



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.”?



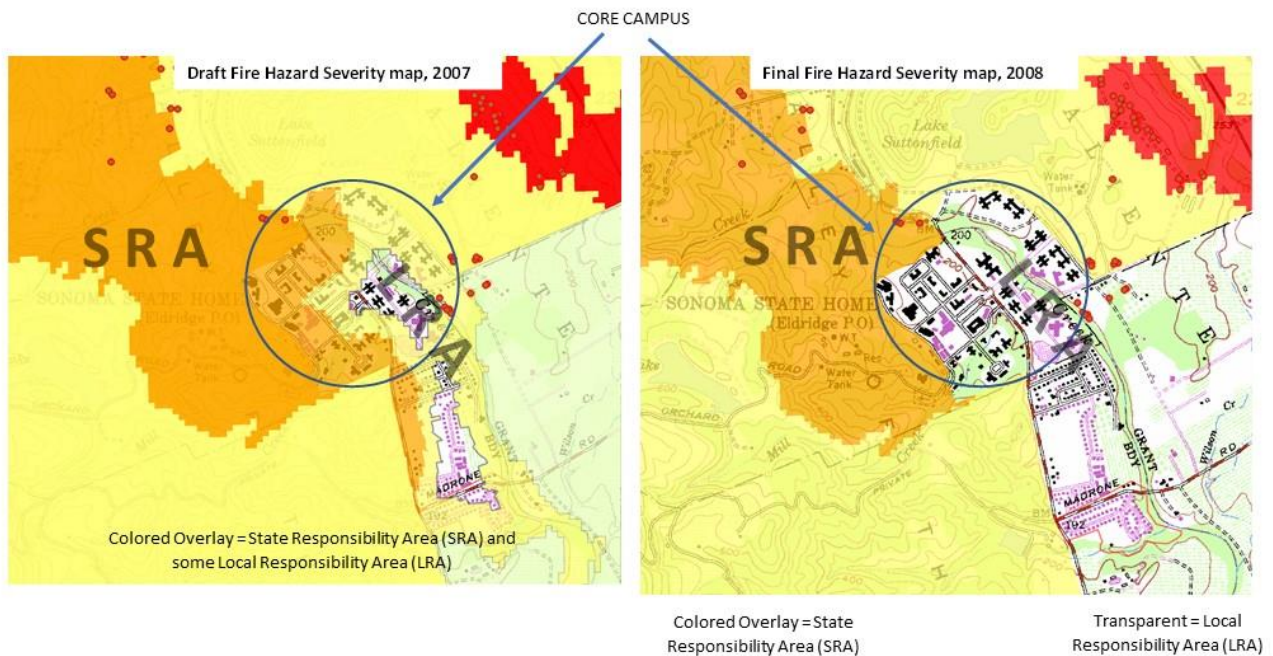
4. In addition, the Sonoma County Community Wildfire Protection Plan Update 2022 (referenced in the DEIR, 16.1.1.3. Regional and Local Regulations, p. 496) states that: “Wildland fires that start in the woods and spread into adjacent areas with relatively dense housing often result in the greatest losses 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