

Arthur Dawson
Glen Ellen, CA

September 13, 2022

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

SENT VIA EMAIL

Re: Sonoma Developmental Center Specific Plan Draft Environmental Impact Report

Dear Mr. Oh,

I am a thirty-three year resident of Glen Ellen and the owner of a small business. My wife Jill grew up in Glen Ellen and is a teacher. Together we raised our two children here. We lost our home in the 2017 fire and have subsequently rebuilt. I currently serve as the Chair of the North Sonoma Valley Municipal Advisory Council as well as the Vice Chair of Sonoma Mountain Preservation, a local non-profit.

Despite their daunting page count, I believe the Draft Environmental Impact Report (DEIR) and Specific Plan for the redevelopment of Sonoma Developmental Center (SDC) are inadequate. They fail to fully evaluate and reasonably describe the severity and extent of impacts from the proposed project. Many of the DEIR's conclusions lack factual support and many of the Specific Plan policies intended to serve as mitigation measures are deferred and not enforceable.

In spite of soliciting extensive input, Permit Sonoma and the consultants have continued to push a proposal that does not have broad support in the community and ignores the well-documented preference of the public for a smaller project. This public recognizes the many significant site constraints on the development at SDC, including: the wildlife corridor, traffic, cultural resources, population, wildfire hazards and others.

Before commenting on specific aspects of the DEIR, I would like to make a request and an observation:

I encourage Permit Sonoma and/or the Planning Commission to revise the DEIR and Specific Plan to **create a multi-phased project with a mitigation monitoring program**. The Specific Plan touches briefly on this idea (SP 4-22): of completing "at least 200 housing units west of Arnold Drive before beginning construction of any housing east of Arnold Drive." No other phases are mentioned and there is no mention at all of a mitigation monitoring program. The DEIR analysis points to a lot of uncertainty in the impacts, making the proposed mitigations uncertain as well. Such uncertainty suggests the need for a robust monitoring program.

Downsizing provides the most obvious mitigation. Impacts from wildfire hazards, traffic, the wildlife corridor and other issues are all improved with a smaller project. The DEIR states that "the Historic Preservation Alternative is the environmentally superior alternative." This was also the smallest project analyzed in the DEIR.

Given time limitations, I will restrict my comments and questions to a few specific aspects of the DEIR and Specific Plan:

Project Description: 2.1.1 Regional Location

It goes without saying that an Environmental Impact Report is site specific. A project's location is fundamental to the analysis of its impacts. A poorly framed site location potentially skews the impacts identified and analyzed in the EIR. This is as true for a site's human geography as it is for biological and other aspects.

Local residents have repeatedly affirmed the Planning Area analyzed in the Draft Environmental Impact Report (DEIR) is in the middle of Glen Ellen and completely surrounded by that community. Based on our shared geography, history and common interests, Glen Ellen as a 'place' forms a cohesive part of our community identity. Local citizens have supported this identification through numerous public comments and a petition circulated during the Specific Plan process. In response to the concerns of our citizens, the North Sonoma Valley Municipal Advisory Council (NSVMAC) passed a "Declaration of Glen Ellen Boundaries" in April of this year, affirming our historic and commonly recognized boundaries, which include the Planning Area.

The U.S. Census Bureau recognizes and supports this viewpoint, stating, "a commonly used community name and the geographic extent of its use by local residents is often the best identifier of the extent of a place." <https://www.govinfo.gov/content/pkg/FR-2008-02-13/pdf/E8-2667.pdf>

The DEIR consistently misplaces the project's location as "between the unincorporated communities of Glen Ellen and Eldridge" (e.g. Section 2.1.1, page 51). Eldridge is a 'census-designated place' (CDP) but does not exist as a community according to the Census definition. Glen Ellen is also the name of a CDP, but that CDP is only a small part of the much larger Glen Ellen community, as defined by local residents.

The Census Bureau defines CDPs as "statistical geographic entities" and, as stated above, leaves the question of the extent of named places to local citizens rather than to government agencies. It should "not be a name developed solely for planning or other purposes." <https://www.federalregister.gov/documents/2018/11/13/2018-24571/census-designated-places-cdps-for-the-2020-census-final-criteria>.

1. Why were the requests of citizens pertaining to the project's location, given in public comments, letters, a petition and a declaration by the Municipal Advisory Council, not incorporated into the Planning Area description in the Draft Environmental Impact Report?
2. Why was the more accurate term 'census-designated place' not used in the EIR? Why was this term replaced with the word 'community'?
3. Placing the project "between communities" suggests it is outside of an existing community. Did you make this assumption? If so, how did it affect the DEIR's analysis? If not, how did you avoid this bias in your analysis?

I strongly request that the project's location be accurately and consistently described in the Final EIR as: "Surrounded by the existing community of Glen Ellen as defined by local residents."

2.3.1.1 Vision Statement

This section states that "New development complements" the surrounding community of Glen Ellen (p. 64). In this context, 'complement' appears to mean "adding to something in a way that enhances or improves it."

1. How was the 'complementary' nature of the new development evaluated? Please provide details about how this development will enhance or improve the existing local community.
2. What evidence (or metrics) on population, housing density, and community scale are being used to back up this statement?

3.16.1.2.2 Wildfire Hazards

The assessment of wildfire hazards in the DEIR appears to have a number of errors and omissions, the most serious of which lead to unwarranted conclusions that underestimate this hazard (“Impact 3.8-7 Implementation of the Proposed Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. (Less than Significant)” p. 268).

Page 503: “Primary responsibility for preventing and suppressing wildland fires in Sonoma County is divided between local firefighting agencies and the State of California, Department of Forestry and Fire Protection. The SDC Planning Area is currently located in an area identified as a State Responsibility Area (SRA).”

1. The Planning Area “includes the approximately 180-acre SDC Core Campus...” (DEIR, pg. 51) According to the State Fire Marshall’s map: https://osfm.fire.ca.gov/media/6822/fhszs_map49.pdf, the Core Campus is within a Local Responsibility Area (map on following page), not the State’s. Is this correct?

Page 503: “Under the Fire and Resources Assessment Program (FRAP) “the Planning Area...includes areas of high to very high Fire Hazard Severity Zones west of Highway 12, areas of high fire hazard severity in the hills, and areas of moderate fire hazards severity zones in the vicinity of Suttonfield Lake and Fern Lake (Figure 3.16-2). The Core Campus is not included in any of these FHSZs “

While it is true that “The Core Campus is not included in any of these FHSZs,” the State Fire Marshall’s final map is not intended to show moderate and high FHSZs within the Local Responsibility Area. The State’s draft map (next page), however does show moderate and high FHSZs covering a substantial portion of the Core Campus. While not finalized, this appears to be the best available fire risk data for the Planning Area.

Goal PS-3 from the Sonoma County General Plan 2020 (DEIR, page 497), reads: “Prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires,” with Objective PS-3.1 stating, “Continue to use complete data on wildland and urban fire hazards.”

2. The Sonoma County General Plan How was the data gap between the SRA and the LRA within the Planning Area addressed during the DEIR’s analysis of wildfire threat? What evidence was the statement about the Core Campus (DEIR, pg 503. See above) based on? Was this conclusion reached because there is data showing low fire risk there or because lack of data was equated with low risk?
3. The Fire Constraints map (13.16-2) shows the Core Campus being almost entirely outside of any Fire Severity Hazard Zones. How would the Fire Severity Hazard data for the Core Campus, shown in the State’s draft map, change the analysis of fire hazards there? Does this change the calculus for significance under 16.1.3.1 Criterion 2: “Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.”?
4. In addition, the Sonoma County Community Wildfire Protection Plan Update 2022 states that: “Wildland fires that start in the woods and spread into adjacent areas with relatively dense housing often result in the greatest losses of property and life. Efforts to save lives and property will take precedence over losses of wildland resources, so firefighters’ response must focus on protecting populated areas rather than fighting a fire in the most efficient way.” Even if we assume there are no FHSZs within the Core Campus, this suggests that building dense housing at SDC adjacent to wildlands could result in high “losses of property and life.”

Responding to such a fire might prevent firefighters from efficiently working to prevent further fire spread. How was this scenario taken into account during the DEIR analysis?

3.16.1.3.4. Wildfire Evacuation

The two scenarios chosen for evaluation accurately represent historical fire patterns.

However, the goals stated on page 507 include “Provide protections at the site against the growing risk of climate change exacerbated wildfire hazards and limit the potential impacts of wildfire to development through intelligent site and building design, and open space management.”

If the 2017 Nunn’s Fire (and other recent wildfires) is an indication, predicting future fire patterns is highly uncertain, given that many homes in moderate FHSZs (including my own), in places with no recorded history of wildfire, burned in that conflagration.

1. How would a third scenario, with a fire starting in the Planning Area near the Core Campus, change the calculus for wildfire risk and evacuation? How would this change the calculus for wildfire risk and evacuation for the neighborhood between the Core Campus and Madrone Road, and the Rancho Madrone neighborhood (south of Madrone)?
2. Wildfire ignitions are known to increase with the size of a population. How was this relationship evaluated in the calculation of fire risk in the Planning Area?

Hazard zones below are from the State Fire Marshall's office: <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>

HAZARD ZONES:

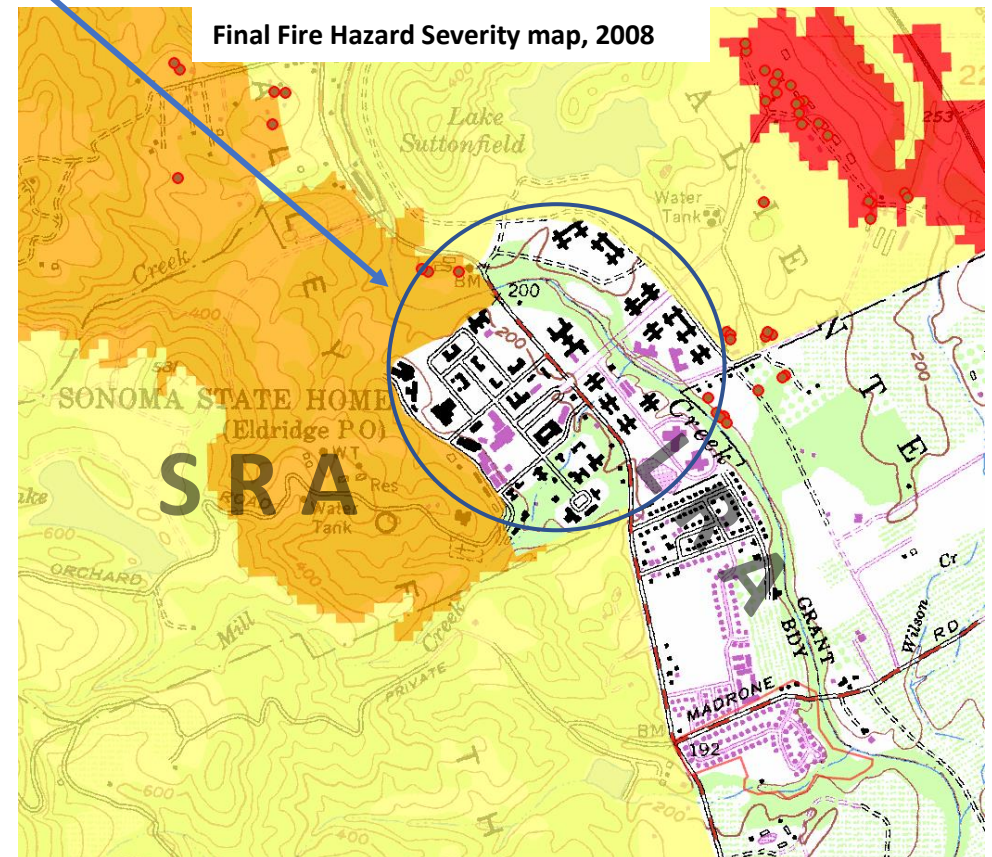
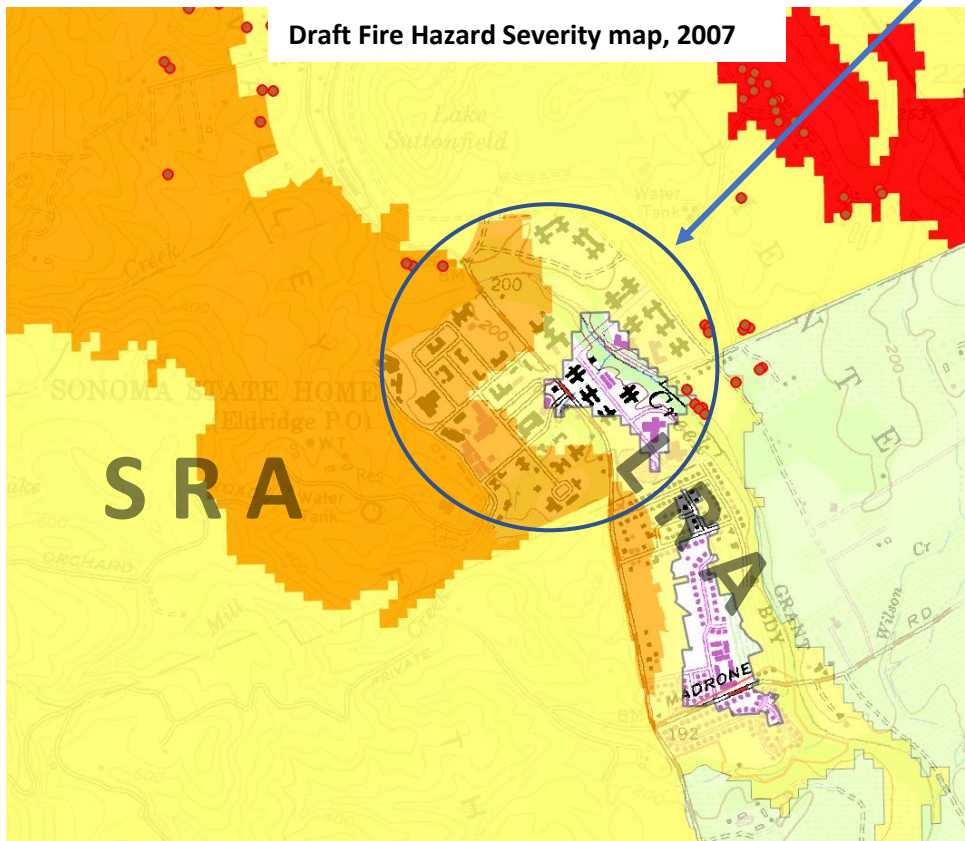
Yellow = moderate

Orange = high

Red = very high

Dots = structures burned in 2017 (Sonoma County GIS)

CORE CAMPUS



Colored Overlay = State Responsibility Area (SRA) and some Local Responsibility Area (LRA)

Colored Overlay = State Responsibility Area (SRA)

Transparent = Local Responsibility Area (LRA)

Thank you for the opportunity to provide comments on the Sonoma Developmental Center Specific Plan Draft Environmental Impact Report. I look forward to your response.

Sincerely,

Arthur Dawson

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