural open space.
Goals and Policies	Open Space Related	Comment or Question	Action Requested
Page 94 3.1.3.3 Relevant Policies			

and Implementing Actions			
<i>Pg 94, 131 Open Space and Resources and Hazards</i>	2-A Open Space: Preserve the open space surrounding the core campus in public ownership in perpetuity, preventing further development in undeveloped areas and ensuring ongoing stewardship in partnership with neighboring State and regional parks and other institutions and organizations.	While I support this, there is no analysis, description or detail or how or when this will be accomplished. This language is far too vague to provide adequate mitigation. It needs to be more detailed and added to Conditions of Approval. The DEIR needs to provide specifics such as naming prioritized entities such as California State Parks, Sonoma County Regional Parks, Sonoma County Open Space District, California Coastal Conservancy and other “conservation” institutions and “non-profit” and “public” organizations. How will it be accomplished, such as through conservation easements, fee-title, inter-agency transfer or other mechanisms. A timeline, such as within three years of the adoption of the DEIR. Right now, there is nothing in writing; and the state statute is vague, conditional on “feasibility.”	Add specific details for how, when and through what mechanisms the preservation of the open space in public ownership in perpetuity will be accomplished, and provide detailed options, as well as a timeline. Preservation of open space in public ownership in perpetuity needs to be added as a DEIR Mitigation and a Condition of Approval in the Specific Plan.
	2-B Balance: Promote a balance of habitat conservation, agriculture, and recreational open space, reflecting the recent historic use of the surrounding open space.	Balance and Promotion is not an action or requirement. Does not serve as an enforceable mitigation or condition of approval. Agriculture needs to be removed or analyzed and mitigated as a new land use. Define historic use. Recreational use is another new term introduced here without definition.	Either remove this entirely as “balance” and “promote” have no enforceability to serve as a mitigation or condition of approval; or change to “require habitat conservation and protection of natural resources of open space in public ownership in perpetuity.” Remove agriculture. Remove or define “historic use.” Remove or define “recreational open space.”
	Policies	Work with is vague and meaningless. Who is	Add specific details for how, when and through

	2-1 Work with Sonoma County to dedicate the preserved open space as regional parkland.	supposed to work with Sonoma County? Isn't this a Sonoma County document? This needs detailed description of how, when and by what mechanisms that the preserved open space will be dedicated for public ownership in perpetuity. Here you say it will be parkland. In other places you say it will be agriculture. I support making it all parkland. But what does regional parkland mean? Does that prevent the land from going to state parks?	what mechanisms the preservation of the open space in public ownership in perpetuity will be accomplished, and provide detailed options, as well as a timeline. Preservation of open space in public ownership in perpetuity needs to be added as a DEIR Mitigation and a Condition of Approval in the Specific Plan. Define what you mean by "regional parkland."
	2-7 Prohibit lights within the wildlife corridor and along the creek corridor.	Support.	
	2-11 Implement "dark skies" standards for all public realm lighting and all new buildings on the site, including by requiring that all outdoor fixtures are fully shielded, that outdoor lights have a color temperature of no more than 3,000 Kelvins, and that lighting for outdoor recreational facilities be prohibited after 11pm.	Support.	
Page 95	2-20 Require that new development preserve existing trees to the fullest extent feasible. Locate new construction and public realm improvements around existing landscaping features.	Inadequate. "As feasible" is unenforceable. This does nothing to save a single tree, nor does it provide any information on the tree canopy that exists at SDC or the conservation or climate benefits they provide.	The DEIR needs a full assessment of the trees and tree canopy; and needs to require protection of mature trees and by size and species and historic value. The conservation and climate values of the existing trees need to be analyzed.
	2-20 Require that new development preserve existing trees to the fullest extent feasible . Locate new construction and public realm	Inadequate. "Fullest extent feasible" is unenforceable. The use of the word "require" is meaningless here.	The DEIR needs a full assessment of the trees and tree canopy; and needs to require protection of mature trees and by size and species and historic value.

	improvements around existing landscaping features.		The conservation ad climate values of the existing trees need to be analyzed.
Pg 101 Standard Conditions of Approval	MOB-2 Construction of the Highway 12 connector should avoid damage to scenic and open space resources such as trees, rock outcroppings, and historic buildings to the greatest extent feasible .	Inadequate. "Fullest extent feasible" is unenforceable. The use of the word "require" is meaningless here.	Provide actual requirements and conditions of approval to prevent damage to scenic and open space resources such as trees, rock outcroppings and historic buildings.
Page 102	Preserved Open Space land use designation is intended to preserve open spaces outside of the Core Campus for habitat, recreation, and agricultural uses.	Remove agriculture from definition of preserved open space. Agriculture is never mentioned in state statute.	Remove agriculture from definition of preserved open space; and/or conduct analysis and mitigations for introducing ag into open space, and land use designations as described above.
Page 105	preserving the site's open space framework	Define open space framework. Is that just a map?	Define and describe the open space framework.
Page 123 3.2.2.4 Planning Area Overview			
Agricultural Resources	The Planning Area is a located in a rural setting within the vastly agricultural area of unincorporated Sonoma County. Parcels immediately to the south of the Planning Area in the eastern portions are currently being used as vineyards. In this rural context, there is some land within SDC that was historically used for agriculture within the Planning Area.	Inadequate. Vague. Unclear.	Define amount of acreage and actual agriculture uses at SDC. Clarify whether they are commercial ag uses or just for growing food for residents and staff at SDC.
	This area contained historic agriculture uses, including animal husbandry and grazing, orchards, vineyards, crop production and the former Sunrise Industries farm.	Inadequate. Vague.	Define amount of acreage and actual agriculture uses at SDC. Clarify whether they are commercial ag uses or just for growing food for residents and staff at SDC.

	The presence of rich soils and the mandate to preserve open space on the SDC site suggests that agricultural uses could again become an important land use on the SDC site.	Commercial agriculture as the Specific Plan and DEIR propose is a new land use compared to the food and farming conducted at SDC for residents and staff.	As above, either remove agriculture or conduct an analysis of the impacts of introducing commercial agriculture into open space. Define amount of acreage and actual agriculture uses at SDC. Clarify whether they are commercial ag uses or just for growing food for residents and staff at SDC.
Page 124	Approximately 610 acres within the Planning Area is designated as Grazing Land and 98 acres is designated as Farmland of Local Importance.	Yes, but there is no commercial grazing or agriculture being conducted on site; and it is unlikely there ever was.	See above.
	However, there are no current grazing activities occurring within the Planning Area.	Exactly.	Introduction of grazing is a new land use that requires analysis and mitigation in the DEIR.
	No land within the Planning Area is currently zoned as Agricultural in the Sonoma County General Plan; the entire Planning Area is currently zoned as Public Facilities. The only agricultural and resource-based land use permitted in this zone is beekeeping, and agricultural processing is conditionally permitted.	Exactly.	Introduction of new commercial agricultural uses as proposed requires analysis and mitigation in the EIR.
Page 131 3.2.3.3 Relevant Policies and Implementing Actions The following relevant policies and implementing actions of the Proposed Plan address agriculture and forestry resources:	2-D Biological Resources: Promote conservation of existing habitat, including creeks, groundwater recharge areas, and open spaces, through intentional water and energy conservation, sustainable food production, top-tier sustainable building practices, and aggressive waste reduction strategies in order to protect natural resources and critical wildlife habitat, maintain wildlife linkages, and foster environmental stewardship.	Inadequate. Promote is not adequate to protect or mitigate environmental harm to biological resources.	Change promote to “require” and provide some actual mitigations.

	<p>Policies</p> <p>2-1 Work with Sonoma County to dedicate the preserved open space as regional parkland.</p>	<p>Inadequate. Vague. Unclear. “Work with” has no clear definition. Given this is one of the most important assets and elements of the Specific Plan and state statute, the DEIR needs to provide far more detail and actual requirements, mitigations and enforceable measures and conditions of approval to meet CEQA.</p>	<p>Add specific details for how, when and through what mechanisms the preservation of the open space in public ownership in perpetuity will be accomplished, and provide detailed options, as well as a timeline.</p> <p>Preservation of open space in public ownership in perpetuity needs to be added as a DEIR Mitigation and a Condition of Approval in the Specific Plan.</p>
	<p>2-2 Work with agricultural community partners and local farmers to reintroduce agricultural uses in the agrihood and within the managed landscape buffer to promote local production and regenerative farming practices, honoring the site’s history and enhancing the site’s connection to the land.</p>	<p>As above, “work with” is an inadequate term to meet CEQA mitigation requirements. New land uses including the agrihood and agriculture need to be analyzed and mitigated. If the intent is to prioritize regenerative farming and local production, that needs to be made clear. Commercial agriculture is not that.</p>	<p>Analyze and mitigate impacts to open space lands from new land use of “agrihood.”</p> <p>See comments above about agrihood, community separators and agriculture in general.</p>
	<p>2-21 Preserve and enhance the wetlands east of the core campus as a fire break, groundwater recharge, and habitat area.</p>	<p>Required by law to protect wetlands. Therefore, this is not a mitigation.</p>	<p>Analyze and mitigate impacts to wetlands as use as fire break and groundwater recharge area, which are new land uses for wetlands that are protected by federal law.</p>
	<p>2-26 Prohibit the use of all pesticides, rodenticides, and poisons in materials and procedures used in landscaping, construction, and site maintenance within the Planning Area. This restriction should be included in all Declarations of Covenants, Conditions and Restrictions (CC&Rs) to ensure that future homeowners are aware of the requirements.</p>	<p>Support.</p>	<p>Support.</p>
	<p>The proposed Agrihood District (Goal 5-M) would</p>	<p>Exactly. And the impacts of this have not been</p>	<p>Analyze and mitigate impacts of Agrihood on</p>

	<p>support new agricultural uses, with physical and visual connections to the historic agricultural areas, low-impact development at a lower intensity, and a smooth visual transition between higher intensities to the west and the agricultural open space at the east. It is also noted that the County's Zoning Code would be concurrently amended to incorporate the Proposed Plan's new and modified land use districts and overlays, use and development standards, and density and intensity limits, if the Proposed Plan is adopted.</p>	<p>analyzed or mitigated in the DIER.</p>	<p>open space lands that is currently missing from DEIR.</p>
	<p>Given that the Proposed Plan supports agricultural uses as permitted by existing zoning and that the Planning Area does not include any Williamson Act contract lands, this impact would be less than significant</p>	<p>This is nonsensical conclusion. What does it even mean?</p>	<p>Explain.</p>
<p>Page 136</p>	<p>The Proposed Plan would introduce new and modified land use districts and overlays that will accommodate proposed land use classifications including residential, employment center, flex zone, institutional, utilities, parks and recreation, buffer open space, preserved open space, and a hotel overlay zone.</p>	<p>Exactly. And the impacts from all that on open space lands are not adequately analyzed or mitigated.</p>	<p>Fully analyze and mitigate all the environmental impacts to open space lands and Sonoma Valley from Proposed Specific Plan, which has not been adequately done in the DEIR, as comments show.</p>
	<p>In addition, the proposed Agrihood District (Goal 5-M) is planned on the eastern side of the Core Campus and would support new agricultural</p>	<p>New land use.</p>	<p>See above on agriculture as a new land use at SDC and on open space lands.</p>

	uses in recognition of the Farmland of Local Importance, which historically supported agricultural uses on the eastern portion of the site.		
	In addition, the proposed Agrihood District (Goal 5-M) is planned on the eastern side of the Core Campus and would support new agricultural uses in recognition of the Farmland of Local Importance, which historically supported agricultural uses on the eastern portion of the site.	New land use.	As above, new land use needs to be analyzed and mitigated in DEIR.
Page 196 3.3 Air Quality	It is noted that quantified operational emissions do not include potential agricultural uses that would be allowed in the Agrihood district and Buffer Open Space and Permanent Open Space designations of the Proposed Plan. However, as discussed in the Methodology and Assumptions section above, these uses would be located away from future sensitive uses including residential areas (i.e., outside the Core Campus), and permitted agricultural activities are unlikely to occur on a scale that would result in daily operational emissions of the Proposed Plan (Table 3.3-8) exceeding BAAQMD's thresholds for particulate matter.	Inadequate analysis. This is giant leap. The DEIR needs to analyze and mitigate, not make giant assumptions based on no facts or evidence.	Analyze and mitigate impacts of potential new ag uses on open space and SDC property, future and current residents of the area. Provide actual mitigations that are enforceable.
	Limited agricultural uses would be allowed in the Agrihood district as well as the Buffer Open	What are the limited agriculture uses.	Analyze and mitigate new agriculture uses.

	Space and Preserved Open Space areas outside of the Core Campus.		
Page 237 3.4.3.3 Relevant Policies and Implementing Actions <i>Open Space and Resources and Hazards</i>	Goals 2-D Biological Resources: Promote conservation of existing habitat, including creeks, groundwater recharge areas, and open spaces, through intentional water and energy conservation, sustainable food production, top-tier sustainable building practices, and aggressive waste reduction strategies in order to protect natural resources and critical wildlife habitat, maintain wildlife linkages, and foster environmental stewardship.	Promote is not an adequate mitigation.	See comments above to require actual requirements and mitigations, replace “promote” with actionable and enforceable measures.
	2-E Wildlife Corridor: Maintain and enhance the size and permeability of the Sonoma Valley Wildlife Corridor (as shown in Figure 1.6-3) by ensuring a compact development footprint at the SDC site and by minimizing impacts to wildlife movement and safety from human activity and development at the campus.	Inadequate. How exactly will impacts be minimized to wildlife movement and safety from human activity and development at the campus.	Provide adequate analysis and mitigations for minimizing impacts to wildlife movement and safety from human activity and development at the campus.
	2-7 Prohibit lights within the wildlife corridor and along the creek corridor.	Support.	Support
	2-8 Maintain wildlife crossing structures by periodically checking for and clearing debris, vegetation overgrowth, and other blockages from culvert and bridge crossing structures; within the Core Campus, the Project Sponsor should develop and execute a maintenance	Inadequate. What does periodically mean? Who will do the checking? How is a project sponsor equipped to develop and execute a maintenance program? The word should needs to be “shall.”	Provide an enforceable requirement for maintaining wildlife crossing structures.

	2-9 Within the wildlife corridor, meet but do not exceed the defensible space requirements of the County Fire Department to maintain wildlife habitat while maximizing fire safety.	Inadequate. What the heck does this mean exactly?	Explain and define what this means exactly; and who would be responsible.
	2-14 Prohibit all unleashed outdoor cats, and restrict off-leash dogs and other domestic animals to private fenced yards and designated areas.	Support.	Support.
	2-15 Collaborate with local wildlife protection groups to create and distribute educational information and regulations for residents and employees to guide safe interactions with wildlife onsite. Materials should be accessible to all ages and abilities and could include posted signs, disclosures, fliers, or informational sessions, among other things.	Inadequate. Collaborate does not constitute and enforceable mitigation.	Change collaborate to “require SDC property owner and open space managers to”
	2-17 Adhere to residential nighttime noise standards to the extent feasible.	Inadequate. Meaningless.	Provide actual enforceable noise mitigations.
	2-20 Require that new development preserve existing trees to the fullest extent feasible. Locate new construction and	Inadequate. Meaningless.	Provide actual enforceable tree preservation mitigations.
Page 239	2-25 Include protective buffers of at least 50 feet along Sonoma and Mill creeks, as measured from the top-of-bank and as shown on Figure 2.2-1: Open Space Framework, to protect wildlife habitat and species diversity, facilitate movement of stream flows and ground	Inadequate. Why does 50 feet provide adequate protection? Why not 100 feet? What is the Open Space Framework? Just a map? Manage how?	Provide adequate analysis and mitigations for protective buffers, define and describe open space framework, and explain how protective buffers will be managed.

	water recharge, improve water quality, and maintain the integrity and permeability of the Sonoma Valley Wildlife Corridor, and the ability of wildlife to use and disperse through the SDC site. Manage protective buffers so that they support continuous stands of healthy native plant communities.		
	2-27 Ensure that all development adheres to Sonoma County Municipal Code Sec 26-65 on riparian corridor protection.	Following existing law is not a mitigation or measure. It is required by law. How will you ensure it is followed?	How will county ensure that the riparian corridor protection regulations will be followed and enforced; and by whom?
	2-28 Prior to the commencement of the approval of any specific project in the Proposed Plan area, Project Sponsors shall contract a qualified biologist to conduct studies identifying the presence of special-status species and sensitive habitats at proposed development sites and ensure implementation of appropriate mitigation measures to reduce impacts to sensitive habitat or habitat function to a less than significant level.	Inadequate. Future studies do not provide mitigation.	Inadequate.
Page 240 3.4.3.4 Impacts Summary of Proposed Plan	The existing undeveloped portions of the Planning Area would be designated as Preserved Open Space land use. Development is not proposed to occur within Preserved Open Space, where current daytime recreational uses would continue. Impact 3.4-1 Implementation of the Proposed Plan would not	So here the DIER states that the Preserved Open Space Land Use would remain undeveloped and not be developed, except for recreational daytime uses. Agricultural use and development are not mentioned here. I support that, but it is inconsistent with other parts of the DEIR and Specific Plan. Remove agriculture to be consistent. You can't say there is no impact when	Remove agriculture from preserved open space.

		the impacts of agriculture haven't been analyzed.	
Page 242	Outside of the developed areas, the Proposed Plan establishes dedicated open space areas. Managed open space in these areas would preserve and, in some cases, enhance the quality of sensitive habitats such as wetlands, native grasslands and oak woodlands. Several special-status wildlife and some plant species would be positively impacted by the preservation of these habitats. The open space would preserve the Sonoma Valley Wildlife Corridor and maintain its permeability for the movement of wildlife at a regional scale.	Support, but needs more detail and explanation on how the open space will be managed and how it will enhance habitats and wildlife. I agree that preservation would be beneficial. But once again, the issue of agriculture is not addressed, which could be extremely harmful to everything here.	Reconcile definition and use of preserved open space throughout DEIR and Specific Plan; remove agriculture.
Page 254	The Proposed Plan is intended to contain development within the already developed area (Core Area) and protect open space for recreational and preservation uses. The	Exactly. No agriculture.	See previous comments on agriculture.
Page 255	Because the Proposed Plan preserves the overwhelming majority of the SDC parcel in open space, it ensures continuation of regional connectivity for wildlife, serving as a conduit for transit of wildlife between significant habitat blocks to the east and west.	Inadequate. Just preserving the 755 acres of open space in itself does not protect the natural resources or ensure connectivity for wildlife. Plus, there is a huge amount of inconsistency on how open space is defined and a lack of specificity on how it will be preserved.	Explain in detail how the Proposed Plan ensures continuation of regional connectivity for wildlife, serving as a conduit for transit of wildlife between significant habitat blocks to the east and west.
Page 257	Moreover, the 750 acres of Planning Area that will be preserved as open space will help offset some of the emissions generated by development under the Proposed Plan, though	What? Please provide detailed analysis and assumptions on this point. Looks like another great leap. Particularly since there is no plan for protecting trees, and there is no analysis of the	Please provide detailed analysis and assumptions on this point. Looks like another great leap with very little actual evidence.

	<p>not necessarily on a magnitude sufficient to achieve carbon neutrality for the Planning Area. Nevertheless, this significant source of carbon sequestration supports the 2022 Scoping Plan’s emphasis on natural and working lands.</p>	<p>impacts of introducing commercial agriculture.</p>	
<p>Page 307 3.10.1.1 Historical Land Use</p>	<p>SDC operations made use of the significant open space for recreation and agriculture, with programs that made use of the land to support the clients. Institutional decline in the 1970s and 1980s led to the eventual transfer of several hundred acres of what was identified as surplus land to the county and state park system, including approximately 600 acres that were transferred to the adjacent Jack London State Historic Park in 2002. With its remaining 945 acres, the SDC continued to operate agriculture and recreation programs on the property and kept much of the land in active use until the State announced closure of developmental centers in 2015 and closed the SDC in late 2018.</p>		
<p>Page 319</p>	<p>As described in the Biological Resources Chapter, the campus will be surrounded by a vast network of permanently preserved open spaces to protect natural resources, foster environmental stewardship, and maintain and enhance the permeability of the Sonoma Valley Wildlife</p>	<p>It is not clear how the Specific Plan and DEIR will adequately accomplish this.</p>	

	Corridor for safe wildlife movement throughout the site.		
Page 396	<p>Policies</p> <p>2-1 Work with Sonoma County to dedicate the preserved open space as regional parkland.</p> <p>2-4 Streamline the existing trail system by mapping, improving, and clearly marking designated trails for recreational use in order to minimize negative effects on the open space from recreational use.</p>	<p>As above, “work with” is not an enforceable mitigation.</p> <p>How will streamlining the trail system improve and mitigate impacts from recreation use?</p>	<p>See comments above about this policy and use of term “work with.”</p> <p>Explain how streamlining the trail system will improve and mitigate impacts from recreation use.</p>
	<p>2-5 Consider creating a designated area for water recreation at Suttonfield Lake, such as an access point near the trail from Arnold Drive with rail fencing and clearly marked signage and rules for swimming, dogs, and non-motorized boating.</p>	<p>Not a good idea. That will require a huge amount of supervision, new fences and roads, lighting and all kinds of things that are not conducive to preserving open space, natural resources and wildlife habitat. Plus, it is drinking water.</p>	<p>Remove this concept.</p>
Page 397 <i>Community Design</i>	<p>5-16 Develop a cohesive and integrated system of parks and open spaces, to fulfill the active and passive recreational needs of the community, building on the overall framework outlined in Figure 5.1-1.</p>	<p>Is the entire framework based on one map?</p> <p>How, who and when will a cohesive and integrated system of parks and open spaces, to fulfill the active and passive recreational needs of the community be accomplished?</p>	<p>Explain the framework. Describe in detail how, who and when will a cohesive and integrated system of parks and open spaces, to fulfill the active and passive recreational needs of the community be accomplished.</p>
Page 403	<p>Moreover, 755 acres of the Planning Area will be retained as open space that will be publicly accessible and integrated into the regional parks system (proposed Policy 2-1).</p>	<p>Yes. Support, but many elements of the Specific Plan and DEIR conflict with this and fail to address impacts from new land uses such as agriculture. Also, why limit to regional park system? What about state?</p>	<p>Explain why regional parks and not state parks?</p> <p>Explain how the 755 acres of open space will be “retained” and by whom, when and by what mechanisms.</p>
Page 524	<p>Full Open Space and Public/Institutional Use alternatives were also considered; however, for reasons discussed in Section 4.3, these alternatives were</p>	<p>While I appreciate that these alternatives were considered, they could have been more fully analyzed and evaluated to provide public and decision makers with</p>	<p>Provide more analysis and detail on the Full Open Space and Public/Institutional Use alternatives to provide the public and decision makers</p>

	<p>determined to be inconsistent with project objectives and infeasible, and therefore not analyzed in detail.</p>	<p>another option for the SDC property. While it is true that this option is not specifically mentioned in state statute, when it comes to housing, it states “as appropriate.” The Specific Plan goes far beyond “appropriate” for housing. It also introduces agriculture which was never mentioned in state statute.</p>	<p>with additional options for the future of SDC.</p>
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Wildfire smoke near Mineral, California. (Photo by Mark Gunn, [Flickr](#))

Fire

A Case for Retreat in the Age of Fire as Dozens of Wildfires Threaten Homes in the West

by *Emily E. Schlickman, Brett Milligan and Stephen M. Wheeler*

September 15, 2022

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After the 2018 wildfire in Paradise, Calif., many fire-damaged homes were razed. [Justin Sullivan/Getty Images](#)

[Emily E. Schlickman](#), *University of California, Davis*; [Brett Milligan](#), *University of California, Davis*, and [Stephen M. Wheeler](#), *University of California, Davis*

*More than **90 large fires** were burning across the parched Western U.S. landscape in mid-September 2022 following a record-setting heat wave, and thousands of people were under evacuation orders. One wildfire had **burned about 100 homes** and buildings in the Northern California town of Weed. As fire risk rises, is it time to consider managed retreat? Three environmental design and sustainability experts explore the options.*

A case for retreat in the age of fire

Wildfires in the American West are getting **larger, more frequent and more severe**. Although efforts are underway to create fire-adapted communities, it's important to realize that we cannot simply design our way out of wildfire – some communities will need to begin planning a retreat.

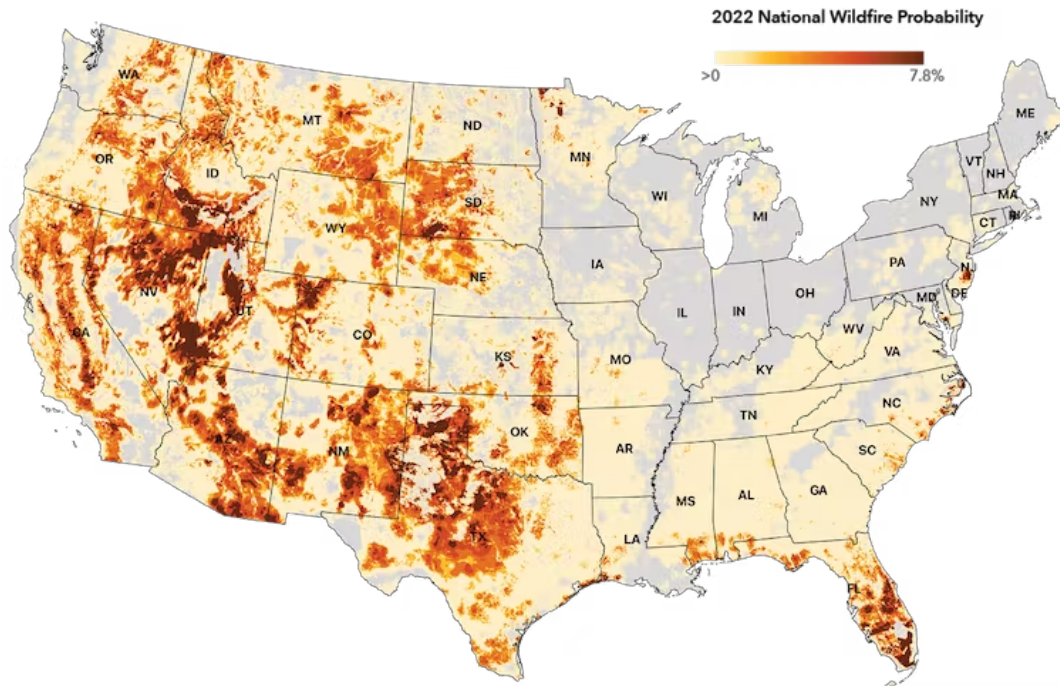
Paradise, California, **worked for decades to reduce** its fire risk by removing dry grasses, brush and forest overgrowth in the surrounding wildlands. It built firebreaks to prevent fires from spreading, and **promoted defensible space** around homes.

But in 2018, a fire sparked by wind-damaged power lines swept up the ravine and destroyed over 18,800 structures. **Eighty-five people died**. It's just one example.

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undeveloped land and urban areas where both wildfires and unchecked growth are common. From 1990 to 2010, new housing in the wildland-urban interface in the continental U.S. **grew by 41%**. By 2020, **more than 16 million homes** were in fire-prone areas in the West.

Whether in the form of large, master-planned communities or incremental, house-by-house construction, developers have been placing new homes in danger zones.



Assesses fire risk at the local level can help communities understand and prepare. The map reflects the probability wildfire will occur in an area in 2022. **First Street Foundation Wildfire Model**

It has been nearly four years since the Paradise fire, and the town's population is now **less than 30% of what it once was**. This makes Paradise one of the first documented cases of voluntary retreat in the face of wildfire risk. And while the notion of wildfire retreat is controversial, politically fraught and not yet endorsed by the general public, as experts in urban planning and environmental design, we believe the necessity for retreat will become increasingly unavoidable.

But retreat isn't only about wholesale moving. Here are four forms of retreat being used to keep people out of harm's way.

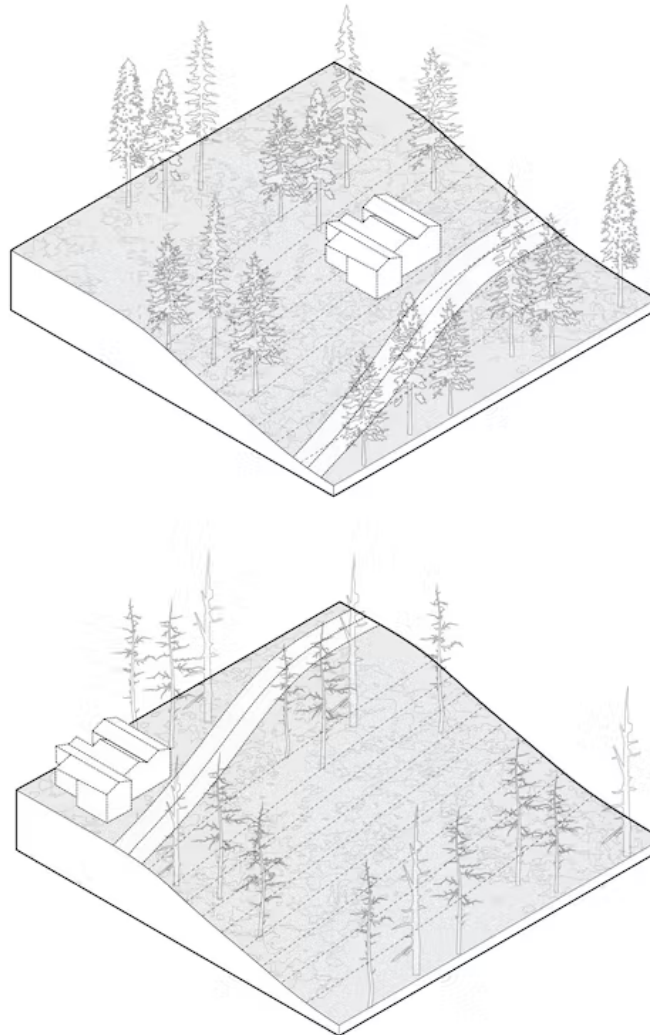
Limiting future development

On one end of the wildfire retreat spectrum are development-limiting policies that create stricter standards for new construction. These might be employed in moderate-risk areas or

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significant grade change, as wildfires burn faster uphill. In the guidelines, steep hillsides have a gradient of at least 25% and a vertical elevation of at least 50 feet. In most cases, new buildings cannot encroach into this zone and must be located **at least 30 feet from the hillside**.

While development-limiting policies like this prevent new construction in some of the most hazardous conditions, they often cannot eliminate fire risk.



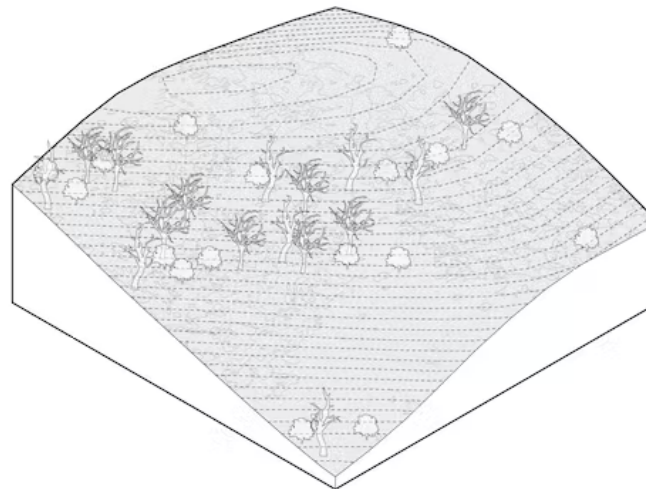
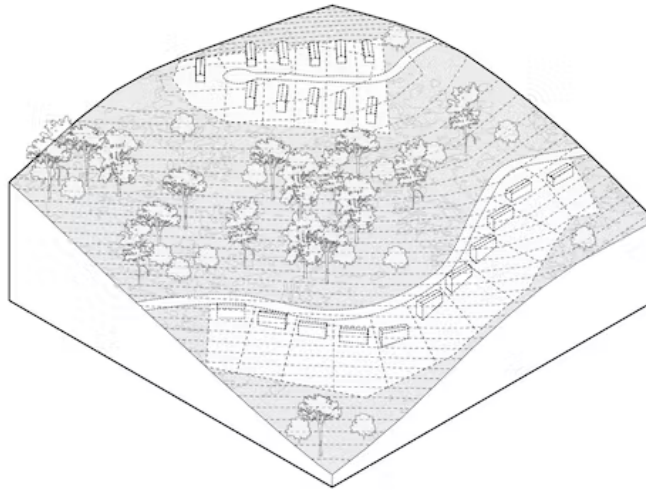
Development-limiting policies can include stricter construction standards. The illustration shows the difference between a home on a steep, wooded hillside that is hard to defend from fire and one farther from the slope. Emily Schlickman

Halting new construction

Further along the spectrum are construction-halting measures, which prevent new construction to manage growth in high-risk parts of the wildland-urban interface.

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example, Los Angeles County recently updated its **general plan to limit new sprawl in wildfire hazard zones**. Urban growth boundaries could also be adopted locally, as many suburban communities north of San Francisco have done, or could be mandated by states, **as Oregon did in 1973**.



Halting construction and managing growth in high-risk parts of the wildland-urban interface is another retreat tool. Emily Schlickman

To assist the process, states and the federal government could designate **fire-risk areas**, similar to Federal Emergency Management Agency flood maps. **California already designates zones** with three levels of fire risk: moderate, high and very high.

They could also develop fire-prone landscape zoning acts, similar to legislation that has helped **limit new development along coasts, on wetlands and along earthquake faults**.

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time, states or federal agencies could refuse funding for local authorities that enable development in severe-risk areas.

In some cases, state officials **might turn to the courts** to stop county-approved projects to prevent loss of life and property and reduce the costs that taxpayers might pay to maintain and protect at-risk properties

Three high-profile projects in California's wildland-urban interface have been stopped in the courts because their environmental impact reports fail to adequately address the increased wildfire risk that the projects create. (Full disclosure: For a short time in 2018, one of us, Emily Schlickman, worked as a design consultant on one of these – an experience that inspired this article.)

Incentives to encourage people to relocate

In severe risk areas, the technique of “incentivized relocating” could be tested to help people move out of wildfire's way through programs such as voluntary buyouts. Similar programs have been used after floods.

Local governments would work with FEMA to offer eligible homeowners the pre-disaster value of their home **in exchange for not rebuilding**. To date, this type of federally backed buyout program has yet to be implemented for wildfire areas, but some vulnerable communities have developed their own.

The city of Paradise created a buyout program funded with nonprofit grant money and donations. However, only **300 acres of patchworked parcels have been acquired**, suggesting that stronger incentives and more funding may be required.

Removing government-backed fire insurance plans or instituting variable fire insurance rates based on risk could also encourage people to avoid high-risk areas.

Another potential tool is a “transferable development rights” framework. Under such a framework, developers wishing to build more intensively in lower-risk town centers could purchase development rights from landowners in rural areas where fire-prone land is to be preserved or returned to unbuilt status. The rural landowners are thus compensated for the lost use of their property. These frameworks have been used for growth management purposes **in Montgomery County, Maryland**, and in **Massachusetts** and **Colorado**.

Incentivized relocating can be used in severe risk areas by subsidizing the movement of some people out of wildfire's way. The illustrations show what before and after might look like. Emily Schlickman

M i i i i h l l

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Vulnerable communities may want to relocate but don't want to leave neighbors and friends. "Wholesale moving" involves managing the entire resettlement of a vulnerable community.

While this technique has yet to be implemented for wildfire-prone areas, there is a long history of its use **after catastrophic floods**. One place it is currently being used is Isle de Jean Charles, Louisiana, which has **lost 98% of its landmass since 1955 because of erosion and sea level rise**. In 2016, the community received a federal grant to plan a retreat to higher ground, including the design of a **new community center** 40 miles north and upland of the island.

This technique, though, has drawbacks – from the complicated logistics and support needed to move an entire community to the time frame needed to develop a resettlement plan to potentially overloading existing communities with those displaced.

In extreme risk areas, wholesale moving could be an approach – managing the resettlement of an entire vulnerable community to a safer area. Emily Schlickman

Even with ideal landscape management, wildfire risks to communities will continue to increase, and retreat from the wildland-urban interface will become increasingly necessary. The primary question is whether that retreat will be planned, safe and equitable, or delayed, forced and catastrophic.

Emily E. Schlickman, Assistant Professor of Landscape Architecture and Environmental Design, *University of California, Davis*; **Brett Milligan**, Associate Professor of Landscape Architecture and Environmental Design, *University of California, Davis*, and **Stephen M. Wheeler**, Professor of Urban Design, Planning, and Sustainability, *University of California, Davis*

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About the Authors

[Emily E. Schlickman](#), [Brett Milligan](#) and [Stephen M. Wheeler](#)

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September 21, 2022

Brian Oh
Comprehensive Planning Manager
Permit Sonoma, County of Sonoma
2550 Ventura Avenue
Santa Rosa CA 95403
[via email]

RE: Draft Environmental Impact Report and Preferred Specific Plan for redevelopment of the Sonoma Developmental Center in Glen Ellen

Dear Mr. Oh,

We appreciate this opportunity to comment on the draft environmental impact report (DEIR) and preferred Specific Plan for redevelopment of the Sonoma Developmental Center (SDC).

While we acknowledge the conflicting directives laid out in the legislation authorizing the specific planning process for the property and recognize the difficulty of making meaningful connections with stakeholders in pandemic times, we must express our overall disappointment with the DEIR and Preferred Plan, which do not reflect community input as we've witnessed in public meetings and in letters over the years-long planning process. The scale of proposed redevelopment of the 180-acre core campus is fundamentally incompatible with the rural character of the surrounding community and the north Sonoma Valley, presents a clear danger to the safety of current and future residents of the Valley in the inevitable event of wildfire, and threatens the integrity of Sonoma Mountain's irreplaceable natural resources — habitats for keystone flora and fauna, the health of the Sonoma Valley Wildlife Corridor, water quality, air quality, recreational opportunities, and historic, tribal, and modern cultural values.

The DEIR fails to adequately or clearly describe meaningful, enforceable mitigations for the environmental impacts of redevelopment at the scale proposed, as required by the California Environmental Quality Act (CEQA). It fails to clearly delineate cumulative

impacts. It does not provide sufficient analysis to give decision-makers all the information they need to satisfactorily draw conclusions about the environmental consequences of the Preferred Plan. It is our hope that by addressing the questions that follow, applicable, effective, enforceable mitigations will be identified and instituted that materially decrease or eliminate those impacts.

General concerns/questions

The DEIR indicates that, across the board, the environmental impacts of the Preferred Plan and the Historic Preservation Alternative (HPA), which is acknowledged as environmentally superior per CEQA, are “largely comparable.” The DEIR also states that the HPA is less superior in terms of energy use, biological resources, and wildfire risk (ES.4.2). Given the significant differences in scale of the two alternatives — the HPA is half the size of the Preferred Plan — these conclusions defy logic.

- 1) Please explain how construction of 1,000 homes occupied by 2,500 people has the same environmental impact across virtually every category studied in the DEIR as does providing 450 homes occupied by 1,125 people (a 55% reduction)? Which studies support this finding?
- 2) Please explain how providing workspace for 900 people has the same environmental impact across virtually every category studied in the DEIR as does providing workspace for 600 people (a 33.3% reduction). Which studies support this finding?
- 3) Please explain how the HPA—which translates to less demolition through adaptive reuse of historic structures, less construction, fewer vehicle miles traveled, and fewer people on the property—uses more energy, has a greater impact on biological resources, and increases wildfire risk than the Preferred Plan, as stated in the DEIR (ES 4.2). Which studies support this finding?

Impacts specific to Sonoma Mountain

The entire 945-acre SDC property, including the developed core campus, is located within one of the last rural regions on the Sonoma Valley floor, with the mostly undeveloped slopes of Sonoma Mountain forming the entire western boundary and serving as a viewshed/mountain backdrop; as an informal natural reserve/safe haven for native flora and fauna; and as an informal recreational resource for hikers, cyclists, and equestrians from throughout Sonoma County and beyond. Further, historic residential use of the SDC by individuals with developmental disabilities and their caregivers had minimal human-caused environmental impacts on the property’s open spaces. Redevelopment at the scale in the Preferred Plan creates an urban footprint within this

historically rural zone, significantly increasing human-caused environmental impacts on a number of areas identified under CEQA (i.e., Aesthetics [3.1]; Biological Resources [3.4], and Public Services and Recreation [3.13], to name a few). To mitigate impacts of any redevelopment on the historic, minimal-impact, rural quality of the property, and to ensure the viewscape is preserved, we request that:

1) The DEIR include mitigation measures to compensate for the loss of the rural attributes of the property at its current baseline, or a baseline that dates back no further than 10 years. Please specify which measures in the current DEIR address these impacts, and which studies support them.

2) Please study, provide mitigation measures, and document how incorporating adaptive reuse of buildings into the HPA proposal, with its smaller human footprint, would impact environmental goals.

3) The SDC's open space currently sees frequent use by recreationalists from all over Sonoma County and beyond. That use increased markedly during the pandemic, despite restrictions on travel. The level of use has remained high as the pandemic has waned. The addition of 2,500 residents, 900 workers, visitors to the proposed hotel and conference center, and their friends and family, as outlined in the Preferred Plan, will add an exponential burden on the property's open space, much of which is on the skirts of Sonoma Mountain. Please analyze what that increase in recreational use means for aesthetics, biological resources, cultural, tribal, and historic resources, and water and air quality, and identify mitigations for those impacts.

4) Please analyze the cumulative impacts and potential degradation of floral and faunal habitats, groundwater supply, and riparian zones across the site, including the 750+ acres identified as open space, caused by the increased housing density, noise, construction, traffic, and demolition proposed under the Preferred Plan. Please provide analysis of the impacts of redevelopment on migratory fish species, such as coho salmon. Please also analyze whether these impacts would be mitigated by a smaller redevelopment such as the HPA.

5) The intent to preserve and protect the 750+ acres of open space surrounding the 180-acre core campus has been codified by the state in its enabling legislation and has been promised by the county in the Preferred Plan. However, neither the Preferred Plan and nor the DEIR delineate clear boundaries for the open space to be transferred, identify a mechanism of transfer, clearly identify the entities that a developer must work with to facilitate transfer, or explicitly require a developer to ensure that redevelopment of the core campus be done in such a way, and with sufficient buffers, as to protect the natural values of the open space. Please add specific, enforceable guidelines for the open space

transfers, specifying acreages and minimum boundaries on both the east and west sides of Arnold Drive, and limiting allowed uses on these acreages to passive recreational uses such as hiking, mountain biking, horseback riding, photography, etc.

6) Agricultural and commercial uses should not be permitted in open space intended to be parkland. Please clarify that uses such as those identified in Table 4.3 will not be permitted in open space identified for transfer to park agencies, and that mitigations for such uses on other open space parcels are identified and enforceable.

Thank you for the time and effort you have put into developing the DEIR and preferred Specific Plan for the property. We look forward to receiving Permit Sonoma's responses to our concerns, and hope the final plan and EIR presented to the Planning Commission for comment and to the Board of Supervisors for approval reflect substantive changes that ensure the integrity of the natural values of Sonoma Mountain, and the communities that surround it, remain intact.

Respectfully,

Meg Beeler, Chairperson
Sonoma Mountain Preservation
Traditional territory of Southern Pomo, Wappo, Patwin, and Coast Miwok

On behalf of Sonoma Mountain Preservation's Board of Directors
Kim Batchelder, Bob Bowler, Arthur Dawson, Avery Hellman, Nancy Kirwan, Larry Modell, Tracy Salcedo, Teri Shore, Helen Bates, Mickey Cooke, Marilyn Goode, David Hansen, and Lucy Kortum

cc:

Senator Mike Thompson, Assembly member Cecilia Aguiar-Curry, Senator Mike McGuire, Senator Bill Dodd, Sonoma County Planning Commission, Sonoma County Board of Supervisors, Springs Municipal Advisory Council, North Sonoma Valley Municipal Advisory Council, Sonoma Valley Citizens Advisory Commission, Sonoma City Council, Permit Sonoma, Department of General Services (Gerald McLaughlin)

From: [Arthur Dawson](#)
To: [PlanningAgency](#)
Cc: [Hannah Whitman](#)
Subject: Sonoma Valley Municipal Advisory Council letter to Supervisors
Date: Thursday, September 15, 2022 5:08:38 PM
Attachments: [0 NSV-MACLettertoBoS_FINAL_01-06-22_signed.pdf](#)
[0 APPENDIX-FINAL_01-06-22.pdf](#)

Dear Planning Commissioners,

As Chair of the North Sonoma Valley MAC I'm attaching the letter and appendix that was approved by our council and sent to the Supervisors in January pertaining to SDC. This letter details the community's vision for SDC, which has remained quite consistent since the first large community meeting in 2015 and represents years of thinking and work by hundreds of people. Its broad support has been demonstrated by a petition circulated early in the year, which at the time (January) had been signed by a thousand people, the vast majority in Sonoma Valley and elsewhere in the County. It now has over 2500 signatures.

The MAC is intended to serve as our community's voice and this is a strong and clear expression of that voice. Thank you for taking this letter under serious consideration as you deliberate the Sonoma Developmental Center Specific Plan and EIR.

Sincerely,

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

From: Arthur Dawson <baseline@vom.com>
Sent: Wednesday, September 14, 2022 4:33 PM
To: 'PlanningAgency@sonoma-county.org' <PlanningAgency@sonoma-county.org>
Cc: 'Hannah Whitman' <Hannah.Whitman@sonoma-county.org>
Subject: SDC Draft EIR Response letter; North Sonoma Valley Municipal Advisory Council

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%20Fisca>

[/Services/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: [Arthur Dawson](#)
To: [PlanningAgency](#)
Cc: [Hannah Whitman](#)
Subject: Sonoma Valley Municipal Advisory Council letter to Supervisors
Date: Thursday, September 15, 2022 5:17:27 PM

Dear Planning Commissioners, Addendum:

Note that the MAC letter included with the email below was endorsed by the Sonoma City Council, Sonoma Land Trust, Valley of the Moon Association, Sonoma Valley Citizens Advisory Commission, Sonoma Mountain Preservation, Glen Ellen Historical Society, Painter Preservation, the Oakmont Village Association as well as Steve Akre, Fire Chief, Sonoma Valley District.

Arthur Dawson, Chair

North Sonoma Valley Municipal Advisory Council

(707) 509-9427; (707) 996-9967

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Sent: Thursday, September 15, 2022 5:08 PM
To: 'PlanningAgency@sonoma-county.org' <PlanningAgency@sonoma-county.org>
Cc: 'Hannah Whitman' <Hannah.Whitman@sonoma-county.org>
Subject: Sonoma Valley Municipal Advisory Council letter to Supervisors

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Sincerely,

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From: [RO](#)
To: [PlanningAgency](#)
Cc: [Brian Oh](#)
Subject: Comments on the DEIR
Date: Thursday, September 22, 2022 1:00:59 PM

Hello Sonoma County Planning Agency,

My name is Rowan, I live in El Verano and I have some concerns about pushing the SDC Project in a for-profit direction and I have a potential alternative.

You have done a great job weighing community and environmental needs. As someone who lives downstream near the Sonoma Creek, the care and attention brought to this project is very comforting.

The broader social and economic goals of creating a new gathering place is inspiring.

I fear that the wonderful plan put forward in the SDC Public Review Draft will be compromised in its execution.

The execution of the plan will reflect its funding; if a developer assumes responsibility for this project they will be compelled to complete it in the most profitable manner. Construction would follow conventional production methodologies and produce a space with the heart and character of an outdoor mall.

The quality and ethic of the execution of this project will ripple through Sonoma Valley and Sonoma County.

This land being left for profit would further entrench us in systems that do not provide the freedom to adequately respond to rising social inequality and changing climates.

I believe there is an opportunity for a different ethic to emerge: an attitude of respect and generosity already apparent in the Public Review Draft.

If we were to use the cooperative legal structure, we could create an entity more capable of representing the needs of Sonoma Valley and her people.

The members of the cooperative would be the different organizations interested in engaging with the space.

These organizations would be responsible for funding the projects they were interested in, as well as contributing to the collective maintenance of the property.

Citizens of the Valley would have the opportunity to patronize the projects they are most

passionate about, creating a direct democracy measured in dollars.

There are several opportunities such an undertaking would facilitate:

1. The ancestral keepers of this land could be invited to participate in the decision making process. This particular land has been a place of intercultural relations prior to European arrival. This is a unique opportunity to honor the people who so masterfully tended this land and be able to build something new together.
2. It could provide a central organizing system for the various philanthropic, socially and environmentally active groups of Sonoma Valley. So much good work is being done here but it is scattered.
3. The property could be developed as needed. This would lower upfront costs as well as reduce the strain on local roadways by construction workers. This would give the property a much more organic and welcoming atmosphere and allow it greater flexibility to precisely meet the needs of its residents.
4. The creation of a Library/Community information center. This center could provide local cloud storage and more equitable access to high powered computers. There are many young people who have been sucked into the internet, especially after the pandemic. Making a space for people to come together to work, learn and play would allow for these activities to be less inherently anti-social while making them easier to regulate.
5. A weekly open air market/festival showcasing craft and food from throughout the Bay Area. A blend between the Sonoma Farmers Market and the Plein Air Art Show, this would give local artisans greater opportunities while further distinguishing Sonoma Valley as a center of the arts.
6. A venue for hosting performances, from musical guests to local performers such as the Avalon Players, Broadway Under the Stars and Rhoten Productions.

The problems facing the SDC and Sonoma Valley are not unique.

Everywhere people are facing water shortages that force us to rethink how we use our resources and produce our food.

Our farmers need the most support so they can have the freedom to innovate, they are severely limited in their capacity to do this when their survival depends on profitability.

A rising cost of living prevents people from purchasing in line with their ethics and ideals, forcing them to choose the cheapest (and most exploitative) products.

This cost of living is forcing young people like myself out of this region.

I (along with some peers) am starting an organization to be able to address these kinds of problems.

Broadly speaking, we are committed to learning how to adapt technologies to satisfy a particular use case.

I have spent quite a bit of time familiarizing myself with the cooperative structure in that endeavor, hence the enthusiasm about its potential application in this setting.

The first technology we are setting out to master is the personal computer.

We are not trying to innovate or redesign anything, just know what technologies are available and help people end up with the tools they actually need and make sure they know how to use and maintain them.

The goal of this organization is to be able to build the capacity to address some of the larger issues outlined above, naturally that will take quite a bit of time.

Still, as someone who is very passionate about the Sonoma Creek, I cannot help pondering this issue of what technologies are needed to meet the needs of this valley.

The idea of a single entity providing the investment for the SDC project makes me deeply uneasy about the level of influence they would have in that situation.

Much of my family still farms and I am very acutely aware of the pressing need for our food system to evolve if my future children are going to be well fed.

It seems foolish to me to not draw on the wisdom cultivated over centuries and millennia for coexisting and thriving with this land, but all too often it seems that wisdom and those practices are flaunted by European Legacy institutions with no connection to the people who actually practice and developed it.

I know it is likely far too late for such a proposal to be considered for this project, especially in such an undeveloped form.

If there is any chance of such an organization emerging I would gladly contribute in any way possible.

Thank you for taking the time to engage with my concerns, your responsibility and service is greatly appreciated.

Rowan Schneider

Omninaut Integrated Technology

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From: [Mimi Pulich](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [BOS](#); engage@sdcspecificplan.com; [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; senator.mcquire@senate.ca.gov
Subject: Please do not support SDC Specific Plan and DEIR as proposed
Date: Monday, September 26, 2022 10:27:28 PM

Dear Sonoma County Planning Commissioners,

The DEIR proposal you are reviewing will change the character of Sonoma as we know it. No where is there a corridor of 1000 housing units. It will impact daily traffic and impede evacuation routes in the case of wildfires.

But the loss of open space and environmental impacts will be more drastic. The DEIR does not adequately analyze and prevent or reduce environmental impacts in most if not all of the areas studied.

Please do the responsible thing for residents and the planet.

Signed,
Mimi Pulich
8120 Sonoma Mountain Rd.
Glen Ellen, CA 94709

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Warning: If you don't know this email sender or the email is unexpected,
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From: [Deborah Nitasaka](#)
To: [Brian Oh](#)
Cc: [Hannah Whitman](#); [PlanningAgency](#); [State Senator Bill Dodd](#); [State Senator Mike McGuire](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [Chase Hunter](#); [Sonoma Valley Sun](#)
Subject: RE: Public Comment on SDC Specific Plan and DEIR
Date: Monday, September 26, 2022 4:52:37 PM
Attachments: [9.26.22-D&T Nit - Planner Oh!.pdf](#)
[112721 \(re-sent to SC BOS 1.12.22\)-Deborah Nitasaka-SDC's Future-My Comments to Sonoma County copy.pdf](#)
[9.23.22-California Coastal Conservancy funds study to create climate hub at Sonoma Developmental Center-Index-Tribune.pdf](#)
[11.3.21-Railroaded Behind the Scenes of SMART's Freight Takeover copy.pdf](#)

EXTERNAL

Please accept the attached letter (and articles) as our contribution to the planning process pertaining the future of SDC.

Deborah Nitasaka, M.A.
Tadashi Nitasaka, M.D.
P.O. Box 1054
Glen Ellen, CA 95442
707-996-8620

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DEBORAH C. NITASAKA, M.A.
Science-Minded Thinker & Freelance Writer
P.O. Box 1054, Glen Ellen, California 95442-1054
707.996.8620; 707.318.7214 (mobile); dclaire77@gmail.com

26 September 2022

Brian Oh, Comprehensive Planning Manager
County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403
email: Brian.Oh@sonoma-county.org

RE: Public Comment on SDC Specific Plan and DEIR

Dear Mr. Oh:

We are writing today following our review of the draft environmental impact report pertaining to the Sonoma Developmental Center's (SDC) future.

As most following this planning process, including Sonoma County Planning Commissioner Greg Carr, have stated (repeatedly, loudly, emphatically) – we find that this report fails, either in part or in total, to account for several environmental impacts essential to any meaningful understanding of the ways in which the public's safety, true protections for the natural environment, and the many human needs are to be addressed. And so, with but a few scant weeks to pour through a 789 page report that bases its assessments, conclusions, and recommendations on the previous "Plan" - and so is itself deeply flawed and grossly inadequate, we will once more *howl into the void*.

Others with more advanced professional qualifications have pinpointed the flaws in those sections of the report pertaining to the natural environment, historic preservation, public safety, and traffic. We will restrict our comments to concerns for the future housing uses of SDC's Core Campus - and to a planning process that appears to have now gone off the rails – disappearing into the abyss of railroaded transparency!

The first of our issues concerns the so-called "SDC Specific Plan" and the "reasonable range of alternatives to the Proposed Plan" - as required by CEQA in an EIR. Is it just us? We find that the community's input is nowhere to be seen in either of these deeply deficient reports.

To illustrate, we and others have proposed, as one reasonable alternative, using SDC's built footprint, referred to elsewhere as its "historical 180-acre built area," as a campus for those seeking training in the trades, in the applied sciences, public service occupations, and other professions of financial and social benefit to the students, their families, and the entire state.

We see no evidence that this invaluable, desperately needed (see any number of actual empirical studies) educational use was given a moment of consideration. Remarkably shortsighted given that use of SDC's Core Campus as a campus would come with fewer vehicle miles travelled, allocations for affordable housing, to name but a few of the benefits, in part because students, staff, and educators could be offered housing within the campus. Please see the attached letter sent to the Sonoma County Board of Supervisors on November 21, 2021 as it offers a deeply researched look at just such a use.

Further, the Draft EIR ignores the county's dire need for affordable housing, calling instead for allocating 90% of the 1,000 proposed new houses as market rate homes. This in defiance of **The Final Regional Housing Needs Allocation (RHNA) Plan**, adopted in December 2021 which determined that Sonoma County's fair share of regional housing would be **3,881 units**, with **1,632** allocated as housing affordable to very low- and low-income

households. That would be about half the homes to be built, not 10% as this draft EIR calls for! Just a disgraceful display of the preference throughout the draft for meeting the needs of the wealthy over the rest of us.

“SDC Core Campus: Consists primarily of residential buildings, with medical, educational, recreational, and administrative buildings interspersed. A cluster of utility and support buildings, and fire station sit at the western edge of the Core Campus. On the eastern portion of the site, historic agriculture uses...”

Government Code Section 14670.10.5 (c) (4): 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.

To this end, we propose developing cottage clusters throughout the campus designed to meet specific needs such as supportive housing for individuals with disabilities, older adults, agricultural workers, and young families in need of starter homes. As an enriching environment affording access to the educational, recreational, social, health, and support resources, all on this technical college campus, all bringing full circle the many necessities of life - all without segregating this campus from the rest of Glen Ellen - what could be better?

It is outrageous to propose 100 of the 1,000 housing units might be deemed affordable, especially when communities such as Glen Ellen have been ravaged for Tourist Occupancy Taxes since Sonoma County's Vacation Rental Ordinance went into effect more than a decade ago. One hundred units doesn't begin to make up for the hundreds of homes converted into commercial tourist traps over these years. We need to actually, truly, add to our housing stock. By “add to” we mean in addition to recovering, by some means, those dwelling units sacrificed for profit, private and public. The proposed housing outline comes nowhere near to meeting the documented need for affordable housing in Sonoma County.

Although state housing element law is cited in Chapter 3.1.2: Population and Housing, we believe that, beyond this scant mention, it ignores state law and the Sonoma County Housing Element. Certainly, it does not begin to touch on the county's requirement to provide for its burgeoning homeless population, a significant aging population unable to live on its paltry retirement income, or an agricultural community ignored in this process - as usual.

Our second point also concerns process. While the people of Sonoma County, of the State of California have been encouraged to participate in a planning process sold to us as public, above board, and time constrained, we have just learned of another process (see attached 9/23/22 Index-Tribune article). This one private, ongoing, underhanded, free of transparency, a play for SDC by a real estate developer and his business partner - both with lengthy histories of questionable business ethics. This time, having sufficiently inserted themselves into the state system, carrying satchels of cash, of many millions of tax dollars, all offered to Sonoma County in exchange for a deal requiring NO Environmental Impact Report and benefitting only the few, the wealthiest schemers.

“Public records reveal that two Sonoma County businessmen — Darius Anderson and Doug Bosco — played central roles in the backdoor negotiations for the easement sales” in a sham process meant to deflect the public's attention away from the dealmaking between a little-known state agency headed by the same man working to bring coal through Sonoma County on the Sonoma-Marin Area Rail Transit district — SMART line (see two attached 2021 Bohemian articles)

Former congressman Doug Bosco is the CEO of the private freight company Northwestern Pacific Railroad Company (NWP Co.). Along with his business partner, real estate developer (e.g., Treasure Island: Radioactive debris) and owner of the powerful Platinum Advisors political consulting firm, Darius Anderson, they leveraged their influence to lobby state and federal lawmakers for the right to transport coal, among other commodities on the SMART rail line. Although most of their plans failed to pan out, through a series of complex loans and contracts (according to The Bohemian's 2021 report), a publicly chartered rail agency, North Coast Railroad Authority (NCRA), now owes NWP Co. millions of dollars. And today they continue running freight on the SMART rails.

It should be noted that Anderson and Bosco are founding members of Sonoma Media Investments, which owns most of the print media in Sonoma County including the Press Democrat, Sonoma Index-Tribune, Sonoma County Gazette, Petaluma Argus-Courier, North Bay Business Journal, Sonoma Magazine, and La Prensa.

So it's business as usual as the high rollers operate behind the scenes, leveraging millions of tax dollars in a play for possession of a community resource. Doug Bosco believes he and he alone can secure SDC, work around the usual requirements for an EIR, and buy off Sonoma County to create his next dream project.

When Supervisor Gorin spoke at last week's (September 21) meeting of the North Sonoma Valley Municipal Advisory Council, there was no mention of the Bosco/Ocean Conservancy deal. Nor did County Planner Oh indicate that he was negotiating a deal with Doug Bosco when he addressed the Sonoma County Planning Commission at its September 15 meeting.

The public is entitled to an explanation - NOW! This planning process must be halted until those who will pay (in oh so many ways) are fully informed of the facts.

And now, one final point that cannot be ignored: The Sonoma Developmental Center, Eldridge, the neighborhoods south of SDC - WE ARE ONE! We are Glen Ellen. We will not stand for further planning hellbent on separating our neighborhoods by this or any other planning process!

With earnest sincerity,



Deborah C. Nitasaka, M.A.
Co-founder, Sonoma County Housing Advocacy Group



Tadashi Nitasaka, M.D.

cc: North Sonoma Valley Municipal Advisory Council <hannah.whitman@sonoma-county.org>
Sonoma County Planning Commission <PlanningAgency@sonoma-county.org>
State Senator Bill Dodd <senator.dodd@senate.ca.gov>
State Senator Mike McGuire <senator.mcguire@senate.ca.gov>
Susan Gorin <Susan.Gorin@sonoma-county.org>
District3@sonoma-county.org
District4@sonoma-county.org
David Rabbitt <David.Rabbitt@sonoma-county.org>
Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>
Chase Hunter <chase.hunter@sonomanews.com>
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Science-Minded Thinker & Freelance Writer
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27 November 2021

Sonoma County Board of Supervisors
Tennis Wick, Permit Sonoma
Brian Oh, Planning Manager
Dyett and Bhatia
Santa Rosa, CA
Submitted 11/28/21: engage@sdcspecificplan.com

RE: Sonoma Developmental Center: Best Use Planning Means Enrichment Planning For A Sustainable Future For All!

Dear Supervisors, Staff, and Consultants:

We have been asked to select from the three options laid out in the SDC Alternatives Report released just a few weeks ago (November 1, 2021). Each offering little realistically plausible beyond an audacious open door for upscale developers to bring in projects bound to fail if past is prologue (i.e., Rohnert Park's Sonoma Mountain Village Jaka Hewlett-Packard] and Petaluma's telecom boom (and bust). Beyond some open space promises (with little detail), the rest in no way addresses the very real and urgent needs of Sonoma County residents.

More tourist-serving accommodations? This valley has been decimated by the county's cash-cow (Transient Occupancy Tax), converting units built for, zoned for, subsidized for, intended for - residents to live in - now operating as disruptive commercial enterprises in residential neighborhoods. The costs to our communities are innumerable. It is clear we have been sold out by our civic leaders. Any further moves toward "tourist-trapping" our community will not go down well. Forget the hotel! Give us back our housing stock!

Industrial parks? For which segment of our undereducated population? According to The Sonoma County Workforce Investment Board's draft Local Workforce Development Plan 2021 – 2024:

Over the next five years, the following are the top five occupations that will be in-demand for Sonoma County:

1. Office and Administrative Support
2. Sales
3. Food Preparation and Serving
4. Transportations and Material Moving
5. Management

Unless Sonoma County changes course, opting for a more enriching, visionary future, these will be the jobs of tomorrow. I see no reason to settle, to offer so little to our children, to our community. My vision is one calling for opportunity, advancement, growth, fulfillment in work and play.

The people of Sonoma County have been told there must be a plan covering how anything we ask for will be paid for. Curiously, I see no such level of detail in this consultant's report. Why the dichotomy? Maybe it's time to get real, to try a bit more transparency, to actually explore feasible options that will bring to the county what residents so urgently need, with top of the list being decent affordable housing for agricultural workers, students, developmentally disabled, the unhoused, and others most sorely in need. This housing might well be thought of as that needed to replace the hundreds of homes lost to the vacation rental industry as well as to the fires of 2017 - 2020.

Sonoma County may not have fulfilled its promise of a community-driven process, but the people of Glen Ellen and beyond are stepping up on their own. For my part, I am pushing past what some say is the line of possible to envision the day students live, learn, and work on SDC's campus. Imagine SDC as a place flourishing with innovation, preserving history, expanding its role to enrich the surrounding community with lifelong learning opportunities, special needs housing and education, visiting professor lecture series, and all while graduating people prepared with the skills essential for fulfilling, well-paying careers, ably set to meet and exceed the demands of today and the future.

I am in full agreement with the thoughts and recommendations sent to you by the Sonoma Land Trust concerning the need to preserve the wildlife corridor. Therefore, the remainder of my comments will pertain to the built portion of the campus.

To start, I have to say that the prospect of jamming together thousands of homes in the southern end of SDC is appalling. How does such a banal idea enrich the quality of life for Sonoma County residents? As a housing advocate clocking in more than 30 years, I endorse incorporating housing into SDC's future, especially special needs housing. To do so well will require far more thought than we see here. Questions remain as to how many homes can safely be added to the this part of the valley, how the units would be protected from further loss to Sonoma County's Vacation Rental Conversion Program or to any other misuse. As well, I need to see much more detail regarding the intended population.

As others have said (and I concur), "The alternatives do not provide for adequate emergency egress in the event of wildfire, are not compatible with the rural character of the surrounding communities within the Sonoma Valley, and do not realistically address impacts on infrastructure, such as water recharge, inadequate roadways, sewage system capacity, etc."

Too often Sonoma County officials have ignored what is needed for what is easiest, furthering the human toll. I've seen it all. The matter of public safety became alarmingly clear as a planning oversight when we learned, through the series of meetings held within a single week earlier this month (11/13/21, 11/16/21, 11/17/21), that the consultants did not meet with CalTrans when developing their traffic outline, yet calculated traffic flow by comparing apples and oranges.

Able-bodied drivers (2,000-4,000 new local residents, those traveling into Glen Ellen for work, tourists, and others are likely not comparable to developmentally disabled people who have never driven. Their traffic pattern predictions would be laughable if they weren't also potentially deadly (as we have seen when residents attempting to escape the Paradise fire and who were incinerated while desperately fighting to escape the flames).

A related shock, we also learned the consultants never met with local fire agencies. Simply appalling comes nowhere close to my outrage that Sonoma County is, once more, cashing in at the expense, at an ultimate cost of the very lives of the people who live and work here.

Yes, the pressures for change have arrived. Sonoma County's needs are:

- Development (commercial: housing imbalance) - We need to plan for a rebalancing;
- Poverty escalation due to promotion of industrial sectors paying less than living wages (hospitality, tourism, and agriculture) must be addressed by accepting nothing less than **living wage jobs**. We need to prepare our young people for a brighter future;
- Economic collapse following the housing bust;
- Brain drain: SDS closure, the relocation of well-paying industries (telecommunications, Hewlett-Packard, etc.);
- An insatiable hunger for revenue derived from new sources such as recreational drug production and sales, vacation rental conversion of thousands of Sonoma County homes;
- A growing homeless population;
- Escalating real estate prices - pricing most local residents out of the market;
- Housing codes prejudicing construction of large homes over more modest sized units;
- The impact of a collapsing infrastructure (fires, contaminated drinking water, unkept electrical systems);
- The decline of our professional and degreed populace;
- Climate change;
- Questionable practices at the county level (planning, code enforcement, zoning, emergency services);
- Student housing shortage: Santa Rosa Junior College opted to use bond revenue for the construction of an elaborate parking structure instead of desperately needed student housing - resulting in thousands of students now sleeping in their cars (some in that very parking structure [PD article about JC students living in their cars]);
- Low to middle income and special needs housing loss due to VACATION RENTAL industry & lack of building;
- Shortage of skilled tradespersons: Sonoma County lacks cutting-edge jobs training for a sorely-needed workforce - one able to meet national trades workforce shortage.

What is the best possible use for SDC as one answer to the issues listed above? Let's start with the dilapidated SDC structures. Their condition is undoubtedly the result of the state's neglect. Therefore, it is incumbent upon Sonoma County to insist that the state acknowledge it is theirs to repair.

Not only must the restoration be paid for by the state, we have recently learned that California has a revenue surplus to cover those costs. And those resources have attached to them some stringent guidelines as to how the reported surplus can be spent. Lucky for us infrastructure and colleges are among the options:

“California is — once again — [overflowing with money](#), and will likely have a \$31 billion budget surplus next year, according to [a Wednesday report](#) from the independent Legislative Analyst's Office. And because the state is forbidden from [spending more tax dollars per Californian than it did in 1978](#), once adjusted for inflation, it only has a few options for handling most of the cash windfall: slashing taxes; issuing tax rebates; funneling it to schools and community colleges; or earmarking it for certain purposes, such as infrastructure.” (Hoeven, 11/18/21)

As indicated above, Sonoma County's workforce predictions are not encouraging. They mirror a sad national trend wherein opting out of college are also coming up short on the skills needed to succeed in the workplace:

Two-thirds of Americans over 25 don't have a bachelor's degree or higher. A Harvard study uncovers inconsistent efforts to give these workers skills for economic mobility and calls for improving the problem.

Academic work on training programs has been somewhat static, says Rachel Lipson, director of the Harvard Project on Workforce. A paper from 30 years ago might not look much different from one published today. "There's been a lot of attention on K-12 quality and college access and completion, but a lot less on the types of educational and training pathways that sit in between high school and four-year college," she says.

These pathways are critical to the future of economic mobility, and the Project on Workforce hopes to raise the research community's interest in them. "The plurality of the U.S. labor force does not have a four-year college degree," says Lipson. "We can't throw up our hands and say four-year colleges are the only answer." (Smith, 2021)

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### **Answers:**

Having outlined the need and some substantial financial avenues, I will now outline how to put SDC to work for the betterment of the people of Sonoma County. Instead of continuing to produce cooks and tourism graduates, we need to give our kids a better future, one promising living wage opportunities, not a serf's subsistence; one grounded in an understanding of California's history as essential to knowing how best to go forward!

### **Some Educational & Housing Models As Best Fits For The SDC Campus:**

- High Tech "Trade Tech College" -
- Satellite Junior College Campus: Vocational Tech!
- Berea College: I have learned that Berea is interested in expanding to develop this unique college model in every state: Every student attends tuition-free! Every student works on campus, putting to work the lessons learned in the classroom. Majors include education, agriculture, the trades, the arts, and much more.
- The University of Oregon, Phil and Penny Knight Campus for Accelerating Scientific Impact: a 160,000-square-foot campus built to accelerate groundbreaking scientific discovery and development in a collaborative multidisciplinary environment <<https://inhabitat.com/leed-gold-targeted-knight-campus-advances-scientific-innovation/>>
- Career Technical Education, (Sonoma County) also referred to as CTE, is a multi-year sequence of courses that integrates core academic knowledge with technical and occupational knowledge to provide students with a pathway to post-secondary education and careers. CTE programs deliver an enriched educational experience that promotes student interest and academic success while developing technical and career readiness skills necessary for the workplace of the future. Graduates of today's rigorous and relevant CTE programs are better prepared for high-wage, high-skill and high demand careers.
- "State-supported technical college" - Clark Howard 9/13/18 show
- "Upskilling For Today & Tomorrow" - The Hill Event: Streamed Live 9/22/21 <[https://youtu.be/ph9f1Z\\_P45c](https://youtu.be/ph9f1Z_P45c)>

**I would add that it is entirely feasible within these models to:**

- Incorporate an affordable housing component, including special needs housing, into the campus plan;
- Offer on-site housing for students, staff, faculty which will reduce traffic impacts and provide additional incentives to prospective applicants;
- Training/Educational offerings might include an emphasis on high tech (environmental sciences, construction trades - including 3-D printing for housing production, modern firefighting and law enforcement courses, certificate programs in mental health, special education, & so much more);
- Traditional Trades (Carpenter, electrician, plumber, telecommunications engineer, auto mechanics, fire fighting, law enforcement - emphasizing community policing!, ecological land/resource management, nursery management [plant propagation, marketing, shipping], etc.), w/emphasis on high tech tools;
- LEED Certification program;
- Environmental Sciences: building in internships around campus grounds care (maintenance, repairs, upgrades, etc.) - Forestry, Firefighting technology, Alternative Energy Program;
- Sustainable Farming Program;
- Indigenous People’s Program: History & Culture;
- Health/Medical: Psych techs, med techs;
- Arts & Crafts Program (including student work program, sale to the public of hand-made goods);
- Retail Management: (w/training to include time spent running on-campus market);
- Day school for students with developmental disabilities (plug in tech students for “on-the-job” psych tech training aspect);
- Carve-outs for Crisis Management Clinic for Developmentally Disabled in need of care beyond that available in their community settings;
- Permanent Supportive Housing: See as a model Sweetwater Spectrum, Fifth Street West, Sonoma - a “mini-community” for autistic adults (Kory Stradinger, Executive Director);
- Community Center & History Museum: Oversight of cemetery, Sports/Playing Fields, Historic Preservation (Cemetery, buildings, overall site);
- Emphasis on: Economic and Racial Diversity.

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Kory Stradinger, Executive Director, Sweetwater Spectrum (Sonoma, Fifth Street West, "mini-community" for autistic adults).

Anisa Thomsen, Redwood Empire Chapter, National Electrical Contractors Association (see 11/4/21 PD LTE: Jointly run labor-management training programs & DIGNIFIED wages & benefits!).

With warm regards,

A handwritten signature in black ink, appearing to read 'D. Nitasaka', with a long horizontal flourish extending to the right.

Deborah C. Nitasaka

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California Coastal Conservancy funds study to create climate hub at Sonoma Developmental Center



SLIDE 1 OF 2

The Main Building of the Sonoma Development Center in Eldridge, California. The building is currently not in use. June 29, 2015. (Photo: Erik Castro/for Sonoma Magazine)



CHASE HUNTER

INDEX-TRIBUNE STAFF WRITER

September 23, 2022, 12:57PM | Updated 23 minutes ago

The California Coastal Conservancy on Thursday approved a \$250,000 grant to explore an addition to the Sonoma Developmental Center redevelopment project that would invest in climate research and rehabilitation.

Doug Bosco, chairperson of the conservancy’s board, said it represented a “major change” to the project’s current \$100 million redevelopment project, which is to sell the 945-acre property to a real estate developer and build up to 1,000 homes, potentially with a hotel and retail spaces.

“It’s a beautiful campus, it should be used for something that really enriches people,” Bosco said.

The grant directs the county’s planning department to develop a plan for adding a climate center to the project and establish financial partnerships that would help pay for it.

“Although real estate developers have proposed typical uses for the campus, the county would like to explore the possibility of dedicating a portion of the site to producing and demonstrating practical solutions for climate change adaptation,” according to the staff report on the grant.

The funding comes as part of a \$500 million appropriation from the state legislature for the Coastal Conservancy to invest in resiliency projects in 2022-23 and 2023-24.

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The proposed climate center would diversify the economy of the Sonoma Valley — which significantly employs low-paying hospitality and agriculture jobs — and bring in “innovators, inventors and investors” to be the “economic engine of the center,” according to the report.

"It would run the gamut" on climate innovation, Bosco said, who served as a member of the U.S. House of Representatives between 1982 and 1990. Bosco has been chair of the state's Coastal Conservancy for 17 years and an environmental advocate since the 1970s.

"Anyone that thinks that the world of climate change adaptation is going to be a poverty stricken world is wrong," Bosco said. "Smart people and smart investors are getting into it fast. What we would like to do is have a place where there's synergy among people similar like to what happened with Silicon Valley."

While other climate centers exist throughout the state, many focus research on a single topic, like agriculture or electric vehicles, Bosco said. The proposed climate center at the developmental center would be unique in seeking innovative solutions for a wider variety of issues related to climate change.

"It's the future. There's no two ways about," Bosco said. "No one knows climate change like Sonoma County."


The draft environmental impact report for developmental center is to be finalized Sept. 23, with the final report to be released Oct. 17. The redevelopment plan is scheduled to go before the Sonoma County Board of Supervisors by the end of the year.

Contact Chase Hunter at chase.hunter@sonomanews.com and follow [@Chase_HunterB](https://twitter.com/Chase_HunterB) on *Twitter*.

MOST POPULAR

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The COVID-19 pandemic crushed SMART's ridership numbers and cast further doubt on the passenger train's long-term viability. Photos by Chelsea Kurnick

Railroaded: Behind the Scenes of SMART's Freight Takeover

By Will Carruthers

A Story in Two Parts. Read the second story [here](#).

Nov 3, 2021

On the muddy banks of the Petaluma River in downtown Petaluma, a new housing complex is rising. Crews employed by the A.G. Spanos

Corporation, a Stockton-based developer, are constructing a 184-unit apartment complex on a lot sandwiched between a row of historic businesses and the tidal slough.

Before laying out the concrete foundations, the crews ripped out a few hundred feet of railroad tracks that crossed the lot. The old rails were part of a spur located less than a mile off the century-old main line running between Sausalito and Eureka. Planning and construction could not commence until Spanos controlled the legal “rights of way” on the tracks.

Rights of way are contractual easements that allow their owners to travel across another’s property. In this case, the easements on the riverfront tracks had value because the developer needed to extinguish them in order to build. That fact cost Spanos millions of dollars.

Public records reveal that lengthy negotiations between the Spanos corporation and two state-created rail transportation agencies for ownership of the rights of way preceded breaking ground for the construction project. One right of way was owned by a passenger line, Sonoma-Marín Area Rail Transit district — SMART. A second right of

way was owned by a state-owned freight line, North Coast Railroad Authority (NCRA). Both railway agencies saw the sale of the easements as potential cash cows.

In April 2017, Spanos reached an agreement with the two agencies, shelling out \$2.4 million for the right to remove the track. But that is not the end of the story. Millions of taxpayer dollars have been deployed to bail out and close down the NCRA, which leases the right to use its rails to a private company called Northwestern Pacific Railroad Company, or NWP Co.

Public records reveal that two Sonoma County businessmen — Darius Anderson and Doug Bosco — played central roles in the backdoor negotiations for the easement sales.

Who are they and why does this story matter?

Darius Anderson is a real estate developer who owns Platinum Advisors, a powerful California lobbying and political consulting firm. He also owns the *Press Democrat*.

Records show that during the negotiations over the railway easement sales price, Anderson apparently leveraged Platinum Advisor's position

as a SMART lobbyist to, in effect, benefit the aforementioned Northwestern Pacific Railroad Company or NWP Co, which is controlled by another *Press Democrat* owner, former congressman Doug Bosco.

Records obtained by the *North Bay Bohemian* and *Pacific Sun* using the California Public Records Act reveal that SMART director Farhad Mansourian allowed Anderson to guide SMART's participation in the Petaluma right of way deal, even though that task was outside of the scope of Platinum Advisor's state lobbying contract with SMART. Mansourian also asked Anderson to lobby federal lawmakers, another task outside the scope of Platinum's original contract.

During his five years representing SMART, Anderson's firm lobbied for state and federal legislation involving the fate of Bosco's private freight company. SMART [paid](#) Platinum Advisors \$600,000 before the contract ended in February 2020.

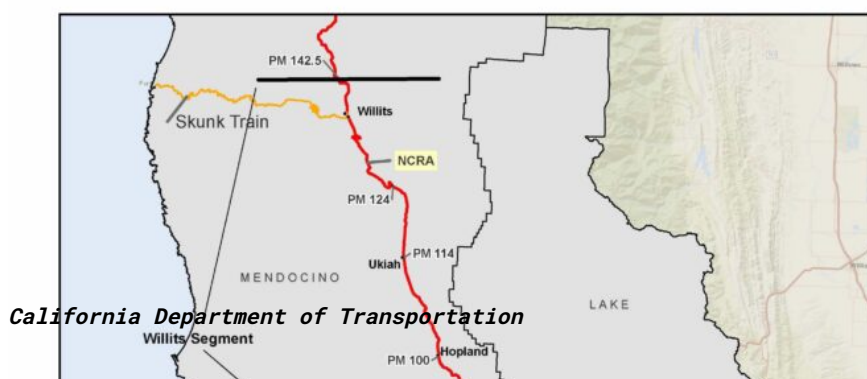
In order to grasp why the lobbying contract and the railway right of way deals stink of conflicts of interest, we must take a step back into the recent history of rail freighting in the North Bay, a

domain which Bosco and his allies have overseen for at least 15 years, with financial consequences that are not in the public's best interests.

How It All Began

Our story starts with the gradual demise of a once-lucrative railroad line stretching about 300 miles from Sausalito to Humboldt Bay that chugged into existence in 1914.

At first, sections of the Northwestern Pacific Railroad were operated by a potpourri of privately owned companies that profitably hauled lumber and other commodities up and down the North Coast, while also operating passenger trains.



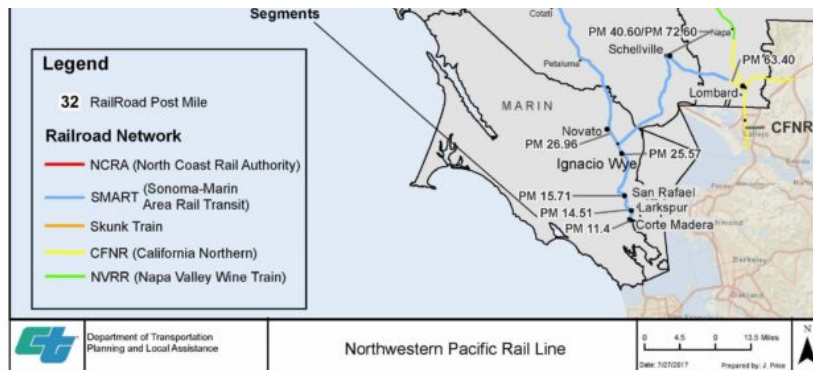


Figure 4. Map of Northwestern Pacific Railroad - Southern Section

However, the rail line's profitability was ultimately doomed by the decline of the North Coast's resource extraction industries, a catastrophic tunnel fire in 1978, and an endless series of floods. In the 1980s, storm-induced landslides destroyed the mid-section of the line, running through the Eel River Canyon. Increasingly, the railway appeared to have no future.

Trying to preserve the viability of the defunct rail line for freighting, state lawmakers created the North Coast Railroad Authority in 1989. Over the next two decades, state and federal agencies spent \$124 million purchasing the railroad from various private companies and funding the NCRA's efforts to restore sections of the decaying track for use by freight trains. But the hoped-for regeneration of the historic railroad was stymied by the failure of the California government to consistently fund the substantial costs of restoring the entire rail

line and the NCRA's ongoing operating costs.

Enter Bosco

In June 2006, a group of businessmen formed the privately owned Northwestern Pacific Railroad Company or NWP Co. The venture was designed to rejuvenate the freight line by creating a “public-private partnership” with the flailing NCRA to reopen the entire line. In short, NCRA and NWP Co would collaborate to improve and maintain the rail infrastructure using public and private funds. NWP Co would privately lease the right to operate freight trains from the NCRA and (somehow) make money.

Among NWP Co's founders was Doug Bosco, a former state assemblyman and congressman who had worked on transportation issues at the state and federal levels during his time in office.

According to the NWP Co business plan submitted to the California Transportation Commission in October 2006, Bosco and his partners had grand plans. The document outlined multiple business prospects which NWP Co claimed would allow the company to generate annual revenues of more than \$3 million within a few short years.

First, on the southern end of the line, NWP Co projected annual revenues of about \$1.1 million hauling lumber and agricultural products. The company estimated revenues of about \$2 million transporting garbage from Sonoma County's landfill to a solid waste dump in Nevada, with which it claimed to have an "exclusive right to negotiate" for 200 years.

If reopened, the northern end of the line would be even more lucrative, NWP Co claimed. The company asserted that it would partner with Evergreen Natural Resources to transport rail cars packed with gravel from the Island Mountain Quarry at the border of Mendocino and Trinity counties. Once the decaying rail lines to the quarry were reopened, the gravel shipping business could generate revenues of "at least \$30 million per year," the business plan stated.





As the general counsel for NWP Co, Bosco would “assist in the interface between NWP Co. and NCRA and various funding agencies in order to ensure ... that the public agencies’ reimbursement funding flows smoothly to NCRA,” according to the NWP Co business plan. Public records show that Bosco now also serves as CEO of NWP Co.

If the company’s Island Mountain plans had panned out, NWP Co — and the NCRA in turn — would have gained a rich stream of income. At the time, the NCRA estimated the capital cost of rehabilitating 300 miles of rails was \$150.6 million — \$42.6 million for the portion south of the Russian River, and \$108 million for the northern Eel River Division, according to NWP Co’s plan. A [Los Angeles Times](#) report in 2001 was less optimistic, citing a federal study which calculated the cost of reopening the entire line for freight and passenger rail at \$642 million.

The NCRA-NWP Co main lease agreement was signed in September 2006. In 2011, the NCRA and NWP Co started running freight cars along 62 miles of refurbished track in the North Bay. But, according to a recent report by SMART, the

freight revenue appears to be lower than the amounts originally projected by NWP Co. Nor did Bosco's company secure a contract to ship Sonoma County's waste to Nevada. And the Island Mountain quarry project, and other shipping opportunities potentially served by rejuvenation of the northern two-thirds of the line, never materialized.

To make up for the shortfall between revenues and capital, legal and operating costs, the NCRA entered into a complex series of loans and contracts with NWP Co, which somehow resulted in the publicly chartered rail agency owing millions of dollars to the privately owned NWP Co.

“AN IMPARTIAL OUTSIDE OBSERVER ... COULD CONCLUDE THAT ... THE PUBLIC IS NOT CURRENTLY GETTING — AND MAY NOT EVER GET — THE BENEFIT OF TENS OF MILLIONS OF TAX-PAYER DOLLARS USED IN THE LINE'S REHABILITATION.”

Bernard Meyers

But a 2020 state assessment of the NCRA — in effect, an autopsy — examines how the public rail agency's intertwined relationship with the private NWP Co came to pass. Remember, the NCRA was theoretically created for the purpose of saving the publicly owned railroad, but it became, in effect,

forever indebted to Bosco's privately owned company, according to government reports and a former NCRA board member.

According to the [report](#), prepared by a handful of state agencies, including the California State Transportation Authority and California Department of Finance, “When the Legislature created NCRA, it did not designate NCRA as a state or local agency and did not appropriate funding for its operations. Since its inception, NCRA has covered its expenses from rail revenues; state grant funding; public and private loans; loan forgiveness; proceeds from lease agreements; and leasing or sale of assets.” (Since it never received much revenue from its lease agreement with NWP Co, NCRA's most valuable assets became the excess properties and rights of way it owned up and down the line, including the property rights on the Spanos lot bordering the Petaluma river — and we shall return to *that* story.)

For decades, California agencies have been wary of funding the NCRA due to its convoluted accounting practices, which are intertwined with the accounts of NWP Co. CalTrans and FEMA have long branded the NCRA a “high risk”

recipient of state and federal funds.



A Sweet Deal

Bernard Meyers, a former NCRA board member, says that the NCRA's long-running debts to NWP Co and its myriad financial problems can be directly traced to the problematic 2006 lease agreement with NWP Co.

Mitch Stogner has served as executive director of NCRA since 2003. Stogner worked as Bosco's chief of staff for 15 years, first in the California Assembly (1976-1982), and then in Congress (1983-1991).

Remarkably, the 2006 agreement states that NWP

Co is not required to pay rent on the tracks *until* the company has booked \$5 million in net revenue in a single year — “net” meaning \$5 million after taxes and other expenses. Because NWP Co has not met the \$5 million threshold, it has paid very little to the NCRA for the use of the tracks.

Between 2006 and 2019, the NCRA “entered into 8 agreements, 7 amendments, and 1 informal financing arrangement with NWP Co. to fund NCRA’s operations,” according to the 2020 state assessment. The partially revealed paper trail delineates a strange relationship between the two, with NCRA acting as landlord and NWP Co acting as tenant. It’s a relationship in which the tenant does not pay rent, because it does not net more than \$5 million a year, but it has enough, somehow, to loan the landlord millions of dollars to cover rail maintenance and capital construction costs.

Without the investment of hundreds of millions of dollars, however, reaching the \$5 million annual revenue benchmark was clearly a pipe dream.

Meyers represented Marin County on the board of the NCRA for six years. In 2013, he wrote a brutally accusatory and detailed [exit memo](#) to his

colleagues laying out a litany of complaints about the way the NCRA was run — and whom the oddly crafted agency seemed designed to benefit.

“An impartial outside observer coming afresh to the NCRA’s books and the NWP lease could conclude that this organization is primarily run for the benefit of its lessee, NWP Co., that the public is not currently getting — and may not ever get — the benefit of tens of millions of taxpayer dollars used in the line’s rehabilitation, and that public benefit was not a primarily intended consequence,” Meyers wrote.

Four years later, in June 2017, the California Transportation Commission revisited the financial status of the NCRA after state staff noticed that a recent audit had raised “substantial doubt about NCRA’s ability to continue as a going concern.” Testifying to the Commission, Stogner did not deny the charge of insolvency. Instead, he leaned into it, commenting that such a concern “is a comment that our auditors have made for at least the last seven or eight years” due in part to the fact that the agency did not have a dedicated source of state funding. As a remedy, Stogner proposed that the state transfuse the moribund NCRA with cash plasma. Instead, in [January 2018](#),

the commission signaled its support for the state legislature to shut the NCRA down, a process which has been dragging on and on.

In early 2018, State Senator Mike McGuire introduced legislation to transform much of the 300 mile long railroad right of way into a bike and pedestrian trail dubbed the Great Redwood Trail, running from Larkspur to Humboldt Bay.

This legislation requires the freight business on the southern end of the line, where its lessee, NWP Co, had been running freight since 2011, to be controlled by Sonoma-Marín Area Rail Transit district, SMART. The passenger rail agency was created by state legislation in 2002. It is funded by a combination of federal, state, and local tax dollars. When NWP Co started to run freight on the NCRA rail lines in 2011, it agreed to share the rails with SMART. In August 2017, SMART started to run passenger trains.





Enter Anderson

On Jan. 1, 2015, SMART hired Darius Anderson's Platinum Advisors to represent the transit agency's interests in Sacramento.

By choosing to hire Platinum Advisors, SMART's board of directors chose a firm with deeply intertwined business and political interests in the North Bay.

Anderson is a North Bay native who reportedly got his start in politics as a driver for Bosco in Washington D.C.

He went on to work for billionaire Ron Burkle's Yucaipa Investments. Burkle has partnered with Anderson in real estate ventures, such as developing Treasure Island in San Francisco Bay. In 1998, Anderson founded a Sacramento-based lobbying firm, Platinum Advisors. Public records from 2018 show that Burkle is Anderson's "partner" and that Burkle "owns ten percent or more" of the political consulting firm.

Notably, in 2017, San Francisco Superior Court found that Anderson and Doug Boxer, the son of former US. Senator Barbara Boxer, had [defrauded](#) the Federated Indians of the Graton Rancheria while working as consultants to the tribe's casino venture in the early 2000s. Anderson was ordered to pay \$725,000 to the tribe to cover its legal fees and arbitration costs in the civil action.

Defrauding the Graton Rancheria does not seem to have negatively affected Anderson's reputation amongst the political and corporate classes, however. Today, Platinum Advisors [represents](#) dozens of public and private clients from its offices in San Francisco, Sacramento and Washington D.C. Anderson enjoys insider access to many Democratic and Republican politicians, as he is a prolific campaign fundraiser.

In 2011, Anderson and Bosco joined forces as founding members of Sonoma Media Investments, which now owns most of the print media in Sonoma County, including the *Press Democrat*, *Sonoma Index-Tribune*, *Sonoma County Gazette*, *Petaluma Argus-Courier*, *North Bay Business Journal*, *Sonoma Magazine*, and *La Prensa*.

SMART's contract with Platinum Advisors includes a conflict of interest clause, requiring

Anderson to promise that he and his firm did not own — and would not develop — any “direct or indirect” financial holdings which conflict with their work for SMART.

The contract allowed SMART to ask Anderson and his employees to divulge their economic interests, but SMART spokesperson Matt Stevens said that SMART’s outgoing director Farhad Mansourian, who directly oversaw Anderson’s work, did not request such disclosures, and that SMART staff was “not aware of any financial conflicts of interests that would conflict in any way with Platinum Advisors performance regarding its services.”

Darius Anderson did not respond to requests for comment.

Mansourian deployed Platinum Advisors to push for state funding and favorable legislation in Sacramento. And he often turned to Anderson and Platinum Advisors’ transportation specialist Steven Wallauch to lobby state officials on legislation involving the NCRA and Bosco’s NWP Co, according to emails obtained by the *Bohemian/Pacific Sun* through a public records request. On multiple occasions, Mansourian also

requested that Bosco himself contact the governor's office and federal lawmakers on behalf of SMART.

When McGuire introduced Senate Bill 1029 in 2018, it needed language to effectuate the closure of the NCRA's debts and business relationships with its contractors, chief among them Bosco's NWP Co.

Emails show that Bosco was involved in crafting the legislation.

On June 27, 2018, Mansourian emailed Anderson for an update on the legislation: "Did you talk to Doug?! ... Should we go and see Governor's chief of staff on SB 1029 ??"

Anderson responded the next day: "I did talk to Doug. Once they have language solidified, they will go to the Governor's office."

"What language? Who is working on that?" Mansourian asked.

"There is language being worked on to pay off the debts and liabilities. I am sure that Jason [Liles] will be sharing with us all before it moves forward. It's the same language that you are working on

with Jason,” Anderson wrote. Jason Liles, the McGuire aide working on the legislation to close down the NCRA, is also a [Bosco alumnus](#).

The last paragraph of McGuire’s bill, as signed by Gov. Jerry Brown in September 2018, allocated \$4 million in state funding to SMART “for the acquisition of freight rights and equipment from the Northwestern Pacific Railroad Company [NWP Co].” At a board meeting last May, SMART’s directors agreed to purchase NWP Co’s freight rights and equipment for \$4 million, and to add freight services to its passenger rail offerings.

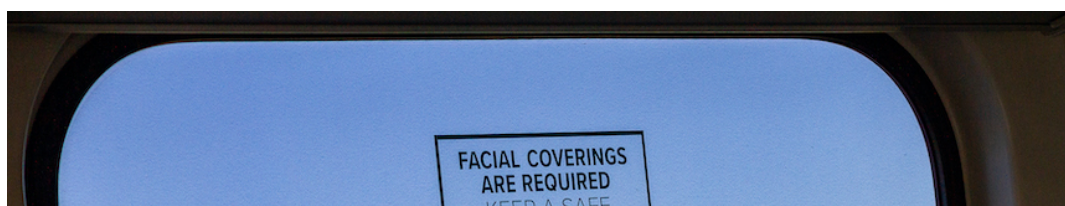
Liles did not respond to requests for comment. SMART’s spokesman said the agency’s staff does not know how the \$4 million figure was reached. Bosco wrote “I do not recall where the \$4m sales price came from,” but called the price a “bargain” for the state. The 2020 state assessment of the NCRA, which was prepared and published after the \$4 million figure was calculated, argues that SMART taking ownership of freight service in the North Bay will have some financial benefits over allowing a separate private freight company to purchase the freight rights from NWP Co.

In subsequent NCRA-related bills authored by

McGuire, the state set aside more millions of dollars to cover NCRA debts. On top of paying \$4 million to NWP Co for freight rights and equipment, the state paid NWP Co \$3.47 million to cover NCRA's interest-bearing debts to the company, according to Garin Casaleggio, a CalSTA representative.

That amounts to a \$7.47 million cash payout to the NWP Co enterprise that had failed to deliver on the prospects it outlined in the 2006 business plan. It does not look like the freight rail business is going to do any better under SMART, however.

The move to take on the additional responsibility of running a freight line came at a trying time for SMART. On March 3, voters in Sonoma and Marin counties rejected [Measure I](#), a ballot item intended to extend the sales tax supporting SMART from 2029 to 2059 — giving SMART a financial buffer for decades to come. Weeks after the failure at the ballot box, a global pandemic hit, crushing the agency's ridership numbers and casting further doubt on the passenger train's long-term viability.





Bosco, who appeared at a virtual SMART meeting in May 2020, wasn't much help in predicting the future. Asked about his company's current revenue, Bosco wouldn't give a specific answer.

“I don't want to disclose the exact numbers because that's our proprietary information. But I can tell you that we take in about \$2 million in revenues a year,” Bosco said.

Yet, despite having few details about how much money Bosco's freight company earned or spent, and lacking an assessment of how much it would cost SMART to take over the freight operation, 11 of SMART's 12 board members voted in favor of the paying off and taking over NWP Co's freight operations at the [May 2020 meeting](#).

The supporters of the decision highlighted the fact that Senator McGuire and state officials had

endorsed the deal, and that McGuire promised to secure \$10 million in state funding over the coming years to cover SMART's freight startup costs. Still, it remains unclear to this day how much it will cost SMART to cover day-to-day freight operations or how much revenue the business is expected to bring in.

Adding to the pressure, SMART staff told board members at the May 2020 meeting that the board had to make a decision by June 30 or risk losing the state money on the table.

Only one board member, then-San Rafael Mayor Gary Phillips, abstained from supporting the takeover, citing a lack of financial information.

“We’ve been told by Mr. Bosco, and I like Doug, that it’s highly profitable or at least profitable. I don’t have anything — I don’t know if any of us have anything that would indicate that. And so we’re going to take on this obligation with the unknowns that are present. I think that, quite frankly, would be quite foolish of the board,” Phillips said during the meeting.

This February, SMART contracted with a Marin County consultant, Project Finance Advisory Limited, to study the feasibility of the freight

takeover plan the agency's board had approved nine months earlier. In early September, the consultant provided board members with an executive summary of the report. The full report is not complete, according to Stevens, the SMART spokesman.

The executive summary is revealing about NWP Co's business history, even though Bosco's company declined to disclose its operating costs to the consultant.

The [document](#) estimates that NWP Co's freight business brings in between \$1.2 and \$1.3 million per year by hauling agricultural products to four North Bay manufacturers, including Lagunitas Brewing Co. and Hunt & Behrens, Inc., and storing excess railroad equipment and liquid petroleum gas for Bay Area refineries. Although most people associate freight companies with transporting goods, the report estimates that nearly half of NWP Co's revenue comes from storing rail equipment and "LPG" filled tankers at a train yard near Schellville.

The report cannot estimate how much it costs NWP Co — and by extension will cost SMART — to offer freight services because "detailed,

itemized financial records for NWPCo. were not provided” to SMART.

The report posits that running freight cars can offer a “comfortable profit margin,” but it’s not clear how many, if any, North Bay companies are interested in switching from conventional trucking to rail freight.

Since the actual freight operating costs are unknown, outsourcing operation of the freighting back to NWP Co or another contractor could run up a deficit for SMART, which is having enough trouble trying to provide adequate passenger services.

While SMART studies the North Bay’s freight market, NWP Co has continued to serve its customers without paying SMART.

In his written response to the *Bohemian/Pacific Sun*’s questions, Bosco said that “The NWP/NCRA lease has not yet been transferred to SMART nor has NWP relinquished its operating rights. Accordingly, NWP is not paying rent to SMART.” Stevens, the SMART spokesman, confirmed that NWP Co continues to run freight under its lease agreement with the NCRA while SMART and NWP Co negotiate an interim agreement.

Next week, the *Bohemian/Pacific Sun* will report on the secret negotiations over the price of the rights of way in Petaluma that took place between Bosco, Anderson, the Spanos Corporation, and SMART.

Peter Byrne contributed to this report and edited it.

From: [randomlouis](#)
To: [PlanningAgency](#); [Brian Oh](#); [BOS](#); [engage@sdcspecificplan.com](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](#); [senator.mcguire@senate.ca.gov](#)
Subject: Public Comment on SDC Specific Plan and DEIR – Scale it Back!
Date: Monday, September 26, 2022 2:58:35 PM

To: [PlanningAgency@sonoma-county.org](#), [Brian.Oh@sonoma-county.org](#), [bos@sonoma-county.org](#), [engage@sdcspecificplan.com](#), [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](#)

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-in-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,
Philip O'Connell,
14095 Sosna Way
Guerneville, CA
[707 799-3931](tel:7077993931)
Randomlouis@comcast.net

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From: [Rose Crown](#)
To: [PlanningAgency](#); [Brian Oh](#); [BOS](#); [engage@sdcspecificplan.com](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](#); [senator.mcguire@senate.ca.gov](#)
Subject: Public Comment on SDC Specific Plan and DEIR – Scale it Back!
Date: Monday, September 26, 2022 2:17:39 PM

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

Contact emails:

PlanningAgency@sonoma-county.org

Brian.Oh@sonoma-county.org

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Susan.Gorin@sonoma-county.org

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David.Rabbitt@sonoma-county.org

Lynda.Hopkins@sonoma-county.org

senator.dodd@senate.ca.gov

senator.mcguire@senate.ca.gov

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

Dear Sonoma County Planning Commissioners,
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Eliminate the hotel,
retail and commercial space that is already provided in Glen Ellen.

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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-in-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,
Stephanie O'Connell,
14095 Sosna Way
Guerneville, CA
707 217-2285
Rosycrown@hotmail.com

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From: [Ritch Foster](#)
To: Brian.oh@sonoma-county.org; [PlanningAgency](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; senator.mcguire@senate.ca.gov
Subject: Re:Public comment on SDC Specific Plan and DEIR...SCALE IT BACK AND GET IT RIGHT!
Date: Monday, September 26, 2022 1:33:43 PM
Attachments: [SDC letter #2 Sept 2022 RF.docx](#)

I am attaching a letter and would appreciate it being included in Public Comments as regards the SDC Specific Plan and the SDC DEIR. Thank you.

--

Ritch Foster

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RITCH FOSTER
PO BOX 477
Glen Ellen, CA 95442

September 25, 2022

TO: Brian Oh @ Permit Sonoma, Board of Supervisors and So.Co. Planning Commission
SENT VIA EMAIL to all parties listed below

Brian.Oh@sonoma-county.org; PlanningAgency@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

RE: Public Comment on SDC Specific Plan and DEIR....SCALE IT BACK AND GET IT RIGHT!

I do not support any of the proposals submitted by Permit Sonoma for development of the SDC Specific Plan. It is MUCH TOO LARGE of a project to be sandwiched in between rural Glen Ellen. The proposals need to be SCALED BACK. Consider the North Sonoma Valley MAC proposal, which included Historic Preservation, increased protection of the wildlife corridor and reduced housing numbers. We need a proposal with fewer significant negative impacts on the surround communities of Glen Ellen, Kenwood and the Sonoma Valley. Why does it seem that you have not heard the majority of people that have spoken out against the huge overreach of the current proposal?

I would, however, support a development of 450 or fewer low-income and affordable homes (NOT market rate), especially if many of the buildings could be adaptively reused, and the Historic District preserved.

The inclusion of a hotel in this project is wrong for so many reasons. It would only exacerbate traffic and the need for low-income workers to be traveling long distances for work...we are supposed to be CUTTING BACK on traffic and our carbon imprint, not exacerbating it. Plus, the water use needed for a hotel is FAR beyond that of residences. We are already experiencing drought conditions and water levels/supply issues with multiple dry years affects our diminishing water supply. A large development (1000

homes plus a hotel) would certainly dangerously diminish our water supply. The only reason to include a hotel in the project is its profitability enticement for a developer, and that is not compelling enough, considering the negative impacts of VMT and traffic that would create.

Wildfire evacuations would be significantly negatively impacted with the addition of 1,000 new homes and 2,000+ additional vehicles. It is laughable to say that the impact would be insignificant! For those of us who were caught in real-time long traffic delays during previous evacuations, we would strongly disagree. Why are you ignoring the reality of the impact of overdeveloping this site will have on our small rural community?

Why have you not considered or pursued outside or alternative funding sources or implementation of a public trust option?

Why is the state not being held responsible for the condition they are leaving the buildings, property and infrastructure in? Their neglect and the cleanup costs associated with developing the site seem to be a big factor in your feeling the need to significantly overdevelop the property in order to offset these costs which should not be the responsibility of our local community to absorb.

Please consider all of the important points that so many have brought to you and do not accept this current plan.

Thank you,

Ritch Foster, Glen Ellen resident for 47 years

From: [Margie Foster](#)
To: [Brian Oh](#); [PlanningAgency](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](#); [senator.mcguire@senate.ca.gov](#)
Subject: SDC Specific Plan and DRAFT EIR - public comment letter attached
Date: Monday, September 26, 2022 12:20:43 PM
Attachments: [SDC ltr Sept 2022 MF.docx](#)

Please include the attached letter into public comments. Thank you for the opportunity to contribute (yet again)! Margie Foster

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MARGIE FOSTER
4850 Warm Springs Rd., Glen Ellen, CA 95442

September 25, 2022

TO: Brian Oh @ Permit Sonoma, Board of Supervisors and So.Co. Planning
Commission

SENT VIA EMAIL to all parties listed below

Brian.Oh@sonoma-county.org; PlanningAgency@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

RE: SDC Specific Plan and DRAFT EIR....PUBLIC COMMENTS—SCALE BACK!

TO ALL PARTIES:

I have tried repeatedly and failed, to read with any coherency, the SDC Specific Plan and the Draft EIR with all of their many pages and details. I do not have the “bandwidth,” focus or apparently the intellect, to do so. It has been extremely frustrating. I can’t believe that I am in the minority here. So I can only now write what I FEEL as a 47 year resident of Glen Ellen.

I applaud all of the people who have devoted countless hours to replying and responding to both documents. I have printed their well written letters and arguments and questions, trying to incorporate them into my own letter. I simply cannot, BUT I WANT MY VOICE TO BE HEARD! I have attended, along with many others over the years, many meetings about SDC, have given my input and listened to many others, feeling hopeful that our voices and concerns would be heard. Sadly this has not happened.

A little background..I grew up in LA, so I LIVED urban sprawl. My early 20s were spent in the Bay Area and in 1975 we moved to Glen Ellen, a working-class community of blue collar workers, many at SDC, and a great community to raise a family and enjoy the open spaces provided. Glen Ellen’s quaint community is what attracted us AND kept

us here over the years...and what has attracted those after us. The proposed SDC development of an additional 1,000 housing units within our town is simply TOO LARGE A PROJECT, and would create a significant negative impact on our rural community, traffic, wildfire evacuation and water usage, as well as HUGE negative impacts on the wildlife corridor.

I don't feel that the Specific Plan OR the Draft EIR adequately address the concerns of such a large project and its negative impacts on the rural character of Glen Ellen, the wildlife corridor, traffic and especially emergency evacuations (we have lived through TWO of them, and the time estimates in the DEIR are laughable), as well as the fact that we have been in drought years and the water usage of the proposed development would certainly exacerbate this situation. AS WOULD A HOTEL....There are plenty of other locations for a hotel...don't let profits override sensibilities by adding a hotel to ANY of the proposals.

I would support up to 450 units of work-force housing for low-income workers, so that they can work and live in the tourism-dominated reality we are now in and have created, as well as affordable housing to attract teachers, firefighters and others in the "forgotten middle" of housing costs. Adaptive re-use of some of the existing buildings should be further considered, especially with the currently increased costs of housing materials. I would NOT support market rate housing.

I am also deeply concerned about historic preservation of not only many buildings, but also of the Legacy of Care that SDC represented over its many years. This property is far too special for the urban sprawl that is being proposed in the Specific Plan. However, I could support an alternative with reduced housing, as suggested by the North Sonoma Valley MAC and also suggested by Supervisor Susan Gorin.

Respectfully,

MARGIE FOSTER sent via e-mail

From: [Kathy Pons](#)
To: [Brian Oh](#); [PlanningAgency](#)
Cc: [Susan Gorin](#); [David Rabbitt](#); [Lynda Hopkins](#); [Chris Coursey](#); [James Gore](#); [engage@sdcspecificplan.com](#)
Subject: VOTMA Comments on SDC
Date: Monday, September 26, 2022 10:50:14 AM
Attachments: [VOTMA comments on SDC Final DRAFT .docx](#)

Below please find VOTMA's comments on the SDC Specific Plan and DEIR.
Thank you,
Kathy Pons

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September 26, 2022

TO: Permit Sonoma: Brian.Oh@sonoma-county.org,

Planning Commissioners: PlanningAgency@sonoma-county.org,

CC: County Supervisors: Susan.Gorin@sonoma-county.org, David.Rabbit@sonoma-county.org,
Lynda.Hopkins@sonoma-county.org, Chris.Coursey@sonoma-county.org,
James.Gore@sonoma-county.org, engage@sdcspecificplan.com

RE: **Comments on SDC Specific Plan and DEIR**

To Permit Sonoma, Planning Commissioners, and Board of Supervisors:

Thank you for this opportunity for Valley of The Moon Alliance (VOTMA) to comment on the Sonoma Developmental Center (SDC) Specific Plan (SP) and DEIR. This is the most significant project proposed for the Valley in many decades, and it will permanently affect the whole of Sonoma Valley. The impact could be quite negative if the project is oversized for the area. Your diligence in getting the appropriate plan and development is appreciated by the communities surrounding SDC.

There has been a lot of discussion and community input into this process and not too many perceived positive results for it. We hope that you will consider and respond to our questions and/or suggestions, and to the other well informed and impacted commentators, including the Sonoma Land Trust, Mobilize Sonoma, and the North Valley Municipal Advisory Committee.

Following are some comments and questions for your response. We have numbered and put in bold the questions, although in some places the text may suggest additional questions.

1. Adequacy of the Documents

- 1) How can the Specific Plan and accompanying EIR be enforced when the language is so imprecise?**

When reviewing the adequacy of the DEIR, one is faced with the dilemma that, as a Specific Plan and a document under CEQA, it is improperly incomplete and inadequate. The current SP contains some goals and objectives that are written with language that is not specific. For example,

“Policies in the Sonoma Developmental Center Specific Plan (SDC Specific Plan) are prepared in response to analysis in the EIR to ensure that the plan minimizes or reduces significant environmental impacts to *the extent feasible*; in this way the plan is “*self-mitigating*.” CEQA also provides opportunities for environmental “*tiering*,” and provides an exemption from subsequent environmental review for certain projects, *including housing developments, that are consistent with a specific plan for which an environmental impact report has been prepared*. If certified, the EIR will apply to development in the Planning Area that is consistent with the Specific Plan, and further environmental review will not be necessary.”

This is only one of the areas where language is imprecise, and in this case is a bit scary as well, as it appears designed to eliminate or severely curtail further environmental review of project phases. At page 7-2 of the SP, the Director of Permit Sonoma appears to be substituted as the review authority for all Administrative Design Review for building, grading and drainage permits in lieu of the Design Review Committee. **2) How does that make sense in terms of facilitating community input and balanced community assessment? 3) How can the DEIR properly analyze a plan when the plan is not specific, and when its size and scope could vary substantially?** Where is the specificity in the language to assess the impact of a future development on the wildlife corridor, or the impact on the community. There is not adequate analysis to say that no mitigation is needed (i.e., that it is “self-mitigating”). Specific standards are needed now for the County to make an informed decision about this property, its future uses, and its impacts, not later.

While different commenters may have different views on aspects of what should be done with the property, this concern for lack of precision is a common complaint of almost all commenters, from ourselves, to the Sonoma Land Trust, to the North Valley MAC.

2. Scale of Development

In the DEIR’s ES.2 Areas of Controversy list below, we have some other concerns and questions:

A. Neighborhood Character

4)How can the SDC site and the surrounding rural neighborhoods and infrastructure possibly support the maximum 1000 housing units and large-scale non-residential development proposed? The traffic on the roads, the demand for water, and the impacts on the wildlife corridor from this level of development would simply be too great.

B. Community Identity

5) Will this development be an extension of Glen Ellen, or will it be its own community of Eldridge, or could an alternative governance structure be preferable?

C. Historic Resource Alternative

6) Why is the Historic Resource Alternative not the preferred project when it is found in the DEIR to be the environmentally superior and otherwise meets the primary objective of the legislation?

With 450 housing units, wouldn't this alternative be more be more appropriate for the rural neighborhood community which it is proposed? It was not named the environmentally superior alternative for nothing. It would allow for more opportunities for re-use of the existing buildings and would create housing and jobs for local essential workers. While the Historic Option might be "less" economically feasible, there is no finding that it is not economically feasible. **7) Why is there no financial model presented that allows a transparent comparison of the economic feasibility of various alternatives?**

D. Legacy of Care

8) Why is the "legacy of Care" spelled out as a goal virtually ignored in the proposed Specific Plan? 9) How did the DEIR arrive at the level of care that the DEIR deemed was adequate? 10) How was the economic feasibility of legacy care units modeled and was any imputed value attributed to preserving the legacy of care?

We believe that a more serious attempt is needed to meet goal 2-I of the SP, "to promote the Legacy of Care" in recognition of the work and history of SDC's work. There are presently only five parcels devoted to housing the disabled. **11) What kind and size of parcels are being considered and how many persons with developmental disabilities would be housed in the buildings on those parcels? 12) How was that level of care determined?** There are existing buildings that need to be seriously investigated as sites to provide shelter for the disabled and comfort for the mentally challenged or a rehabilitation center. That investigation is missing from the plan. The SDC was established in this location because of its natural serenity and beauty. There remains a need for these kinds of services in such a setting.

E. Density

The DEIR fails to adequately articulate the decision model for determining that 1000 housing units together with a hotel and a quality restaurant should be the preferred project. Economic feasibility is not the primary articulated decision criteria in the legislation. **13) How were the varying objectives in the legislation valued, weighted, and prioritized? 14) Who made the final decision for the preferred project details in terms of housing density and the ratio of affordable vs market rate housing? 15) What decision support model(s) were utilized?**

F. Type, Location and Size of Individual Housing Units

The DEIR assumes that major infrastructure facilities must be replaced under all alternatives. **16) Did the DEIR consider whether the scope and level of infrastructure replacement might be less if fewer new units were constructed, and greater restoration and reuse of the existing structures was instead the focus of the development strategy? 17) Did the DEIR consider the operational feasibility of isolating stormwater inflow and the cost savings (including the downstream avoidance of capacity additions to the treatment facilities) that would result from a simplified smaller housing unit strategy and expanded reuse of existing buildings? 18) Did the DEIR evaluate available newer technology to acceptably mitigate asbestos risks in existing building by isolating and sealing off the hazardous materials instead of ripping that material out and disposing of it?** VOTMA believes that increasing the amount of new construction inflates the estimated infrastructure costs and climate change impacts, which in turn inflates the amount and type (i.e., market rate units) of development being proposed to recapture those costs. “Big” becomes self-reinforcing, which it should not be, particularly when the impacts to the environment and community can be so substantial.

The DEIR says little if anything about the actual size of various units contemplated in the preferred project. **19) What are the maximum sizes (sq. ft.) for any of the units, and what is the minimum size of the smallest unit? 20) Why did the DEIR not propose a maximum size for any unit, and maximum sizes (sq. ft.) for the various types of units/multifamily facilities?** The legislation from which the SP is being developed focuses on affordable housing. By controlling the maximum size of units, the “market rate” units become more affordable. The DEIR suggests that the preferred project is the most economically feasible. **21) Where is the modeling that supports the proposal that 1000 units with 75% of those units priced at market rate is the appropriate outcome consistent with the legislation?**

G. Connection to Highway 12.

22) What impact on Highway 12 traffic flow would the proposed connector have if the connector is used only for emergency escape? 23) Would there be a new traffic signal for this connector on Highway 12? 24) How far would that signal be from the existing Madrone Road/Hwy 12 signal and how would those signals be coordinated?

VOTMA is uncertain about this proposed connection. Another emergency evacuation route, depending on the size of the project, its intensity of use, its precise location, its probable need for yet another stoplight on Highway 12, all need further explanation. Further, the SP, 3-22 proposes to “establish an express bus service to and from Sonoma/ Santa Rosa that would utilize a new connector road between the SDC Core Campus and Hwy 12.” **25) Does the proposal assume that the County would provide the funding to construct and operate the line? 26) If not, how would that be funded? 27) What and where is the analysis that supports the conclusion that a new road is needed for that purpose?**

H. Wildlife Corridor.

VOTMA believes that the wildlife corridor at issue here is unique in this region of the State, including its usage by mountain lions and black bear. **28) What studies and representative examples of similar wildlife corridor/adjacent dense development projects influenced your determination that the construction and operation of the 1000 housing units, hotel, quality restaurant, commercial and other enterprise developments that encompass the preferred project would not adversely affect the feasibility of this well-functioning natural wildlife corridor as portrayed by the DEIR and required by the legislation?**

VOTMA feels it is essential to protect the existing wildlife corridor, which is both unique to the Bay Area and essential for many important species. The transfer of ownership to the parks, SLT or other agencies that would support and maintain the Corridor is needed outside of the choosing of a developer.

The size of the project also has an obvious and unavoidable impact on the Corridor. The population and traffic resulting from 1,000 new residences, a hotel and many businesses will have substantial and irreversible impacts on wildlife's use of the area. Furthermore, maintaining the integrity of the Corridor and the ability of wildlife to transit and disperse through the SDC property and adjacent parks is critical to meeting sustainability objectives. VOTMA endorses the Sonoma Land Trust's comments on this issue.

I. Wildfires and wildfire evacuation.

29) Were any of the available traffic congestion databases (including those that specifically incorporate the real time traffic conditions on Highway 12 in the Sonoma Valley fires during 2017-2020) used in reaching the conclusion that the evacuation time would not increase significantly if the proposed project were developed? 30) How did you model the conflicting demands of inbound emergency and fire equipment/personnel, with outbound citizen evacuation demands in view of the two-lane status of all major arterials? 31) If done, what were the results and findings?

This is a serious consideration especially for those of us who have been evacuated in the past. The testimony given about the length of time it took to get out of the danger zones should cause a recalculation of the timing presented. With this recalculation there needs to be considered how many other people will be trying to leave on the roadways at the same time. In the fires of 2017 and 2020, the traffic was alarming. **31) What happens when other developments, like Kenwood Ranch and Elnoka, are added to the stresses SDC redevelopment poses to Highway 12 as an evacuation corridor?**

J. Water supply.

On page 469, the DEIR claims that "The WSA concludes all future demands within its service area can be met, inclusive of the Proposed Project in normal and multiple dry hydrologic years from 2025 through 2045". This same DEIR only acknowledges the likelihood of "single dry years", rather than a concatenation of multiple dry years. **33) Why hasn't the WSA considered**

the worst-case scenario with multiple dry years – a scenario we are currently facing? This could be our reality. **34) How does the DEIR look at preventive actions in the face of this uncertainty? 35) Would it be prudent to include the Sonoma Valley Groundwater Sustainability Agency (GSA) for comments since the State still holds surface water rights and groundwater wells may be needed for supply water for this project? 36) Was the transfer of the State’s water rights included as a done deal within the DEIR evaluation? 37)What if they continue to hold these rights within the open space, like Lake Suttonfield?**

K. Hazardous Materials.

VOTMA filed comments on the need for further environmental assessment work on March 24, 2022, in response for requests for comments in the NOP for the EIR. Those comments are included in pages 459-464 of the appendix to the DEIR. The DEIR acknowledged those comments on page 236 of Section 3.8 Hazards and Hazardous Waste. But the subsequent portion of this section does not add any new analysis of the recognized environmental conditions (REC) that VOTMA referenced. **38) Why was no further investigation undertaken and presented?**

The discussion for the most part addresses hazardous materials and substances issues that were identified as known or likely to exist in the Core Planning Area (CPA). The discussion acknowledged that the 2017 Limited Phase II report identified a variety of areas, both in the Core Planning Area (CPA) and in the lands outside of the CPA where “further investigation was needed”. (Page DEIR 248; download, page 425). The discussion at various points indicates that if needed further investigation could be undertaken. Deferral of investigation and mitigation are not an allowed strategy under CEQA. The DEIR appears incomplete and defective on this issue.

39) Why were Phase II environmental assessments regarding hazardous materials and substances in the gap areas of recognized environmental conditions (RECs) identified in the prior Phase I but Limited Phase II investigations not undertaken?

40) For areas outside the CPA, where agriculture and recreation with public access are contemplated, will disturbance of soil be prohibited? 41) If not, how did the DEIR determine that there was no significant risk that hazardous material and waste that might have resulted from past activities over the last 125 years in those areas and what might be harmful to the persons, crops or wildlife could be disturbed or uncovered?

L. Transportation/Traffic

42) Where is the W-Trans traffic operations analysis that PS suggested in the DEIR footnote 118 had been done? 43) Why was it not made available for review as part of the DEIR?

The DEIR analysis of transportation, and specifically traffic issues is inadequate. VMT analysis is acceptable for dense urban projects, but does not capture the rural transportation impacts, especially in an area with defined and limited transportation corridors. Furthermore, if anyone

else has submitted this VMT analysis, the County presumably would have required a peer review.

44)Where is that?

Importantly, the requirement to use VMT for the projects' CEQA analysis does not preclude requiring a Level of Service traffic impact analysis to assist decision making for land use policy planning purposes, for zoning purposes, and for assessing fire/flood/earthquake evacuation risk parameters, and for assessing risks to the wildlife corridor, as wildlife must live within and navigate whatever level of development is approved here.

When asked about this by VOTMA, Permit Sonoma responded that the analysis was in Appendix F of the DEIR appendix. Appendix F at page 748 consists of a one page set of "Traffic Volume Data". There is no text, no interpretation, no assumptions, no contextual analysis. Informed, sound analysis and decision-making require a stand-alone project specific analysis for this project. The textual analysis in the DEIR itself is full of summary and conclusory statements. On the face the findings include 1) on page 442 that traffic from Harney to Glen Ellen would be reduced from peak, 2) on pages 445-446 that household, employment, and total service VMT would be reduced by the project compared to peak, and 3) on page 451 that the project would not result in inadequate emergency access, all seem particularly unsupported, counter-intuitive, and problematic. It is not clear whether the VMT analysis included hotel and quality restaurant VMT (or for that matter whether the GHG analysis included air travel of guests). The GHG analysis and the transportation analysis also do not seem consistent. The GHG analysis does not appear to incorporate emission associated with "fueling" EVs.

It would seem relevant in this context to ask some simple foundational questions for both LOS and VMT analysis, such as: **45) Where will the people working at SDC be coming from to work there? 46) Where will the people who live at SDC but work off site be traveling? 47) Where would guests at the hotel be coming from? 48) Where is the nearest pharmacy? 49) Where is the nearest full service affordable market? 50) Where are the nearest medical complexes? 51)What will be the impact on Highway 12 traffic of having another traffic signal at the new proposed connector?** The answers to those questions are not in the transportation segment of the DEIR.

The use of VMT analysis should not be an excuse to avoid real impact analysis for the many decision-making functions the County must exercise with respect to the appropriate level of development of this property.

In developing these comments VOTMA did review some of the earlier documents listed on the SDC SP website. VOTMA now assumes that the August 2022 W Trans Analysis referenced in DEIR footnote 118 was intended to reference the July 2022 Analysis posted on the website. That LOS study uses a single weekday in April 2022 as its sole data source, does not include weekend data, does not include winery event and seasonal data, does not include any segment or intersection data north of the Arnold Drive-Highway 12 intersection, does not include any transportation cumulative impact analysis, and does not reference, reconcile or incorporate the Sonoma Valley

Traffic Study the County sponsored in connection with assessing the over-concentration of winery events in Sonoma Valley as it develops the winery event ordinance. The W-Tran is inadequate and incomplete. **52) Was the W-Tran analysis peer reviewed as required by PS guidelines?**

M. Cumulative Impacts

53) Where is the detailed cumulative impact analysis? The DEIR basically dodges this requirement by saying that the cumulative impacts are already covered in relevant regional analyses. The community and its representatives must live with these impacts, and we have a right to see a detailed cumulative impact analysis. For example, **54) have the effects of the known proposed developments of Elnoka and Kenwood Ranch off Highway 12 been considered from either a traffic or water use perspective?**

In summary, VOTMA believes that the DEIR is inadequate under CEQA and that the Specific Plan is not precise enough in its project statement to meet the requirements of CEQA. The County needs to ensure that the future use of the SDC is consistent with both the character and limitations of Sonoma Valley and with the communities that reside here. There may be no decision you face that will have a more significant or lasting impact on the Sonoma Valley for decades to come. Please ensure that the unique beauty and character of this special place are not adversely affected by this SDC decision-making process.

Sincerely yours,

Kathy Pons, President

Valley of The Moon Alliance

Board of Directors

From: [Mary Guerrazzi](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [BOS](#); engage@sdcspecificplan.com; [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); senator.dodd@senate.ca.gov; senator.mcquire@senate.ca.gov
Subject: Public Comment on SDC Specific Plan and DEIR
Date: Sunday, September 25, 2022 2:54:07 PM

Dear Sonoma County Planning Commissioners,

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma.

I took a 7 mile hike in the SDC and Jack London State Park today before I wrote these comments. I have hiked there thousands of times and here are my comments regarding the DEIR:

- 1. Housing. 1,000 homes is not acceptable. That increases the size of Glen Ellen by threefold. Imagine increasing Petaluma, Santa Rosa, Windsor or even Bodega Bay by threefold!!! The amount of people and traffic that would introduce into a very rural area is not acceptable. Around 400 homes should be the maximum considered. A very small, boutique hotel (20 rooms or less) would fit the area but not a bigger hotel. Light manufacturing and commercial spaces, Dunbar School, Community Center, Arts Center, would all be acceptable.**
- 2. I support the Historic Preservation Alternative as the folks who worked on that live and work in the area and know the property and environment surrounding the property intimately. This is a great alternative!**
- 3. Protect Open Space. This is the most important aspect of the future of the SDC. The wildlife corridor is critical to the continuation of many species in Sonoma County and beyond. Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed. And don't build 1,000 homes - the people, traffic, light pollution, noise pollution will reduce the wildlife to a critical point if there are thousands of people in this small area that is home to so much wildlife bordering Jack London State Park.**
- 4. Wildfire. Adding 4,000 people to the SDC is a death trap should there be another wildfire such as the wildfires of 2017 or 2020. On 10/8/17 Arnold Drive was a snarled traffic mess at 1:00 am when we evacuated from the village of Glen Ellen. We had to drive through SDC on Arnold Drive as Highway 12 was on fire. If there were 2,000 more cars (1,000 homes = 2 cars per household) on that road it would have been a disaster beyond proportion as folks would have been trapped in their cars. The addition of a road from SDC east to Highway 12 is laughable. The fires all come from the East over the Mayacamas mountain range - you would be sending thousands of people directly into the fire if you built that road and they had to evacuate during a firestorm event. Given the current climate crisis another firestorm is a high probability.**
- 5. Traffic. It is unimaginable how awful the traffic would be through Glen Ellen and**

Eldridge if you add 2,000 cars. You cannot compare this to the SDC when it was a hospital - none of the “clients” drove and the staff came and went in three shifts over a 24 hour period. Arnold Drive is a “scenic” road as is Highway 12 through Kenwood and Glen Ellen - the traffic mess would be comparable to Highway 29 in Napa Valley on a Friday evening in the summer. That is not what we want in Sonoma.

**Mary Guerrazzi
707-486-0085
13480 Mound Avenue, Glen Ellen, CA 95442**

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From: [Jim Price](#)
To: [Brian Oh](#); [engage@sdcspecificplan.com](#); [Susan Gorin](#)
Cc: [Greg Carr](#); [Caitlin Cornwall](#); [Pat Gilardi](#); [Larry Reed](#); [Jacquelyne Ocana](#); [Shaun McCaffery](#); [Belen.Grady@sonoma-county.org](#); [PlanningAgency](#); [Logan](#); [Senator.McGuire@senate.ca.gov](#); [Senator.Dodd@senate.ca.gov](#); [Rebecca](#); [Ezrah](#); [Cecilia.Aguiar-Curry@asm.ca.gov](#); [Gerald McLaughlin](#); [district4](#); [James Gore](#); [district5](#); [Susan Gorin](#); [David Rabbitt](#); [SDC Specific Plan](#); [Hannah Whitman](#); [Arielle Kubu-Jones](#); [Rebecca Hermosillo](#); [Rep. Mike Thompson](#)
Subject: Public Comments on Sonoma Developmental Center Draft Environmental Impact Report (DEIR) and Specific Plan – Revise EIR to Meet CEQA,
Date: Saturday, September 24, 2022 8:41:12 PM

Dear Permit Sonoma, Board of Supervisors and Sonoma County Planning Commission,

I have lived in the Springs of Sonoma Valley since 2008 when my late wife Pamela and I moved to the Sonoma Valley. I am a homeowner, a Viet Nam era Army veteran and a graduate of UC Santa Cruz with degrees in Economics and Planning and Public Policy in Environmental Studies. I'm also a member the Sonoma Land Trust and an avid hiker of the Sonoma Valley Parks and Jack London State Park as well as the lands of the SDC currently owned by the State. I have a love of this land and place as well as the people of this community that I call home. The SDC is a public treasure that demands our best efforts at preservation and protection. That said, I support the North Valley Municipal Advisory Council's vision for future development at the SDC. I do not support the Sonoma Developmental Center (SDC) Specific Plan as proposed by Permit Sonoma and find that the DEIR is inadequate to meet the requirements of the California Environmental Quality Act. While I'm not a resident of Glen Ellen, I nonetheless have been actively following the advocacy the North Valley Municipal Advisory Council have performed on behalf of the citizens of Glen Ellen and all of Sonoma Valley and I strongly urge you to follow their recommendations.

I will confine my comment to one important issue that I have not seen addressed in the DEIR:

The conflicts created by domestic animals that a population of ~ 2,400 people and their pets will have on the wildlife corridor and other native species.

Questions:

- 1) What specific empirical studies has Permit Sonoma and/or their consultants conducted to determine the probable effects of domestic animals (specifically cats, dogs, reptiles, amphibians) on the wildlife known to use the corridor and other native wildlife known to inhabit the SDC and environs?
- 2) If such studies have been conducted where are they available for review?
- 3) If such studies have been conducted what mitigating measures have been identified for each species of domestic animal studies?
- 4) In the Specific Plan, it has been suggested that cat owners will be required to keep their cats on leashes as a mitigating measure. At what specific locations in California has this strategy been implemented? What studies have been done to suggest that such a stratagem works? How would this be enforced and by whom? What penalties will the cat owner face for not following the mitigation measure? Can these measures be overturned by subsequent Homeowners Associations that might be expected to be constituted at a later date? How do you ensure these measures in perpetuity?

- 5) Cats are known to carry disease that may have ill effects on our native mountain lions and bobcats that are known to frequent the corridor and the environment in and around the SDC. What specific diseases has the DEIR considered? What specific mitigating measures are recommended to keep our wild cats safe from these diseases?
- 6) In my own experience, dogs have a keen sense of hearing a smell and it is not unusual for them to bark at wildlife that strays onto their owner's property. What studies has the DEIR relied upon to inform them of the probable effects that domestic dogs will have on the wildlife corridor? What mitigating measures have proven effective at preventing domestic dogs from barking at wildlife expected to use the wildlife corridor? How and who will be responsible for enforcing your recommended mitigating measures?
- 7) What diseases do domestic dogs carry that may be a threat to native animals that are known to use the wildlife corridor? What mitigating measures have proven effective at preventing the spread of these diseases to the wildlife known to use the corridor?
- 8) Domestic reptiles and amphibians are known to carry diseases that may have deleterious effects on native species. What studies have been done to identify these diseases? What mitigating measures are recommended to prevent the transfer of these diseases to native species? What enforcement measures are contemplated? How and who will be responsible for enforcement?
- 9) Light pollution may have a negative impact on the wildlife corridor. What light mitigation measures are contemplated at the core campus to limit these effects? What science is/ or will Permit Sonoma and/ or their consultant use to identify and mitigate these effects?
- 10) Lions and Bears are native to the SDC. There is a strong probability that domestic animals may be considered food by these apex predators. What protocols will be put into place to ensure native apex predators are not euthanized because they kill domestic animals? What measure will human pet owners be required to follow to mitigate domestic animals from falling prey to apex predators? How and who will be responsible for enforcement of these protocols/laws?

Thank you for addressing my specific questions.

Best regards, — Jim Price, Homeowner and Resident of the Springs, Sonoma, CA.

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From: [Derek Knowles](#)
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: RE: Public Comment on SDC Specific Plan and DEIR – Opposition to current plan
Date: Saturday, September 24, 2022 11:33:15 AM

Dear Sonoma County Planning Commissioners,

I am a 33-year-old, ten-year Sonoma County resident, living between the town of Sonoma and Santa Rosa, and am writing to voice my strong opposition to the current SDC Specific Plan.

That plan, and the flimsy DEIR that corresponds to it, simply do not meet the moment and demands of a rapidly warming and unequal world.

Whether because of wildfires, heatwaves, or rising unaffordability, Sonoma is becoming more difficult to live in by the day.

The SDC offers a rare and potentially galvanizing opportunity to legitimately expand access to housing to those beyond just the wealthiest strata of the county, while also expanding (not just maintaining) the wildlife corridor and prioritizing the minimization of emissions output by creatively repurposing existing infrastructure and limiting construction to essential, egalitarian development; not hotels that will invite more fairweather tourism that only advantages developers, amplifies mindless sprawl, and does nothing to address a climate crisis that is only getting worse.

I am joining a growing chorus of community voices, supported by local organizations like the Sonoma Land Trust, the Sonoma Ecology Center and more, to urge the Commissioners to direct Permit Sonoma to:

- Scale back the size of the development and require that the *majority* of housing be made affordable
- Support the Historic Preservation Alternative as the most environmentally sane option
- Protect open space by ensuring the DEIR include enforceable actions and timelines for permanently protecting the wildlife corridor and keeping it public.
- Revise the DEIR and SDC Specific Plan to reduce climate emissions from driving and development (i.e. repurposing existing buildings, providing public transit, constructing fewer buildings altogether)

The future SDC can be a continuation of a business-as-usual approach that is sure to further enshrine Sonoma as a place of exclusivity, growing class division, antiseptic suburban sprawl, and eroding natural beauty.

Or it can be an emblem of a rich, vibrant, and inclusive community with people and the land at its center.

I certainly hope and will continue to fight for the latter, as I know so many others will too.

Most sincerely,

Derek Knowles
400 Brockman Lane,
Sonoma, CA 95476
310-279-7507
dereklindenknowles@gmail.com

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From: [Arthur Dawson](#)
To: [Brian Oh](#)
Cc: [Susan Gorin](#); [Tennis Wick](#); [rajeev@dyettandbhatia.com](#); [engage@sdcspecificplan.com](#); [Greg Carr](#); [Caitlin Cornwall](#); [Pat Gilardi](#); [Larry Reed](#); [Jacquelynn Ocana](#); [Shaun McCaffery](#); [Belen.Grady@sonoma-county.org](#); [PlanningAgency](#); ["Logan"](#); [Senator.McGuire@senate.ca.gov](#); [Senator.Dodd@senate.ca.gov](#); ["Rebecca"](#); ["Ezrah"](#); [Cecilia.Aguiar-Curry@asm.ca.gov](#); ["Gerald McLaughlin"](#); [district4](#); [James Gore](#); [district5](#); [Susan Gorin](#); [David Rabbitt](#); [Rebecca Hermosillo](#); ["Rep. Mike Thompson"](#); ["Cooper, Kai"](#)
Subject: North Sonoma Valley Municipal Advisory Council Comment Letter, SDC DEIR
Date: Friday, September 23, 2022 2:46:26 PM
Attachments: [FINAL NSV-MAC DEIRComment-Letter_09-21-22.pdf](#)
[Addendum NSV MAC Public Comment Received Item 8 9.21.22.pdf](#)

Dear Mr. Oh,

On behalf of the North Sonoma Valley Municipal Advisory Council (NSV MAC), I respectfully submit the attached comments pertaining to the Public Review Draft of the Sonoma Developmental Center (SDC) Specific Plan (Proposed Plan) and the SDC Specific Plan Draft Environmental Report (DEIR), issued in August 2022.

As the NSV MAC serves as the voice of the community within county government, we intend this letter to be reflective of community input. However, it is not intended to be exhaustive or to take the place of individual comments from community members and other interested parties.

As you will read in the attachments, we do not believe this DEIR adequately and completely evaluates the environmental and safety impacts of the Proposed Plan. Furthermore, we remain committed to the Sonoma Valley community's consistent input calling for both affordable housing and a lower density plan alternative. A plan closer to the Historic Preservation Alternative – determined as “environmentally preferred” in the DEIR analysis – successfully meets the project objectives and the established Guiding Principles for this project and should be given strong consideration.

Thank you for your attention to the issues raised. We look forward to your response.

Sincerely,

Arthur Dawson, Chair

North Sonoma Valley Municipal Advisory Council

(707) 509-9427; (707) 996-9967

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September 21, 2022

Mr. Brian Oh, Comprehensive Planning Manager
Permit Sonoma County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

Dear Mr. Oh,

On behalf of the North Sonoma Valley Municipal Advisory Council (NSV MAC), we respectfully submit the following comments pertaining to the Public Review Draft of the Sonoma Developmental Center (SDC) Specific Plan (Proposed Plan) and the SDC Specific Plan Draft Environmental Report (DEIR), as issued by Sonoma County in August 2022. While this letter is reflective of community input, it is not intended to be exhaustive or to take the place of individual comments from community members and other interested parties.

Given the tremendous amount of input from Sonoma Valley residents and business owners concerned about the project size and its impacts, as well as this MAC's own request and the Board of Supervisors' direction to scale back the Specific Plan, it is surprising that the proposed Specific Plan still contains over 1,000 homes and approximately 940 jobs. It appears that the DEIR fails to disclose the full extent of impacts that will result throughout Sonoma Valley from this large-scale development outside of an urban growth area, as is further detailed in this letter.

The Specific Plan represents one of the largest, if not THE largest, developments in the history of Sonoma Valley and is in conflict with County General Plan policies calling for city-centered growth. Furthermore, the proposed plan is inconsistent with its own guiding principles calling for a balance between redevelopment and historic preservation; the plan will destroy the very qualities that make the historic SDC site unique and its implementation will have far-reaching, significant adverse impacts on Sonoma Valley residents.

With this in mind, we provide the following comments, by general category. Please explain the following inconsistencies in the DEIR:

PROJECT SCALE & HOUSING

Increasing the supply of affordable and workforce housing is broadly supported by the Sonoma Valley Community, but not at any cost to the environment and the health and safety of Sonoma Valley residents. Our understanding is that the DEIR should help the community better understand the scale of the environmental impacts of the Specific Plan, how they will be mitigated, what options were considered, and why these options were dismissed. We do not believe the DEIR has yet met these objectives.

For example, the DEIR identifies the smaller-scale Historic Preservation Alternative (Historic Alternative) as the environmentally superior alternative. It is not ruled out in the DEIR because it meets the required objectives, but it is dismissed from full consideration. Why?



If this alternative is environmentally superior and substantially reduces impacts of the proposed plan; if it more effectively meets some of the fundamental project objectives as outlined in the Specific Plan guiding principles, including Preservation of Historic Resources and Balancing Redevelopment with Land Use (DEIR pages 5 and 6); if it provides 450 new homes (still the largest project in Sonoma Valley); and meets the state’s statutory objectives regarding the disposition of the SDC site, why is this alternative (or a version of it that addresses some of the issues identified) not being put forward as the proposed plan?

“Overall, the Historic Preservation Alternative is the environmentally superior alternative, although significant impacts of the Proposed Plan and the two alternatives are largely comparable, and the Historic Preservation Alternative would be less superior in some environmental features such as energy use, biological resources, and wildfire risks. Additionally, this alternative would not support key project objectives related to increased housing supply, varied housing opportunities, community vibrancy, and long-term fiscal stability to the same degree as the Proposed Plan.” (DEIR page 14)

We do not find adequate data in the DEIR that supports the “less superior” distinctions above, or any reason why these couldn’t be readily addressed. There is no requirement that maximum housing be developed, especially if it means significant impacts in several issue areas. In terms of biological resources, the analyses on page 563 of the DEIR indicates that the Historic Preservation Alternative would be “similar or slightly better” than the Specific Plan. In terms of energy use, the older historic buildings are presumed to be less energy efficient, but it’s not clear how the net calculation was made since “energy use” is also cited in conjunction with construction and demolition GHGs, which would be significantly higher in the Specific Plan. The increased wildfire risk with this lower density plan is presumably solely because of the arbitrary exclusion of the Hwy 12 connector road in this alternative. **How would the proposed Specific Plan fare in comparison to the Historic Preservation alternative if it also excluded the Hwy 12 connector road, or if both included the Hwy 12 connection?**

Scale is the most obvious way to mitigate impact. While the types of impacts of the Historic and proposed Specific Plans may be the same, they are not equal in magnitude.

FEASIBILITY

If the Historic Preservation alternative was dismissed because of an assumption that feasibility will require higher development densities, **how is a feasibility analysis considered in the DEIR and shouldn’t this be more transparently addressed in the Proposed Plan?**

Since it’s unclear what “economic feasibility” means for the SDC campus at this time, **shouldn’t there be an economic feasibility analysis as part of this evaluation process?** The market demand study that was prepared for the alternatives report does not fill this need (and is inconsistent with the Specific Plan in any case in that it reports little demand for non-residential uses).

MITIGATION MONITORING / PERFORMANCE STANDARDS

It’s of concern to the community that most of the policies in the proposed Specific Plan are not enforceable, generally because of the use of “should” in the descriptive language rather than “shall” in many instances. Terms such as “if feasible” and “assumed” are also used repeatedly and the DEIR analysis acknowledges considerable uncertainty in the impacts and thus in the mitigation measures as well.



Will the policies and conditions of the approval of the Specific Plan be put into a mitigation monitoring plan or program to ensure mitigation compliance for the project?

Given the scale of the proposed Specific Plan and absence of any phasing requirements, it's critical that performance standards be developed and tied into the phasing of the project, especially since the DEIR calls for future studies and mitigations that are not yet identified. **Will performance standards be put into place, potentially to consider impacts that might include Traffic, Wildlife Function, Resources, Noise?**

HOUSING NUMBERS

The Specific Plan states that it will result in 1,000 units and the DEIR uses that assumption, but as noted in Specific Plan Table 4.2 more units are suggested, even without likely density bonuses. That means that most of the environmental impacts in the DEIR are underestimated for the number of units permitted. If the analysis is limited to 1,000 units, why is the possibility of 1,100 or more of units included in the Specific Plan?

CULTURAL RESOURCES / HISTORIC PRESERVATION

Isn't it true that the Historic Alternative meets the fundamental project objectives listed on pages 5-6 of the DEIR? Isn't it true that the proposed Specific Plan is inconsistent with the fundamental project objective calling for balancing development with historic resource conservation?

Regarding policies and impacts on cultural resources, isn't it true that the DEIR does not specifically address impacts on Contributing Resources. Please amend the EIR to include such impacts in its own section, not embedded in the discussion of impacts on the district as a whole or explain why not. Isn't it violative of CEQA for the EIR to assume that the project will be approved as proposed, without mitigations and alternatives to reduce impacts on historic resources having been determined feasible or infeasible? Wouldn't the loss of eligibility for the National Register of Historic Places remove protections for contributory resources? What environmental impacts would attend such losses of eligibility? What mitigations could avoid that loss? Please consider and analyze the benefits of the pending efforts to list SDC in the National Register.

What are the performance-based standards to determine which buildings can feasibly be restored or adaptively reused? How is demolition of any building to be decided? What type of analysis and performance-based standards will be applied to permit demolition under the Specific Plan? Please amend the Specific Plan so that demolition of any qualified historic resource will require a Plan amendment based on codified criteria. If not, why not? Isn't protection of National Register eligibility required by CEQA if feasible?

Regarding the Sonoma House and the main building, Specific Plan Policy 2-47 uses terms like "consider" and "if feasible." How will feasibility be determined? In light of significant impacts, why are mitigation measures not identified or analyzed? Doesn't CEQA disallow deferral of analysis and mitigation of the Specific Plan's foreseeable impacts on historic resources? Isn't it true that projects consistent with the Specific Plan, including those involving demolition of currently listed or eligible historic resources will not be subject to discretionary CEQA review? If not, under what circumstances would CEQA review be required?



UTILITY INFRASTRUCTURE

The Valley of the Moon Water District (VOMWD) consistently contacts customers requesting a 20% reduction in water use, further stating that penalties will be assessed if the reduction is not met. Yet, for the purposes of the DEIR and the water assessment section, the DEIR and VOMWD assert they have the resources to serve the SDC project. What assumptions underpin this assertion?

There are contradictions that should be addressed in the DEIR. For example: VOMWD's own estimates for future water deliveries and shortages are based upon single dry years, not the multiple dry year shortfalls we are already experiencing. Additionally, the Sonoma Valley Groundwater Sustainability Agency has made increasing projections for the need for groundwater re-charge throughout the Sonoma Valley, but the VOMWD has not estimated its own required contribution to groundwater re-charge and has maintained an increased groundwater "draw down" in the SDC water assessment report. What are the groundwater re-charge assumptions for the SDC site and are they included in the DEIR?

Additional areas of the water assessment report that require clarification in the DEIR:

- The report assumes the planning area will be served by local, on-site surface water sources. However, for Fern and Suttonfield Lakes, the treatment plant and the pipes/infrastructure are not a part of the core campus development. For the purposes of the DEIR and water assessment, those resources do not exist.
 - What, specifically are the surface water sources the DEIR is stating are available for use?
 - What becomes of those "non-available" water sources (the lakes, treatment plant)?
 - Who is responsible for the evaluation of the dams that contain all of that water?
 - Are the lakes going to be drained, filled in, maintained?
- The riparian rights contradict the findings of both the Sonoma Ecology Center and the Sonoma Valley Water Sustainability study that urges an elimination of riparian water rights in order to provide groundwater recharge to diminishing Sonoma Valley aquifers.
 - Who maintains the riparian water rights? The VOMWD, the state, the developer?
- The SDC water treatment plan has not been licensed for operation in many years. The DEIR states it will be evaluated for re-use by the water system operator.
 - Who will pay for the evaluation? If the plant requires re-construction, or is not salvageable, who pays for these updates?
 - Where, on the Specific Plan, will it be located?

ENERGY MICROGRIDS:

The DEIR language is vague in the section that pertains to an electrical microgrid. By definition, a microgrid is a locally controlled and maintained electrical grid with defined electrical boundaries. It is

able to operate in both a grid-connected and "island" mode. A stand-alone or isolated microgrid only operates off-the-grid and cannot be connected to a wider electric power system.

- Which type of system is being proposed, grid-connected or stand alone?



- Will the system have localized generating capacity?
- Where is the dedicated space on the Specific Plan for any proposed generation?
- Who pays for it and maintains it?
- Where is the electrical use projection data for microgrid design?

VEHICLE MILES TRAVELED (VMT)

The Specific Plan indicates that there will be no free parking on campus. Has the DEIR studied the VMT and traffic safety impacts of this policy with respect to visitor vehicle trips to find parking off-site; the impacts on the narrow streets in the adjacent neighborhoods, particularly the Glen Ellen streets south of the SDC (Martin, Lorna, Burbank, Sonoma Glen Circle, Marty and Madrone) where parking is free; or the public safety or emergency evacuation impacts of this policy? Has the potential limit on public access been evaluated?

In addition, was there analysis done on the safety implications of increased VMT on the routes used by cyclists and commuters to travel from Glen Ellen to other county locations (Santa Rosa and Rohnert Park), specifically Warm Springs and Bennett Valley Roads. These narrow, winding roads are commonly traveled at relatively high speeds; their road shoulders are significantly deteriorated (no shoulder at all for significant portions). The safety implications on these roads due to the increased VMT in the Proposed Plan must be considered in the DEIR.

There is no evidence at this juncture that anyone living on the SDC site will be employed at the site so this cannot be assumed. Has the DEIR considered this in one of its VMT scenarios? On a related note, while it's noted that institutional uses associated with the former SDC have been removed from the SCTM19 model's existing land use database (DEIR page 426), historical VMT numbers are still cited in the Historical Use section (DEIR 427-428) and implied to be relevant. VMT under the Proposed Plan will not be directly comparable to the historic SDC site in terms of either resident (non-driving) or single-employer shift work VMT per capita; any assumptions made pertaining to historical VMT need to be made clearer in the DEIR analysis and narrative. Finally, the DEIR cites a VMT increase of ~631, with the existing VMT at 59,654, and the Proposed Plan VMT at 60,285 in 2040 (DEIR, page 183). How can this be accurate based on the anticipated population and the VMT summaries cited throughout the DEIR?

The DEIR's Project trip generation estimate was developed using the SCTM19 travel demand forecasting model maintained by the Sonoma County Transportation Authority (SCTA). The specific trip generation factors are not included in the DEIR. Thus, it is impossible to evaluate the reasonableness of either those factors or the resulting trip generation numbers.

Can the DEIR appropriately consider the completion of the Sonoma Valley Trail multi-use path, connecting the SDC site with Santa Rosa, as part of the SDC site VMT mitigation if this is a Caltrans controlled project?

Why is the downscaling or elimination of the hotel not considered part of VMT mitigation? The hotel is no identified as a priority in the state legislation pertaining to the SDC site and will contribute significantly to VMT.

In Table ES-2, the DEIR determines that VMT reduction measures cannot be guaranteed, and they may be insufficient to reduce VMT per capita below the applicable significance threshold or fully offset the effect of induced VMT. "There are no other feasible mitigation measures available." Why is this an allowed conclusion when there are certainly mitigation measures available that might justifiably be



considered, even if reductions might not reduce impacts to levels that are less than significant? Examples of mitigation include a reduced scale alternative or elimination (or reduction of size) of the hotel or other commercial development.

WILDLIFE CORRIDOR

There is no analysis of the impacts on the wildlife corridor through the campus and no acknowledgement of the fact that animals currently use the campus and will be impacted. Also, there is no assessment of the impacts of fencing on wildlife. (Only wooden fences are prohibited on the campus.) The fencing policies appear to apply only to the open space and human/wildlife interface areas, not the campus.

LAND USE IMPACTS

The proposed Specific Plan is both inconsistent with several project objectives, as noted above, and inconsistent with existing County General Plan policies encouraging growth in transit-oriented, urban areas. It is also inconsistent with General Plan policies calling for an overall reduction in VMT since it introduces urban uses in a non-urban area; this will necessarily increase vehicle trips to reach services in either Sonoma or Santa Rosa.

COMMERCIAL SPACE / JOB CREATION

There appears to be no policy saying that the hotel can't be built first. Is there anything in the proposed Specific Plan requiring the developer to build housing first?

Why is such a large-scale hotel being proposed when it's not a defined project objective, and when VMT is listed as a challenge?

POPULATION and GROWTH ASSUMPTIONS

The DEIR analysis of growth-inducing impacts is based on a comparison of the project size to county-wide population and employment numbers, which is an unrealistic and invalid comparison. As a distinct planning unit, Sonoma Valley should be the region of comparison. Given the relatively small population of Sonoma Valley, the proposed plan represents a substantial growth-inducing project. Alone, it will double (triple?) the community housing numbers and draw population and employees from other parts of the county as well as from outside the county. Given its location away from necessary goods and services, it will generate pressure for additional urban land uses on surrounding and nearby unincorporated lands. This urban sprawl growth scenario is in direct conflict with climate change policies to encourage compact, in-city growth.

IMPACTS ON NEIGHBORHOODS SOUTH OF SDC

The Glen Ellen neighborhoods adjacent to SDC will take the brunt of both the construction and operation impacts – not to mention the ongoing impacts of traffic and safety related to parking if there is no free parking on the SDC campus. The over 200 apartments and small lot single family homes directly south of the SDC property will be subject to the aggregate effects of noise, traffic, air emissions, and visual effects. These residents' daily routines will be disrupted during a very long-term construction period. This area is home to many low to moderate-income families who have arguably not had an adequate voice in this planning process.

Has the DEIR adequately studied the effect of the Specific Plan on this neighborhood, to include the narrow Glen Ellen streets from Martin Street south to Madrone Road and along Madrone Road?



CUMULATIVE EFFECTS

There are several foreseeable projects within 15 miles of the SDC site that will contribute to cumulative growth and related impacts, including but not limited to: the Graywood Ranch Hotel, Elnoka Village Senior Citizens housing project, Milestone Siesta Senior Citizens housing project, Donald Street housing development project, Verano hotel and housing project, Hanna Boys Center residential development program, and the proposed ~70% membership license increase at the Sonoma Golf Club.

In the Transportation Methodology section (page 432), the DEIR states, "The model's 2040 cumulative year includes growth that is consistent with adopted general plans within the County and with regional projections contained in Plan Bay Area 2040." Were the above-mentioned projects, and any additional foreseeable projects, considered either in the general plans or by Plan Bay Area 2040? Is Permit Sonoma able to share what was included in the model?

FIRE / EMERGENCY PREPAREDNESS

The DEIR did not consider a fire scenario in which the fire comes in from the west, down from Sonoma Mountain. "Historically, a fire approaching from the west may be less likely, and therefore did not warrant further specific analysis" (DEIR page 515). We know that fires are now burning in ways that are outside of historical precedent due to climate change and related impacts, and that this area has not burned in recent history. With this in mind, we believe a west-approaching fire scenario west must be considered.

Did the DEIR consider an evacuation scenario where broadband and/or cell service is out, or is unreliable, affecting receipt of alerts? This occurred in both the 2017 and 2020 fires – land lines and cell service were knocked out or overloaded and people had limited information to guide evacuation.

In Section 16.1.3.4 (page 511), the DEIR states that to further mitigate potential impacts, Policy 2-54 requires that the project sponsor proactively plan for emergency wildfire safety by building or designating an on-site shelter-in-place facility, to be open to both SDC residents and the general public. In our community conversations to date, Sonoma County fire and emergency experts have not condoned or recommended this as appropriate for the SDC site, so we question this as an appropriate mitigation measure.

The DEIR indicates no significant increases in evacuation times with the Specific Plan. Tables show evacuation times in the order of 15-20 minutes, with and without the proposed project. The Evacuation Time analysis suggests that "added times" for travel during an evacuation range from 1 or 2 minutes to 37 minutes to get to Napa. These hypothetical scenarios defy residents' reality and the actual evacuation times experienced during recent fires: Nuns Canyon fire (2017) resulted in evacuation times out of Sonoma Valley of 1 hour or more; Glass Fire (2020) resulted in evacuation times from nearby Oakmont onto Hwy 12 of one to two hours; evacuations from Kenwood during recent fires took hours, not minutes; adding thousands of vehicles will exacerbate the problem.

Page 520 of the DEIR states that, "The additional SR 12 connector road will provide additional fire access and evacuation routes." However, during a wildfire, it's quite possible that residents and workers in the proposed project area will not be able to take this connector route east toward highway 12 due to the high probability of a wildfire advancing from the highway 12 direction (see Specific Plan, figure 2.3-1). Has this possibility been considered in the DEIR analysis of evacuation times? Also, can the analysis



assume the Hwy 12 roadway connection when it will be subject to a separate CalTrans review and approval process and might not be approved?

The DEIR indicates that the SDC core campus is in the Local Responsibility Area (LRA) versus the State Responsibility Area (SRA) with respect to fire-related development governance. In Figure 3.16-2, it appears that the LRAs are outside of any fire hazard severity zone. However, given that parts of the LRA are immediately adjacent to medium, high and very high fire hazard severity potential zones (FHSZs), can this be accurate?

The assessment of wildfire hazards in the DEIR appears to have a number of errors and omissions, the most serious of which lead to unwarranted conclusions that underestimate this hazard ("Impact 3.8-7 Implementation of the Proposed Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. (Less than Significant)" p. 268).

Page 503: "Primary responsibility for preventing and suppressing wildland fires in Sonoma County is divided between local firefighting agencies and the State of California, Department of Forestry and Fire Protection. The SDC Planning Area is currently located in an area identified as a State Responsibility Area (SRA)."

1. The Planning Area "includes the approximately 180-acre SDC Core Campus..." (DEIR, pg. 51) According to the State Fire Marshall's map: https://osfm.fire.ca.gov/media/6822/fhszs_map49.pdf, the Core Campus is within a Local Responsibility Area (LRA. See map on page 4), not the State's. Is this correct?

Page 503: "Under the Fire and Resources Assessment Program (FRAP) "the Planning Area...includes areas of high to very high Fire Hazard Severity Zones west of Highway 12, areas of high fire hazard severity in the hills, and areas of moderate fire hazards severity zones in the vicinity of Suttonfield Lake and Fern Lake (Figure 3.16-2). The Core Campus is not included in any of these FHSZs. "

The State Fire Marshall's final map is not intended to show moderate and high FHSZs within the Local Responsibility Area. The State's draft map (page 4), however does show moderate and high FHSZs covering a substantial portion of the Core Campus. While not finalized, this appears to be the best available fire risk data for the Planning Area.

Goal PS-3 from the Sonoma County General Plan 2020 (DEIR, page 497), reads: "Prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires," with Objective PS-3.1 stating, "Continue to use complete data on wildland and urban fire hazards."

2. How was the data gap between the SRA and the LRA within the Planning Area addressed during the DEIR's analysis of wildfire threat? What evidence was the statement about the Core Campus (DEIR, pg 503. See above) based on? Was this conclusion reached because there is data showing low fire risk there or because lack of data was equated with low risk?
3. The Fire Constraints map (13.16-2) shows the Core Campus being almost entirely outside of any Fire Severity Hazard Zones. How would the Fire Severity Hazard data for the Core Campus, shown in the State's draft map, change the analysis of fire hazards there? Does this change the calculus for significance under 16.1.3.1 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."?



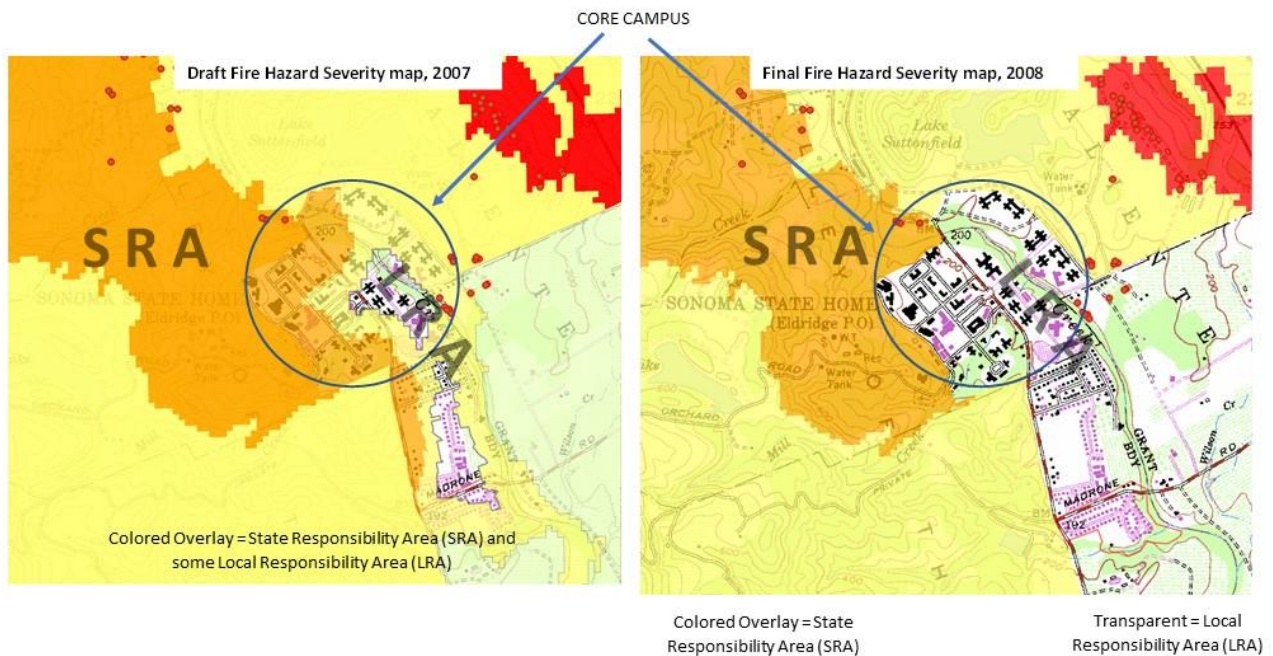
4. In addition, the Sonoma County Community Wildfire Protection Plan Update 2022 (referenced in the DEIR, 16.1.1.3. Regional and Local Regulations, p. 496) states that: “Wildland fires that start in the woods and spread into adjacent areas with relatively dense housing often result in the greatest losses of property and life. Efforts to save lives and property will take precedence over losses of wildland resources, so firefighters’ response must focus on protecting populated areas rather than fighting a fire in the most efficient way.”
- Even if we assume there are no FHSZs within the Core Campus, this suggests that building dense housing at SDC adjacent to wildlands could result in high “losses of property and life.” Responding to such a fire might prevent firefighters from efficiently working to prevent further fire spread. How was this scenario taken into account during the DEIR analysis?

3.16.1.3.4. Wildfire Evacuation

1. Wildfire ignitions are known to increase with the size of a population. How was this relationship evaluated in the calculation of fire risk in the Planning Area?

Hazard zones below are from the State Fire Marshall’s office: <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>

HAZARD ZONES: Yellow = moderate Orange = high Red = very high Dots = structures burned in 2017 (Sonoma County GIS)





CLOSING COMMENTS

As evidenced through the comments above, we do not believe this DEIR yet adequately and completely evaluates the environmental and safety impacts of the Proposed Plan. Furthermore, we remain committed to the Sonoma Valley community's consistent input calling for both affordable housing and a lower density plan alternative. A plan closer to the Historic Preservation Alternative – determined as “environmentally preferred” in the DEIR analysis – successfully meets the project objectives and the established Guiding Principles for this project and should be given strong consideration.

We remain committed to a plan that we can all support and appreciate this opportunity to provide comment. The NSV MAC letter process did not allow to adequately address all topic areas. Please respond to the public comments in the attached addendum that we received in advance of the NSV MAC meeting on 9/21/22, relating to the Specific Plan and the DEIR, which we are incorporating by reference, and give them full consideration.

Sincerely,

Arthur Dawson

Arthur Dawson, Chair
North Sonoma Valley MAC

cc: Susan Gorin
Tennis Wick
Rajeev Bhatia
Sonoma County Planning Commission

From: [Thomas Ells](#)
To: [Hannah Whitman](#)
Subject: NSV MAC Meeting
Date: Wednesday, September 21, 2022 4:54:46 PM
Attachments: [SCD EIR and Specific Plan Process Comments 3 Valley of the Moon.pdf](#)

EXTERNAL

Dear Hannah & NVS MAC Members,
Please distribute the attached by email to participants/members of the MAC.
Thank you
Thomas Ells

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
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ENGINEERING

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Real Estate Consulting § Property Management*

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Formerly NASD Series 7 & 63 Registered Rep, & Series 66 Financial Advisor.
Securities Not Available

Mr Brian Oh, Comprehensive Planning Manager, SDC
Permit Sonoma, County of Sonoma
2550 Ventura Ave.
Santa Rosa, CA 95403

Regarding: Sonoma Developmental Center (SDC) Specific Plan (SP) & Program Draft EIR (EIR) Comments 2

Sept 18, 2022

County's evidentiary record is anecdotal @best. Sonoma Valley represents a national treasure, as described as, "The Valley of the Moon". Sonoma is the Native Indigenous American name for the valley. When White settlers asked what Sonoma meant, Natives pointed to the trace of the Moon setting and rising behind the eastern ridgetops during certain times of the year, the White's interpretation was that "Sonoma" meant 'the valley that the Moon touches' ("The Valley of the Moon"). My Anthropology studies and linguistic avocation has taught me to hear the phonetic sounds (the basic phonemes), particularly for significant language words, words that have cultural, spiritual, or international usage, such as words which are adopted into a language from another. The basis of this study is Multi-critical analysis as opposed to diacritical analysis. Typically there will be very little understanding of the actual meaning of an adopted word. Then, if it retains a high referential standing, it indicates it's an adopted word, not merely a forgotten word. Typical adopted words with high Referential standing and forgotten meanings are: Alleluia, precious, and Amen.

In this case we have Sonoma: what are the phonemes for "Sonoma", they are "Tsu" (not Tso) & "Noma"; so in this case our supposition is correct, because these are two very important international words. "Tsu" or "Tzu" represents the name given by the Chinese to one of their greatest Philosophers, "LaoTzu" the founder of Taoism (from UCI Anthropology studies "Chinese, Taoism & Confucianism", 1983), "LaoTzu" was originally named "LoTzu", meaning "Man-Master" (Philosopher) and when he was older it was changed to "LaoTzu", meaning "Old-Man-Master" (or Great Philosopher): Therefore "Tzu" means "Master". "Noma" is the Aramaic word for 'name' establishing the identity and essence of a thing and thereby giving man control over the substance, and in the Greek "Nomo" means "law or control", again, in Western parlance the essence is unknowable but the manifestation is controllable by the 'name': so control and name are the same thing, therefore "Noma" means "name" (from participation in Antiochian and Greek culture, which develops from a multi-critical analysis as opposed to diacritical).

"Sonoma" therefore means "The Master's Name", and in a Spiritual sense, it means the highest name above all names. "The Master's Holy Name", in an Eastern Spiritual sense describing God's, the Creator's, or Great Spirit's control over the location by the Moon's contact with the Earth, not Man's control over God by invocation of the Name. This we hear many times from Joseph Campbell, man's search for control vs man's search for God.

Also, in another form of Transcendence, both “Tsu” and “Noma” mean “control”, so they are like conjoined twins, in a simple manifestation of the “Rosetta Stone”. Looked at separately, we call this a “Translation”, but conjoining them is a form of transcendence in the physical plane of existence. The name “Sonoma” appears to be used as a descriptive tool, by connecting physical transcendence (translation of place) with the location of a Spiritual Transcendence (in reference to the verticality of the Moon’s touching the Earth), it again mirrors the “Rosetta Stone” representing two kinds of Transcendence, with the Earthly “T” crossing the Spiritual vertical demarcation.

More than the mere analysis of the word and its application to the space, is the significance of "Sonoma" in the cross-cultural linguistic representation of deification using ancient language references from across the sea, and linked only by many thousands of years. There is no other place name which connects so perfectly the unity of man, the Name itself transcends both the ages and the seas, thus we have the essence of a World Heritage Cultural Site. Like many other UNESCO World Heritage Sites, which are in disrepair and in danger of destruction, Sonoma's "Valley of the Moon" is suffering an existential threat from the Proposed Project Alternative. Located at near the exact geographic center of Sonoma Valley, 10 miles from it's head along Hwy 12, and 12 miles from it's outlet at Skagg's Island. And transected by a vital Wildlife Corridor connecting 2 Mountain Parks: Sugarloaf/Hood and Jack London Parks; no discussion or analysis has been given to the significance of this World Heritage Cultural Site, or the impacts or any mitigation from the significantly new, taller, and dense construction within the Program Draft EIR-SP Project analysis (cursory discussion was given to light pollution, but none to the physicality of the presence of tall, dense, populous village construction in the midst of an Historic Treasure, McDonalds centered in Teotihuacan).

The significance of this Spiritual location was not lost on those who created the Sonoma Developmental Center for a healing center for their developmentally disabled children. We should hope that at this more enlightened time, and consistent with CEQA, the Historical Preservation Act, and the 50th Anniversary of the World Heritage Convention (Sept 17, 2022), we should be prepared to preserve both the content and the context, as much as is physically possible, for this National Treasure, "The Valley of the Moon". Under the UNESCO World Heritage Convention, which the United States was signatory (though withdrawn from 2018), we should "strengthen Credibility of the World Heritage List, ensure Conservation of World Heritage properties, promote Capacity-building measures, increase public awareness, involvement and support for World Heritage, and enhance the role of Communities in implementation of the World Heritage Convention". What has been done here appears to be the opposite, a complete neglect of not only Native American cultural values, but World Heritage Convention values.

Analysis of EIR Historical Asset discussion:

The Program Draft EIR is silent on the above discussion, while reporting Environmental Impact Report - County Summary "5.3 Significant and Unavoidable Impacts: According to CEQA Guidelines 15126.2(b), an EIR must discuss any significant environmental impacts that cannot be avoided under full implementation of the proposed program...However the Proposed Plan aims to be self-mitigating. Thus, all proposed policies aim to address environmental impacts (to the, sic) to the greatest extent feasible and no mitigation measures are required. The analysis in Chapter 3 determined that the Proposed Plan would result in significant impacts to the cultural/historic resources and transportation (home-based work trip vehicle miles traveled per capita) that, even with implementation of mitigation measures, would remain significant and unavoidable". This language neglects real analysis of the Null Hypothesis Project, and only considers the Proposed Plan impacts which it states (along with all other alternatives) have similar impacts [without discernment as to avoidable, mitigatable, or unmitigatable], which is entirely untrue in the Null Hypothesis case.

Continuing; "5.3.1 Cultural, Historic, and Tribal Resources: new construction under the Proposed Plan has the potential to disconnect the remaining contributing resources in the Core Campus from those in the Community Separator and Regional Parks lands to the east and west, disrupting the SSHHD's overall integrity to the point that it would no longer be eligible for listing in the National Register of Historic Places, CRHR, or as a California Historic Landmark. This impact, in addition to demolition of the aforementioned resources would result in a substantial adverse change to the significance of the historic district such that the significance of the historic district would be materially impaired pursuant to Section 15064.5. Implementation of goals 2-I and 2-J and policies 4-20 through 4-32 as well as Standard Conditions of Approval (LU1 through LU6) would partially compensate for the impact associated with the demolition of historically contributing resources and physical alteration of the historic district to the maximum extent practicable; however, because these measures would not be enough to avoid or reduce the impact completely, the Proposed Plan's impact would remain significant and unavoidable". No mention is made of the Tribal Resources, because no artifacts remain or they could be recovered in a project excavation, but this does not address the transcendent value of the space and place name as a World Heritage Cultural Site, which can be subsumed in the potential Project construct, where we have heard discussed 2-3Msf of Commercial Construction.

Again, the Program Draft EIR's considerations of the impacts, mitigations, and alternatives appear limited to the Proposed Plan Project Alternative, and do not address the Alternatives, nor the Null Hypothesis Project, continuing a foregone conclusion (see 2-3Msf of Commercial Construction discussed above, is that unmitigatable?).

Please see the following analysis of project conceptual iteration for planning and design.

Please see pg4 p3 San Mateo Gardens, re "substantial evidence in the record, is a predominantly factual question...for the agency...drawing on its particular expertise"; here we are bringing your attention to the word "expertise".

Friends of the College of San Mateo Gardens v. San Mateo County Community College District

<https://law.justia.com/cases/california/court-of-appeal/2017/a135892.html>

We want to accept the presumption of legal operation, but we must also accept and correct the illegal condition when evidence is presented to the contrary. In a County system, Engineering is not conducted without Accounting. But if the Accounting fails such as for Northwestern Pacific Railroad, the sad evidence must be accepted, and correction immediately made or we suffer the loss of funding or function. No one was there to accept the Trucker's weighmaster's tickets when the washout deliveries were made in the upper NWP line, none could be found, none ever delivered, no NWP.

The reason we approach the initial determination of a project this way, using California Supreme Court's remand for San Mateo Gardens, is, here we equate the Court EIR analysis process to the Engineering process, in that there are a sequence of iterative steps involved. This process is best exemplified from the CA Supreme Court's remand expressed in San Mateo Gardens, where a series of back-and-forth evaluations and propositions are made in analyzing a project (one such method is CPM, Critical Path Method), which is the same process we use in conceptual design or planning.

A comparison is made by question; does the "initial concept" with its features fit the need and the existing space, then we may have to adjust the concept's features to the needs, or to the space? Conceptual planning designs forward & backward many times.

This comparison is not to decry the effort expended or the information obtained through Planning education or product, but a marathon runner prepares for a marathon, not Law or Engineering. Preparation for a marathon may be great preparation for someone wanting to become a Lawyer, Doctor, or Engineer, but by itself does not make one a Lawyer, Doctor, or Engineer. Nor is an Urban Planner a qualified Civil Engineer, and therefore is unable to make professional judgments in respect to the Planning of "fixed works" identified in BPC 6731.

[See Licensing BPC 6730-6730.2(a); 6731; 6734; 6735(a). See also Administrative Mandamus case, *Morris v Harper* (2001) 94 Cal.App.4th 52 . "After all, "[i]t is the refusal or neglect to perform an act which is enjoined by the law as a present duty that serves as the very foundation for the [mandamus] proceeding.' " (*Morris v. Harper*, supra, at p. 60.)]

San Mateo Gardens; "Instead of resting on whether a project is new "in an abstract sense," the "decision to proceed under CEQA's subsequent review provisions must . . . necessarily rest on a determination—whether implicit or explicit—that the original environmental document retains some informational value." (Id. at p. 951.) Such an inquiry "is a predominantly factual question . . . for the agency to answer in the first instance, drawing on its particular expertise." (Id. at p. 953.)"

From where does this "expertise" derive, Planners require no Science education?

The EIR standard is, if/when there are significant environmental impacts, then a review of impacts and mitigations must obtain (other than stating overriding or unmitigatable conditions), and a "judicial review must reflect the exacting standard that an agency must apply". San Mateo (ibid) pg 8.

What this is referring to is, that the evidence must be prepared to a very high standard, from the beginning, in order for it to be considered "substantial evidence in the record". Where is the "exacting Standard" & "expertise"?

According to the National Society of Professional Engineers code of ethics, Professional Engineers may disagree without a single outcome obtained, but must remain decorous.

["The Supreme Court in San Mateo Gardens provided guidance for how to apply the subsequent review provisions. It explained that whether "major revisions" will be

required as a result of project changes "necessarily depends on the nature of the original environmental document," i.e., whether it was an EIR or a negative declaration. (San Mateo Gardens, supra, 1 Cal.5th at p. 958.) It further explained that the appropriate standard of review also depends on the nature of the original environmental document. Although an agency's determination of whether major revisions are required is reviewed for substantial evidence, "judicial review must reflect the exacting standard that an agency must apply when changes are made to a project that has been approved via a negative declaration," as opposed to the deferential standard that applies when the project was originally approved by an EIR. (Id. at p. 953; see Committee for Re-Evaluation of TLine Loop v. San Francisco Municipal Transportation Agency (2016) 6 Cal.App.5th 1237, 1247, 1251-1252 [applying San Mateo Gardens in case where project originally approved by EIR]; Latinos Unidos de Napa v. City of Napa (2013) 221 Cal.App.4th 192, "]

In planning, we have said, the process is intensely exhaustive and iterative, and what is described as the Court EIR review process is also exhaustive and iterative.

The Court ceding competency to the local agency is similar to the process of presenting a case to a Court of Competent Jurisdiction. A Court of Competent Jurisdiction is composed firstly of a trained lawyer, either by a Law School or by preparation and passing the Baby Bar. Then of course, the prospectant Judge must pass the National Bar Exam locally administered, next the Judge must practice law for a minimum of 10 years. At some point the Judge is appointed or runs for election, and finally, the Judge is selected to hear a case by the Chief Judge. The Court itself must also be of Competent Jurisdiction, meaning it is the proper venue, as established by our system of Jurisprudence. These are significant tests.

If someone went to College and studied English or Political Science, they could learn a lot of laws, but they would not be presumed to know how to practice Law,

And they did not go to Law School or pass the Baby Bar, and they have not prepared to be a Lawyer, let alone a Judge.

Engineering is one of the most complex problems in supply & demand, as evidenced by the number of divorces in custom home remodeling and construction, and why Public Works requires Licensed Civil Engineers.

Our critique is not meant to characterize the work of any Engineers having completed reports for the SDC EIR-SP, since we do not know what instructions they were given.

But we contend that recommended demolition for over 1.2Msf without analysis of 400,000sf, and recommended demolition of ~75,000sf of Hospital Treatment Building rated at "not requiring any updates", represents an incomplete analysis at best, and certainly a neglect of the impacts on the resources being analyzed.

As we spoke of backward-and-forward analysis in design, this is required in Planning as well, unless a truncated process is employed. It is far easier to make the facts fit the design, than to make the design fit the facts. If your timeline is short, it is far easier for you to establish the Project, and make the analysis fit the Project by not addressing impacts except in a standard way, such as, "(h)owever the Proposed Plan aims to be self-mitigating". "from Program Draft EIR 5.3 Significant and Unavoidable Impacts"

Subsequent to the very specific State Law being passed to sell SDC, incorporating significant intent for community participation, many meetings were held with studied interest and good comments. Comments were sent to Permit Sonoma and the Planners involved in SDC's NOP of Program Draft EIR & SP, but these comments were not incorporated in the evaluation nor in the Proposed Alternative Project SP, nor were they forwarded to the Planning Commission, nor were they provided to other participants or commenters to the EIR & SP.

This is not standard practice, and violates CEQA Code 15300(a)&(b)(1)-(3); "(a) Before granting any approval of a project subject to CEQA, every lead agency or responsible agency shall consider a final EIR or negative declaration or another document authorized by these guidelines...(b) Choosing the precise time for CEQA compliance involves a balancing of competing factors, EIR's and negative declarations should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment."

(b)(1) "With public projects, at the earliest feasible time, project sponsors shall incorporate environmental considerations into project conceptualization".

The timeframe window for "cumulative impacts" evaluation was limited to after Proposed Alternative Project completion, leaving out the demolition and construction of the entire project, let alone the life cycle embedded costs, GHG's and energy to be demolished as a consequence from the new construction.

This time frame results in unsubstantiated conclusions for the Proposed Project Alternative in ES.3 Alternatives to the Proposed Plan, "As discussed in Impacts 3.6-2, the Proposed Plan would thus support and reflect the increasingly stringent State and local goals and regulations that seek to increase energy efficiency, reduce energy consumption, and prioritize renewable energy – reinforcing that the Proposed

Plan would not result in cumulatively considerable impact with respect to wasteful, inefficient, or unnecessary consumption of energy resources." They left out 161,000 tons of waste.

15300 (b)(3), "With private projects, the Lead Agency shall encourage the project proponent to incorporate environmental considerations into project conceptualization, design, and planning at the earliest feasible time."

This truncated analysis appears to be the type that establishes priorities, goals, and objectives before the certification of the EIR is complete, therefore "limiting alternatives or mitigation measures".

This truncated analysis would violate CEQA Code 15300 (b)(2), "public agencies shall not undertake actions concerning the proposed public project that would have a significant adverse effect or limit the choice of alternatives or mitigation measures, before completion of CEQA compliance"; "and for example, agencies shall not:(b)(2)(B)", "Otherwise take any action which gives impetus to a planned or foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project".

Given that Permit Sonoma will only provide the public's comments to the Planning Commission upon final EIR Certification, and a series of comments have been made to the SDC Comprehensive Planning Manager which has not incorporated the public's comments into the Proposed Project Alternative, "at the earliest feasible time", they appear to have violated Sec's 15300(a)&(b)(1)-(3), inclusive.

What we contend here is, that the proper "back-and-forth" process has not occurred, as within the planning process proper, within the design process proper, within the EIR process, as would be the same within the Court's evaluation of the EIR process itself, from San Mateo Gardens remand from the California State Supreme Court, which constitutes proper Authority to all jurisdictions within California.

We also contend that "particular expertise" and "the exacting standard that an agency must apply" is not available to the review that the "judicial review must reflect", without a Licensed Civil Engineering in Responsible Charge of "Fixed Works" Planning, BPC 6731.

Your Humble Servant



Thomas Chase Ellis, ED, Galen's Gardens/Samaritan Housing Society
Anthropologist, RCE 40655, MS Tax Law, MS Fin, MS Acc.

UCI Administrative Law Certificate in Hazardous Materials & Emergency Management

From: [Teri Shore](#)
To: [Hannah Whitman](#); [Arthur Dawson](#)
Cc: [Angela Nardo-Morgan](#); [Kate Eagles](#); [Susan Gorin](#)
Subject: NSVMAC - SDC Letter - Open Space Text Addition - Item 8 - 9.21.22 Public comment
Date: Monday, September 19, 2022 1:30:55 PM
Attachments: [OpenSpacePages from Permitted UsesPages from SDC Public Review Draft Specific PlanLR.pdf](#)
[NVMACAddShore.docx](#)

EXTERNAL

Dear Chair Dawson, NSVMAC, Sup. Gorin and Hannah,

Please consider adding this section on open space to the NSVMAC letter regarding SDC at your September 21, 2022 meeting, Agenda Item 8.

It is important to go on record requesting more details in the DEIR and Specific Plan about the open space, as without it we will face more uncertainty as the SDC project progresses over the years and the players change.

Please see below and attached suggested text.

Thanks for your consideration.

Teri Shore
515 Hopkins St.
Sonoma, CA 95476

SUGGESTED TEXT ADDITION TO NSVMAC LETTER ON SDC

Submitted by Teri Shore

PRESERVED OPEN SPACE/PARKLANDS

While we recognize that it is the intent of the County of Sonoma and the State of California to protect the open space lands around the historic campus at SDC, the DEIR and Specific Plan are inconsistent and inadequate regarding the description, protection and disposition of 755 acres of open space outside the core campus.

Neither the DEIR or Specific Plan gives the exact boundaries (other than in one general overlay map in the Land Use Section of the Specific Plan) or give details on how or when open space lands will be protected, transferred, or managed; or analyze or mitigate the impacts to those lands from the development of the historic campus.

These inadequacies need to be resolved in the DEIR and Specific Plan by adding clear descriptions of the open space lands with exact boundaries; likely mechanisms for transferring the lands and to what possible entities or types of entities; a timeline; and how the lands will be managed and under what authority. Environmental impacts and mitigations for impacts to the open space lands from development of the campus and ongoing operations must be provided.

A major concern is that multiple new agricultural uses including tasting rooms and agricultural processing that have never occurred at SDC are proposed to be permitted in the "Preserved Open Space" in the Land Use Section of the Specific Plan. These as well as new conditional land uses in the open space including geothermal development, sports facilities, and parking

facilities are never mentioned or analyzed in the DEIR. See Table 4.3 of the Specific Plan, attached. The DEIR needs to be revised to eliminate these issues and/or to analyze and mitigate environmental impacts on the open space and natural resource.

Vague Goals and Policies contained in the Specific Plan and DEIR do not suffice, such as “*future developers at the site must work with the County to ensure proper management and stewardship*” and “*Work with Sonoma County to dedicate the preserved open space as regional parkland.*” Not resolving these issues is likely to create confusion and conflict later for all involved, as elected officials, agency staff and developers change over time.

Lastly, the DEIR and Specific Plan cannot rely on state statute to protect the open space lands as that language is vague, only as “feasible” and in the “best interests of the state.”^[1]

^[1] *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.***

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Neither the DEIR or Specific Plan gives the exact boundaries (other than in one general overlay map in the Land Use Section of the Specific Plan) or give details on how or when open space lands will be protected, transferred, or managed; or analyze or mitigate the impacts to those lands from the development of the historic campus.

These inadequacies need to be resolved in the DEIR and Specific Plan by adding clear descriptions of the open space lands with exact boundaries; likely mechanisms for transferring the lands and to what possible entities or types of entities; a timeline; and how the lands will be managed and under what authority. Environmental impacts and mitigations for impacts to the open space lands from development of the campus and ongoing operations must be provided.

A major concern is that multiple new agricultural uses including tasting rooms and agricultural processing that have never occurred at SDC are proposed to be permitted in the “Preserved Open Space” in the Land Use Section of the Specific Plan. These as well as new conditional land uses in the open space including geothermal development, sports facilities, and parking facilities are never mentioned or analyzed in the DEIR. See Table 4.3 of the Specific Plan, attached. The DEIR needs to be revised to eliminate these uses and/or to analyze and mitigate environmental impacts on the open space and natural resource.

Vague Goals and Policies contained the Specific Plan and DEIR do not suffice, such as “*future developers at the site must work with the County to ensure proper management and stewardship*” and “*Work with Sonoma County to dedicate the preserved open space as regional parkland.*” Not resolving these issues is likely to create confusion and conflict later for all involved, as elected officials, agency staff and developers change over time.

Lastly, the DEIR and Specific Plan cannot rely on state statute to protect the open space lands as that language is vague, only as “feasible” and in the “best interests of the state.”¹

¹ *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.***

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									

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>
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	-	-	-
P Permitted - Not Permitted C Conditional Use Permit									

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>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	-	-	-	-
LowTemperature 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									

From: [Tracy Salcedo](#)
To: [Hannah Whitman](#); [Arielle Kubu-Jones](#); [Karina Garcia](#)
Cc: [Arthur Dawson](#); [Maite Iturri](#)
Subject: SMP letter re: SDC DEIR and preferred plan
Date: Wednesday, September 21, 2022 9:42:13 AM
Attachments: [SMP DEIR letter FINAL 9-21-22.pdf](#)

EXTERNAL

Hi Hannah, Arielle, and Karina,

I have attached the letter from Sonoma Mountain Preservation addressing the draft environmental impact report and preferred specific plan for the Sonoma Developmental Center. While I apologize for the redundancy, since I've already copied you on the original email with its cc list, I would like to make sure the letter is received by all members of the North Sonoma Valley Municipal Advisory Council, the Springs Advisory Council, and the Sonoma Valley Citizens Advisory Commission.

I appreciate your assistance with this request. Thank you for all you do.

Kindly, Tracy

Tracy Salcedo
Laughingwater Ink
(707) 246-0694
laughingwaterink@gmail.com / laughink@vom.com
laughingwaterink.com

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September 21, 2022

Brian Oh
Comprehensive Planning Manager
Permit Sonoma, County of Sonoma
2550 Ventura Avenue
Santa Rosa CA 95403
[via email]

RE: Draft Environmental Impact Report and Preferred Specific Plan for redevelopment of the Sonoma Developmental Center in Glen Ellen

Dear Mr. Oh,

We appreciate this opportunity to comment on the draft environmental impact report (DEIR) and preferred Specific Plan for redevelopment of the Sonoma Developmental Center (SDC).

While we acknowledge the conflicting directives laid out in the legislation authorizing the specific planning process for the property and recognize the difficulty of making meaningful connections with stakeholders in pandemic times, we must express our overall disappointment with the DEIR and Preferred Plan, which do not reflect community input as we've witnessed in public meetings and in letters over the years-long planning process. The scale of proposed redevelopment of the 180-acre core campus is fundamentally incompatible with the rural character of the surrounding community and the north Sonoma Valley, presents a clear danger to the safety of current and future residents of the Valley in the inevitable event of wildfire, and threatens the integrity of Sonoma Mountain's irreplaceable natural resources — habitats for keystone flora and fauna, the health of the Sonoma Valley Wildlife Corridor, water quality, air quality, recreational opportunities, and historic, tribal, and modern cultural values.

The DEIR fails to adequately or clearly describe meaningful, enforceable mitigations for the environmental impacts of redevelopment at the scale proposed, as required by the California Environmental Quality Act (CEQA). It fails to clearly delineate cumulative

impacts. It does not provide sufficient analysis to give decision-makers all the information they need to satisfactorily draw conclusions about the environmental consequences of the Preferred Plan. It is our hope that by addressing the questions that follow, applicable, effective, enforceable mitigations will be identified and instituted that materially decrease or eliminate those impacts.

General concerns/questions

The DEIR indicates that, across the board, the environmental impacts of the Preferred Plan and the Historic Preservation Alternative (HPA), which is acknowledged as environmentally superior per CEQA, are “largely comparable.” The DEIR also states that the HPA is less superior in terms of energy use, biological resources, and wildfire risk (ES.4.2). Given the significant differences in scale of the two alternatives — the HPA is half the size of the Preferred Plan — these conclusions defy logic.

- 1) Please explain how construction of 1,000 homes occupied by 2,500 people has the same environmental impact across virtually every category studied in the DEIR as does providing 450 homes occupied by 1,125 people (a 55% reduction)? Which studies support this finding?
- 2) Please explain how providing workspace for 900 people has the same environmental impact across virtually every category studied in the DEIR as does providing workspace for 600 people (a 33.3% reduction). Which studies support this finding?
- 3) Please explain how the HPA—which translates to less demolition through adaptive reuse of historic structures, less construction, fewer vehicle miles traveled, and fewer people on the property—uses more energy, has a greater impact on biological resources, and increases wildfire risk than the Preferred Plan, as stated in the DEIR (ES 4.2). Which studies support this finding?

Impacts specific to Sonoma Mountain

The entire 945-acre SDC property, including the developed core campus, is located within one of the last rural regions on the Sonoma Valley floor, with the mostly undeveloped slopes of Sonoma Mountain forming the entire western boundary and serving as a viewshed/mountain backdrop; as an informal natural reserve/safe haven for native flora and fauna; and as an informal recreational resource for hikers, cyclists, and equestrians from throughout Sonoma County and beyond. Further, historic residential use of the SDC by individuals with developmental disabilities and their caregivers had minimal human-caused environmental impacts on the property’s open spaces. Redevelopment at the scale in the Preferred Plan creates an urban footprint within this

historically rural zone, significantly increasing human-caused environmental impacts on a number of areas identified under CEQA (i.e., Aesthetics [3.1]; Biological Resources [3.4], and Public Services and Recreation [3.13], to name a few). To mitigate impacts of any redevelopment on the historic, minimal-impact, rural quality of the property, and to ensure the viewscape is preserved, we request that:

1) The DEIR include mitigation measures to compensate for the loss of the rural attributes of the property at its current baseline, or a baseline that dates back no further than 10 years. Please specify which measures in the current DEIR address these impacts, and which studies support them.

2) Please study, provide mitigation measures, and document how incorporating adaptive reuse of buildings into the HPA proposal, with its smaller human footprint, would impact environmental goals.

3) The SDC's open space currently sees frequent use by recreationalists from all over Sonoma County and beyond. That use increased markedly during the pandemic, despite restrictions on travel. The level of use has remained high as the pandemic has waned. The addition of 2,500 residents, 900 workers, visitors to the proposed hotel and conference center, and their friends and family, as outlined in the Preferred Plan, will add an exponential burden on the property's open space, much of which is on the skirts of Sonoma Mountain. Please analyze what that increase in recreational use means for aesthetics, biological resources, cultural, tribal, and historic resources, and water and air quality, and identify mitigations for those impacts.

4) Please analyze the cumulative impacts and potential degradation of floral and faunal habitats, groundwater supply, and riparian zones across the site, including the 750+ acres identified as open space, caused by the increased housing density, noise, construction, traffic, and demolition proposed under the Preferred Plan. Please provide analysis of the impacts of redevelopment on migratory fish species, such as coho salmon. Please also analyze whether these impacts would be mitigated by a smaller redevelopment such as the HPA.

5) The intent to preserve and protect the 750+ acres of open space surrounding the 180-acre core campus has been codified by the state in its enabling legislation and has been promised by the county in the Preferred Plan. However, neither the Preferred Plan and nor the DEIR delineate clear boundaries for the open space to be transferred, identify a mechanism of transfer, clearly identify the entities that a developer must work with to facilitate transfer, or explicitly require a developer to ensure that redevelopment of the core campus be done in such a way, and with sufficient buffers, as to protect the natural values of the open space. Please add specific, enforceable guidelines for the open space

transfers, specifying acreages and minimum boundaries on both the east and west sides of Arnold Drive, and limiting allowed uses on these acreages to passive recreational uses such as hiking, mountain biking, horseback riding, photography, etc.

6) Agricultural and commercial uses should not be permitted in open space intended to be parkland. Please clarify that uses such as those identified in Table 4.3 will not be permitted in open space identified for transfer to park agencies, and that mitigations for such uses on other open space parcels are identified and enforceable.

Thank you for the time and effort you have put into developing the DEIR and preferred Specific Plan for the property. We look forward to receiving Permit Sonoma's responses to our concerns, and hope the final plan and EIR presented to the Planning Commission for comment and to the Board of Supervisors for approval reflect substantive changes that ensure the integrity of the natural values of Sonoma Mountain, and the communities that surround it, remain intact.

Respectfully,

Meg Beeler, Chairperson
Sonoma Mountain Preservation
Traditional territory of Southern Pomo, Wappo, Patwin, and Coast Miwok

On behalf of Sonoma Mountain Preservation's Board of Directors
Kim Batchelder, Bob Bowler, Arthur Dawson, Avery Hellman, Nancy Kirwan, Larry Modell, Tracy Salcedo, Teri Shore, Helen Bates, Mickey Cooke, Marilyn Goode, David Hansen, and Lucy Kortum

cc:

Senator Mike Thompson, Assembly member Cecilia Aguiar-Curry, Senator Mike McGuire, Senator Bill Dodd, Sonoma County Planning Commission, Sonoma County Board of Supervisors, Springs Municipal Advisory Council, North Sonoma Valley Municipal Advisory Council, Sonoma Valley Citizens Advisory Commission, Sonoma City Council, Permit Sonoma, Department of General Services (Gerald McLaughlin)

From: [Jay Gamel](#)
To: [Hannah Whitman](#)
Cc: [Arthur Dawson](#)
Subject: Re: North Sonoma Valley MAC Materials-9/21/22 Meeting
Date: Wednesday, September 14, 2022 7:36:44 PM
Attachments: [NSV-MAC-DEIR-Comment-Letter-Draft4-09-12-22.pdf](#)

EXTERNAL

An excellent start to this response. I have noted a few very small grammatical items; nothing substantive.

jay gamel, kenwood

On Wed, Sep 14, 2022 at 6:06 PM Kathy Pons <282kpons@gmail.com> wrote:
Draft comment letter on SDC from North SV MAC...

----- Forwarded message -----

From: **Hannah Whitman** <Hannah.Whitman@sonoma-county.org>
Date: Wed, Sep 14, 2022 at 11:40 AM
Subject: North Sonoma Valley MAC Materials-9/21/22 Meeting
To: Hannah Whitman <Hannah.Whitman@sonoma-county.org>

Greetings,

Attached please find:

- Materials for Item #8 for 9.21.22 NSV MAC Meeting

Best,

Hannah Whitman

Aide to Supervisor Susan Gorin
Sonoma County Board of Supervisors
575 Administration Dr., Room 100A
Santa Rosa CA, 95403
Hannah.Whitman@sonoma-county.org

Phone: (707) 565-2241
Fax: (707) 565-3778

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Draft letter only – Draft to be edited and reviewed for potential approval at the NSV MAC meeting of 9/21/22.

September 13, 2022

Mr. Brian Oh
Permit Sonoma
Address / Email

Dear Mr. Oh,

On behalf of the North Sonoma Valley Municipal Advisory Council (NSV MAC), I respectfully submit the following comments pertaining to the Public Review Draft of the Sonoma Developmental Center (SDC) Specific Plan (Proposed Plan) and the SDC Specific Plan Draft Environmental Report (DEIR), as issued by Sonoma County in August 2022. While this letter is reflective of community input, it is not intended to be exhaustive or to take the place of individual comments from community members and other interested parties.

Given the tremendous amount of input from Sonoma Valley residents and business owners concerned about the project size and its impacts, as well as this MAC's own request and the Board of Supervisors' direction to scale back the Specific Plan, it is surprising that the proposed Specific Plan still contains over 1,000 homes and approximately 940 jobs. It appears that the DEIR fails to disclose the full extent of impacts that will result throughout Sonoma Valley from this large-scale development outside of an urban growth area, as is further detailed in this letter.

The Specific Plan represents one of the largest, if not THE largest, developments in the history of Sonoma Valley and is in conflict with County General Plan policies calling for city-centered growth. Furthermore, the proposed plan is inconsistent with its own guiding principles calling for a balance between redevelopment and historic preservation; the plan will destroy the very qualities that make the historic SDC site unique and its implementation will have far-reaching, significant adverse impacts on Sonoma Valley residents.

With this in mind, we provide the following comments, by general category:

PROJECT SCALE & HOUSING

Increasing the supply of affordable and workforce housing is broadly supported by the Sonoma Valley Community, but not at any cost to the environment and the health and safety of Sonoma Valley residents. Our understanding is that the DEIR should help the community better understand the scale of the environmental impacts of the Specific Plan, how they will be mitigated, what options were considered, and why these options were dismissed. We do not believe the DEIR has yet met these objectives.

For example, the DEIR identifies the smaller-scale Historic Preservation Alternative (Historic Alternative) as the environmentally superior alternative. It is not ruled out in the DEIR because it meets the required objectives, but it is dismissed from full consideration. Why?



If this alternative is environmentally superior and substantially reduces impacts of the proposed plan; if it more effectively meets some of the fundamental project objectives as outlined in the Specific Plan guiding principles, including Preservation of Historic Resources and Balancing Redevelopment with Land Use (DEIR pages 5 and 6); if it provides 450 new homes (still the largest project in Sonoma Valley); and meets the state’s statutory objectives regarding the disposition of the SDC site, why is this alternative (or a version of it that addresses some of the issues identified) not being put forward as the proposed plan?

“Overall, the Historic Preservation Alternative is the environmentally superior alternative, although significant impacts of the Proposed Plan and the two alternatives are largely comparable, and the Historic Preservation Alternative would be less superior in some environmental features such as energy use, biological resources, and wildfire risks. Additionally, this alternative would not support key project objectives related to increased housing supply, varied housing opportunities, community vibrancy, and long-term fiscal stability to the same degree as the Proposed Plan.” (DEIR page 14)

We do not find adequate data in the DEIR that supports the “less superior” distinctions above, or any reason why these couldn’t be readily addressed. There is no requirement that maximum housing be developed, especially if it means significant impacts in several issue areas. In terms of biological resources, the analyses on page 563 of the DEIR indicates that the Historic Preservation Alternative would be “similar or slightly better” than the Specific Plan. In terms of energy use, the older historic buildings are presumed to be less energy efficient, but it’s not clear how the net calculation was made since “energy use” is also cited in conjunction with construction and demolition GHGs, which would be significantly higher in the Specific Plan. The increased wildfire risk with this lower density plan is presumably solely because of the arbitrary exclusion of the Hwy 12 connector road in this alternative. **How would the proposed Specific Plan fare in comparison to the Historic Preservation alternative if it also excluded the Hwy 12 connector road, or if both included the Hwy 12 connection?**

Scale is the most obvious way to mitigate impact. While the types of impacts of the Historic and proposed Specific Plans may be the same, they are not equal in magnitude.

FEASIBILITY

If the Historic Preservation alternative was dismissed because of an assumption that feasibility will require higher development densities, **how is a feasibility analysis considered in the DEIR and shouldn’t this be more transparently addressed in the Proposed Plan?**

Since it’s unclear what “economic feasibility” means for the SDC campus at this time, **shouldn’t there be an economic feasibility analysis as part of this evaluation process?** The market demand study that was prepared for the alternatives report does not fill this need (and is inconsistent with the Specific Plan in any case in that it reports little demand for non-residential uses).

MITIGATION MONITORING / PERFORMANCE STANDARDS

It’s of concern to the community that most of the policies in the proposed Specific Plan are not enforceable, generally because of the use of “should” in the descriptive language rather than “shall” in many instances. Terms such as “if feasible” and “assumed” are also used repeatedly and the DEIR analysis acknowledges considerable uncertainty in the impacts and thus in the mitigation measures as well.



Will the policies and conditions of the approval of the Specific Plan be put into a mitigation monitoring plan or program to ensure mitigation compliance for the project?

Given the scale of the proposed Specific Plan and absence of any phasing requirements, it's critical that performance standards be developed and tied into the phasing of the project, especially since the DEIR calls for future studies and mitigations that are not yet identified. **Will performance standards be put into place, potentially to consider impacts that might include Traffic, Wildlife Function, Resources, Noise?**

HOUSING NUMBERS

The Specific Plan states that it will result in 1,000 units and the DEIR uses that assumption, but as noted in Specific Plan Table 4.2 there could be closer to 1,210 units, even without likely density bonuses. That means that most of the environmental impacts in the DEIR are underestimated for the number of units permitted.

CULTURAL RESOURCES / HISTORIC PRESERVATION

The Historic Alternative meets the fundamental project objectives listed on pages 5-6 of the DEIR, unlike the proposed Specific Plan that is inconsistent with the fundamental project objective calling for balancing development with historic resource conservation.

Regarding policies and impacts on cultural resources, the DEIR does not specifically address impacts on Contributing Resources. This should be its own section, not embedded in the discussion of impacts on the district as a whole. For example, if impacts on the integrity of the historic district are considered unavoidable and this would result in removing its eligibility for the National Historic Register, under CEQA that means there are no contributing resources because there is nothing to contribute to, and that all Conditions of Approval referring to contributing resources are effectively moot and not applicable. This seems to be the rationale used under Policy 4-25, but we'd like further detail as to how this is applied.

What are the criteria to determine which building are saved, reused, or demolished? Criteria and standards are mentioned, but we don't find any specific documentation, policy or analysis to properly guide this determination in the Specific Plan. Also, the loss of eligibility for the National Register listing would have additional significant impacts. *(Detail to be confirmed.)*

Regarding the Sonoma House and the main building, Specific Plan Policy 2-47 uses terms like "consider" and "if feasible." Where is the text describing how these determinations will be applied? Why is this not explained through explicit mitigation measures, of which there are currently none? Analysis of impacts on individually significant historic resources are deferred to a time when individual projects are proposed. However, since many future projects will not be subject to CEQA, doesn't this analysis have to be done as part of the Specific Plan EIR with mitigation measures identified, not deferred?

Neither the proposed Specific Plan nor the Draft EIR acknowledges the community effort to get the SDC listed in the National Register as an Historic District. Why is this not mentioned?

UTILITY INFRASTRUCTURE (Comments to come)

CLIMATE CHANGE (Comments to come)



VEHICLE MILES TRAVELED (VMT)

The Specific Plan indicates that there will be no free parking on campus. Has the DEIR studied the VMT and traffic safety impacts of this policy with respect to visitor vehicle trips to find parking off-site; the impacts on the narrow streets in the adjacent neighborhoods, particularly the Glen Ellen streets south of the SDC (Martin, Lorna, Burbank, Sonoma Glen Circle, Marty and Madrone) where parking is free; or the public safety or emergency evacuation impacts of this policy? Has the potential limit on public access been evaluated?

There is no evidence at this juncture that anyone living on the SDC site will be employed at the site so this cannot be assumed. Has the DEIR considered this in one of its VMT scenarios?

Can the DEIR appropriately consider the completion of the Sonoma Valley Trail multi-use path, connecting the SDC site with Santa Rosa, as part of the SDC site VMT mitigation if this is a Caltrans controlled project?

Why is the downscaling or elimination of the hotel not considered part of VMT mitigation? The hotel is **no** identified as a priority in the state legislation pertaining to the SDC site and will contribute significantly to VMT.

In Table ES-2, the DEIR determines that VMT reduction measures cannot be guaranteed, and they may be insufficient to reduce VMT per capita below the applicable significance threshold or fully offset the effect of induced VMT. "There are no other feasible mitigation measures available." Why is this an allowed conclusion when there are certainly mitigation measures available that might justifiably be considered, even if reductions might not reduce impacts to levels that are less than significant? Examples of mitigation include a reduced scale alternative or elimination (or reduction of size) of the hotel or other commercial development.

WILDLIFE CORRIDOR

There is no analysis of the impacts on the wildlife corridor through the campus and no acknowledgement of the fact that animals currently use the campus and will be impacted. Also, there is no assessment of the impacts of fencing on wildlife. (Only wooden fences are prohibited on the campus.) The fencing policies appear to apply only to the open space and human/wildlife interface areas, not the campus.

LAND USE IMPACTS

The proposed Specific Plan is both inconsistent with several project objectives, as noted above, and inconsistent with existing County General Plan policies encouraging growth in transit-oriented, urban areas. It is also inconsistent with General Plan policies calling for an overall reduction in VMT since it introduces urban uses in a non-urban area; this will necessarily increase vehicle trips to reach services in either Sonoma or Santa Rosa.

COMMERCIAL SPACE / JOB CREATION

There appears to be no policy saying that the hotel can't be built first. Is there anything in the proposed Specific Plan requiring the developer to build housing first?

Why is such a large-scale hotel being proposed when it's not a defined project objective, and when VMT is listed as a challenge?



POPULATION and GROWTH ASSUMPTIONS

The DEIR analysis of growth-inducing impacts is based on a comparison of the project size to county-wide population and employment numbers, which is an unrealistic and invalid comparison. As a distinct planning unit, Sonoma Valley should be the region of comparison. Given the relatively small population of Sonoma Valley, the proposed plan represents a substantial growth-inducing project. Alone, it will double (triple?) the community housing numbers and draw population and employees from other parts of the county as well as from outside the county. Given its location away from necessary goods and services, it will generate pressure for additional urban land uses on surrounding and nearby unincorporated lands. This urban sprawl growth scenario is in direct conflict with climate change policies to encourage compact, in-city growth.

IMPACTS ON NEIGHBORHOODS SOUTH OF SDC

The Glen Ellen neighborhoods adjacent to SDC will take the brunt of both the construction and operation impacts – not to mention the ongoing impacts of traffic and safety related to parking if there is no free parking on the SDC campus. The over 200 apartments and small lot single family homes directly south of the SDC property will be subject to the aggregate effects of noise, traffic, air emissions, and visual effects. These residents' daily routines will be disrupted during a very long-term construction period. This area is home to many low to moderate-income families who have arguably not had an adequate voice in this planning process.

Has the DEIR adequately studied the effect of the Specific Plan on this neighborhood, to include the narrow Glen Ellen streets from Martin Street south to Madrone Road and along Madrone Road?

CUMULATIVE EFFECTS

There are several foreseeable projects within 15 miles of the SDC site that will contribute to cumulative growth and related impacts, including but not limited to: the Graywood Ranch Hotel, Elnoka Village Senior Citizens housing project, Milestone Siesta Senior Citizens housing project, Donald Street housing development project, Verano hotel and housing project, Hanna Boys Center residential development program, and the proposed ~70% membership license increase at the Sonoma Golf Club.

In the Transportation Methodology section (page 432), the DEIR states, "The model's 2040 cumulative year includes growth that is consistent with adopted general plans within the County and with regional projections contained in Plan Bay Area 2040." Were the above-mentioned projects, and any additional foreseeable projects, considered either in the general plans or by Plan Bay Area 2040? Is Permit Sonoma able to share what was included in the model?

FIRE / EMERGENCY PREPAREDNESS

The DEIR did not consider a fire scenario in which the fire comes in from the west, down from Sonoma Mountain. "Historically, a fire approaching from the west may be less likely, and therefore did not warrant further specific analysis" (DEIR page 515). We know that fires are now burning in ways that are outside of historical precedent due to climate change and related impacts, and that this area has not burned in recent history. With this in mind, we believe a west-approaching fire scenario west must be considered.

Did the DEIR consider an evacuation scenario where broadband and/or cell service is out, or is unreliable, affecting receipt of alerts? This occurred in both the 2017 and 2020 fires – land lines and cell service were knocked out or overloaded and people had limited information to guide evacuation.



In Section 16.1.3.4 (page 511), the DEIR states that to further mitigate potential impacts, Policy 2-54 requires that the project sponsor proactively plan for emergency wildfire safety by building or designating an on-site shelter-in-place facility, to be open to both SDC residents and the general public. In our community conversations to date, Sonoma County fire and emergency experts have not condoned or recommended this as appropriate for the SDC site, so we question this as an appropriate mitigation measure.

The DEIR indicates no significant increases in evacuation times with the Specific Plan. Tables show evacuation times in the order of 15-20 minutes, with and without the proposed project. The Evacuation Time analysis suggests that “added times” for travel during an evacuation range from 1 or 2 minutes to 37 minutes to get to Napa. These hypothetical scenarios defy residents’ reality and the actual evacuation times experienced during recent fires: Nuns Canyon fire (2017) resulted in evacuation times out of Sonoma Valley of 1 hour or more; Glass Fire (2020) resulted in evacuation times from nearby Oakmont onto Hwy 12 of one to two hours; evacuations from Kenwood during recent fires took hours, not minutes; adding thousands of vehicles will exacerbate the problem.

Page 520 of the DEIR states that, “The additional SR 12 connector road will provide additional fire access and evacuation routes.” However, during a wildfire, it’s quite possible that residents and workers in the proposed project area will not be able to take this connector route east toward highway 12 due to the high probability of a wildfire advancing from the highway 12 direction (see Specific Plan, figure 2.3-1). Has this possibility been considered in the DEIR analysis of evacuation times? Also, can the analysis assume the Hwy 12 roadway connection when it will be subject to a separate CalTrans review and approval process and might not be approved?

The DEIR indicates that the SDC core campus is in the Local Responsibility Area (LRA) versus the State Responsibility Area (SRA) with respect to fire-related development governance. In Figure 3.16-2, it appears that the LRAs are outside of any fire hazard severity zone. However, given that parts of the LRA are immediately adjacent to medium, high and very high fire hazard severity potential zones (FHSZs), can this be accurate?

CLOSING COMMENTS (to come)

Sincerely,
North Sonoma Valley Municipal Advisory Council

cc: Susan Gorin
Tennis Wick
Rajeev Bhatia
(Other tbd at NSV MAC 9/21 meeting)

From: [Josette Brose-Eichar](#)
To: [Hannah Whitman](#)
Subject: Re: North Sonoma Valley MAC Materials-9/21/22 Meeting
Date: Wednesday, September 14, 2022 5:12:42 PM

EXTERNAL

Hi Hannah,

Thank you for sending this. I will not be able to attend the North Sonoma Valley MAC meeting on 9-21. But, if you could please pass on to the members of the MAC and Supervisor Gorin, how fabulous I think this letter is. The North Sonoma Valley MAC, has so much technical knowledge and expertise, for which I am so grateful. They have covered all the areas that must be addressed in this very vague and almost useless draft EIR. I fully support everything they have so far and the level of detail is outstanding. As I can not attend the meeting, I urge them to approve the final version and get it to PRMD. I will be attending the PRMD meeting tomorrow and then will work on my own letter, but it will never have the level of detail and understanding of all the issues that this draft letter has.

Thank you and sincerely,

Josette Brose-Eichar

On 9/14/2022 11:39 AM, Hannah Whitman wrote:

Greetings,

Attached please find:

- Materials for Item #8 for 9.21.22 NSV MAC Meeting

Best,

Hannah Whitman
Aide to Supervisor Susan Gorin
Sonoma County Board of Supervisors
575 Administration Dr., Room 100A
Santa Rosa CA, 95403
Hannah.Whitman@sonoma-county.org
Phone: (707) 565-2241
Fax: (707) 565-3778

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From: papaeshield@gmail.com
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: Eldridge site development
Date: Friday, September 23, 2022 11:29:20 AM

To whom it may concern:

As a resident neighbor in rural Bennett Valley I am concerned about the massive redevelopment plan being proposed for the Eldridge property. With a development of this magnitude and the sole access northern route to Highway 101 coming right through our rural community, I am very concerned with the excessive traffic it will bring.

Please do not support the SDC Specific Plan or DEIR as proposed by Permit Sonoma, and instead please consider the following:

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.

Thank you for your consideration and action on this matter

Respectfully,
Eric Shield

Eric G Shield | (714) 943-3712
4525 Grange Road
Santa Rosa, CA 95404

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From: [Josette Brose-Eichar](#)
To: [Brian Oh](#)
Cc: [BOS](#); [PlanningAgency](#)
Subject: Comments after yesterday's meeting at SDC
Date: Friday, September 30, 2022 11:09:23 AM

EXTERNAL

Hi Brian,

Thank you for the walk through and meeting yesterday at SDC. It was a good chance to meet some of us in person and to allow the planning commissioners to ask questions.

Dave and I will not be able to attend the next meeting on October 6. We have both sent in our comments on the DEIR. Both of us have focused on development on the campus and have assumed the vast open space we have now will be protected and available to the public. We assumed that it would not be open to private use for profit and would be a park with hiking trails and recreational use by the public. It is impossible for us and other community members to read everything in detail as it is quite voluminous. Often we only find out about things buried in the plan because someone else informs us.

First I want to ask for a complete change in what will be allowed in the majority of the acreage that is now open space, not the campus area. The following commercial uses are listed as allowed: agriculture crop production, agricultural processing, animal keeping/ confined animals, retail farm sales, farm stands, indoor crop cultivation, mushroom farming, nursery wholesale, timberland conversion and tasting rooms. The CA law passed for SDC, SDC Planning State Law states that this land is to be a public resource. These uses are not consistent with this being a resource open to the public, they are private use for profit. Many of these uses will decimate the wild life population. It is hard to believe this got through and has not been questioned up to this point.

Second, we were told again and again to submit specif issues, critiques and comments to be listened to. Well, many of us have been doing that for almost three years and nothing has changed. We keep hearing that our input is wanted, yet nothing has changed. We still have an unrealistic assessment of vehicle miles traveled, fire evacuation and water use. And simply using the term "missing middle" is totally meaningless. All anyone has to do is look at the current housing market to see clearly what homes and condos are currently selling for. I am including both existing resale housing and new projects. The reality is that these approximately 700 or more housing units can not be built and sold or rented to teachers, firefighters, nurses etc. at prices they can afford. All this plan is doing is creating more homes for the wealthy, and many of them will be second homes. Throwing around terms like "missing middle" and constantly referring to AMI does not reflect reality in dollars and cents. I recently crunched some numbers based on actual salaries and current mortgage rates to come to my conclusion. I have written my next Sun column based on these figures.

So, no I am not going into the minutia of the Specific Plan and Draft

EIR again. I have done this in numerous, previous e-mails and comments at meetings and nothing has changed. It is time for the county, including the Board of Supervisors to change this Specific Plan to address ecological and financial reality. This valley must protect its natural resources and provide services and housing for those that lack them today. We simply do not need a luxury resort/ event and conference center or more million dollar housing units. We need to plan for the real future as we face climate change. This plan and EIR does not do that, plain and simple.

Sincerely,

Josette Brose-Eichar
Boyes Hot Springs

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From: [David Eichar](#)
To: [PlanningAgency](#); [Brian Oh](#)
Cc: [BOS](#)
Subject: SDC Specific Plan Workshop, October 6th
Date: Friday, September 30, 2022 12:24:59 PM

Commissioners, Mr. Oh;

I just reviewed the legislation for the SDC plan, Government Code, Section 14670.10.5, paragraph (c):

"(3) 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. . ."

Notice that the open space is to be a "public resource". Any private ownership commercial use, even agricultural use, is not a public resource. The current zoning in the SDC Specific Plan is contrary to California Government Code, Section 14670.10.5. Thus, it must be changed to remove any allowed private or commercial use of the open space. (Mr. Oh, if staff believes this private, commercial uses of the non-core area is not against California law, please explain to the Planning Commission.)

Looks like we need a special zoning overlay. This overlay zone would start with the allowed uses as per table 4-3 Permitted Uses in the SDC Specific Plan for Preserved Open Space, removing the following allowed uses:

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

The above list is everything in table 4-3 listed under "Agriculture and Resource-Based Land Use" as being allowed in Preserved Open Space. The one possible exception would be Animal Keeping: Beekeeping, if this could be determined to be a "public resource."

Why is this important? The main reason is impact to wildlife. Fences restrict wildlife movement. Mechanized farming equipment, especially at night, negatively impact wildlife, as does construction of buildings and structures.

Regards,

Dave

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Mr. Brian Oh, Comprehensive Planning Manager, Permit Sonoma
County of Sonoma
2550 Ventura Avenue Santa Rosa, CA 95403
Brian.Oh@sonoma-county.org

Sent via email; PDF attached

RE: "What we want"

Dear Mr. Oh,

I was unable to attend the Planning Commission tour of SDC on September 29. But I learned that you asked the public to express what we want at the former Sonoma Developmental Center (SDC).

As a 33-year Glen Ellen resident, Chair of the North Sonoma Valley Municipal Advisory Council and Vice Chair of Sonoma Mountain Preservation, I have been involved in developing the vision for the site since 2014. I have expressed my own opinion and as well as those of the organizations I am involved with numerous times in public comments and letters. A selection of those letters is attached to this email.

The main points of my own vision, the organizations with which I am involved, and the majority of the Sonoma Valley community are most closely aligned with the **Historic Preservation Alternative (HPA)**, identified as "environmentally superior" in the Draft Environmental Impact Report (EIR). While I believe the HPA needs some adjustment, I would encourage Permit Sonoma and the Planning Commission to use that as a starting point for revising the Draft EIR.

In summary, we want:

- A vastly scaled down plan, compatible with the site's rural character, wildlife corridor and wildfire safety.
- Commercial development at an appropriate scale for the site.
- As much affordable housing as possible ($\geq 50\%$ of units affordable for households at $\leq 100\%$ AMI)
- Maximum protection for the open space and wildlife corridor, including wetland setbacks of at least 100'.
- Minimum hotel development, or none.
- Adaptive reuse of historic buildings.
- A climate neutral, or better, development, both in construction and long-term.
- A multi-phased development with a strong mitigation monitoring program.

For further details, please see the attached. I also support the opinions expressed by the Sonoma Land Trust and Sonoma Mountain Preservation in their letters and comments.

Respectfully,

Arthur

Arthur Dawson
Glen Ellen, CA 95442
(707) 996-9967
baseline@vom.com



APPENDIX to North Sonoma Valley Municipal Advisory Council Letter of 01/06/22.

This appendix provides additional details in support of the concepts presented in the main body of the NSV MAC letter dated January 6, 2022. These details are a compilation of information provided in public comments on the SDC Specific Plan Alternatives Report (November 2021), a community survey, and NSV MAC input. These details should be addressed in the Specific Plan policies and design guidelines.

All “community survey” references below are to the non-affiliated survey conducted by Sonoma Valley resident Dr. Shannon Lee, Biology Department Faculty at Sonoma State University, in December 2021 ([link](#)).

OPEN SPACE:

General Information:

- Community input consistently emphasizes the singular opportunity the SDC campus represents in terms of protecting the open space and wildlife corridor in the context of a vibrant, sustainable community.
- Over 90% of the community survey respondents ranked “preservation of open space” as of the highest priority.

The Community Supports:

- Prioritizing the transfer of park-adjacent properties to Sonoma Valley Regional, Jack London State Historic parks, or a potential land trust with continued public access to trails and open space.
- Protecting the wildlife corridors, their permeability and related natural resources from the wide range of impacts associated with over-development of the campus.
- The wildlife corridors are not separate from SDC campus—animals are not cognizant of boundaries—and their protection is integral to all aspects of the site plan.
- Pursuing the development of performance standards to support housing and other development, as outlined in the Sonoma Land Trust’s memo to the NSV MAC, Springs MAC and Sonoma Valley Citizens Advisory Council in follow-up of the November 18, 2021 joint meeting.

HOUSING DENSITY:

General Information:

- The SDC site is outside of an urban growth area and surrounded by community separator lands and the rural village of Glen Ellen.
- Based on current United States’ census definitions, the Eldridge “census designated place,” including the SDC campus and the Glen Ellen community just south of the SDC, could add approximately 450 housing units, i.e., through redevelopment of the SDC campus, and still be within a rural (vs. urban) designation, assuming average occupancy in Sonoma County of 2.61 people per dwelling unit.
- Maintaining a rural designation for the site’s development is consistent with the Guiding Principles established for the site plan in that new development must complement the surrounding communities of Glen Ellen and Eldridge/Glen Ellen.

The Community Supports:

- The creation of additional housing on the SDC site, particularly affordable housing, *however at a substantially lower density—450 or fewer housing units—than in any of the draft alternatives published to date. (The number of housing units in all three plan alternatives is 990 or greater.)*



- 89% of community survey respondents support no more than 450 housing units; 65% of those supporting between 400-450 units, and 24%, less than 400 units.
- Related to this and to complementary community development as mentioned above, 87% of community survey respondents cited “preserving the rural character of Glen Ellen” as “very important.”
- The community does not prioritize market rate housing.

AFFORDABLE HOUSING:

The Community Supports:

- A higher percentage of mixed level affordable housing than the 25% of the published alternatives. Specifically:
- 76% of community survey respondents think that 25-50% (or more) of the SDC housing should be affordable; 49% of all respondents would push that percentage higher, with at least 50-75% of housing units affordable. Over half of that 49% would prefer that 75%+ of all housing be affordable.
- Housing to include housing for individuals with developmental disabilities (as indicated in state statute); community comments also support senior and veterans housing and related services.
- Housing should be fully accessible (to disabled), as outlined in letters from representatives of the disabled community.
- The survey showed little support for estate homes (81% of respondents opposed) or 3-story apartment buildings (68% opposed), however during the NSV MAC discussion of 12/15/21 it was acknowledged that 3-story housing may need to be considered to achieve higher levels of affordable housing.
- Adaptive re-use of existing buildings (see below) may alleviate need for 3-story structures.
- The community generally agrees that clustered housing and integrated affordability level housing should be considered.
- **The state of California has prioritized the creation of affordable housing, as has Sonoma County. The state must reconcile this priority with its fiscal responsibility with respect to the SDC property by defraying the significant site remediation costs.**
- Housing clusters and siting should be designed to support open space priorities as identified above.
- Housing should be located away from Arnold Drive to preserve the existing visual and historic character and density of the SDC campus.

Potential funding sources:

- Federal Infrastructure Investment and Jobs Act

ADAPTIVE REUSE OF EXISTING BUILDINGS:

General Information:

- ALL responsible structural studies of the single-story buildings on the east side of the SDC campus indicate that re-use of the buildings is both financially feasible, and a likely positive use of existing resources.
- It is important to note that all of the studies related to the re-use option were conducted using old financial data. Local new construction costs have escalated sharply in the past few years, and particularly in the past 12 months.
- The discussions of adaptive re-use have focused on perceived low demand, and the potential unwillingness of people to live in buildings that have been re-designed. However, there are examples of creative, livable residential re-use designs throughout urban environments both locally,



and in other regions of the US, including lofts in old train stations, apartments in old manufacturing facilities, etc.

- Additionally, those discussions regarding design do not take into account the changes we have seen in the past couple of years alone. Tiny houses, re-purposed shipping containers, etc., are designs that are now considered livable and comfortable despite the out-of-date view of such designs.

Community Benefits:

- The re-use option will reduce greenhouse gases associated with demolition and construction. It will reduce air quality problems since the impacts of dismantling of concrete, wood and toxics will be considerably reduced as compared to that of demolished whole buildings.
- The roadways will not be further burdened by the weight and number of overloaded trucks.
- Public safety will be improved due to reduced traffic flows.
- The unique and beautiful architectural nature of the existing buildings will be preserved.
- The re-use of the buildings will be less expensive, and less time consuming, resulting in a more rapid occupancy schedule.
- Local job creation will increase with the use of adaptive re-use of existing buildings due to the nature of the specialty construction skills required for the work.
- “Proof of concept,” or the demonstration project aspect of the work, will serve as a model for additional other communities or similar projects.

The Community Supports:

- The community survey found that 49% of all respondents find **adaptive reuse of buildings to serve at-risk populations** to be of highest or high priority combined.
- In addition, a total of 64% of all respondents find **adaptive reuse of buildings to serve special needs populations** to be of highest or high priority combined.
- In addition, the community has indicated support for alternative housing types, e.g., co-housing, that could be implemented to make reuse financially feasible.

Potential funding sources:

- Grants
- Developer funds

UTILITY INFRASTRUCTURE:

Sewer Treatment / Water Recycling

General Information:

- The Sonoma Valley County Sanitation District Treatment Facility is located approximately 13 miles from the SDC Campus. The area surrounding the current treatment facility, located at the end of 8th Street East, routinely floods during the wet season.
- Untreated effluent is discharged into Nathanson Creek during flood events.
- Climate change, and associated sea level rise, will result in operations at the current location becoming increasingly difficult to maintain and sustain.
- Flood events will increase as groundwater levels rise.
- Discharges into Nathanson Creek will increase.
- Currently the Sanitation District pays a fine every time it has to dump overflow into the Nathanson Creek system. This happens multiple times a year. Adding additional homes to the sanitation system design will likely cause more frequent overflow problems.



Community Benefits:

- A sewage treatment facility could be sited on the SDC site—a location in the Sonoma Valley which is resistant to the impacts of climate change and sea level rise.
- Localized water recycling makes re-use financially feasible since the Sonoma Valley County Sanitation District does not, and will not, have the funds to create a large-scale water recycling program from its current location at the end of 8th St. East.
- Localized water recycling and storage is part of a fire resiliency plan.
- Wetlands associated with water treatment could be associated with a wildlife preserve and fire break, adding to climate resiliency.
- Groundwater recharge in the upper Sonoma Valley would benefit the groundwater plan requirements.
- Infrastructure requirements associated with SDC development would require an upgraded sewer treatment and water recycling plan.

Potential funding sources:

- Grants
- Reduced penalties for discharges into the Nathanson Creek system could be applied to the construction of a treatment facility.
- Recycled water sales.
- Local sewer district fees including SDC development, the existing town of Glen Ellen and potential expansion into areas that are currently served by underperforming septic systems.
- Developer funds.
- Federal Infrastructure Investment and Jobs Act

Energy Resiliency / Microgrid Construction

General Information:

- An energy sustainability plan and microgrid design should accompany any SDC development.
- Community Choice Aggregation is available in 23 municipalities and counties in California, serving 11 million customers.
- The Climate Center, located in Santa Rosa, is among the main organizing and lobbying organizations responsible for the development and adoption of Community Choice Aggregation.
- PG&E has shown itself to be an increasingly unreliable source for the electric grid.

Community Benefits:

- A move towards a localized, sustainable energy infrastructure can serve as an emergency preparedness resource.
- Reduced greenhouse gas emissions.
- Lower energy costs will attract potential commercial interests, and reduce operating costs for a sewage treatment plant, public school, etc.
- Local job creation will increase due the highly skilled workers required for construction, and the administration and monitoring of the system.

Potential funding sources:

- Grants
- Local rate payers
- Federal Infrastructure Investment and Jobs Act



FIRE SAFETY / CLIMATE RESILIENCY:

Fire Safety / Protections

General Information:

- Many of our appendix items address this indirectly, including water treatment and wetlands as fire protection; microgrid as protection against large scale electrical grid failure or neglect; adaptive reuse of the reinforced concrete buildings and the open space designation as fire protection. A community center could be used for any number of emergencies.
- Additionally, fire protection building code and WUI (Wildlands Urban Interface) requirements are codified.
- Evacuation plans and roadway emergency preparedness are big questions; it's our understanding that the EIR will address these issues.

Climate Resiliency

General Information:

- The Sonoma Valley wildlife corridor on the SDC campus is critical to maintain the quality of our water, forests, and wildlife in a rapidly changing and warming environment.
- Keeping landscapes connected via habitat linkages or corridors is the most frequently recommended approach to maintain ecosystem resilience in the face of climate change as it provides an "escape route" for plants and animals to relocate when their habitats are no longer viable.
- Linking also allows resources, including water and nutrients, to pass between habitats that are increasingly confined by human development to maintain ecosystem health for humans and wild residents.
- In 2015, when the SDC was still operational, a [paper prepared for Sonoma Land Trust](#) by researchers from the University of California, Berkeley, not only documented how the SDC's wildlife corridor maintains connectivity, but also addressed what it will take to ensure its integrity.
- The SDC "has high potential for landscape permeability and therefore is expected to allow for free passage of wildlife if left undisturbed," the researchers wrote. They also cited a state mandate—"a cornerstone of California's State Wildlife Action Plan"—that places a priority on making sure development does not encroach on such corridors.
- The researchers noted that protecting the corridor "will require preventing further development, especially in the northern portion of the SDC; as well as reduction in traffic speeds, artificial lighting, invasive species and domestic animal control, limiting human access, and a move toward wildlife-friendly fencing throughout the corridor."
- Aligns with the state's 30x30 goals.

Community Benefits:

- Clean and abundant water: connected creek corridors protect our streams and groundwater.
- Reduced wildfire risk: well-managed landscapes have less fuel to carry and spread flames.
- Climate change resilience: plants and animals can move through corridors to cooler places.
- Room to roam: connected landscapes maintain healthy flows of plants, animals, and resources.

HISTORIC PRESERVATION:

General Information:

- The community supports and recognizes the importance of preserving the historic, architectural, and aesthetic character of the SDC campus, including permanent protection, preservation and management of selected buildings and structures,



- This would include the historic cemetery, and related landscapes that sit within the boundary of the historic district of Sonoma Developmental Center.
- Inclusion of a museum, archival research center, library, and visitor center (The Gateway to Sonoma Mountain) on the grounds linked with and complementary to the Historic Cemetery, Open Space and Wildlife Corridor.
- This management structure is compatible with the goals of the Sonoma Land Trust, co-housing advocates, disability rights supporters, the numerous stakeholders that contributed to past community forums, and the recent community survey conducted and presented to the NSV MAC.

Community Benefits:

- In addition to bringing people together through public events, lectures and workshops, a museum will help provide a sense of community and place by celebrating our collective heritage.
- Museums educate, inspire, foster dialogue, curiosity, self- reflection and serve to help future generations comprehend their history and recognize the achievements of those who came before.
- Fosters partnerships and collaboration with the larger community and other non-profits
- Adaptive reuse of buildings to house research, museum and visitor centers will be effective in reducing our carbon footprint preparing for a future of fire safety, climate resiliency and sustainability of Sonoma Valley
- Historic preservation and reuse of historic buildings reduces resource and material consumption, puts less waste in landfills and consumes less energy than demolishing entire buildings and constructing new ones. Destruction of historic buildings unleashes vast amounts of embodied carbon into the atmosphere contributing to an already overtaxed and warming planet and adding to our carbon footprint.
- An historic district ensures that we are protecting and revitalizing the character of our town and ensuring that the most iconic and diverse collection of architectural buildings, sites and object are preserved for future generations
- Documentation supports that well preserved and revitalized historic districts are an economic boon to a community and affect property values in a very positive way.
- Historic districts are a vibrant, social and economic center for towns and are regarded as world class destinations.

The Community Supports:

- Preservation and rehabilitation of historically significant buildings, structures, landscapes and historic cemetery. These buildings include Sonoma House, McDougall, Oak Lodge, Hatch, PEC and King.
- Preservation of the SDC Library and other sources of written knowledge.
- Preservation of historic artifacts and digital archives currently stored on campus.
- Preservation of the knowledge possessed by individuals associated with SDC, Eldridge and Glen Ellen.

Potential Funding Sources:

- Glen Ellen Historical Society has already received grants and funding from private philanthropists to support a museum and visitor center.
- The Board of Directors of GEHS and general membership include experienced legal, development, grant writing, fundraising and cultural heritage professionals engaged in raising funding for the project.
- Establishment of "Friends of Glen Ellen Historic District" will be instrumental in organizing fundraisers and events providing financial assistance. Modeled after the Friends of Jack London, this



will have a self-generating funding source which includes an event/community center, museum, visitor center that includes historic tours and a world class archival and research hub

- Federal and State Grants
- State Historic Preservation Office Funding
- National Park Service Historic Preservation Funding
- National Trust for Historic Preservation Funding
- Privately Funded Grants
- Scholarships and Research Fellowships
- Governor Newsom's 2021 Executive Order for 30 x 30 State Funding

COMMERCIAL SPACE / JOB CREATION:

The Community Supports:

- The community has expressed support for innovative or educational use of commercial space at a scale that is compatible with the semi-rural Valley. Vocational training center is a popular idea.
- Although it is the NSV MAC's understanding that it is premature to designate too specifically, community suggestions have included a non-profit hub and a trade skills vocational center.
- Community comments have also noted that we have no identified tenants for commercial space at this time, and that the level of demand for commercial space is uncertain, reflective of significant changes in work patterns.
- Community comments have also noted that it's not clear that we have a shortage of jobs in Sonoma Valley—versus a shortage of affordable housing—and that *the scale of the commercial space designation needs to be appropriate for this rural community*.
- Commercial space ranked second lowest for “not important / neutral” as a re-development priority in the community survey.
- However, when survey respondents were asked to prioritize commercial development, a Community Center was the most popular (77% of survey respondents supporting), following by an Innovation/Research /Climate Hub at 60%.
- Hotel / Resort was the least popular with 10% support from community survey respondents.

Potential funding sources:

- Federal Infrastructure Investment and Jobs Act
- Legislative job training bill

COMMUNITY-ORIENTED COMMERCIAL:

The community is supportive of commercial space to be set aside for community-oriented usage to potentially include:

Community Center

General Information:

- Glen Ellen currently does not have a community center.

Community benefits:

- Potential uses and needs: emergency shelter, temporary emergency health clinic, community meetings, live performances.
- Provides a great boost to the local economy, providing jobs, both in the building and running of the facility. It also provides opportunities for the town to raise money through events, performances and weddings.



- Provides an opportunity for youth to congregate in a safe space promoting strong relationships through sports and recreational activities.
- Can be associated with the local Dunbar School for general assemblies, meetings, and activities, resulting in reduced project costs.

Potential funding sources:

- Grants
- Community fundraising
- Adaptive re-use of an existing building as a cost-saving measure

Relocate Dunbar School to SDC campus

General Information:

- Dunbar school currently serves grades K-5 and is located 3.5 miles from the SDC Campus. The current Dunbar campus is aged and located in a rural setting which requires either busing or car transportation for the commute.
- It is acknowledged that the Sonoma Valley Unified School District would need to run demographic and other feasibility studies as part of any determination to relocate.

Community Benefits:

- Job creation for the SDC development through school administration, maintenance, and enhanced school campus use by the public.
- The relocation allows for greater use of foot traffic to school from the proposed SDC campus development and the south Glen Ellen area.
- Reduced bus and individual car trips through Glen Ellen.
- Reduced greenhouse gases.
- Reduced bus maintenance and fuel costs.
- Multiple studies have indicated that school campus proximity to neighborhoods and housing promotes increased school campus use and greater neighborhood/ community continuity.
- Modernized Dunbar School campus

Potential funding sources:

- Grants
- Local school construction bonds
- Sale of existing Dunbar school campus as surplus land
- Developer funds. Most developments of the scale proposed for the SDC campus would require new school construction.

SITE GOVERNANCE:

General Information:

- Many members of the public have requested consideration of establishing a trust to implement the Specific Plan rather than a private developer. A trust would open opportunities for financing and site management that would broaden the potential for successful redevelopment AND community compatibility.
- The model of the Land/ Government-owned Trust for SDC governance and development was introduced at the first public meeting in 2016. Local community response was supportive of the Trust model for SDC governance.



- The SDC Planning Resource Committee was convened to consider the feasibility of forming a “State-Owned” trust, and to examine the required land disposition, land planning, development management, and infrastructure improvements issues.
- In 2018, the SDC Planning Resource Committee received a proposal from WRT Consulting for a financial assessment study of SDC site development potential, with an emphasis on: conservation of wildlife habitat and open space areas, protection and re-use of historic structures, adaptive re-use of existing buildings, and potential redevelopment off-setting revenue uses for the central SDC campus.
- It is important to note WRT Consulting performed the original Existing Conditions Assessment of the SDC site under a contract with the California State Department of General Services.
- An example of a successful community land trust model: OPAL Community Land Trust

Community Benefits:

- The non-profit government trust model reduces the profit incentives associated with private developers. Development companies generally generate a 25-30% profit on a specific project.
- Local trust governance allows for far more development financing opportunities. Public funding (governmental in nature), private funding (traditional lending sources: banks, pension funds, insurance companies), private non-profit funding (land trusts, housing trusts, other types of trust related grants).
- Local trust governance may allow for affordable housing occupancy formulas which enable a larger percentage of local workers and residents to live in the newly constructed homes. A private developer cannot make the housing available ONLY to local residents and workers. Any applicant, no matter their location of residency or occupation, is eligible for occupancy.
- A community housing trust-based model would only be responsible for the work associated with SDC campus development.

Potential funding sources:

- Private non-profit grants
- Private fund raising
- Governmental grants
- Traditional developer fund resources
- Income from commercial development



January 6, 2022

Sonoma County Board of Supervisors
575 Administration Drive, Room 102A
Santa Rosa, California
Via email:

Dear Sonoma County Board of Supervisors:

The North Sonoma Valley Municipal Advisory Council (NSV MAC) has prepared this letter for consideration by the Board of Supervisors (Board) and Sonoma County planning staff regarding the proposed land use and design alternatives for the SDC Specific Plan. The primary purpose of this letter is to summarize public input received by the NSV MAC in response to the SDC Specific Plan Alternatives Report prepared by Dyett & Bhatia and published by the County in early November 2021.

This letter incorporates the extensive community input from public meetings on November 17, 2021, December 15, 2021 and January 5, 2022, the Sonoma Valley community survey, as well as written correspondence and NSV MAC comments, and synthesizes this information into several main themes to create the framework for a community-supported land use alternative. **The intent of this exercise is to provide sufficient information to enable the Board to direct Permit Sonoma staff to develop a preferred alternative that truly reflects the community vision for SDC as articulated in the January 2021 Draft Vision and Guiding Principles.**

As reflected in the hundreds of comments received since publication of the Alternatives Report, the Sonoma Valley community does not support any of the three alternatives proposed by the County; 71% of participants rejected all three alternatives when polled during the SDC Alternatives Workshop on November 13, 2021. We also reference a non-affiliated Sonoma Valley survey (community survey) conducted by Sonoma Valley resident Dr. Shannon Lee, Biology Department Faculty at Sonoma State University in December 2021. The survey received 672 responses, 95% of which were from Sonoma Valley and Sonoma County residents. The SDC is not suitable as an “urban infill site” and the community’s rejection of the proposed alternatives reflects the incompatibility of the scale of proposed development with the adjacent Glen Ellen communities and the site’s environmental constraints.

Request for Community-Driven Process for Preferred Alternative

On behalf of the community, the NSV MAC requests the Board to delay the initiation of the California Environmental Quality Act (CEQA) process to prepare an Environmental Impact Report (EIR) for a preferred alternative until after a new alternative reflective of site constraints and community input is developed as promised in the December 17, 2019 agreement between the State of California and Sonoma County. The NSV MAC requests the Board to direct staff to pursue this new alternative as outlined in this letter.

Community Input as Framework for a Preferred Alternative

The community continues to support the January 2021 Vision and Guiding Principles that have underpinned community workshops, Sonoma County requests for proposals for preparation of the Specific Plan, and related efforts during this multi-year SDC redevelopment process. These principles are most recently expressed on pages 10-11 of the Specific Plan Alternatives Report. The community feedback conveyed in this letter reflects these principles through an integrated vision of development at an appropriate scale, with an intention to balance affordable, inclusive housing and related commercial development with the protection of SDC’s open space (a California public trust resource), the Sonoma Valley Wildlife Corridor, the historic district portions of the SDC campus, fire safety and climate resiliency, and the rural character of the surrounding region. An alternative with substantially reduced



density is necessary to ensure that the negative impacts of development on traffic, public safety, wildlife corridors, water/water treatment, and related issues do not cause environmental and social harm.

The nine community priorities are summarized below and detailed in the Appendix to this letter.

OPEN SPACE. Community input consistently emphasizes the singular opportunity the SDC campus represents in terms of protecting the open space and wildlife corridor in the context of a vibrant, sustainable community. Over 90% of community survey respondents ranked “preservation of open space” as the highest priority; this is consistent with the state’s 30x30 goals.

This concern goes beyond setting aside open space lands and creating creek and sensitive habitat setbacks. The density of development planned within the SDC campus must not exceed the carrying capacity of the site’s resources. In other words, it must not result in overuse of open space resources or interference with wildlife movement and permeability.

HOUSING DENSITY. The community unequivocally supports the creation of additional housing on the SDC site, particularly affordable housing, however at a lower density (450 or fewer housing units) than that included in any of the alternatives published to date. Higher housing density will move the surrounding communities from a “rural” to “urban” designation based on current U.S. census definitions (see Appendix) and is a primary driver of unacceptable impacts, including environmental, infrastructure, traffic and related public safety issues.

AFFORDABLE HOUSING. The community supports a considerably higher percentage of affordable housing than the approximately 25% included in the published alternatives, **with 76% of community survey respondents indicating a preference for 50-75% (or more) affordable units.** Use of available funding mechanisms and incentives—including revisiting the State’s obligations for SDC site cleanup and remediation—must be included in the financial feasibility assumptions to maximize the affordable housing percentage (see Site Governance / Funding below).

ADAPTIVE REUSE OF EXISTING BUILDINGS. Public and NSV MAC member comments indicate that the County should revisit the potential reuse of existing buildings to satisfy some of the housing needs on the East Side of the SDC campus.

UTILITY INFRASTRUCTURE. An energy sustainability plan, including a microgrid design, should accompany any SDC development, as should a thorough review of the potential benefits of an on-site sewage treatment facility in light of the challenges to the existing Sonoma Valley infrastructure.

FIRE SAFETY/ CLIMATE RESILIENCY: Fire safety and climate resiliency will be impacted by the other elements of the site plan—water use/recycling, energy grids, housing density—and their impacts on traffic and public safety. These interconnected factors must be more intentionally considered in any preferred alternative for this site. The Sonoma Valley community has expressed particular concern that fire risk, evacuations and related community preparations have evolved significantly during the course of the SDC re-development process. 71% of community survey respondents indicated that the County has not adequately addressed fire hazard, traffic and other impacts to the community in the proposed alternatives.

HISTORIC PRESERVATION. The community recognizes the importance of preserving the historic, architectural, and aesthetic character of the SDC campus, and envisions permanent protection, preservation and management of selected buildings and structures within the historic district. More specifically, the community has consistently supported the preservation of an historic district on the



west side of the SDC campus which could include a museum, library, research hub and visitor center, all of which would be linked with the cemetery and open space.

COMMERCIAL SPACE / JOB CREATION: The community supports innovative use of commercial space (education, training, research) and inclusive job creation at a scale suitable for this semi-rural site. In addition, the community wants to see commercial space set aside for **COMMUNITY**-oriented functions, e.g., a community center or school, and is prepared to explore funding options for these uses.

SITE GOVERNANCE / FINANCING: Many members of the public have requested consideration of establishing a trust or similar management entity to oversee redevelopment and implementation of the Specific Plan rather than a private developer. A trust mechanism would open opportunities for public financing and site management that would broaden the potential for successful redevelopment AND community compatibility. In fact, the Board’s April 2019 resolution “Supporting a Land Use Planning process and considerations for disposition of the Sonoma Developmental Center Site,” states:

“Be it further resolved that the Board may also consider in the future a Joint Powers Authority, Trust or other mechanism to facilitate the disposition and transition of the site to meet the desired outcomes.”

Community members have clearly articulated the conflict inherent in creating a plan that is both appropriate for Sonoma Valley and financially feasible, with these economics driven in large part by the dilapidated infrastructure and environmental cleanup liabilities left by the State. The State must help defray the significant costs to clean up the site that it has left in poor condition to ensure that the plan is not merely driven by economic factors. 89% of community residents surveyed believe that the State should be responsible for clean-up and other remedial maintenance of the site.

Conclusions

The Sonoma Valley community’s reasons for rejection of the proposed alternative plans are aligned and consistent. The alternatives do not reflect the themes heard over and over in multiple Valley-wide workshops regarding the appropriate size and scale of development, and adequate protection of the wildlife corridor and surrounding open space. None of the current alternatives reflect the many environmental constraints on the site, nor do any strike a balance between financial interests, affordable housing, and environmental and community well-being.

The community has spoken clearly. On its behalf, the NSV MAC respectfully reiterates its request that the Sonoma County Board of Supervisors direct staff to work with the community to develop an alternative using the framework as outlined above and detailed in the accompanying Appendix.

Sincerely,

Arthur Dawson

Chair, North Sonoma Valley Municipal Advisory Council

cc: Permit Sonoma, Sonoma City Council Mayor Jack Ding, Congressman Thompson, Senator McGuire, Senator Dodd, Gov. Gavin Newsom, Wade Crowfoot, local media, Assemblymember Aguiar-Curry, Springs MAC, SVCAC, Sonoma County Regional Parks, Agricultural Preservation and Open Space District, Sonoma County Historical Society

Arthur Dawson
5082 Warm Springs Rd
Glen Ellen, CA 95442

September 13, 2022

Mr. Brian Oh, Comprehensive Planning Manager
Permit Sonoma
County of Sonoma
2550 Ventura Avenue, Santa Rosa, CA 95403
Brian.Oh@sonoma-county.org

SENT VIA EMAIL

Re: Sonoma Developmental Center Specific Plan Draft Environmental Impact Report

Dear Mr. Oh,

I am a thirty-three year resident of Glen Ellen and the owner of a historical consulting business. My wife Jill grew up in Glen Ellen. Together we raised our two children here. We lost our home in the 2017 fire and have subsequently rebuilt. I currently serve as the Chair of the North Sonoma Valley Municipal Advisory Council as well as the Vice Chair of Sonoma Mountain Preservation, a local non-profit.

Despite their daunting page count, I believe the Draft Environmental Impact Report (DEIR) and Specific Plan for the redevelopment of Sonoma Developmental Center (SDC) are inadequate. They fail to fully evaluate and reasonably describe the severity and extent of impacts from the proposed project. Many of the DEIR's conclusions lack factual support and many of the Specific Plan policies intended to serve as mitigation measures are deferred and not enforceable.

In spite of soliciting extensive input, Permit Sonoma and the consultants have continued to push a proposal that does not have broad support in the community and ignores the well-documented preference of the public for a smaller project. This public recognizes the many significant site constraints on the development at SDC, including: the wildlife corridor, traffic, cultural resources, population, wildfire hazards and others.

Before commenting on specific aspects of the DEIR, I would like to make a request and an observation:

I encourage Permit Sonoma and/or the Planning Commission to revise the DEIR and Specific Plan to **create a multi-phased project with a mitigation monitoring program**. The Specific Plan touches briefly on this idea (SP 4-22): of completing "at least 200 housing units west of Arnold Drive before beginning construction of any housing east of Arnold Drive." No other phases are mentioned and there is no mention at all of a mitigation monitoring program. The DEIR analysis points to a lot of uncertainty in the impacts, making the proposed mitigations uncertain as well. Such uncertainty suggests the need for a robust monitoring program.

Downsizing provides the most obvious mitigation. Impacts from wildfire hazards, traffic, the wildlife corridor and other issues are all improved with a smaller project. The DEIR states that "the Historic Preservation Alternative is the environmentally superior alternative." This was also the smallest project analyzed in the DEIR.

Given time limitations, I will restrict my comments and questions to a few specific aspects of the DEIR and Specific Plan:

Project Description: 2.1.1 Regional Location

It goes without saying that an Environmental Impact Report is site specific. A project's location is fundamental to the analysis of its impacts. A poorly framed site location potentially skews the impacts identified and analyzed in the EIR. This is as true for a site's human geography as it is for biological and other aspects.

Local residents have repeatedly affirmed the Planning Area analyzed in the Draft Environmental Impact Report (DEIR) is in the middle of Glen Ellen and completely surrounded by that community. Based on our shared geography, history and common interests, Glen Ellen as a 'place' forms a cohesive part of our community identity. Local citizens have supported this identification through numerous public comments and a petition circulated during the Specific Plan process. In response to the concerns of our citizens, the North Sonoma Valley Municipal Advisory Council (NSVMAC) passed a "Declaration of Glen Ellen Boundaries" in April of this year, affirming our historic and commonly recognized boundaries, which include the Planning Area.

The U.S. Census Bureau recognizes and supports this viewpoint, stating, "a commonly used community name and the geographic extent of its use by local residents is often the best identifier of the extent of a place." <https://www.govinfo.gov/content/pkg/FR-2008-02-13/pdf/E8-2667.pdf>

The DEIR consistently misplaces the project's location as "between the unincorporated communities of Glen Ellen and Eldridge" (e.g. Section 2.1.1, page 51). Eldridge is a 'census-designated place' (CDP) but does not exist as a community according to the Census definition. Glen Ellen is also the name of a CDP, but that CDP is only a small part of the much larger Glen Ellen community, as defined by local residents.

The Census Bureau defines CDPs as "statistical geographic entities" and, as stated above, leaves the question of the extent of named places to local citizens rather than to government agencies. It should "not be a name developed solely for planning or other purposes." <https://www.federalregister.gov/documents/2018/11/13/2018-24571/census-designated-places-cdps-for-the-2020-census-final-criteria>.

1. Why were the requests of citizens pertaining to the project's location, given in public comments, letters, a petition and a declaration by the Municipal Advisory Council, not incorporated into the Planning Area description in the Draft Environmental Impact Report?
2. Why was the more accurate term 'census-designated place' not used in the EIR? Why was this term replaced with the word 'community'?
3. Placing the project "between communities" suggests it is outside of an existing community. Did you make this assumption? If so, how did it affect the DEIR's analysis? If not, how did you avoid this bias in your analysis?

I strongly request that the project's location be accurately and consistently described in the Final EIR as: "Surrounded by the existing community of Glen Ellen as defined by local residents."

2.3.1.1 Vision Statement

This section states that "New development complements" the surrounding community of Glen Ellen (p. 64). In this context, 'complement' appears to mean "adding to something in a way that enhances or improves it."

1. How was the 'complementary' nature of the new development evaluated? Please provide details about how this development will enhance or improve the existing local community.
2. What evidence (or metrics) on population, housing density, and community scale are being used to back up this statement?

3.16.1.2.2 Wildfire Hazards

The assessment of wildfire hazards in the DEIR appears to have a number of errors and omissions, the most serious of which lead to unwarranted conclusions that underestimate this hazard (“Impact 3.8-7 Implementation of the Proposed Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. (Less than Significant)” p. 268).

Page 503: “Primary responsibility for preventing and suppressing wildland fires in Sonoma County is divided between local firefighting agencies and the State of California, Department of Forestry and Fire Protection. The SDC Planning Area is currently located in an area identified as a State Responsibility Area (SRA).”

1. The Planning Area “includes the approximately 180-acre SDC Core Campus...” (DEIR, pg. 51) According to the State Fire Marshall’s map: https://osfm.fire.ca.gov/media/6822/fhszs_map49.pdf, the Core Campus is within a Local Responsibility Area (map on following page), not the State’s. Is this correct?

Page 503: “Under the Fire and Resources Assessment Program (FRAP) “the Planning Area...includes areas of high to very high Fire Hazard Severity Zones west of Highway 12, areas of high fire hazard severity in the hills, and areas of moderate fire hazards severity zones in the vicinity of Suttonfield Lake and Fern Lake (Figure 3.16-2). The Core Campus is not included in any of these FHSZs “

While it is true that “The Core Campus is not included in any of these FHSZs,” the State Fire Marshall’s final map is not intended to show moderate and high FHSZs within the Local Responsibility Area. The State’s draft map (page 5), however does show moderate and high FHSZs covering a substantial portion of the Core Campus. While not finalized, this appears to be the best available fire risk data for the Planning Area.

Goal PS-3 from the Sonoma County General Plan 2020 (DEIR, page 497), reads: “Prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires,” with Objective PS-3.1 stating, “Continue to use complete data on wildland and urban fire hazards.”

2. The Sonoma County General Plan How was the data gap between the SRA and the LRA within the Planning Area addressed during the DEIR’s analysis of wildfire threat? What evidence was the statement about the Core Campus (DEIR, pg. 503. See above) based on? Was this conclusion reached because there is data showing low fire risk there or because lack of data was equated with low risk?
3. The Fire Constraints map (13.16-2) shows the Core Campus being almost entirely outside of any Fire Severity Hazard Zones. How would the Fire Severity Hazard data for the Core Campus, shown in the State’s draft map, change the analysis of fire hazards there? Does this change the calculus for significance under 16.1.3.1 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.”?
4. In addition, the Sonoma County Community Wildfire Protection Plan Update 2022 states that: “Wildland fires that start in the woods and spread into adjacent areas with relatively dense housing often result in the greatest losses of property and life. Efforts to save lives and property will take precedence over losses of wildland resources, so firefighters’ response must focus on protecting populated areas rather than fighting a fire in the most efficient way.” Even if we assume there are no FHSZs within the Core Campus, this suggests that building dense housing at SDC adjacent to wildlands could result in high “losses of property and life.”

Responding to such a fire might prevent firefighters from efficiently working to prevent further fire spread. How was this scenario taken into account during the DEIR analysis?

3.16.1.3.4. Wildfire Evacuation

The two scenarios chosen for evaluation accurately represent historical fire patterns.

However, the goals stated on page 507 include “Provide protections at the site against the growing risk of climate change exacerbated wildfire hazards and limit the potential impacts of wildfire to development through intelligent site and building design, and open space management.”

If the 2017 Nunn’s Fire (and other recent wildfires) is an indication, predicting future fire patterns is highly uncertain, given that many homes in moderate FHSZs (including my own), in places with no recorded history of wildfire, burned in that conflagration.

1. How would a third scenario, with a fire starting in the Planning Area near the Core Campus, change the calculus for wildfire risk and evacuation? How would this change the calculus for wildfire risk and evacuation for the neighborhood between the Core Campus and Madrone Road, and the Rancho Madrone neighborhood (south of Madrone)?
2. Wildfire ignitions are known to increase with the size of a population. How was this relationship evaluated in the calculation of fire risk in the Planning Area?

Hazard zones below are from the State Fire Marshall's office: <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>

HAZARD ZONES:

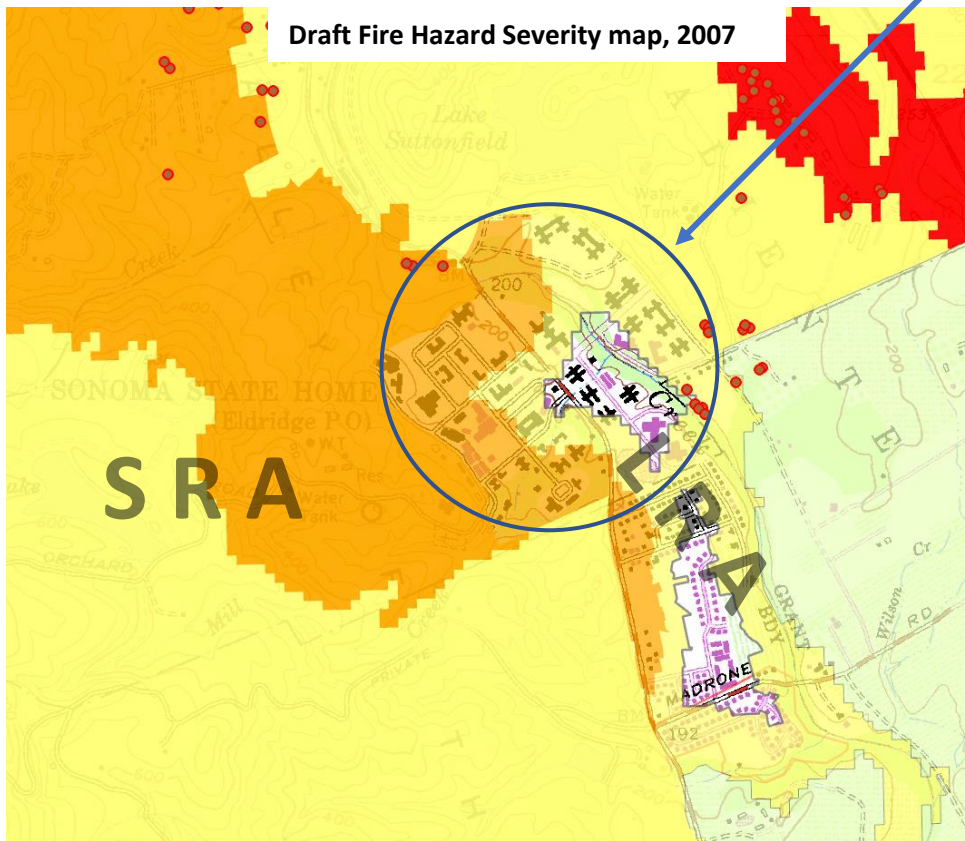
Yellow = moderate

Orange = high

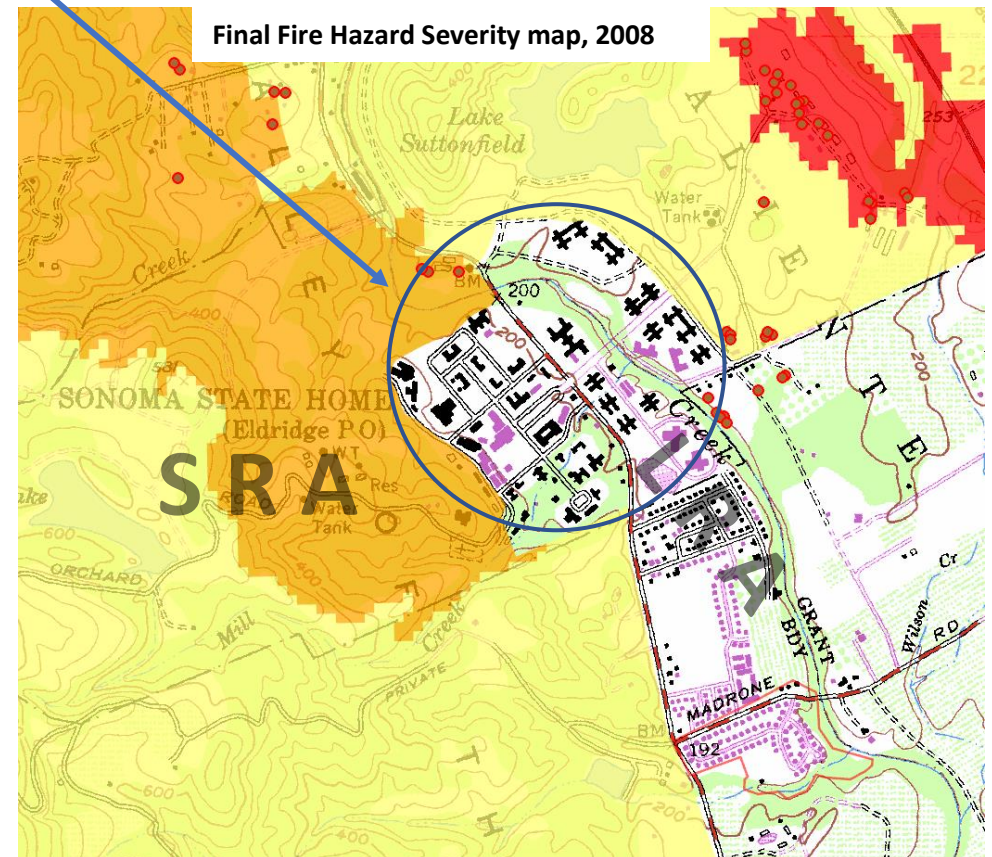
Red = very high

Dots = structures burned in 2017 (Sonoma County GIS)

CORE CAMPUS



Colored Overlay = State Responsibility Area (SRA) and some Local Responsibility Area (LRA)



Colored Overlay = State Responsibility Area (SRA)

Transparent = Local Responsibility Area (LRA)

Thank you for the opportunity to provide comments on the Sonoma Developmental Center Specific Plan Draft Environmental Impact Report. I look forward to your response.

Sincerely,

Arthur Dawson

Arthur Dawson
5082 Warm Springs Rd
Glen Ellen, CA 95442



September 21, 2022

Mr. Brian Oh, Comprehensive Planning Manager
Permit Sonoma County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

Dear Mr. Oh,

On behalf of the North Sonoma Valley Municipal Advisory Council (NSV MAC), we respectfully submit the following comments pertaining to the Public Review Draft of the Sonoma Developmental Center (SDC) Specific Plan (Proposed Plan) and the SDC Specific Plan Draft Environmental Report (DEIR), as issued by Sonoma County in August 2022. While this letter is reflective of community input, it is not intended to be exhaustive or to take the place of individual comments from community members and other interested parties.

Given the tremendous amount of input from Sonoma Valley residents and business owners concerned about the project size and its impacts, as well as this MAC's own request and the Board of Supervisors' direction to scale back the Specific Plan, it is surprising that the proposed Specific Plan still contains over 1,000 homes and approximately 940 jobs. It appears that the DEIR fails to disclose the full extent of impacts that will result throughout Sonoma Valley from this large-scale development outside of an urban growth area, as is further detailed in this letter.

The Specific Plan represents one of the largest, if not THE largest, developments in the history of Sonoma Valley and is in conflict with County General Plan policies calling for city-centered growth. Furthermore, the proposed plan is inconsistent with its own guiding principles calling for a balance between redevelopment and historic preservation; the plan will destroy the very qualities that make the historic SDC site unique and its implementation will have far-reaching, significant adverse impacts on Sonoma Valley residents.

With this in mind, we provide the following comments, by general category. Please explain the following inconsistencies in the DEIR:

PROJECT SCALE & HOUSING

Increasing the supply of affordable and workforce housing is broadly supported by the Sonoma Valley Community, but not at any cost to the environment and the health and safety of Sonoma Valley residents. Our understanding is that the DEIR should help the community better understand the scale of the environmental impacts of the Specific Plan, how they will be mitigated, what options were considered, and why these options were dismissed. We do not believe the DEIR has yet met these objectives.

For example, the DEIR identifies the smaller-scale Historic Preservation Alternative (Historic Alternative) as the environmentally superior alternative. It is not ruled out in the DEIR because it meets the required objectives, but it is dismissed from full consideration. Why?



If this alternative is environmentally superior and substantially reduces impacts of the proposed plan; if it more effectively meets some of the fundamental project objectives as outlined in the Specific Plan guiding principles, including Preservation of Historic Resources and Balancing Redevelopment with Land Use (DEIR pages 5 and 6); if it provides 450 new homes (still the largest project in Sonoma Valley); and meets the state’s statutory objectives regarding the disposition of the SDC site, why is this alternative (or a version of it that addresses some of the issues identified) not being put forward as the proposed plan?

“Overall, the Historic Preservation Alternative is the environmentally superior alternative, although significant impacts of the Proposed Plan and the two alternatives are largely comparable, and the Historic Preservation Alternative would be less superior in some environmental features such as energy use, biological resources, and wildfire risks. Additionally, this alternative would not support key project objectives related to increased housing supply, varied housing opportunities, community vibrancy, and long-term fiscal stability to the same degree as the Proposed Plan.” (DEIR page 14)

We do not find adequate data in the DEIR that supports the “less superior” distinctions above, or any reason why these couldn’t be readily addressed. There is no requirement that maximum housing be developed, especially if it means significant impacts in several issue areas. In terms of biological resources, the analyses on page 563 of the DEIR indicates that the Historic Preservation Alternative would be “similar or slightly better” than the Specific Plan. In terms of energy use, the older historic buildings are presumed to be less energy efficient, but it’s not clear how the net calculation was made since “energy use” is also cited in conjunction with construction and demolition GHGs, which would be significantly higher in the Specific Plan. The increased wildfire risk with this lower density plan is presumably solely because of the arbitrary exclusion of the Hwy 12 connector road in this alternative. **How would the proposed Specific Plan fare in comparison to the Historic Preservation alternative if it also excluded the Hwy 12 connector road, or if both included the Hwy 12 connection?**

Scale is the most obvious way to mitigate impact. While the types of impacts of the Historic and proposed Specific Plans may be the same, they are not equal in magnitude.

FEASIBILITY

If the Historic Preservation alternative was dismissed because of an assumption that feasibility will require higher development densities, **how is a feasibility analysis considered in the DEIR and shouldn’t this be more transparently addressed in the Proposed Plan?**

Since it’s unclear what “economic feasibility” means for the SDC campus at this time, **shouldn’t there be an economic feasibility analysis as part of this evaluation process?** The market demand study that was prepared for the alternatives report does not fill this need (and is inconsistent with the Specific Plan in any case in that it reports little demand for non-residential uses).

MITIGATION MONITORING / PERFORMANCE STANDARDS

It’s of concern to the community that most of the policies in the proposed Specific Plan are not enforceable, generally because of the use of “should” in the descriptive language rather than “shall” in many instances. Terms such as “if feasible” and “assumed” are also used repeatedly and the DEIR analysis acknowledges considerable uncertainty in the impacts and thus in the mitigation measures as well.



Will the policies and conditions of the approval of the Specific Plan be put into a mitigation monitoring plan or program to ensure mitigation compliance for the project?

Given the scale of the proposed Specific Plan and absence of any phasing requirements, it's critical that performance standards be developed and tied into the phasing of the project, especially since the DEIR calls for future studies and mitigations that are not yet identified. **Will performance standards be put into place, potentially to consider impacts that might include Traffic, Wildlife Function, Resources, Noise?**

HOUSING NUMBERS

The Specific Plan states that it will result in 1,000 units and the DEIR uses that assumption, but as noted in Specific Plan Table 4.2 more units are suggested, even without likely density bonuses. That means that most of the environmental impacts in the DEIR are underestimated for the number of units permitted. If the analysis is limited to 1,000 units, why is the possibility of 1,100 or more of units included in the Specific Plan?

CULTURAL RESOURCES / HISTORIC PRESERVATION

Isn't it true that the Historic Alternative meets the fundamental project objectives listed on pages 5-6 of the DEIR? Isn't it true that the proposed Specific Plan is inconsistent with the fundamental project objective calling for balancing development with historic resource conservation?

Regarding policies and impacts on cultural resources, isn't it true that the DEIR does not specifically address impacts on Contributing Resources. Please amend the EIR to include such impacts in its own section, not embedded in the discussion of impacts on the district as a whole or explain why not. Isn't it violative of CEQA for the EIR to assume that the project will be approved as proposed, without mitigations and alternatives to reduce impacts on historic resources having been determined feasible or infeasible? Wouldn't the loss of eligibility for the National Register of Historic Places remove protections for contributory resources? What environmental impacts would attend such losses of eligibility? What mitigations could avoid that loss? Please consider and analyze the benefits of the pending efforts to list SDC in the National Register.

What are the performance-based standards to determine which buildings can feasibly be restored or adaptively reused? How is demolition of any building to be decided? What type of analysis and performance-based standards will be applied to permit demolition under the Specific Plan? Please amend the Specific Plan so that demolition of any qualified historic resource will require a Plan amendment based on codified criteria. If not, why not? Isn't protection of National Register eligibility required by CEQA if feasible?

Regarding the Sonoma House and the main building, Specific Plan Policy 2-47 uses terms like "consider" and "if feasible." How will feasibility be determined? In light of significant impacts, why are mitigation measures not identified or analyzed? Doesn't CEQA disallow deferral of analysis and mitigation of the Specific Plan's foreseeable impacts on historic resources? Isn't it true that projects consistent with the Specific Plan, including those involving demolition of currently listed or eligible historic resources will not be subject to discretionary CEQA review? If not, under what circumstances would CEQA review be required?



UTILITY INFRASTRUCTURE

The Valley of the Moon Water District (VOMWD) consistently contacts customers requesting a 20% reduction in water use, further stating that penalties will be assessed if the reduction is not met. Yet, for the purposes of the DEIR and the water assessment section, the DEIR and VOMWD assert they have the resources to serve the SDC project. What assumptions underpin this assertion?

There are contradictions that should be addressed in the DEIR. For example: VOMWD's own estimates for future water deliveries and shortages are based upon single dry years, not the multiple dry year shortfalls we are already experiencing. Additionally, the Sonoma Valley Groundwater Sustainability Agency has made increasing projections for the need for groundwater re-charge throughout the Sonoma Valley, but the VOMWD has not estimated its own required contribution to groundwater re-charge and has maintained an increased groundwater "draw down" in the SDC water assessment report. What are the groundwater re-charge assumptions for the SDC site and are they included in the DEIR?

Additional areas of the water assessment report that require clarification in the DEIR:

- The report assumes the planning area will be served by local, on-site surface water sources. However, for Fern and Suttonfield Lakes, the treatment plant and the pipes/infrastructure are not a part of the core campus development. For the purposes of the DEIR and water assessment, those resources do not exist.
 - What, specifically are the surface water sources the DEIR is stating are available for use?
 - What becomes of those "non-available" water sources (the lakes, treatment plant)?
 - Who is responsible for the evaluation of the dams that contain all of that water?
 - Are the lakes going to be drained, filled in, maintained?
- The riparian rights contradict the findings of both the Sonoma Ecology Center and the Sonoma Valley Water Sustainability study that urges an elimination of riparian water rights in order to provide groundwater recharge to diminishing Sonoma Valley aquifers.
 - Who maintains the riparian water rights? The VOMWD, the state, the developer?
- The SDC water treatment plan has not been licensed for operation in many years. The DEIR states it will be evaluated for re-use by the water system operator.
 - Who will pay for the evaluation? If the plant requires re-construction, or is not salvageable, who pays for these updates?
 - Where, on the Specific Plan, will it be located?

ENERGY MICROGRIDS:

The DEIR language is vague in the section that pertains to an electrical microgrid. By definition, a microgrid is a locally controlled and maintained electrical grid with defined electrical boundaries. It is

able to operate in both a grid-connected and "island" mode. A stand-alone or isolated microgrid only operates off-the-grid and cannot be connected to a wider electric power system.

- Which type of system is being proposed, grid-connected or stand alone?



- Will the system have localized generating capacity?
- Where is the dedicated space on the Specific Plan for any proposed generation?
- Who pays for it and maintains it?
- Where is the electrical use projection data for microgrid design?

VEHICLE MILES TRAVELED (VMT)

The Specific Plan indicates that there will be no free parking on campus. Has the DEIR studied the VMT and traffic safety impacts of this policy with respect to visitor vehicle trips to find parking off-site; the impacts on the narrow streets in the adjacent neighborhoods, particularly the Glen Ellen streets south of the SDC (Martin, Lorna, Burbank, Sonoma Glen Circle, Marty and Madrone) where parking is free; or the public safety or emergency evacuation impacts of this policy? Has the potential limit on public access been evaluated?

In addition, was there analysis done on the safety implications of increased VMT on the routes used by cyclists and commuters to travel from Glen Ellen to other county locations (Santa Rosa and Rohnert Park), specifically Warm Springs and Bennett Valley Roads. These narrow, winding roads are commonly traveled at relatively high speeds; their road shoulders are significantly deteriorated (no shoulder at all for significant portions). The safety implications on these roads due to the increased VMT in the Proposed Plan must be considered in the DEIR.

There is no evidence at this juncture that anyone living on the SDC site will be employed at the site so this cannot be assumed. Has the DEIR considered this in one of its VMT scenarios? On a related note, while it's noted that institutional uses associated with the former SDC have been removed from the SCTM19 model's existing land use database (DEIR page 426), historical VMT numbers are still cited in the Historical Use section (DEIR 427-428) and implied to be relevant. VMT under the Proposed Plan will not be directly comparable to the historic SDC site in terms of either resident (non-driving) or single-employer shift work VMT per capita; any assumptions made pertaining to historical VMT need to be made clearer in the DEIR analysis and narrative. Finally, the DEIR cites a VMT increase of ~631, with the existing VMT at 59,654, and the Proposed Plan VMT at 60,285 in 2040 (DEIR, page 183). How can this be accurate based on the anticipated population and the VMT summaries cited throughout the DEIR?

The DEIR's Project trip generation estimate was developed using the SCTM19 travel demand forecasting model maintained by the Sonoma County Transportation Authority (SCTA). The specific trip generation factors are not included in the DEIR. Thus, it is impossible to evaluate the reasonableness of either those factors or the resulting trip generation numbers.

Can the DEIR appropriately consider the completion of the Sonoma Valley Trail multi-use path, connecting the SDC site with Santa Rosa, as part of the SDC site VMT mitigation if this is a Caltrans controlled project?

Why is the downscaling or elimination of the hotel not considered part of VMT mitigation? The hotel is no identified as a priority in the state legislation pertaining to the SDC site and will contribute significantly to VMT.

In Table ES-2, the DEIR determines that VMT reduction measures cannot be guaranteed, and they may be insufficient to reduce VMT per capita below the applicable significance threshold or fully offset the effect of induced VMT. "There are no other feasible mitigation measures available." Why is this an allowed conclusion when there are certainly mitigation measures available that might justifiably be



considered, even if reductions might not reduce impacts to levels that are less than significant? Examples of mitigation include a reduced scale alternative or elimination (or reduction of size) of the hotel or other commercial development.

WILDLIFE CORRIDOR

There is no analysis of the impacts on the wildlife corridor through the campus and no acknowledgement of the fact that animals currently use the campus and will be impacted. Also, there is no assessment of the impacts of fencing on wildlife. (Only wooden fences are prohibited on the campus.) The fencing policies appear to apply only to the open space and human/wildlife interface areas, not the campus.

LAND USE IMPACTS

The proposed Specific Plan is both inconsistent with several project objectives, as noted above, and inconsistent with existing County General Plan policies encouraging growth in transit-oriented, urban areas. It is also inconsistent with General Plan policies calling for an overall reduction in VMT since it introduces urban uses in a non-urban area; this will necessarily increase vehicle trips to reach services in either Sonoma or Santa Rosa.

COMMERCIAL SPACE / JOB CREATION

There appears to be no policy saying that the hotel can't be built first. Is there anything in the proposed Specific Plan requiring the developer to build housing first?

Why is such a large-scale hotel being proposed when it's not a defined project objective, and when VMT is listed as a challenge?

POPULATION and GROWTH ASSUMPTIONS

The DEIR analysis of growth-inducing impacts is based on a comparison of the project size to county-wide population and employment numbers, which is an unrealistic and invalid comparison. As a distinct planning unit, Sonoma Valley should be the region of comparison. Given the relatively small population of Sonoma Valley, the proposed plan represents a substantial growth-inducing project. Alone, it will double (triple?) the community housing numbers and draw population and employees from other parts of the county as well as from outside the county. Given its location away from necessary goods and services, it will generate pressure for additional urban land uses on surrounding and nearby unincorporated lands. This urban sprawl growth scenario is in direct conflict with climate change policies to encourage compact, in-city growth.

IMPACTS ON NEIGHBORHOODS SOUTH OF SDC

The Glen Ellen neighborhoods adjacent to SDC will take the brunt of both the construction and operation impacts – not to mention the ongoing impacts of traffic and safety related to parking if there is no free parking on the SDC campus. The over 200 apartments and small lot single family homes directly south of the SDC property will be subject to the aggregate effects of noise, traffic, air emissions, and visual effects. These residents' daily routines will be disrupted during a very long-term construction period. This area is home to many low to moderate-income families who have arguably not had an adequate voice in this planning process.

Has the DEIR adequately studied the effect of the Specific Plan on this neighborhood, to include the narrow Glen Ellen streets from Martin Street south to Madrone Road and along Madrone Road?



CUMULATIVE EFFECTS

There are several foreseeable projects within 15 miles of the SDC site that will contribute to cumulative growth and related impacts, including but not limited to: the Graywood Ranch Hotel, Elnoka Village Senior Citizens housing project, Milestone Siesta Senior Citizens housing project, Donald Street housing development project, Verano hotel and housing project, Hanna Boys Center residential development program, and the proposed ~70% membership license increase at the Sonoma Golf Club.

In the Transportation Methodology section (page 432), the DEIR states, "The model's 2040 cumulative year includes growth that is consistent with adopted general plans within the County and with regional projections contained in Plan Bay Area 2040." Were the above-mentioned projects, and any additional foreseeable projects, considered either in the general plans or by Plan Bay Area 2040? Is Permit Sonoma able to share what was included in the model?

FIRE / EMERGENCY PREPAREDNESS

The DEIR did not consider a fire scenario in which the fire comes in from the west, down from Sonoma Mountain. "Historically, a fire approaching from the west may be less likely, and therefore did not warrant further specific analysis" (DEIR page 515). We know that fires are now burning in ways that are outside of historical precedent due to climate change and related impacts, and that this area has not burned in recent history. With this in mind, we believe a west-approaching fire scenario west must be considered.

Did the DEIR consider an evacuation scenario where broadband and/or cell service is out, or is unreliable, affecting receipt of alerts? This occurred in both the 2017 and 2020 fires – land lines and cell service were knocked out or overloaded and people had limited information to guide evacuation.

In Section 16.1.3.4 (page 511), the DEIR states that to further mitigate potential impacts, Policy 2-54 requires that the project sponsor proactively plan for emergency wildfire safety by building or designating an on-site shelter-in-place facility, to be open to both SDC residents and the general public. In our community conversations to date, Sonoma County fire and emergency experts have not condoned or recommended this as appropriate for the SDC site, so we question this as an appropriate mitigation measure.

The DEIR indicates no significant increases in evacuation times with the Specific Plan. Tables show evacuation times in the order of 15-20 minutes, with and without the proposed project. The Evacuation Time analysis suggests that "added times" for travel during an evacuation range from 1 or 2 minutes to 37 minutes to get to Napa. These hypothetical scenarios defy residents' reality and the actual evacuation times experienced during recent fires: Nuns Canyon fire (2017) resulted in evacuation times out of Sonoma Valley of 1 hour or more; Glass Fire (2020) resulted in evacuation times from nearby Oakmont onto Hwy 12 of one to two hours; evacuations from Kenwood during recent fires took hours, not minutes; adding thousands of vehicles will exacerbate the problem.

Page 520 of the DEIR states that, "The additional SR 12 connector road will provide additional fire access and evacuation routes." However, during a wildfire, it's quite possible that residents and workers in the proposed project area will not be able to take this connector route east toward highway 12 due to the high probability of a wildfire advancing from the highway 12 direction (see Specific Plan, figure 2.3-1). Has this possibility been considered in the DEIR analysis of evacuation times? Also, can the analysis



assume the Hwy 12 roadway connection when it will be subject to a separate CalTrans review and approval process and might not be approved?

The DEIR indicates that the SDC core campus is in the Local Responsibility Area (LRA) versus the State Responsibility Area (SRA) with respect to fire-related development governance. In Figure 3.16-2, it appears that the LRAs are outside of any fire hazard severity zone. However, given that parts of the LRA are immediately adjacent to medium, high and very high fire hazard severity potential zones (FHSZs), can this be accurate?

The assessment of wildfire hazards in the DEIR appears to have a number of errors and omissions, the most serious of which lead to unwarranted conclusions that underestimate this hazard ("Impact 3.8-7 Implementation of the Proposed Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. (Less than Significant)" p. 268).

Page 503: "Primary responsibility for preventing and suppressing wildland fires in Sonoma County is divided between local firefighting agencies and the State of California, Department of Forestry and Fire Protection. The SDC Planning Area is currently located in an area identified as a State Responsibility Area (SRA)."

1. The Planning Area "includes the approximately 180-acre SDC Core Campus..." (DEIR, pg. 51) According to the State Fire Marshall's map: https://osfm.fire.ca.gov/media/6822/fhszs_map49.pdf, the Core Campus is within a Local Responsibility Area (LRA. See map on page 4), not the State's. Is this correct?

Page 503: "Under the Fire and Resources Assessment Program (FRAP) "the Planning Area...includes areas of high to very high Fire Hazard Severity Zones west of Highway 12, areas of high fire hazard severity in the hills, and areas of moderate fire hazards severity zones in the vicinity of Suttonfield Lake and Fern Lake (Figure 3.16-2). The Core Campus is not included in any of these FHSZs. "

The State Fire Marshall's final map is not intended to show moderate and high FHSZs within the Local Responsibility Area. The State's draft map (page 4), however does show moderate and high FHSZs covering a substantial portion of the Core Campus. While not finalized, this appears to be the best available fire risk data for the Planning Area.

Goal PS-3 from the Sonoma County General Plan 2020 (DEIR, page 497), reads: "Prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires," with Objective PS-3.1 stating, "Continue to use complete data on wildland and urban fire hazards."

2. How was the data gap between the SRA and the LRA within the Planning Area addressed during the DEIR's analysis of wildfire threat? What evidence was the statement about the Core Campus (DEIR, pg 503. See above) based on? Was this conclusion reached because there is data showing low fire risk there or because lack of data was equated with low risk?
3. The Fire Constraints map (13.16-2) shows the Core Campus being almost entirely outside of any Fire Severity Hazard Zones. How would the Fire Severity Hazard data for the Core Campus, shown in the State's draft map, change the analysis of fire hazards there? Does this change the calculus for significance under 16.1.3.1 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."?



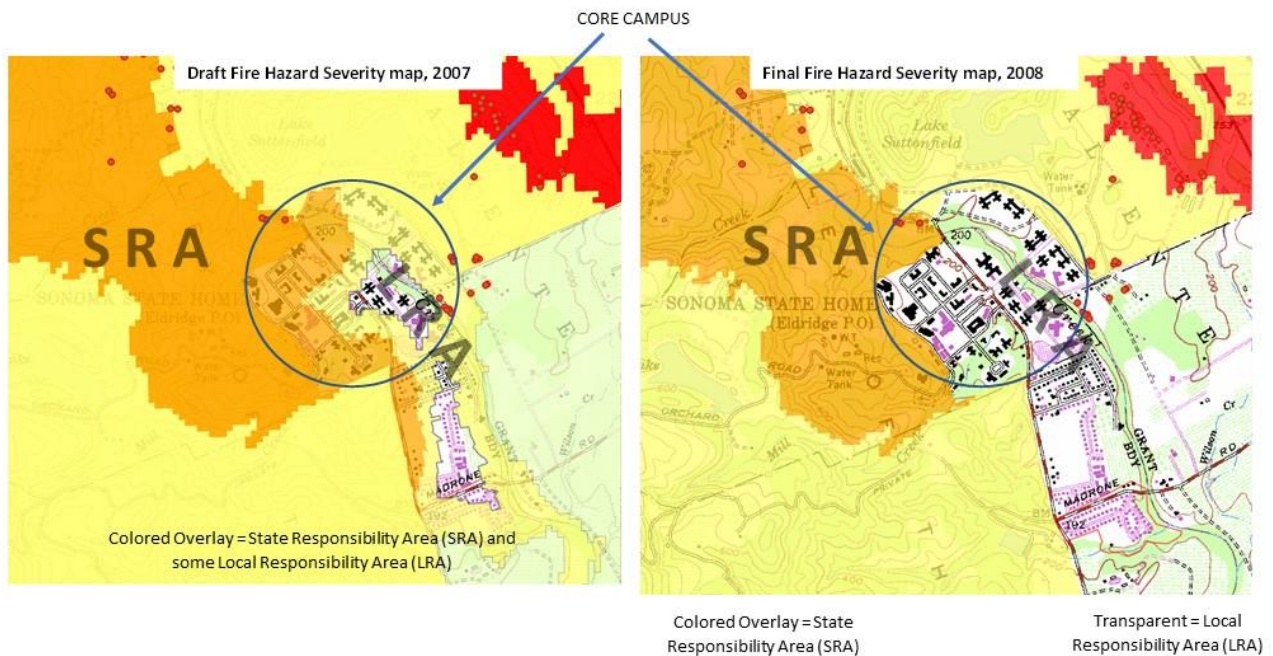
4. In addition, the Sonoma County Community Wildfire Protection Plan Update 2022 (referenced in the DEIR, 16.1.1.3. Regional and Local Regulations, p. 496) states that: “Wildland fires that start in the woods and spread into adjacent areas with relatively dense housing often result in the greatest losses of property and life. Efforts to save lives and property will take precedence over losses of wildland resources, so firefighters’ response must focus on protecting populated areas rather than fighting a fire in the most efficient way.”
- Even if we assume there are no FHSZs within the Core Campus, this suggests that building dense housing at SDC adjacent to wildlands could result in high “losses of property and life.” Responding to such a fire might prevent firefighters from efficiently working to prevent further fire spread. How was this scenario taken into account during the DEIR analysis?

3.16.1.3.4. Wildfire Evacuation

1. Wildfire ignitions are known to increase with the size of a population. How was this relationship evaluated in the calculation of fire risk in the Planning Area?

Hazard zones below are from the State Fire Marshall’s office: <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>

HAZARD ZONES: Yellow = moderate Orange = high Red = very high Dots = structures burned in 2017 (Sonoma County GIS)





CLOSING COMMENTS

As evidenced through the comments above, we do not believe this DEIR yet adequately and completely evaluates the environmental and safety impacts of the Proposed Plan. Furthermore, we remain committed to the Sonoma Valley community's consistent input calling for both affordable housing and a lower density plan alternative. A plan closer to the Historic Preservation Alternative – determined as “environmentally preferred” in the DEIR analysis – successfully meets the project objectives and the established Guiding Principles for this project and should be given strong consideration.

We remain committed to a plan that we can all support and appreciate this opportunity to provide comment. The NSV MAC letter process did not allow to adequately address all topic areas. Please respond to the public comments in the attached addendum that we received in advance of the NSV MAC meeting on 9/21/22, relating to the Specific Plan and the DEIR, which we are incorporating by reference, and give them full consideration.

Sincerely,

Arthur Dawson

Arthur Dawson, Chair
North Sonoma Valley MAC

cc: Susan Gorin
Tennis Wick
Rajeev Bhatia
Sonoma County Planning Commission

From: [Jan Bowen](#)
To: [PlanningAgency](#)
Subject: Development of Sonoma Developmental Center
Date: Thursday, October 6, 2022 12:15:07 PM



If a Developer becomes the new owner of the property known as Sonoma Developmental Center, what would stop them from changing the “Plan” to ADD 1000 MORE houses and a REDUCED area wildlife corridor?

What is meant by “...permanent protection of open space.....TO THE GREATEST EXTENT FEASIBLE.... and shall be upon terms and conditions the director deems to be IN THE BEST INTEREST OF THE STATE”.

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From: [Thomas Ells](#)
To: [PlanningAgency](#); [Susan Gorin](#); [Lynda Hopkins](#)
Subject: Findings of "Overriding Considerations" within SDC EIR-SP B for Supervisor's Approval & my full Planning Commission comments from today's meeting, 10/6/22.
Date: Friday, October 7, 2022 12:53:30 AM

EXTERNAL

Dear Sonoma County Planning Commissioners,
You have the opportunity to place Items on the Board of Supervisors' Agenda, should you desire,
through your representative District Supervisor.
Two (2) Supervisors, under almost every BofS I have ever worked with, can request agendaizing an item. Yes, the Agenda is under the control of the Chair, but two (2) Supervisors can make that request, which usually cannot be denied.

It is not necessarily like a friendly amendment to an Ordinance, ie voluntary, eg political overtones.

But with respect to the nature of this item's sensitivity, "in the overriding interests of public consideration for the item" this should be done.

With the greatest respect, Commissioner Carr & Commissioner Koenigshofer can, if your Supervisors are each amenable,
request that the EIR-SP item be placed on the date of the Dec 16th Closed Session Calendar, meaning that
the Meeting Agenda will be revised to contain an Open Session Item, SDC EIR & SP approval.
Dec 16th is already calendared for the Supervisors to meet in Closed Session.

As you are all aware, there are many items to correct within the plan.
If this cannot be accomplished, it may be better for the Commission to recommend denial of the EIR-SP, and let the "overriding considerations" contained be unsupported for the Board's consideration.

PS; your meeting, 10/27, can carryover to any day you want, which is not a "Special Meeting", needs no special notice other than "carryover", and can or cannot have comments as your Chair determines.

YHS Thomas

My full comments follow;

Our Proposal is Historic Preservation: we intend 600 units of Affordable Housing (Max) ~ 600k-800ksf, Environmental Benefit Climate Crisis Institute, and the Science Departments for a CalPoly University (2-3 Departments).

Our Proposal has received recognition and will be presented and evaluated by the CA-DGS Committee.

We respect Commissioner Koenigshofer's Adjacent uses question and Comm Carr's question regarding uses & existing water systems and wastewater treatment facilities.
2 Tanks = 1.3M gal of fresh water for Fire Flow exist and are not considered within the EIR - SP.

[Development Agreements are scary for developers, and usually end up costing developers money, best to leave flexibility for the developer to negotiate with some degree of freedom.]
Commissioner Reed: Plan vs Timing; [Rancho Santa Margarita (5000Ac) took 10 years on paper before shovel hit the ground.]

Commissioner Ocana's questions did not appear to be answered from Thursday's prior session.

Commissioner Carr: unit sizes vs Affordable Housing Projects size limits, Roundabout, GP Service Areas;

Shaun McCaffery, local pipeline for housing recipients? Inclusivity of Affordables?

Sita - Local Preferences,

Comm Koenigshofer, Conversions vs price Occidental experiences

Historical assets: eastside residences? #126?

Cost of Refuse vs Reuse of buildings.

[Brian Oh said 9/29 that Max unit was 5000sf,
then if min is 1000sf, Avg=3000sf/unitx1000units= 3Msf of houses.]

Comm Carr: Reuse\$ vs New Const\$

Planner Bhatia = depends? Scott Orr ??

Commenters: David H, Thomas E, Jerry B, Steve B, man, woman, man,
Jim Price, Sharon Church, Larry, woman, Nick Brown, Deb N.

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From: [Tracy Salcedo](#)
To: [PlanningAgency](#); [Brian Oh](#); [Tennis Wick](#); [Rajeev Bhatia](#); [Scott Orr](#)
Cc: [district4](#); [James Gore](#); [district5](#); [Susan Gorin](#); [David Rabbitt](#); [SDC Specific Plan](#); [Logan.Pitts@sen.ca.gov](#); [Senator.McGuire@senate.ca.gov](#); [Senator.Dodd@senate.ca.gov](#); [Wachsberg, Rebecca](#); [Hannah Whitman](#); [Arielle Kubu-Jones](#); [Karina Garcia](#); [Chaaban, Ezrah](#); [Cecilia.Aguiar-Curry@asm.ca.gov](#); [gerald.mclaughlin@dgs.ca.gov](#); [Melanie Parker](#); [McLaughlin, Gerald@DGS](#); [Misti Arias](#); [Meg Beeler](#); [Nancy Evers Kirwan](#); [Kate Eagles](#); [Rajeev Bhatia](#); [John McCaull](#); [Richard Dale](#); [Eamon O"Byrne](#)
Subject: Open Space Preservation at the Sonoma Developmental Center
Date: Friday, October 7, 2022 4:42:06 PM
Attachments: [Planning commission meeting 10-6-22.pdf](#)
Importance: High

Hello,

I'd like to respectfully submit this letter following up on yesterday's meeting of the Sonoma County Planning Commission. I made a public statement during the meeting, but feel it's important to elaborate as the Planning Commission, Permit Sonoma, and Dyett & Bhatia continue to hone the Specific Plan and environmental impact report for the property.

Thank you for allowing these opportunities to comment, and for all your diligent work on this important project.

Kindly, Tracy

Tracy Salcedo
Laughingwater Ink
(707) 246-0694
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October 7, 2022

Sonoma County Planning Commission
Permit Sonoma
Dyett & Bhatia
County of Sonoma

RE: Specific Plan for the Sonoma Developmental Center

Dear Planning Commissioners, Permit Sonoma Planners, and Mr. Rajeev Bhatia,

I want to thank you all again for the hard work you have put into developing the right plan for redevelopment of the Sonoma Developmental Center. After sitting in on yesterday's thoughtful meeting, I have nothing but respect for the work you do, especially what's been done by Permit Sonoma and Dyett & Bhatia. We may not see eye to eye, but I truly believe we have the same thing in our sights: The best plan to ensure an extraordinary place remains extraordinary.

As I stated in the hearing, my passion has been preservation of the property's open space. My long history as a hiking guidebook writer (more than 25 guides to parklands throughout the American West and Alaska) informs my activism in this regard. I know firsthand how important green space is to human well-being. Planning for these spaces has become more critical as demand for access to them increases.

Promises that the SDC's open space will be protected in the public trust in perpetuity have been made, both verbally and on paper. But the questions asked by Sonoma County's Planning Commissioners about the mechanisms by which the open space will be preserved, and the potential uses that would be allowed on the open space per the specific plan, left me very unsettled.

I have long maintained that actually sealing the deal on protection of the property's open space — not on paper or with promises, but on the ground — would go a long way toward easing the minds of community stakeholders in the Sonoma Valley and beyond. I heard some solutions yesterday that I would encourage the Planning Commissioners to follow up on:

- 1) Confirm with DGS that the open space outside the 180-core campus will not be transferred into private ownership as part of the overall property sale. My understanding is that once a buyer for the campus is selected, the transfer of the open space to a conservancy or Sonoma County's Ag+OS Department will happen concurrently. But having confirmation that process is proceeding as planned from both county and state officials is critical.
- 2) Strengthen language within the Specific Plan so that it clearly states that at least 750 acres of the property outside the core campus *will be* transferred into the public trust. Refer to the map contained in the Specific Plan (Figure 2.2-2) to firmly delineate the portion of the property that will be transferred to state and county park agencies. If you'll pardon the expression: Draw the line.
 - a. As Commissioner Carr stated, the possibility of the open space coming under private ownership must be eliminated, especially because, as I understand from yesterday's discussion, the plan can be amended as part of the development agreement.

- 3) Using the map contained in the Specific Plan (Figure 2.2-2), recommend to the Board of Supervisors that the designated open space be protected in perpetuity as public parkland by using either an existing zoning designation (PQP?) or a new zoning designation that would ensure the land could only be used for state and county parks.
- 4) Direct staff to revise Chart 4.3 (Permitted Uses) to restrict permitted uses in Preserved Open Space outside the core campus to passive recreation (hiking, cycling, horseback riding), and to exclude all agricultural, commercial ag, and other uses.
 - a. A suggestion: Could all commercial and agricultural uses, which are historically relevant, be restricted to areas zoned for the agrihood? Could the agrihood zoning be expanded to other areas of the redeveloped core campus to accommodate such uses?
- 5) Strengthen the language in 3.5, specifically 3.21, to include the requirement that a developer provide adequate parking for open space users. I suggest a minimum of 15 parking spaces on the west side at the Orchard Road access point to Sonoma Mountain and 15 on the east side accommodating access to Lake Suttonfield and environs, per my observations of the number of cars parked along Arnold Drive and in existing campus parking lots on weekends. Require the developer to also provide adequate setbacks around designated parking on the developed campus for signage, fee stations, restrooms, and garbage cans at these trail connections.
 - a. Thank you, Mr. Bhatia, to pointing me to the language within the specific plan that addresses these trail connections. You also referred to 4-6, but my search of the document for that reference let me to sections that did not appear to address parking and facilities at trailheads. If there's another place I should look, please advise.
- 6) Make the statement, as suggested by Commissioner Koenigshofer, that the land be transferred to Sonoma County Ag+OS or another conservancy immediately by whatever means is most expedient (conservation easement; sale).
 - a. As Commissioner Koenigshofer stated, this should not be a hard lift. It's been done before, and it is the unanimous will of the state, the county, and community stakeholders. The rules that constrain open space transfer, such as maintenance of utilities, are rules of our own making, and can be amended, just as the Specific Plan can.

The SDC open space is, at present, the best park that's not a park I've ever walked in. It deserves formalized protection sooner rather than later, to preserve its natural and cultural values as well as protect the safety of the people who are using it right now. Please let me know if there's anything I can help do to expedite its conservation.

Respectfully, Tracy

Tracy Salcedo
1320 London Ranch Road
Glen Ellen, CA 95442
(707) 246-0694
laughingwaterink.com
laughingwaterink@gmail.com

cc:
Sonoma County Board of Supervisors

Senator Mike McGuire
Senator Bill Dodd
Assemblymember Cecilia Aguiar-Curry
Sonoma Land Trust
Sonoma Ecology Center
Sonoma Mountain Preservation
North Sonoma Valley Municipal Advisory Council

From: [Mark Speer](#)
To: [PlanningAgency](#)
Subject: SDC
Date: Thursday, October 6, 2022 9:50:52 AM

EXTERNAL

Please listen to the environmental part of the issues carefully, with respect to the development part of the property. If you allow too much growth, you will lose the pristine effect of nature, and it will be gone forever, with too much development, cars, traffic etc!!

Thanks for listening,

Mark Speer. Glen Ellen resident

Sent from my iPad

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From: [Deb Votek](#)
To: [PlanningAgency](#)
Subject: support for the Glen Ellen Historical Society's proposal "Next Hundred Years at SDC"
Date: Thursday, October 6, 2022 2:35:41 AM

EXTERNAL

I strongly support the Glen Ellen Historical Society's proposal entitled "The Next Hundred Years at SDC". The plan creates a community trust to make policies for development and responsible stewardship of the property.

Please prohibit development in the Open Space Area. I do not support the permitted activities in the Preserved Open Space listed in Draft Specific plan Table 4-5.

Any hotel or conference center must be subject to conditional use permit and additional CEQA review.

The proposal for 470 housing units (282 designated affordable) would reduce some of the detrimental consequences from demolition and construction to air quality, noise, and the health of our towns residents when compared to the proposal for 1000 units.

I am very concerned about traffic congestion, parking, wildfire evacuation, and the degradation of the wildlife corridor if a large scale inappropriate proposal is chosen instead of the Glen Ellen Historical Society's proposal.

I appreciate my comments consideration.

Respectfully,
Deborah Votek

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From: [April Starke](#)
To: [PlanningAgency](#); [Brian Oh](#); [BOS](#); [engage@sdcspecificplan.com](#); [Susan Gorin](#); [district3](#); [district4](#); [David Rabbitt](#); [Lynda Hopkins](#); [senator.dodd@senate.ca.gov](#)
Subject: Sonoma Developmental Center Land of Special Opportunity
Date: Saturday, October 8, 2022 3:35:45 PM

CC: to all Sonoma Supervisors, Permit Sonoma, and Senator Dodd

Governor Gavin Newsom
2022
1021 O Street, Suite 9000
Sacramento, CA

October 8,

Dear Governor Newsom,

RE: Sonoma Developmental Center Land of Special Opportunity

In Sonoma County we have a special opportunity to create low-income housing, a vibrant neighborhood, while supporting historic preservation, Open Space, and contributing to Climate Solutions.

The now closed Sonoma Developmental Center is excess state property. Plans have been proposed, that would overload our roads and further add to wild fire risk; crowd out our wild creatures by closing the one wildlife crossing in the region; build where there is no public transport.

What we need in addition to **reasonable housing** is a commercial venture on site that would employ at living wages. Lower the housing in the DEIR by half and add a research center, not a hotel

The expense of building this new neighborhood is too great to be supported by the current plans. We need state support to remove the non-reusable buildings, stabilize the historic structures and clear derelict features from the remaining site. The estimate is \$100,000,000. Just too much for a local developer or the county to overcome.

In this time of state excess budget, California should invest these funds. An Opportunity Fund for every county to have an equal or proportional amount could be planned

Your leadership should lead the way to making this opportunity a reality. There is only so much excess property and so little time.

Sincerely,
April Starke
18693 Lomita Avenue
Sonoma, CA 95476
aprilmv@aol.com

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From: [Maria S](#)
To: [PlanningAgency](#)
Subject: Approval
Date: Saturday, October 22, 2022 11:27:32 AM



Hello

As a member of Sonoma Valley I am writing to express my approval for the
Permit Sonoma FEIR - Final Environmental Report

I hope the report is adopted so that more affordable housing will come to the region. And a new roadway will be built to help with traffic and fire risk.

Sincerely,

Maria Solarez

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From: [Jan](#)
To: [BOS](#); [PlanningAgency](#)
Subject: Permit Sonoma Releases FEIR - Final Environmental Report Comment
Date: Saturday, October 22, 2022 12:27:48 PM

Why are you not listening to the outcry of the public?

We want a smaller more sustainable plan for SDC. Once again I beg, I request.

Please adopt the historic preservation alternative and scale down the proposed SDC specific plan. This plan is what is needed at 450 housing units, the Historic Preservation Alternative would still be authorizing the largest housing project in Sonoma Valley since Oakmont.

The HPA does not call for a new road between Highway 12 and Arnold Dr., thus protecting wetlands and wildlife.

The HPA calls for significant adaptive reuse of existing buildings, thus preserving the cultural integrity of the property while reducing the impact of carbon emissions resulting from the tear down/re-build of existing sites.

I want Permit Sonoma to adopt the HPA and include performance standards that will guide the phasing of the level and location of the smaller development and hold developers accountable. Why does Permit Sonoma consistently appear to care much more about developers making money than about the community and wildlife who have to live with the negative consequences of this current proposed over development?

I'd like to know how the HPA plan is not feasible, when no economic feasibility study on the proposed SDC Specific Plan has been done. Why can't the County find a way to pay for an economic feasibility study for its own plan?

Why has there been no changes made to the plan to address the community wishes for the adoption of the historic preservation alternative. We are the community, we live here, we want the SDC Specific Plan to be scaled back and adopt the HPA plan.

Jan Humphreys

p.o.box 899 boyes springs ca 95416

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From: yennif54@gmail.com
To: [BOS](#)
Subject: SDC action
Date: Saturday, October 22, 2022 12:20:59 PM

As citizens of this community, we urge you as our representatives to adopt the Historic Preservation Alternative and SCALE DOWN the proposed SDC Specific Plan and direct Permit Sonoma to include performance standards that will guide the phasing of the level and location of development.

Carl Finney
Glen Ellen, CA

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From: [Leigh Hall](#)
To: [PlanningAgency](#)
Cc: [BOS](#); [Susan Gorin](#)
Subject: SDC development plan
Date: Saturday, October 22, 2022 12:33:00 PM

I respectfully submit that there is no way the area surrounding SDC can accommodate 1000 new homes (with up to 2000 new cars on the road), as you have proposed. I fear for the safety of my wife and I in the event of an evacuation, and such concentrated development will require huge amounts of water, inevitably disturb wildlife and tax our roads well beyond capacity . We need new homes in the Valley, but 1000 in one place simply does not make sense.

The analysis I've read does NOT indicate that the site can accommodate such development.

Please consider reality and do the analysis that accounts for what will really happen.

Thanks.

Leigh Hall
Glen Ellen,CA

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From: [Alice Horowitz](#)
To: [PlanningAgency](#)
Subject: SDC Specific Plan and FEIR
Date: Sunday, October 23, 2022 10:28:19 AM

Dear Planing Commissioners,

As you enter into final deliberations regarding the future of the SDC, please consider the following I wrote for the 10/22/22 Eldridge For All newsletter. (eldridgeforall.org)

Many thanks for your consideration of these thoughts, and best wishes to you,
Alice Horowitz

.....
Due to its location and surrounding area, there are many valid reasons why the 180-acre SDC redevelopment site cannot handle the level of development (1,000+ housing units and over 400,000 sqf of commercial space) proposed by Permit Sonoma. Sonoma County must build 3,881 affordable housing units in unincorporated areas to satisfy RHNA requirements. But why should this relatively small piece of semi-rural land in the heart of Sonoma Valley and in the middle of the wildlife corridor have to accommodate such a large percentage of what is admittedly a County-wide requirement? Our Sonoma Valley Community has widely called for a SCALED DOWN project, and this is what the Powers That Be must understand - **It's not just that the people of Sonoma Valley want a smaller project – it's what the site needs and can accommodate.** To read environmental land use planner Vicki Hill's letter on this topic, please click on this link and SCROLL DOWN the page:
<https://eldridgeforall.org/sp-%26-deir-talking-points>

Although Permit Sonoma's recently revised SDC Specific Plan does include a handful of improvements to further protect wildlife, introducing thousands of people and cars into the Sonoma Valley Wildlife Corridor (animals move through the entire area, not just the officially designated corridor along the northern boundary), will be highly disruptive and damaging where wildlife is concerned. The scale of the County proposed plan (and the road to Highway 12) will likely overwhelm any mitigations or "enhancements" proposed in the revised Plan. **Permit Sonoma claims the project will protect 750 acres of open space, but it won't be protected for very long or all that well if 5000 people are continuously onsite. Permit Sonoma should stop trying to justify the plan's size by unfairly comparing it to the previous SDC institutional use. SDC residents did not drive cars, there were no commercial uses generating vehicle trips, and employees were spread over three shifts.**

Adding 1,000+ housing units and 900 on-site jobs will directly translate into more traffic - a lot more. Not only will adding several thousand more cars to the area's already impacted two-lane roads have severe consequences for area residents, the consequences for our wildlife could very well be deadly. An entire newsletter could be dedicated to the issue of impacted evacuation routes, so suffice it to say that exponentially increased traffic could prove deadly for humans too. People need homes, wildlife needs to safely roam, and we all need to evacuate quickly and safely in the event of a natural disaster.

WHAT'S THE SOLUTION TO THE SDC CONUNDRUM? The HISTORIC PRESERVATION ALTERNATIVE (HPA) - identified in the EIR as the "ENVIRONMENTALLY SUPERIOR ALTERNATIVE" - offers a clear path to crafting an acceptable compromise for a plan everyone - humans and animals - can live with. Note: Permit Sonoma insists the HPA is not economically feasible. We'd like to know how they can be so sure when no economic feasibility study on the proposed SDC Specific Plan has been done. Someone found the money for Sonoma Water, the County's Water Agency, to prepare an *Economic Impact Analysis of Eldridge Enterprise, Redevelopment of the Sonoma Developmental Center (SDC), Sonoma County, California*; an economic feasibility study on which Permit Sonoma is now building its plan for a Climate Center. **Why, then, can't the County find a way to pay for an economic feasibility study for its own plan?**

- At 450 housing units, the Historic Preservation Alternative would still be authorizing the largest housing project in Sonoma Valley since Oakmont. Permit Sonoma's SDC Specific Plan currently allows for 28% of the proposed 1,000 housing units to be "affordable." Following this same formula, the HPA means less overall affordable housing units. But who's to say that a community as industrious and caring as our Sonoma Valley Community can't come up with creative solutions to considerably increase that percentage? Not to mention our County and State legislators for whom affordable housing has become an increasingly pressing issue? What a win-win it would be for everyone - humans and animals - if we could settle on a plan with less overall housing but with a significantly higher percentage of that housing going to those who need it most.
- The HPA does not call for a new road between Highway 12 and Arnold Dr., thus protecting wetlands and wildlife.
- The HPA calls for significant adaptive reuse of existing buildings, thus preserving the cultural integrity of the property while reducing the impact of carbon emissions resulting from the tear down/re-build of existing sites.

WHAT CAN WE DO? We still have a bit of time to lobby both the Sonoma County Planning Commission and the Board of Supervisors to:

1. direct Permit Sonoma to adopt the Historic Preservation Alternative and SCALE DOWN the proposed SDC Specific Plan
2. direct Permit Sonoma to include performance standards that will guide the phasing of the level and location of development.

On this last point, Permit Sonoma believes performance standards will limit what developers can do and threatens that developers might sue if they don't get to build as many units as originally planned. Hmm..... Isn't the point of including performance standards to hold developers accountable? And, should developers not be performing to the standards, isn't the point to restrict further development until all problems are corrected? Why does Permit Sonoma consistently appear to care much more about developers making money than about the community and wildlife who have to live with the negative consequences of overdevelopment? Could it be the County is so enamored by the idea of future property taxes from all the new development included in the "preferred plan" rolling in year after year that the HPA, the environmentally superior alternative, is not even considered a viable option?

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