

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

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ENGINEERING

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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

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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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									

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Services Land Use Category									
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	-	-	-	-	-
Transportation, Energy, Public Facilities Land Use Category									
Dispatch Facility	-	-	P	P	P	-	-	-	-
Low Temperature Geothermal Resource Development	-	-	-	-	P	-	-	-	P
Parking Facilities	P	P	P	P	P	P	P	P	P
Public Safety Facilities	P	P	P	P	P	-	P	-	-
Public Utility Facilities	-	-	-	-	P	-	P	P	P
Renewable Energy Facilities	P	P	P	P	P	P	P	-	-
Telecommunications Facilities	-	-	-	-	P	-	-	-	-
P Permitted - Not Permitted C Conditional Use Permit									

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
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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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