

September 21, 2022

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

Re: Comments on Draft EIR and Specific Plan for SDC

Dear Mr. Oh,

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

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

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

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

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

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

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

I request that you please:

- 1) Analyze current studies relating to riparian protection, wetlands protection, and related groundwater sustainability to conform to State and County climate goals and best environmental practices.
- 2) Set goals and policies for protection.
- 3) Cite studies used to support your decisions on creek buffers, wetlands incursions, wildlife travel, and lake protection.
- 4) Analyze the cumulative impacts and potential degradation of floral and faunal habitats, groundwater supply, and riparian zones caused by the increased housing density, noise, construction, traffic, and demolition proposed under the Preferred Plan. Provide analysis of the impacts of redevelopment on

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

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

migratory fish species, such as coho and steelhead salmon. Also analyze whether these impacts would be mitigated by a smaller redevelopment such as the HPA.

- 5) In the DEIR, add creeks/riparian zones and wetlands to goals, significance criteria, and section 3.1.3.3 relevant policies, implementing actions, and policies. Note that in section 3.4.1.3, local land use regulations, Sonoma County General Plan 2020, the DEIR mentions policy LU10-a for establishing maximum densities and siting standards for wetlands, sensitive natural communities, and areas of essential habitat connectivity, yet the same DEIR offers none of these.
- 6) Adhering to the above studies, delineate—in both the Preferred Plan and the DEIR—clear boundaries for riparian setbacks, identify the entities that a developer must work with to facilitate creek and wetland protection, or explicitly require a developer to ensure that redevelopment of the core campus be done in such a way, and with sufficient buffers, as to protect the natural values of the open space.
- 7) Add specific, enforceable guidelines for riparian and wetland protections, specifying acreages and minimum boundaries on both the east and west sides of Arnold Drive, and limit allowed uses on these acreages to passive recreational uses such as hiking, mountain biking, horseback riding, photography, etc. If agricultural or commercial uses are permitted, ensure mitigations are identified and enforceable.
- 8) Please make sure that policies in the Specific Plan are consistent in Wildlife Corridor Policies (p40), People/Wildlife Interface (p 41), and policy 2-25 (p 42).
- 9) Please ensure that policies in the DEIR, notably policies 2-21, 2-23, 2-25, 2-27, and 2-30 are consistent.

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

Sincerely,

Meg Beeler

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

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

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

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