

# Vicki A. Hill

## Land Use and Environmental Planning

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Office: (707) 935-9496

Email: vicki\_hill@comcast.net

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RE: Comments on Sonoma Developmental Center (SDC) Draft Specific Plan EIR and Draft Specific Plan

Dear Staff, Planning Commissioners, and Consultant Team,

This letter contains my comments on the Draft Environmental Impact Report (DEIR) for the SDC Specific Plan and on the Draft Specific Plan (proposed plan) itself. Thank you for considering and responding to these comments and sharing them with the planning team.

I agree with and support the comments submitted by the Sonoma Land Trust (SLT). Also, I agree with and support the comments identified in the North Sonoma Valley MAC comment letter. In addition to the issues identified in those two letters, I have submitted comments to the County Landmarks Commission and the County Planning Commission – the comments in both these letters (attached at the end) are hereby incorporated by reference and should be addressed in the Final EIR.

Overall, as a 30 plus year land use planner and CEQA specialist, I am disappointed with the failed process to prepare a plan that represents at least a modest amount of responsible land use planning, mindfulness of site constraints, and community input. Sonoma Valley residents, including the community surrounding SDC, supports housing, especially affordable housing. However, there is no support for the high-density scale reflected in the proposed plan, which would double the size of the existing semi-rural community. At even half the proposed size, the project would represent the largest development in Sonoma Valley in decades. The plan reads as if it belongs in an existing urban area in a city and does not reflect the rural character and special qualities of the site and surrounding area that are valued by residents and visitors. The proposed plan does not reflect a “community-driven” process - it fails to incorporate a moderate scale that was requested by the vast majority of public comments over the past two years. The plan also lacks many mitigating policies that were requested multiple times.

The DEIR is fundamentally flawed, as outlined in my comments below. Overall, the DEIR reflects a bias towards the proposed dense development and tends to dismiss the proposed plan’s environmental disadvantages when comparing it to other reduced-scale alternatives. Many comments from wildfire experts have already been submitted and I share their concerns, having had to evacuate twice from my home. Revisions to both the EIR and the Specific Plan are necessary to address these potentially significant impact issues and to develop a more balanced plan that will reduce significant impacts.

**GENERAL EIR COMMENTS** – Please respond to each of these concerns

- 1. Deferral of analysis** – In many topical areas, the DEIR states that sufficient details are not available to conduct the environmental analysis and that the analysis will occur when individual projects are

proposed. However, many of the projects will not be subject to CEQA due to exemptions provided once the Specific Plan is completed. Therefore, this deferral is not adequate.

2. **Minimization of impacts** - The DEIR assumes plan policies will mitigate impacts, but the feasibility of these policies is unknown (such as increasing transit and building a road connection to Highway 12) and many policies are unenforceable. So, the DEIR grossly underestimates the impacts. The DEIR is clearly result-driven.
3. **Skewed Alternatives Comparison** - The DEIR identifies the Historic Preservation Alternative as environmentally superior, but then dismisses advantages of this smaller alternative and incorrectly claims that impacts of the proposed plan and the Historic Preservation Alternative are “comparable.” Some mitigating components (e.g., widening creek corridors) were arbitrarily excluded from the Historic Preservation Alternative, making it look worse than it is. For a fair unbiased analysis, the alternatives must be evaluated in an “apples to apples” comparison to the proposed plan, using the same or similar assumptions about project components that offer mitigation.
4. **Environmentally Superior Alternative Should Be Selected:** Given the sensitivity of the site, the onsite wildlife corridor, surrounding open space, rural location, wildfire risks, and guiding principles, both a reduction in the number of homes and substantial reduction in commercial development size should be the preferred plan. A reduced-size alternative is the only way to mitigate the many significant impacts of the proposed high intensity project. Design guidelines will not mitigate the impacts. The market study did not identify a high demand for non-residential development. The Historic Preservation Alternative, while not ideal, is the only alternative that presents a level of land use development at a scale compatible with the site, surrounding rural lands, and overall Sonoma Valley character. There has been an overwhelming number of public comments requesting a smaller alternative.
5. **Comparison to Previous SDC Use:** The continued argument that the SDC property should be able to accommodate thousands of residents and workers because it used to house and employ thousands of residents and workers is not valid. Nor is it valid to compare existing building square footage to proposed square footage, in an attempt to justify the proposed plan and minimize impacts, as it is the proposed use (not necessarily footprint) of the buildings that drives most of the impacts. The reason this comparison is invalid is as follows:
  - a. As an institution, SDC tread very lightly on the environment and adjacent community. At its most populous, most of the residents of SDC did not leave the property. They did not drive cars, they didn’t go offsite to schools, doctors, restaurants, etc.
  - b. Vehicle trips were primarily limited to employees who worked three shifts so that traffic was spread out, rather than concentrated at peak hours.
  - c. Because of the limited outdoor activities and absence of constant vehicle traffic onsite, people and cars did not interfere with wildlife movement; the campus was open, peaceful, and not occupied with uses that generated a substantial amount of traffic (e.g., hotel, restaurants, etc.).
  - d. There were no retail uses drawing visitors and vehicles to the site.

e. It should also be noted that employment and resident numbers at SDC reached a peak during a time over 50 years ago when there was very little cumulative growth in Sonoma Valley and both Arnold Drive and Highway 12 were still well-functioning roadways.

**6. Lack of supporting evidence** – Throughout the DEIR, conclusions and assumptions are made without providing supporting information, thus providing no rationale or transparency.

**7. Project Scale is Source of Significant Impacts and Failure to meet project objectives:** The proposed plan's size and scale contradicts the County's transit-oriented growth and land use policies; and is inconsistent with its own guiding principles, failing to balance development with resource and historic protection. Another SDC Specific Plan guiding principle directs the plan to balance redevelopment with existing land uses and calls for looking at how uses fit the character and values of the site and surrounding area, as well as benefit local communities and residents. It does not appear that the proposed project abides by this principle. Regardless of whether the housing is low, medium, or high density, it's the total amount of housing and commercial development that is particularly important in evaluating the project. The community will not benefit from clogged roadways and increased fire risks and evacuation delays.

Because of its size, the project will have significant impacts in both transportation and historic resources, but no mitigation is offered in the way of downscaling the size to reduce these impacts. There is no way that the site can provide all the goods and services needed for this large population. To try to provide that undermines the function of the surrounding open space and destroys the semi-rural character of the existing community on both sides of the site.

**8. Missing Project Phasing and Performance Standards** –

- a. The proposed Specific Plan is missing mandatory phasing requirements that would help mitigate impacts. The phasing components of the proposed Specific Plan are advisory only and not enforceable. There is no guarantee that the needed housing will be developed before the hotel or other commercial uses. There is nothing stopping the future landowner from building the hotel first, which would be contrary to the project objectives.
- b. Affordable housing should be prioritized in a mandatory phasing plan.
- c. The project description needs to identify a project phasing plan to address all the demolition and remediation that will need to occur, as well as site preparation, infrastructure repairs, etc. This plan needs to be fully evaluated in terms of impacts on traffic and roadways, wildlife and open space resources, and surrounding land uses (noise, emissions, glare), etc.
- d. Project phasing should be tied to performance standards. There are no performance standards to gauge or monitor project impacts. Since many of the future impacts are unknown and feasibility of some policies is unknown, performance standards are needed to ensure that future development can be modified if policies or mitigation measures are not effective. For example, biological surveys should be required to monitor how well wildlife adapts to demolition, construction, and new land uses. If it becomes clear that the wildlife corridor is being adversely impacted, additional measures and design features could be implemented to reduce impacts before proceeding with additional development phases. VMT and roadway congestion thresholds should also be established and traffic impacts mitigated to the maximum extent feasible before continuing with buildout. Performance standards could be developed for each environmental resource area.

**9. Flawed Market Demand Study** – The market demand study prepared in 2020 for the SDEC Background Report and the Alternatives Report that preceded the DEIR was updated via a short memo (July 14, 2021), with assumptions that were never reviewed by the public or peers. The update was to attempt to justify larger housing numbers, using a straight-line projection over the next 20 years. This updated study was then used as the basis for including and defending the proposed 1000 homes in the proposed Specific Plan. However, there is no justification for the projections methodology, which is over-simplified. There is no evidence that housing demand in Sonoma Valley will increase at the rate presented in the updated market study. This “update” to the market study cannot be used as a basis for the housing in the proposed plan.

## **DETAILED DEIR COMMENTS**

### ***DEIR EXECUTIVE SUMMARY***

**Page 3**, “...does not mandate that the State will accept the outcome of the County-driven process...” – This statement implies that somehow the State has jurisdiction over the approval of the Specific Plan. It does not have any Specific Plan approval authority and this misleading wording should be stricken. The County planning process does not require approval from the State. Whoever buys the property from the state will be bound by the Specific Plan. This type of wording has been used by the County as a thinly veiled threat to the community that if we don’t accept the County’s plan, the state will enact a far worse redevelopment.

**Page 3**, “The Planning Area includes all SDC property, encompassing approximately 945 acres –which includes a developed Core Campus covering approximately 180 acres, the 755 acres of contiguous open space, and the 11-acre non-contiguous Camp Via grounds within Jack London State Historic Park.” Is this planning area equivalent to the study area for the EIR? The study area should go beyond the site itself and must be clearly defined for each impact topic.

**Page 7, Buildout:** “Buildout projections of this EIR do not include the total amount of potential development that could be accommodated by the Proposed Plan; rather, the buildout outlines the most likely development that would occur by 2040, including additional bonus housing units that would result from provision of affordable housing as mandated by the Proposed Plan.”

Basing the DEIR analysis on this assumption of the “most likely development” is insufficient and is not supported by any evidence that this level of development is the most likely scenario. The DEIR underestimates the overall impacts because it does not evaluate the reasonable worst case buildout scenario. The DEIR must evaluate a reasonable worst case of development to ensure that all potential impacts are identified.

**Page 7, Buildout:** “The Proposed Plan is anticipated to result in a total buildout of approximately 2,400 residents, 1,000 housing units, and 940 jobs.” This does not clarify whether this is the total maximum buildout or the “likely development” referenced in the previous paragraph. Looking at the

minimums/maximum table in Chapter 4 of the plan shows that over 1200 units could be built and that doesn't even include bonus densities.

**Page 7, Areas of Controversy:** "Many members of the public expressed opposition to new housing development in the area..." This appears to be another attempt to paint the community as NIMBYS. This statement is not true, which I can say after listening to hours of public testimony and reading countless comment letters. This statement must be modified to note that people support housing, especially affordable housing, but are opposed to the large number of houses, especially the large number of market rate housing, based on the fact that the site is outside of the urban growth boundary and not along a transit corridor.

**Page 11** acknowledges that "the market demand for non-residential uses (with the exception of a hotel) is limited and higher employment levels will reduce financial feasibility." Yet, the DEIR still analyzes a proposed plan with more than 900 jobs, which detracts from financial feasibility and substantially contributes to significant impacts. What is the basis for this high amount of commercial development?

**Page 11, Reduced Alternative** – The text states that this alternative would be less economically viable – what does that mean? Is it viable or not? There is no provision in the state legislation or in the project objectives to maximize economic viability. Yes, the plan must be feasible but it does not need to maximize financial gains.

**Page 12, Historic Preservation Alternative** – There is no basis given for only a partial reduction in jobs - why not reduce the jobs proportionately? With 600 jobs, it would be heavier on commercial development than housing, when in fact the State has prioritized housing, not commercial development.

**Page 14, Environmentally Superior Alternative (also in Section 4.5):** "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." This statement is incorrect and misleading for several reasons.

- To say that the proposed plan's impacts are "largely comparable" to the impacts of other alternatives is seriously flawed. The types of impacts may be the same, but the magnitude of impacts is much less under the Historic Preservation Alternative, with the substantial reduction in buildout. This needs to be acknowledged and corrected throughout the EIR. The Historic Preservation Alternative, in addition to reducing historic resources impacts, would substantially reduce impacts in the issue areas of traffic, biological resources, land use, noise, visual, air quality, Greenhouse Gas emissions, and public services. Traffic impacts may still be significant, but they would be much less severe in the Historic Preservation Alternative.
- It is reasonable to assume that impacts across the board would be reduced with a smaller development.

- The way the Historic Preservation Alternative is crafted, it excludes components that allow a fair comparison between it and the proposed plan. For example, widened creek corridor setbacks are included in the proposed plan but arbitrarily excluded from the Historic Preservation Alternative, resulting in a conclusion that this alternative would cause greater biological impacts. Corridor setbacks could be easily incorporated into the Historic Preservation Alternative in most locations. The connection to Hwy 12 is also excluded from this alternative, thus making the traffic impacts greater. This alternative (or the proposed plan) must be modified to include the same impact-reducing features such as creek corridor setbacks, roadway connections, etc. to at least provide a fully transparent, apples to apples comparison. If properly compared, the impacts in biological resources and wildfire risks would be reduced compared to the proposed plan.
- The Historic Preservation Alternative would support multiple key project objectives, including significantly increasing housing supply with the largest housing project ever in the Sonoma Valley; contributing to community vibrancy and long-term fiscal stability; AND reducing both traffic and historic resources impacts, as well as other impacts. The DEIR provides no supporting information to substantiate the claim that the Historic Preservation Alternative would not support key project objectives.
- There is no basis for the claim that the Historic Preservation Alternative would not achieve long-term fiscal stability similar to the proposed plan.

## **EIR MAIN BODY**

**Page 41, Section 1.1.1, Purpose:** One of the purposes of the DEIR is stated as: “To recommend a set of measures to mitigate any significant adverse impacts.” Yet, there is no mitigation included in the DEIR. Even in the two significant impact areas, no additional mitigation is recommended although there is feasible mitigation. For example, the proposed hotel size could be reduced, or the overall development size could be reduced to minimize environmental impacts.

**Page 43, Scope of EIR:** “...nor does it assess project-specific impacts of potential future projects under the Proposed Plan, **all of which** are required to comply with CEQA and/or the National Environmental Policy Act (NEPA) as applicable.” This statement contradicts statements elsewhere that indicate that most, if not all, future development will be exempt from CEQA due to streamlining provisions. Please clarify which individual projects will be subject to environmental review. Even if project-specific impact assessment is not possible at this stage, it is feasible to assess the types and magnitude of impacts of buildout and to identify appropriate types of mitigation measures. This has not been done in the DEIR.

**Page 47:** “Subsequent to certification of the Final EIR, the Board of Supervisors may approve the Proposed Plan.” Isn’t it possible for them to approve one of the alternatives, as well? Please clarify.

**Page 51,** “In addition, the Proposed Plan includes amendments to the County’s General Plan and Zoning Code.” The DEIR is incomplete in that these proposed amendments, particularly the zoning code amendments, are not included in the plan or DEIR project description.

**Page 51, Location:** The description of the project location is erroneous in claiming that it is between Glen Ellen and Eldridge, as if it will not disrupt these two communities. Why does the County insist on

continuing to ignore the neighborhood south of SDC and call it Eldridge? It is part of Glen Ellen and the SDC site is in the middle of Glen Ellen, dividing it. Furthermore, there's nothing in the text noting that this location is OUTSIDE of an urban growth area, which is an important land use policy consistency issue.

**Page 53, Planning Area:** Sonoma Valley Regional Park is not located to the south of the SDC site.

**Page 53, Section 2.1.2.1, Land Use:** "...designed in a relatively compact footprint within the expansive grounds to maximize the benefits of the tranquility and peacefulness of the site." These tranquil features are at the core of the existing land use pattern and must be considered in assessing the proposed plan's consistency with County land use policies, the proposed plan objectives, and Glen Ellen Design Guidelines.

**Page 55, Section 2.1.2.3, Environmental Resources and Natural Setting:** This section fails to discuss the critical wildlife corridor that covers the entire property.

**Page 57, Water:** The text states that the water system components "have the capacity to provide drinking water, irrigation, and fire suppression to a resident population in the neighborhood of 6,600 people." Please cite the source of this statement and provide documentation to support it. Also, if the water system is going to be restored to service this number of people, this growth-inducing impact needs to be evaluated in the DEIR.

**Page 58:** "...WTP is in relatively good condition." This conclusion is not supported by any analysis. Assessments in earlier reports indicated problems with the system.

**Page 61:** "SDC was the valley's largest employer until it closed." Please provide documentation to support this statement. Employment at SDC dropped off dramatically in the past 10 years before closing, as the client population was reduced.

**Page 68, Section 2.4.3:** "It also aims to improve multi-modal access from the SDC to Highway 12 (State Route 12 or SR 12) by exploring the feasibility of constructing an additional east-west emergency access connection from the site." This makes the connection to Hwy 12 sound very tentative and, therefore, the road connection cannot be assumed in the DEIR analysis. It is not known whether this roadway is feasible or could be permitted by CalTrans.

**Page 71:** "8 to 30 units per gross acre and a maximum FAR of 2.0" – This is a very broad range – what was assumed for the EIR analysis?

**Page 72:** Institutional Use: FAR of 2.0 – There is no discussion of the acreage provided for this category so the project description is incomplete.

**Page 72, Buffer areas:** Who will be responsible for maintaining these buffer areas and ensuring they are fire resistant and appropriate for wildlife use?

**Page 73, Hotel:** 120 rooms is entirely out of scale for this rural location, outside of an urban growth area and within a high fire risk area. This use will substantially increase VMT, hamper wildfire evacuation, and generate the need for other goods and services demanded by clientele at such a high-end hotel. The community has been very vocal about not turning SDC into a tourist destination. How does this fit in with a primarily residential area and lower income residential population? Furthermore, there is nothing in the state legislation calling for a large-scale hotel. This use was not adequately analyzed in the DEIR.

**Page 73, Section 2.4.4.1, Core Campus Districts:** There is no documentation or analysis of how these districts fit in with the surrounding land uses on neighboring lands. It is not clear how these districts comply with the fundamental objective of the project:

“Balance Redevelopment with Existing Land Uses. Use recognized principles of land use planning and sustainability to gauge how well proposed land uses protect public trust resources and fit the character and values of the site and surrounding area, as well as benefit local communities and residents.”

What benefits are provided to the surrounding and neighboring Sonoma Valley communities?

**Page 77, Build Out:** “While the project buildout projection reflects a reasonably foreseeable maximum amount of development for the Planning Area through 2040, it is not intended as a development prediction or cap that would restrict development in any of the five subareas.” This statement contradicts other statements about buildout assumptions. Doesn’t the plan need to have a development cap? The DEIR needs to identify the maximum buildout for each land use and then analyze that maximum development scenario.

**Table 4-2, DEIR assumptions regarding buildout:** Table 4-2 in the Specific Plan lists the minimum and maximum number of housing units for each district. The maximum totals 1210 and the table footnote states that this number does not include additional county and state density bonuses. Density bonuses are likely to occur and are reasonably foreseeable. Therefore, the EIR substantially underestimates the full project impacts by more than 200 units or 20 percent of the project.

**Arnold Drive Overlay:** Figure 5.3-1 in the Specific Plan shows maximum building heights of 45 feet in the historic core, right up to Arnold Drive. This height contradicts the proposed policies for Arnold Drive and conflicts with multiple requests to maintain the open feel of Arnold. This is a significant visual impact.

**Page 81,** “This EIR serves as the environmental document for all discretionary actions associated with development under the Proposed Plan.” This statement implies that all development will be exempt from CEQA and contradicts the statement noted on page 43. Please clarify these contradicting statements and document what projects will and will not be subject to subsequent CEQA. The road connection, for one, will not be exempt. Is the site in a designated “transit-priority area”?

### ***Section 3.1 Aesthetics***

**Section 3.1.2, Environmental Setting:** The description fails to discuss the existing scenic landscapes created by the former SDC. Broad lawns and vistas to both the east and west mountain ranges exist within the campus and along Arnold Drive and these scenic vistas need to be acknowledged. The



campus was intentionally designed to provide open spaces and extensive landscaping between buildings to establish a calming, tranquil environment for the clients. Please include this information in the setting and include an assessment of these visual features in the impact analysis.

**Page 103:** “Given that construction will be clustered only in the previously developed Core Campus and that new development will keep with the overall scale and development height variation of the current SDC campus, adverse effects on the scenic vistas of SR 12 on the eastern edge of the Planning Area and the scenic landscape unit on the western edge of the Planning Area would be less than significant.”

There is no guarantee that new development will be required to comply with the advisory goal of keeping with the overall scale and development height of the current SDC campus so compliance cannot be assumed. This conclusion fails to acknowledge the increased density and overall increased number of buildings at higher heights than existing, not in keeping with surrounding land uses. The proposed plan will not maintain the large internal open space expanses. This impact analysis also fails to address the impacts on scenic vistas of Sonoma Mountain and the Mayacamas along Arnold Drive.

**Page 104:** “With adherence to existing and proposed policies and standards, development of an SR 12 connector under the Proposed Plan would ensure that damage to scenic resources along SR 12 would be less than significant.” But many of the proposed policies are not mandatory and therefore cannot be assumed in the analysis.

**Page 104, impact 3.1.3:** The analysis states that the site is nonurbanized but fails to acknowledge the significant impact that will occur as a result of the proposed urban development plan – it represents a significant change in visual character. Instead, the analysis attempts to justify the project because it will create a new vibrant community. How does creating a “vibrant” community protect rural scenic qualities? The proposed plan’s urban features are in direct conflict with rural scenic resources, both onsite and on surrounding properties, especially since SDC is in the middle of the rural village of Glen Ellen.

**Page 104, impact 3.1.3:** The analysis fails to address the fact that the introduction of new modern, urban architectural features will significantly impact existing historic visual character of the campus and surrounding land uses. There is no discussion of impacts on surrounding land uses. What policies will ensure that architecture blends in with surrounding land use character?

**Consistency with Glen Ellen Development and Design Guidelines:** There is no mention of these existing guidelines that address Glen Ellen. How does the proposed redevelopment conform to these existing guidelines?

### ***Section 3.3 Air Quality***

**Page 167, Construction:** The analysis fails to mention or address demolition impacts, which will be substantial.

**Page 167, Construction:** Even though this EIR is programmatic, the deferral of construction impact analysis is not acceptable. There is substantial information available to develop reasonable demolition

and construction scenarios. The aggregate dust and toxic air contaminants released from demolition activities must be analyzed because the amount of demolition will be enormous.

**Page 169:** “Furthermore, because the SDC facility has been closed since 2018, there has been no change in the amount of development or types of land uses in the Planning Area between 2019 and 2022 – meaning that the 2019 baseline year conditions are comparable with existing conditions as of the release of the NOP for this EIR.” Please define both the Planning Area and study area for the air quality analysis. Is the Planning Area the same as the study area? The study area for air quality should include the surrounding community. Please provide evidence to support the conclusion that there has been no change in development. As a local resident, I can verify that conditions have indeed changed since 2019. In 2019, Glen Ellen had just lost 180 homes. These homes are still being rebuilt, as of 2022 and many empty lots are waiting to be rebuilt. There continues to be demolition, site-grading, and construction.

**Relevant Proposed Policies:** There are no mitigating policies for reduction/avoidance of demolition impacts on air quality or GHG emissions.

**Page 183, VMT:** It is incomprehensible that VMT would increase by less than 1000 as a result of the proposed plan, with so much new development and the introduction of thousands of new residents. The SDC site’s location outside of an urban area will necessitate vehicle use for daily goods and services. Because the VMT is grossly underestimated, the air quality and greenhouse gas analysis both underestimate impacts and must be revised.

**Impact 3.3-1:** The DEIR impact analysis relies on proposed plan policies to reduce air quality impacts and conform to the 2017 Clean Air Plan. Some of these policies are enforceable, and the feasibility of several policies has not been determined. For example, relying on multi-modal transportation to reduce VMT is unrealistic given the site’s rural location and lack of existing or planned frequent transit service. There are no schools within walking distance, nor are there doctors’ offices, hospitals, farm jobs, or winery jobs. People will be required to drive on a daily basis, most likely to Santa Rosa, Sonoma, or Napa.

Also, there is no discussion of the massive amounts of demolition and associated emissions that will occur to develop a plan of this size.

**Impact 3.3-2:** The DEIR claims that construction impacts cannot be assessed at this time. How will these impacts be assessed if future projects are exempt from CEQA?

**Page 200, Impact Summary:** “Future development would be subject to individual review; new sources would be evaluated through the BAAQMD permit process and/or the CEQA process to identify and mitigate any significant exposures.” This deferral of analysis and mitigation measures is not acceptable, especially since future projects may be exempt from CEQA and many uses will be allowed by right. The DEIR should at least require a buffer between new development at SDC and existing residential uses adjacent to the southern boundary, as mitigation for future potential impacts.

**Missing Analysis:** The DEIR fails to analyze the numerous types of land uses permitted under the proposed plan that will involve toxic emissions, such as fertilizer plants and laundry facilities.

### ***Section 3.4 Biological Resources***

**Missing Species:** The wildlife species list is missing Bald Eagle, observed multiple times at the Lake Suttonfield reservoir.

**Missing Analysis:** Impacts on wildlife movement through the campus are not discussed in the EIR. The campus itself is part of the wildlife corridor. Proposed development will result in far more activity within the campus than ever existed, even during SDC's peak operation. There will be significant impacts on wildlife movement from the introduction of thousands of people and vehicles. Furthermore, there is no overall prohibition or restrictions on fencing within the campus so wildlife will likely be blocked from movement through the campus. The proposed fencing policies refer to the open space and campus interface areas, not the campus itself.

### ***Section 3.5 Cultural Resources***

**Page 295:** "Furthermore, at the time when rehabilitation projects for these two individual historic resources or new work immediately adjacent to the historic resources are proposed, the project-level CEQA document would need to identify potential impacts to historic resources." This conclusion is flawed in that it attempts to defer necessary impact analysis. Again, many future projects will be exempt from CEQA so there will be no way to analyze potential impacts and develop appropriate mitigation measures.

### ***Section 3.10 Land Use Analysis***

**Page 321, Land Use Impact Analysis:** The DEIR states that the proposed policies will be incorporated into the zoning codes that will be concurrently adopted by the Board. Where are the proposed amendments to the Zoning Code? Don't they have to be specified in an official proposed zoning code amendment and analyzed in this DEIR in order to proceed with adoption?

**Page 317, Impact 3.10-1:** The DEIR claims that there is no impact associated with physically dividing an established community. This conclusion is in error. There is no discussion of the fact that the proposed dense development, which is in effect a new city, is in the middle of the existing semi-rural village of Glen Ellen. There have been many references to the proposed development as a self-contained "closed community" - this indicates that it will indeed cut off the two parts of Glen Ellen. The massive size and scale of the proposed plan will certainly divide Glen Ellen. There is no attempt to integrate the land uses on the site with neighborhoods to the north and south because the large amount of proposed commercial development is basically inconsistent with the nearby residential and semi-rural village uses. Instead, the proposed plan will create gridlock on Arnold Drive, preventing local residents from passing from one side of the village to the other side. The previous low-intensity institutional use did not create a barrier or divide the community.

### ***Impact 3.10-2, General Plan Policy Consistency Analysis***

The Sonoma County General Plan (GP) contains many policies aimed at preventing urban sprawl and encouraging development within or adjacent to urban growth areas. The high-density development proposed for SDC is neither within nor adjacent, or even near, urban growth boundaries. Furthermore, all the land around it is within a community separator. As such, the proposed plan's size and scale is in direct conflict with County General Plan policies and therefore, the plan's project description is inconsistent with the General Plan. These existing policies still apply to the SDC site and will not be replaced by the Specific Plan. As noted on Draft EIR page 312, under CEQA, if a proposed project conflicts with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, then a significant land use impact would occur.

The DEIR analysis of consistency with existing policies, contained on pages 319 to 321, does not address individual policies and fails to address the many significant impacts associated with policy conflicts. Furthermore, by failing to identify impacts, it fails to recommend mitigation measures (such as downscaling, reducing overall density and bulk, etc.) to reduce these major conflicts. This DEIR land use section includes conclusions without providing any analysis or evidence to support the claims that the proposed plan is consistent with the General Plan policies. Instead, it ignores the relevant policies and concludes that the project is consistent and no mitigation is required. The analysis of this land use impact must be revised to address each applicable General Plan policy and any other existing relevant policy.

**Page 321**, DEIR states:

“Further, the Proposed Plan retains the overall land use framework of the General Plan with some targeted changes to promote economic development and appropriate residential and commercial infill development in the Core Campus. The Proposed Plan's land use designations (see Figure 3.10-3) are generally consistent with those in the General Plan, although they differ in some instances. In these limited exceptions, the Proposed Plan's designations differ from the General Plan in order to more accurately reflect either the existing zoning or current use on the property. While the Proposed Plan does include some targeted changes to land use designations, these changes are generally consistent with the General Plan vision of supporting transit-oriented residential and commercial development, encouraging new retail opportunities, and preserving open space.”

This paragraph is full of inaccuracies and misleading statements. Placing high density development in a semi-rural area does NOT retain the overall land use framework of the General Plan in Sonoma Valley. It is not an infill site in an urban area. The Proposed Plan's high density land use designations are not consistent with General Plan designations outside urban growth areas. The statement that the Proposed Plan's designations differ from the General Plan in order to more accurately reflect existing zoning or current use on the SDC site is completely erroneous. The site is zoned Public Facility and the current use is vacant. The prior use was an institution, not a high-density urban residential and commercial community. This is not a transit-oriented development site (not along a major travel corridor in an

urban area, with existing frequent transit service) and is inconsistent with General Plan policies regarding transit-oriented development.

The following policy conflicts would occur, as a result of the proposed plan. These policies need to be addressed in the DEIR. It is likely that there are other relevant policies not listed below that need to be analyzed as well.

#### OPEN SPACE/AESTHETIC POLICIES

*Goal OSRC-1: Preserve the visual identities of communities by maintaining open space areas between cities and communities.*

*Objective OSRC-1.1: Preserve important open space areas in the Community Separators shown on Figures OSRC-5a through OSRC-5i of the Open Space and Resource Conservation Element.*

*Objective OSRC-1.2: Retain a rural character and promote low intensities of development in Community Separators. Avoid their inclusion in City Urban Growth Boundaries or Spheres of Influence. Avoid their inclusion within Urban Service Areas for unincorporated communities.*

*Objective OSRC-1.4: Preserve existing specimen trees and tree stands within Community Separators.*

*Goal OSRC-2: Retain the largely open, scenic character of important Scenic Landscape Units.*

*Objective OSRC-2.1: Retain a rural, scenic character in Scenic Landscape Units with very low intensities of development. Avoid their inclusion within spheres of influence for public service providers.*

*Goal OSRC-3: Identify and preserve roadside landscapes that have a high visual quality as they contribute to the living environment of local residents and to the County's tourism economy.*

*Objective OSRC-3.1: Designate the Scenic Corridors on Figures OSRC-5a through OSRC-5i along roadways that cross highly scenic areas, provide visual links to major recreation areas, give access to historic areas, or serve as scenic entrances to cities.*

*Objective OSRC-3.2: Provide guidelines so future land uses, development and roadway construction are compatible with the preservation of scenic values along designated Scenic Corridors.*

*Goal OSRC-4: Preserve and maintain views of the nighttime skies and visual character of urban, rural and natural areas, while allowing for nighttime lighting levels appropriate to the use and location.*

COMMENT: The above General Plan policies point out the importance of maintaining rural landscapes and land uses and protecting the very qualities that make Sonoma Valley attractive to residents and visitors. The intensity and density of uses in the proposed Specific Plan are contrary to these policies. Implementation of the proposed plan will not preserve the scenic values of the Arnold Drive and Highway 12 scenic corridors. The visual identity of Glen Ellen and Sonoma Valley will be permanently altered.

COMMENT: Arnold Drive is a designated scenic corridor. It serves as a scenic component of the village of Glen Ellen; it provides expansive views of both the Mayacamas and Sonoma Mountain; it instills a sense of calm and peacefulness with its beautiful large mature treescape. The proposed land uses, development and new roadway construction will NOT be compatible with the preservation of scenic values along this scenic corridor. The policies in the proposed plan do not protect these scenic values, as the plan allows tall out of scale buildings adjacent to Arnold, inconsistent with existing land uses on the site and nearby developed properties. Figure 5.3-1 (Specific Plan) shows maximum building heights of 45 feet in the historic core, right up to Arnold Drive. The policies intended to protect qualities are “should” statements rather than shall statements. Therefore, the proposed plan is inconsistent with General Plan policies intended to mitigate an environmental effect. This is a significant impact.

#### LAND USE POLICIES

*Goal LU-3: Locate future growth within the cities and unincorporated Urban Service Areas in a compact manner using vacant "infill" parcels and lands next to existing development at the edge of these areas.*

*Objective LU-3.3: Encourage "infill" development within the expansion areas of the cities and unincorporated communities.*

COMMENT: This is NOT an infill project. Infill development is within urban areas, as in “urban infill.” This site is not an edge to urban areas – it is within the semi-rural unincorporated low-density village of Glen Ellen, some distance away from urban goods and services (e.g., doctors, schools, etc.). Nor is the site an “expansion” area – it was a low-intensity institution that had very little impact on the surrounding community. The proposed plan will destroy the existing rural, scenic character of this area with massive removal of trees, highly dense construction, and urban development features. It is inconsistent with these existing General Plan land use policies.

**Sonoma County Code:** The DEIR summarizes relevant sections of the County Code: “Article 82 of Chapter 26 of the Sonoma County Code details general design review standards. The intent of Article 82 is not to stifle individual initiative, but to set forth the minimums necessary to achieve a healthful community whose property values are protected from unplanned developments. General development standards favor preserving natural topography, landmark sites and trees, views and vistas of the landscape, harmony with site characteristics and nearby buildings, and local architectural motifs. Article 82 also details general development standards that pertain to light and glare. Requirements include that the number, location, size, design, lighting, materials, and use of colors in signs are compatible with the architectural style of the structure they identify and harmonize with their surroundings. The color, size, height, lighting and landscaping of appurtenant signs and structures shall be elevated for compatibility with local architectural motif and the maintenance of view and vistas of natural landscapes, recognized historic landmarks, urban parks, or landscaping.

Article 64 of Chapter 26 of the Sonoma County Code outlines the purpose and development criteria for the Scenic Resources Combining District which applies to the Planning Area. The purpose of this district is to preserve the visual character and scenic resources of lands in the county and to implement the provisions of Sections 2.1, 2.2 and 2.3 of the General Plan Open Space Element. Article 64 provides

specific provisions that impact development for scenic landscape units and scenic corridors within the county. Such requirements include that structures should be sited below ridgelines, be screened by vegetation, and that development should be clustered. Further, Article 64 outlines requirements regarding Community Separators which also apply to the Planning Area. Except for most of the Core Campus area, the SDC site is located within a local voter-approved Community Separator overlay that preserves lands with very low densities between communities. The Community Separators help to achieve the County's General Plan Land Use Element goal to maintain natural character and low intensities of development in open spaces between cities and communities.

The Historic Combining District (HD) also applies to the Planning Area. As stated in Article 68 of Chapter 64 of the Sonoma County Code, the purpose of the HD is to protect those structures, sites and areas that are remainders of past eras, events and persons important in local, state or national history, or which provide significant examples of architectural styles of the past, or which are unique and irreplaceable assets to the county and its communities. Alterations to existing structures and construction of new structures within historic districts shall be consistent with the historic district design guidelines adopted by the board of supervisors.

COMMENT: It appears that the proposed plan conflicts with numerous provisions of the County Code, as it will not preserve existing character and will introduce high-density development directly adjacent to designated community separator lands. Also, the proposed removal of many historic structures will violate the intent of County Code provisions.

#### TRANSPORTATION POLICIES

COMMENT: The County General Plan establishes Level of Service (LOS) standards for roadway operations. Although CEQA no longer requires LOS analysis, the LOS standards still apply to the proposed Specific Plan. The proposed Specific Plan is in direct conflict with these existing LOS standards. This policy conflict must be evaluated and disclosed in the DEIR.

#### ***Section 3.14 Transportation***

**Flawed Analysis:** The transportation analysis is deficient because of the lack of transparency, missing supporting documents, underestimation of impacts, and missing analysis. The assumptions used in the transportation impact analysis must be transparent and based on existing conditions and traffic patterns. Policies to encourage onsite jobs are not enough to reduce the impact. People will still need to drive to schools, doctors, grocery stores, etc. and commercial uses onsite and a hotel will draw visitors and generate many additional vehicle trips. It cannot be assumed that providing a jobs/housing balance will substantially reduce VMT.

**Vehicle Trip Generation:** VMT is underestimated likely because of unrealistic assumptions about transit and vehicle use. The DEIR's proposed plan trip generation estimate was developed using the SCTM19 travel demand forecasting model maintained by the Sonoma County Transportation Authority (SCTA). However, the trip generation factors used in the analysis were not included in the DEIR. Consequently, it

is impossible to evaluate the reasonableness of either those factors or the resulting trip generation estimates. This information is critical to understand and independently review the DEIR conclusions.

**Underestimation of impacts:** The transportation analysis must evaluate a reasonable worst-case scenario, meaning it should be assumed that the large amount of proposed commercial space could accommodate regional businesses that generate a high volume of vehicle trips (e.g., Amazon distribution center or large retail facility). These types of facilities are being proposed in other parts of Sonoma County.

**Missing baseline and impact analysis:** One glaring omission in the transportation analysis is that there is NO MENTION of Warm Springs Rd., which connects to Bennett Valley Road (also not addressed) and is a major commuter route between SDC (as well as Sonoma and Napa) and Santa Rosa. People and trucks use this route to bypass the congestion on Highway 12 because it's faster. The VMT on this rural, winding, two-laned roadway will dramatically increase, yet there is no analysis.

As a 30-year resident on Warm Springs Road, I can speak from experience regarding Glen Ellen traffic patterns. Arnold Drive is used as an alternative to Highway 12 for commuting between Santa Rosa and Napa, Vallejo, and San Francisco. The commuting route includes Bennett Valley Road, Warm Springs Road and Arnold Drive. It has gotten to the point of being dangerous to pull out onto Warm Springs Road from private driveways between Arnold Drive and Bennett Valley Road. The narrow two-lane winding country Warm Springs and Bennett Valley roads provide poor line of sight, and commuting vehicles drive at excessive speeds. There is no bicycle lane or even a roadway shoulder, yet it is a very popular bicycle route to avoid Highway 12 between Glen Ellen and Kenwood – literally hundreds of bicyclists use the road on some days. With the increase in traffic from the Specific Plan buildout, this hazardous roadway situation will be significantly exacerbated, yet it was not studied.

Other commuters coming from Santa Rosa use Highway 12 to Arnold Drive to bypass congestion in Boyes Hot Springs on Hwy 12. The intersections of Arnold Drive/Highway 12 and Arnold Drive/Warm Springs Road must be added to the analysis. Traffic in Sonoma Valley has dramatically increased during the past 20 years, as evidenced by congestion on Highway 12 and Arnold Drive. All studies should be conducted using current traffic counts. Traffic counts conducted in 2018 for the referenced study "Sonoma Valley Capacity Threshold Study, Draft Report" are not reflective of current conditions. This was a time period after the fires and many residents were displaced to other parts of the valley due to their homes being lost.

**Missing Analysis – Traffic Safety on Arnold Drive:** Because VMT is substantially underestimated and there is no LOS analysis (that is required by General Plan policies), there is no consideration of the traffic safety implications for Arnold Drive both north and south of the SDC site. Arnold Drive bisects the central village of Glen Ellen where commercial business and private driveways join the street and pedestrians cross back and forth between businesses. This semi-rural village will very likely experience gridlock with the addition of thousands of vehicles on a daily basis. There will be substantially increased safety risks for cars trying to turn onto Arnold Drive and for pedestrians using this segment of Arnold Drive. In effect, the increased traffic on Arnold Drive will divide the existing village of Glen Ellen. South



of the SDC site, vehicles exiting the multitude of private driveways (including the several hundred apartments just south of SDC) will have an extremely difficult time trying to turn onto Arnold Drive. The existing hazardous condition will be significantly exacerbated with the addition of project-related traffic.

**Page 409, Highway 12 Connection:** The DEIR refers to Caltrans comments regarding the proposed Hwy 12 connection, “noting that the new connector should not be designed to increase vehicular throughput, since doing so could result in induced auto travel and prior Caltrans studies have indicated that Highway 12 and Arnold Drive already have sufficient capacity to accommodate growth.” What previous studies? When? Did those previous studies anticipate the size of redevelopment at SDC? How will the new connector NOT increase vehicular throughput? By its very nature, it will increase vehicle throughput to Hwy 12.

**Highway 12 Connection:** The impact analysis assumes that the possible road connection to Hwy 12 will be implemented despite the absence of any feasibility study. The Specific Plan makes the proposed road seem tentative, which it is since it will have to undergo a lengthy CalTrans review process. It should not be assumed in the transportation impact analysis.

**Page 409-410:** “...though a feasibility analysis of the viability of future transit service increases is beyond the scope of a programmatic CEQA assessment.” The proposed Specific Plan identifies numerous policies regarding provision of transit services. How can we know if these policies are feasible and will reduce/avoid impacts if no feasibility analysis is conducted now? Infeasible mitigation policies cannot be assumed to reduce impacts.

**Page 410:** Where is the following referenced traffic study available for review: Focused Traffic Operation Analysis for the SDC Specific Plan, W-Trans, August 2022? This report is necessary in order to conduct an independent review of the traffic numbers.

**Page 417:** “The segment of Arnold Drive between Harney Street within the Planning Area and Glen Ellen carried a daily volume of approximately 5,400 vehicles per day in 2021.” Please clarify where in “Glen Ellen” the traffic volumes on Arnold Drive were counted. Is the northern terminus of this segment at Hwy 12 or where?

**Page 417, incomplete sentence:** “To the south of the Proposed Plan area between Harney Street and Madrone Road, daily volumes in 2021 were approximately 6,200 vehicles, as compared to approximately 7,100” – when?

**Page 425:** “Areas that have a diverse land use mix and ample facilities for non-automobile modes of travel, including transit, tend to generate lower VMT than auto-oriented suburban areas.” The SDC site is an example of an “auto-oriented” location. It is not located on a transit corridor and will generate higher VMT than a site closer to an urban area.

**Page 427, Historical traffic volumes:** How is this discussion of historic traffic volumes relevant? The method to estimate old volumes is not accurate; also, this was 7 years ago, before regional growth

occurred. "...estimated to have generated approximately 3,800 vehicle trips per day in 2015 when it was fully operational." It wasn't fully operational in 2015 – the clients had dramatically decreased.

**Table 3.14.3 Traffic Volumes:** How can it be that the proposed plan results in lower traffic volumes than No Project? This makes no sense and is not valid. The assumptions for the No Project Alternative need to be revised to reflect a truly No Project scenario.

**Proposed Project Scenario** – The traffic analysis assumes construction of the Hwy 12 connection but there are no details on this connection and no project-specific CEQA analysis of the connection to satisfy CalTrans approval requirements. Therefore, this connection cannot be reasonably assumed. As requested by Planning Commissioner Carr, please redo the analysis without the Hwy 12 connection and then compare it to the Historic Preservation and other alternatives.

**Page 432, Transportation Methodology:** "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." There is no way to determine if the multiple Sonoma Valley projects that are reasonably foreseeable are included in these growth forecasts.

**Page 440:** "For informational purposes, it is estimated that the Sonoma Developmental Center historically generated approximately 3,800 daily vehicle trips, suggesting that the Proposed Plan would generate approximately 13 percent more vehicular traffic than historical uses." This type of statement skews the analysis and attempts to minimize the impacts of the proposed plan, by comparing trips to historical levels that are not relevant to current conditions. This type of bias should be removed from the DEIR.

**Internal Circulation Impacts:** The DEIR claims that there would be little or no traffic impacts resulting from internal vehicle trips at the SDC site. However, if Arnold Drive is considered part of the "internal" roadway system, this conclusion is invalid. Arnold Drive, as a major connector roadway and essential part of the internal roadway system will be adversely impacted by the large increase in vehicle use.

**Specific Plan Policy 3-27,** "Provide no free parking within campus." The EIR did not analyze the impacts of this policy. This policy must be removed from the specific plan. There will be impacts on neighboring narrow streets and restrictions on vehicular access. Furthermore, where do people park their extra cars, given that only 1 space per unit is required? Impacts on recreation users – people who can't afford to pay for parking. Also, visitors to the site? Nowhere in Sonoma Valley are there parking meters.

**Specific Plan Policy 3-30:** "Allow adjacent on-street parking spaces to apply towards minimum parking requirements." How would this work if there is no free parking on campus?

**Back-in diagonal parking** – this technique doesn't work in semi-rural areas where there are large trucks, trailers, etc. This parking configuration will have adverse impacts on roadway operations and safety.

**Policy 3-43,** "Work with Sonoma Regional Parks Department to ensure that there is adequate off-street parking for parks users on both the east and west sides of Arnold Drive, including through the use of

shared parking areas, and eliminate existing on-street parking along Arnold Drive north of the Core Campus.”

This area is not part of the campus, is it? It is in the county road right of way and is an extremely popular trail access and should NOT be deleted. People with disabilities use this parking area to access the paved pathway because it is the closest area to park to pavement. Removal of this parking area will have adverse impacts on recreation access. This policy should be removed from the plan.

### **Specific Plan Components Causing Impacts**

There are numerous proposed Specific Plan policies and components of the proposed site plan that will have direct impacts that have been underestimated. As mitigation, revisions must be made to certain plan features. Here are some examples.

**Page 4-6, Specific Plan:** “Employment uses are clustered in the northwest, creating a job center” – this is one of the most sensitive places for wildlife movement. Structures, employees, and vehicles will have significant impacts on the wildlife corridor in this area. Revisions to the plan are needed to avoid this impact.

**Specific Plan Figure 4.1-3 (FAR)** doesn’t show 2.0, which is what much of the campus will be allowed. Permitting 2.0 FAR reflects a strictly urban plan. There is no consideration of the site’s special landscape features or of its semi-rural location, or the people living in adjacent neighborhoods. The FAR should be reduced in highly visible scenic areas along Arnold Drive and in areas where wildlife movement is important.

**Specific Plan Page 4-7, Plan Impacts:** Provide an “active jobs center for the broader Sonoma Valley” – this will generate thousands of extra vehicle trips that are unnecessary to meet the project objectives. The state legislation does not mandate a job center nor is it appropriate in this semi-rural location, not on a transit corridor. This land use is inconsistent with county city-centered growth policies and should be identified as such in the DEIR land use policy consistency analysis.

**Page 4-10, Specific Plan:** Creek buffer is only 50 feet – is this adequate for protection of wildlife movement?

### **Specific Plan Permitted Uses Table 4-3 and Potential Impacts:**

- Laundry plant, fertilizer plant, etc. - These uses would result in use of highly toxic chemicals, in close proximity to homes. This impact has not been analyzed.
- Timberland Conversions – Impact 3.2-3 states that: “Further, the proposed plan does not contemplate allowing any timber harvesting activities in the area.” However, Table 4-3 of the Specific Plan allows Timber Conversions as a permitted use in both the Preserved Open Space lands

and in the Flex zone. This is a significant impact that has not been identified. Impact 3.2-3 must be modified to note this impact.

- Tasting rooms would be permitted by right in flex zone - Please remove this from the list of permitted uses. Glen Ellen and Sonoma have been overrun by tasting rooms and they do not benefit residents.
- Resort permitted by right in Hotel Overlay zone and the flex zone - Elsewhere, a hotel is referenced, which is different from a resort. Neither a resort nor hotel should be allowed by right, potentially circumventing public review and CEQA.
- Both a conference center AND a 120 -room hotel are listed as permitted uses. This combination of uses is not discussed or analyzed in the DEIR. What was assumed for VMT of these two combined uses? Why are both a conference center and a hotel allowed – this was never discussed with the community?

**Specific Plan Policy 4-3**, “Require completion of at least 10,000 square feet of retail and eating and drinking establishments and of at least 200 housing units west of Arnold Drive before beginning construction of any housing east of Arnold Drive.” This policy could hamper housing development. If the County truly wants to promote housing, why is there a condition limiting housing until at least 10,000 square feet of commercial is developed? This provision seems contrary to the purpose.

**Policy 5-K Arnold Drive Overlay**: “Along Arnold Drive, development should maintain the feel and scale of the buildings and landscape along Arnold Drive, including with a variety of building types and scales, a continuous landscape setback, activity, and views into the SDC site.”

This goal and its implementing policies must be modified to say “shall” and include provisions to protect views of Sonoma Mtn. and Mayacamas from Arnold Drive. Otherwise, there will be a potentially significant impact on both historic resources and visual resources (scenic views and scenic view corridor). There is no mention of protecting these views or the existing beautiful mature trees that line Arnold Drive. Also, existing setbacks and lower building heights must be maintained along Arnold Drive. Current proposed policies don’t provide those protections that the community has requested, repeatedly.

**Policy 5-52** “Vary building heights and types along Arnold Drive to avoid a monolithic appearance and to foster an interesting streetscape, and the existing setbacks along Arnold Drive should be maintained.”

This policy needs to be strengthened by replacing “should” with “shall.”

#### **Chapter 4 Alternatives**

**Page 529, No Project Assumptions**: “While this EIR cannot pre-judge the State’s actions, the EIR tries to frame these in light of the State Legislature’s established land use objectives for the site, per Govt. Code Section 14670.10.5. Furthermore, the State has already released a developer request for proposal for development of the site pointing to the Proposed Plan underway, and can enter into long-term ground leases with private developers—cited as a mechanism for the site in the Government Code for SDC redevelopment—so that the State retains planning control over the campus unfettered by local regulations to achieve these land use objectives, should the County be unwilling to plan and zone for these uses.”

Under the No Project alternative, it cannot be assumed that the state will take control of the site and that the county will have no land use authority. If the state proceeds with sale of the property, any private developer would be subject to county land use controls. The RFP issued by the State clearly states that the property is being offered for sale. There is nothing in the RFP referencing the possibility for a long-term ground lease with private developers. Furthermore, there is no documentation of how the EIR preparers derived the housing and job numbers for the No Project scenario. The State legislation does not specify that jobs are a high priority.

**Historic Preservation Alternative:** It appears that the Historic Preservation Alternative arbitrarily excludes some elements in order to make it look less environmentally superior. For example, the road connection to Highway 12 (for emergency response) is not included. As a result, the Draft EIR claims that the Historic Preservation Alternative has greater evacuation impacts than the proposed plan. All things being equally compared, the proposed project will have substantially greater impacts on evacuation times.

**Page 533:** “Thus, it is anticipated that some new development would occur under the Historic Preservation Alternative, and this alternative would prioritize market rate housing units over affordable housing units in order to generate adequate financial returns, undermining the State mandate and project objectives to promote affordable housing.” There is no documentation of this conclusion – please provide evidence to support this statement that market rate housing would be prioritized over affordable units. In fact, compared to current and projected construction costs for new buildings, adaptive reuse is an effective way to reduce costs. The alternative could still promote affordable housing, which may be more viable with lower adaptive reuse costs. Furthermore, there are financing mechanisms to fund affordable housing and policies can be included in the Specific Plan to promote more affordable housing.

**Page 570, Environmentally Superior Alternative:** “Overall, the Historic Preservation Alternative is the environmentally superior alternative...” The text goes on to dismiss this alternative and minimize its environmental benefits. To say that the proposed plan’s impacts are “largely comparable” to the impacts of other alternatives is inaccurate and misleading. The types of impacts may be the same, but the magnitude of impacts is much less with a reduced size alternative. The Historic Preservation Alternative, in addition to reducing historic resources impacts, would substantially reduce impacts in the issue areas of traffic, biological resources, land use, visual, air quality, climate change, and public services, if properly compared to the proposed plan. Even if reuse of existing buildings may be more expensive than new construction, it would offset the significant greenhouse gas emissions and site disruption that will result from demolition and new construction. The reuse analysis conducted by the planning team did not factor in the costs of mitigating greenhouse gas impacts, which will be substantial. Therefore, the Historic Preservation Alternative provides significant advantages over the proposed Specific Plan.

### ***Growth-Inducing and Cumulative Impacts***

**Section 5.1.1.2 Jobs/Housing Growth:** It is completely inaccurate to say that the proposed job growth of 940 jobs outside of an urban growth boundary, within the rural village of Glen Ellen is a “modest” number. The number of jobs cannot be compared to the county-wide number. Compared to jobs in Sonoma Valley, the addition of 940 jobs is significant and is growth-inducing. Commercial businesses are struggling to find employees for existing retail services so it is not clear how the EIR can claim that there is a shortage of jobs. Furthermore, the market study conducted for the Specific Plan determined that non-residential development did not generate overall revenues and was not a contributing factor for financial feasibility. As quoted in the SDC Alternatives Report (November 2021), “Commercial and industrial uses may support building construction costs but are unlikely to have a significantly positive impact on overall development feasibility.”

While there is a large demand for affordable housing in Sonoma Valley, creating over 700 market-rate homes is a significant growth-inducing impact because there is no evidence to demonstrate the existing or projected demand for this high number of market-rate homes. These housing units will not serve the existing Sonoma Valley population – they will attract people from outside the valley and outside of Sonoma County.

**Page 568, Historic Preservation Alternative, Growth Inducement:** “The Historic Preservation Alternative would result in 600 jobs, which is much lower than both the historical employment level of 1,365 employees at SDC prior to its closure, as well as jobs to fully balance the projected population and would thus not induce growth. Additionally, as with the Proposed Plan, all development will occur in already developed areas. The Historic Preservation Alternative would not induce substantial unplanned population growth in the Planning Area and the impact would be less than significant and comparable to the Proposed Plan. However, this Alternative would accommodate a lower proportion of the projected regional growth within the SDC campus, and lead to greater development pressures elsewhere in the region.”

This is not a growth-inducing impact, yet the table shows it as having a greater impact than the Proposed Plan, which is absurd. There is no basis provided for this conclusion and no evidence of regional growth projections that show this demand in Sonoma Valley. It cannot be justified that this site should accommodate a disproportionate amount of the Countywide projected growth. There is no large-scale “projected growth” for this rural area because it is outside the urban growth boundary. Growth should be placed in urban growth areas, consistent with city and county policies to avoid leapfrog development and urban sprawl.

### **TRANSPORTATION POLICIES**

The County General Plan establishes Level of Service (LOS) standards for roadway operations. Although CEQA no longer requires LOS analysis, the LOS standards still apply to the proposed Specific Plan. The proposed Specific Plan is in direct conflict with these existing LOS standards. This policy conflict must be evaluated and disclosed in the DEIR.

**DEIR Section 7.2:** Section 7.2 of the plan references additional project review but does not address any future CEQA review.

### **MISSING SPECIFIC PLAN POLICIES THAT WOULD HELP MITIGATE IMPACTS**

Despite the large number of policies in the proposed plan, there are numerous critical policy omissions. Here are suggested policy additions and modifications. These policies should be incorporated into the EIR as mitigation measures.

- Prohibit Big Box Developments – this type of development would significantly impact the site and surrounding area and draw large numbers of vehicles.
- Prohibit exclusionary fencing within the campus, in order to allow wildlife movement throughout the campus.
- Establish MANDATORY project phasing programs to ensure that housing development is prioritized over hotel and commercial development.
- Require design features to incorporate permeability.
- Establish performance standards to guide project phasing.
- Establish mandatory policies to minimize demolition impacts associated with noise, air toxics, dust, etc. This should include project phasing.

Thank you for carefully considering and addressing my comments.

Regards,

Vicki Hill, MPA

Environmental Land Use Planner

# Vicki A. Hill

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## Land Use and Environmental Planning

September 13, 2022

Sonoma County Planning Commissioners

RE: Preliminary Comments on Draft SDC Specific Plan and Draft EIR for 9/15/22 Meeting

Dear Planning Commissioners,

I am a land use planner and CEQA specialist in Sonoma County and have many concerns regarding the proposed large-scale SDC Specific Plan and the adequacy of the SDC Specific Plan Draft EIR. I am still reviewing the Plan and EIR and will submit detailed comments by the comment due date. However, I wanted to bring to your attention a few of the many issues that need to be addressed. Overall, the DEIR reflects a bias towards the proposed dense development and tends to dismiss the proposed plan's environmental disadvantages when comparing it to other reduced-scale alternatives. Substantial revisions are necessary to the EIR and Specific Plan to make the EIR adequate, under CEQA, and to create a plan that represents sound land use planning.

### **Specific Plan Scale**

The planning process has failed to result in a plan that even remotely resembles a community-supported alternative. The promised community-driven process has not occurred. Despite widespread, valid public concerns about the proposed high-density plan and the Board of Supervisors direction to evaluate a plan with 450 to 800 residential units, the proposed Specific Plan still includes an extreme amount of development (1000 plus homes, 410,000 square feet of commercial), which is totally out of scale for this location outside of an urban growth boundary and in the middle of the semi-rural village of Glen Ellen. There is no project comparable to this size in the entire Sonoma Valley. This urban sprawl development, including a 120-room hotel and potential conference center, will, in effect, create a new city, in direct conflict with good land use planning principles and County growth policies. Yes, we need and want housing, but there must be a balanced approach that factors in site constraints, impacts, surrounding land uses, historic resource values, and limited transportation network. This balanced approach is even reflected in the plan's guiding principles (see DEIR page 5-6) but the plan fails to conform to these principles. Project objectives to "balance redevelopment with existing land uses" and "balance development with historic resource conservation" have been ignored.

The Draft EIR identifies significant, unavoidable impacts on historic resources and traffic from the proposed Specific Plan due to its size. There is no mitigation identified for destroying so many historic buildings and converting the site to a new urban development. These issues could be addressed with a smaller alternative.



## **Environmentally Superior Alternative**

DEIR page 570 states: “Overall, the Historic Preservation Alternative is the environmentally superior alternative...” The text goes on to dismiss this alternative and minimize its environmental benefits. To say that the proposed plan’s impacts are “largely comparable” to the impacts of smaller alternatives is false and misleading. The types of impacts may be the same, but the magnitude of impacts on traffic, climate change, historic resources, noise, biological resources, public services and land use would be much less with a reduced-scale alternative. The Historic Preservation Alternative is feasible and its size and scale should be pursued as the preferred plan. Some modifications to this alternative could be incorporated to further reduce impacts, such as even more adaptive reuse and more compact development design. It appears that some impact-reducing elements included in the proposed plan were arbitrarily excluded from this alternative (e.g., the road connection to Highway 12 for emergency access), thus making this alternative appear less environmentally advantageous. Also, there is no reason to conclude that this alternative couldn’t achieve affordable housing goals. Compared to current and projected high construction costs for new development, adaptive reuse can be an effective strategy to reduce overall project **costs and impacts**.

## **Deferral of Analysis**

The Draft EIR defers analysis of impacts on some resources to a future time when individual projects are proposed. However, most if not all future projects will be exempt from CEQA under permit streamlining legislation so there will be no means to limit full buildout or implement much-needed future mitigation measures.

## **Specific Plan Phasing**

SDC Planning Advisory Team (PAT) members and public comments stressed the importance of project phasing to reduce impacts on the environment and on the community. There is only one requirement for phasing (Policy 4-3, which requires completion of at least 10,000 square feet of retail businesses and at least 200 housing units west of Arnold Drive before beginning construction of any housing east of Arnold Drive) and this policy does not reduce any environmental impacts. The Specific Plan itself has a section on “Recommended Phasing” but these provisions are advisory and not mandatory. The EIR must identify phasing as mitigation to help further reduce traffic and other impacts.

## **Need for Performance Standards**

Project phasing should be based on performance standards adopted for each environmental issue area. In this way, impacts can be monitored and additional mitigation measures developed, as needed. For example, there is no certainty that massive demolition and construction activities, as well as the introduction of a large mobile population to the site, will not dramatically affect the surrounding open space resources. Before proceeding with full buildout, it should be proven that the site can actually accommodate the projected buildout.

### **Specific Plan Policy Language and Enforceability**

Many of the policies in the proposed plan are intended to reduce/avoid impacts but the wording is such that it is not mandatory and many policies are not carried forward to Appendix A, Standard Conditions of Approval. Thus, these policies cannot be relied on to be implemented and fully mitigate impacts. Any policy that does not have a strong “shall” statement is not enforceable.

### **Jobs/Housing Growth (DEIR Section 5.1.1.2)**

It is completely inaccurate to say that the proposed job growth of 940 jobs outside of an urban growth boundary is a “modest” number. The number of jobs cannot be compared to the county-wide number – this methodology purposefully minimizes the impact. Compared to the rest of Sonoma Valley, which is a distinct planning region, the addition of 940 jobs is significant and is growth-inducing. Also, there is no documentation of the need for these jobs in Sonoma Valley. The market study conducted as part of the Specific Plan alternatives report (November 2021, see [sdcspecificplan.com/documents](http://sdcspecificplan.com/documents)) determined that non-residential development did not generate overall revenues and did not contribute to financial feasibility. The alternatives report states: “Commercial and industrial uses may support building construction costs but are unlikely to have a significantly positive impact on overall development feasibility.” Also, the EIR (page 11) states: “...the market demand for non-residential uses (with the exception of a hotel) is limited and higher employment levels will reduce financial feasibility.”

While there is a large demand for affordable housing in Sonoma Valley, creating over 700 market-rate homes is definitely a significant growth-inducing impact because there is no existing demand for this high number. These housing units will not serve the existing Sonoma Valley population – they will attract people from outside the valley and outside of Sonoma County.

### **Comparison to Previous Institutional Use**

The EIR analysis, including the growth-inducing section as well as other sections, attempts to justify the large-scale plan by erroneously comparing the proposed plan population and employee growth to the previous institutional use and number of clients/employees. This comparison is invalid and should not be used as a basis for over-developing the site due to the fact that:

- As an institution, SDC tread very lightly on the environment and adjacent community. At its most populous, most of the residents of SDC did not leave the property. They did not drive cars, they didn’t go offsite to schools, doctors, restaurants, etc.
- Vehicle trips were primarily limited to employees divided into three shifts so that traffic was spread out, rather than concentrated at peak hours. There were no retail commercial uses or a hotel to generate trips.
- Because of the limited outdoor activities and absence of constant vehicle traffic onsite, people and cars did not interfere with wildlife movement; the campus was open, peaceful, and not occupied with uses that generated a substantial amount of traffic (e.g., hotel, restaurants, etc.).

- Employment and resident numbers at SDC reached a peak during a time over 50 years ago when there was very little cumulative growth in Sonoma Valley and both Arnold Drive and Highway 12 were still well-functioning roadways.

Nor is it valid to compare existing building square footage to proposed square footage in an attempt to minimize impacts, as it is the proposed **use** of the buildings that drives most of the impacts.

### **EIR Traffic Assumptions**

There is no guarantee that people who live onsite will work there. That cannot be assumed for purposes of analyzing traffic impacts. Also, it cannot be assumed that the roadway connection to Highway 12 will be developed. Therefore, the traffic impacts are substantially underestimated in the EIR.

### **Wildlife Corridor Impacts**

Despite many scoping comments, impacts on wildlife movement **through** the campus are not addressed in the EIR. The campus itself is part of the wildlife corridor and must be acknowledged as such. Furthermore, there is no overall prohibition or restrictions on fencing within the campus (only prohibition on wooden fences) so wildlife will likely be blocked from movement through the campus. There will be significant impacts on wildlife movement from the introduction of thousands of people and vehicles, as well as fences.

### **No Project Alternative Definition**

Under the No Project alternative, it cannot be assumed that the state will take control of the site and that the county will have no land use authority. If the state proceeds with sale of the property, any private developer would be subject to county land use controls. The RFP issued by the State clearly states that the property is being offered for sale. The RFP contains no reference to the possibility for a long-term ground lease with private developers. Therefore, this is not a reasonable assumption.

### **Financial Feasibility**

Despite making references to financial considerations, there is no definition or accurate assessment of the financial feasibility of the proposed plan or alternatives. While financial feasibility is required, there is no mandate to maximize revenues at the cost of other resources and values, or at the cost of reasonable land use planning.

Thank you for considering my comments. Please feel free to contact me if you have any questions or need clarification on any of these comments.

Regards,



Vicki A. Hill

Vicki Hill, MPA

**Email sent to Landmarks Commission:**

September 5, 2022

Dear Landmarks Commissioners,

I am unable to attend the Landmark Commission hearing regarding the SDC Specific Plan and Draft EIR but have the following comments. As a land use planner and CEQA specialist, I have serious concerns about the proposed Specific Plan and its impacts on historic resources (and many other environmental impacts). These impacts could be substantially reduced by a smaller alternative, as identified in the Draft EIR.

1. A redevelopment plan of this scale (over 1000 homes and 900 jobs) on the historic SDC campus will destroy multiple significant historic structures and the historic setting and values of the site. Although the Draft EIR assumes 1000 homes, Specific Plan Table 4-2 identifies maximum buildout numbers, which total 1210 residential units. This total does not include density bonuses that will likely be granted to the future developer. It will not be possible to preserve the historic character of the site with a project of this size.
2. The proposed plan is inconsistent with one of the fundamental project objectives, which calls for balancing development with historic resource conservation. The high-density plan does not provide a balance and would not maintain the historic integrity of the site. The SDC site has been determined eligible for listing as a Historic District under the National Register of Historic Places.
3. The Draft EIR identifies **significant, unavoidable** impacts on historic resources from the proposed Specific Plan. There is no mitigation identified for destroying so many historic buildings and converting the site to a new urban city-like development, as called for in the proposed plan.
4. The Draft EIR identifies the **Historic Preservation Alternative** as the **environmentally superior alternative**. Because of its reduced size, impacts on historic resources would be **less than significant** under the Historic Preservation Alternative. This alternative would also be consistent with the project objectives. Furthermore, this alternative has other environmental advantages, some of which have been dismissed in the Draft EIR.
5. While financial feasibility is required, there is no mandate to maximize revenues at the cost of historic resources. The Historic Preservation Alternative is feasible and its size and scale should be selected as the preferred plan. Some modifications to this alternative could be incorporated to further reduce impacts, such as even more adaptive reuse and more compact development design. It appears that some impact-reducing elements of the proposed plan were arbitrarily excluded from this alternative (e.g., the road connection to Highway 12 for emergency access). Also, there is no reason to conclude that this alternative couldn't achieve affordable housing goals. Compared to current and projected high construction costs for new development, adaptive reuse can be an effective strategy to reduce overall project costs and impacts.

6. The Draft EIR defers analysis of impacts on individually significant historic resources to a future time when individual projects are proposed. However, many future projects will not be subject to CEQA and therefore the analysis cannot be deferred – it must take place as part of the Specific Plan EIR and mitigation measures must be identified.

Thank you for considering my comments during your deliberations.

Regards,

Vicki Hill, MPA

Environmental Land Use Planner

(707) 935-9496