



# Bennett Valley Community Association

P.O. Box 2666, Santa Rosa, CA 95404

<http://bennettvalley.org>

[info@bennettvalley.org](mailto:info@bennettvalley.org)

September 19, 2022

Brian Oh  
Planning Manager at Permit Sonoma  
Via email to [Brian.Oh@sonoma-county.org](mailto:Brian.Oh@sonoma-county.org)

Re: Sonoma Developmental Center

Dear Mr. Oh:

On behalf of the Bennett Valley Community Association (BVCA) and the residents of Bennett Valley, the BVCA Board of Directors wants to express its concerns about the Draft EIR and Specific Plan for the Sonoma Developmental Center (SDC). The BVCA was established in 1970 and is dedicated to promoting and preserving the rural, residential character and natural environment of Bennett Valley.

## **Specific Plan Policies Do Not Provide Sufficient Protection.**

The centerpiece of this planning effort is a specific plan, which is intended to adopt area-specific policy requirements to avoid or mitigate significant environmental impacts within the plan's boundaries. Bennett Valley residents are familiar with how the county implements such plans. The attached Bennett Valley Area Plan was adopted over 40 years ago and, like the SDC Specific Plan, was supported by an environmental impact report. Policy LU-1a of the General Plan states "a Specific or Area Plan may establish more detailed policies affecting proposed development . . . where there appears to be a conflict between the General Plan and any Specific or Area Plan, the more restrictive policy or standard shall apply."

Our experience in Bennett Valley is that the supposed protections offered in an area plan can be illusory and unenforced. Land Use Policy 2 in the Bennett Valley Area Plan provides "Commercial development is not considered appropriate to the rural character of Bennett Valley." Yet PRMD and county counsel distort the plain words and concluded that commercial cannabis development and operations are not "commercial development." In addition, any new structure must undergo design review to preserve scenic vistas and corridors. The county has decided that large and unsightly hoop houses that can be in place six months each year need not undergo design review. Residents who think the SDC Specific Plan contains policies that forbid or regulate certain activities may learn that the county has made a closed-door decision that is the opposite of any logical interpretation of the plan's provisions.

## **Evacuation Issues.**

The BVCA endorses and incorporates by reference the comments filed by the State Alliance for Firesafe Road Regulations on September 13, 2022. About 30% of the land area of Sonoma County has burned since 2017, making wildlife and evacuation issues paramount. Although the DEIR acknowledges that 95% of wildfires are caused by human activity (p. 500), it fails to analyze the extent to which 2,500 new residents, new hotel guests, and new business patrons will exacerbate this risk. All four criteria from the CEQA checklist for Wildfire (XX) would create a significant impact. The DEIR ignores that areas downwind from or adjacent to high or very high fire hazard zones can be consumed by wildfires, as experienced recently in Sonoma County. The 2017 Nuns fire consumed areas near the SDC that are rated as moderate fire hazard, and this occurs across California. Hoping that much of the area is safe because it is only in a moderate fire hazard zone is not a strategy. The DEIR concludes that the proposal would increase wildfire risk to new residents and visitors, but only proposes policies for future consideration without requiring mitigation measures.

The DEIR fails to describe existing wildfire hazards or properly analyze potential impacts. It is impossible to evaluate evacuation safety and the associated impacts on existing residents and employees when no baseline is provided for their evacuation utilizing the same routes. We know from the 2017 Nuns Canyon Fire, 2019 Kincaid Fire, and 2020 Glass Fire that Highway 12 was blocked, with traffic often at standstill for hours. The proposal jeopardizes the lives of Bennett Valley residents who need to flee from a fire driving east to Sonoma Valley using Route 12 or Arnold Drive. Moreover, because those routes are known bottlenecks, residents of Sonoma Valley might elect to escape a conflagration by driving west using Bennett Valley Road or even Sonoma Mountain Road. This could congest the escape routes for Bennett Valley residents who need to flee to the west.

The evacuation analysis for Bennett Valley needs to include the fact that during normal conditions Penngrove has become a chokepoint for traffic because of massive housing developments along Petaluma Hill Road. The Board of Supervisors has recognized this problem and recently approved the "Railroad Avenue traffic circulation study." The evacuation route for Bennett Valley residents via Petaluma Hill Road toward Penngrove is already compromised. The DEIR's lack of subregional traffic circulation studies to identify such problems, let alone mitigate them, jeopardizes not only Bennett Valley residents but also the thousands of others sharing these evacuation routes. This violates Public Safety Goal PS-3 of the Sonoma County General Plan ("prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires"), as well as Objective PS-3.2 (new development must minimize fire hazards to acceptable levels).

The conclusion that the proposed development would not substantially impair an adopted emergency response plan or evacuation plan (p. 511) is unsupported and contradicted by experience. We know that Highway 12 already gets rapidly congested during mass evacuations, turning it into a parking lot for hours. Depending on the

direction of the fires, residents may either need to evacuate south, thus combining with traffic from Boyes Hot Springs and Sonoma, or north, with additional traffic from eastern Santa Rosa. To conclude that adding thousands more people would not impair existing evacuation is incomprehensible. Emergency alarm systems are now implemented (e.g., during the September 13, 2022 earthquake), and residents will flee simultaneously. Assuming that a maximum of 65% of residents would evacuate in the first hour (Figures 3.16-3 and 3.16-4) is unrealistic. The fire may be upon them within the hour.

A shelter-in-place facility is never a first choice; studies have shown that people want to flee a fire, not let it burn over them. Most fire professionals say that shelter-in-place is a last resort and emergency plans cannot rely upon it to mitigate fire risks. Fires kill people with smoke and oxygen deprivation, not just flames. The proposal has not mitigated the potentially significant impacts related to wildfire.

### **Normal Traffic Circulation in Bennett Valley.**

The proposal will force more traffic onto the few east-west arterial routes in Sonoma County, especially Bennett Valley Road and Sonoma Mountain Road. The most recent Bennett Valley Road study was done in 2011, when over 3,500 vehicle trips were recorded per day. There is no adequate sub-regional traffic circulation study of these impacts. Bennett Valley Road is notoriously tortuous, especially the section between Warm Springs Road and Walker Road. More traffic on this section would be especially dangerous. The portion of Bennett Valley Road that approaches Santa Rosa has had 5 investigated accidents during the last six months, and scores in recent years. The BVCA is very concerned about increases in these already unacceptable statistics. The DEIR concludes there will be significant and unavoidable impacts regarding increased traffic, and proposes no mitigation. This is unacceptable.

### **Conclusion**

The DEIR and Specific Plan ignore the unenforceability of specific plans and gives short shrift to evacuation issues and general traffic issues in Sonoma Valley and Bennett Valley. It must be revised to address them. The proposal risks not only the lives of future residents of the SDC, but also residents of Bennett Valley. The DEIR ignores current and potential wildfire risk factors and assessment methods, and bizarrely dismisses them as insignificant. We recommend drastically reducing the number of housing units and eliminating hotel and new businesses.

Sincerely,  
Chris Gralapp  
Board of Directors,  
Bennett Valley Community Association

cc: Supervisor Susan Gorin [Susan.Gorin@sonoma-county.org](mailto:Susan.Gorin@sonoma-county.org)