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Permit Sonoma  
Attn: Brian Oh and Bradley Dunn  
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Questions **1-22** for SDC Specific Plan DEIR  
Due Sept. 23, 2022

Definitions:

**SDC** – Sonoma Development Center

**DEIR** – Draft Environmental Impact Report

**HCD** – Dept. of Housing and Community Development

**RHNA** – Regional Housing Needs Assessment, issued by HCD

**APPENDIX D WATER SUPPLY ASSESSMENT  
AND HYDROLOGY & WATER QUALITY**

- (p. 469 of the DEIR) The DEIR claims that “The WSA concludes all future demands within its service area can be met, inclusive of the Proposed Project in normal and multiple dry hydrologic years from 2025 through 2045.” This same DEIR only acknowledges the likelihood of “single dry years”, rather than a concatenation of multiple dry years.
  - 1. Recognizing that we are already in our second year of a severe drought in Sonoma County and are still under water restrictions that date back to 2014, what justification does Permit Sonoma use to assert that the only issues concerning water availability were for “single dry years?”**
  - 2. Does Permit Sonoma accept that a) Climate Change is driving new drier, hotter climates worldwide, including that in Sonoma County, b) that these changes are man-made, and c) that they will continually worsen until the atmosphere’s load of CO<sub>2</sub> diminishes significantly?**
- (p. 15 of Appendix D) Climate Change as described by the UN Intergovernmental Panel on Climate Change is a cumulative phenomenon. The more CO<sub>2</sub> we place in the atmosphere, the more dry, warm years we will have, NOT LESS.
  - 3. If Permit Sonoma accepts man-made Climate Change, and that our dry, warming pattern will only get worse, then why does it presume that there will “Rebound”**

- years, and why does it presume that the Rebound will be sufficient to make up for the dry years?
4. In Appendix D, p. 41, your own model predicts that “starting in 2030, water demands will exceed water supplies due to Lake Sonoma declining below 100,000 Acre-Feet before July 15. For the last two years Lake Sonoma water supplies were below 130,000 Acre-Feet. With recognition that Climate Change is forcing even dryer conditions, how can Permit Sonoma glibly add more total hookups from not just the SDC Specific Plan (1000+ hookups), but also the Springs Specific Plan (480+ hookups), the Sonoma Airport Specific Plan --- with such a small margin of error regarding the water levels in Lake Sonoma?
  5. The last option for Sonoma Water is to obtain water from its groundwater pumps. While capacity is high today, groundwater depends upon rainfall plus snowmelt, both of which will be diminishing for the foreseeable future. Where can I find your predictions of rainfall and snowmelt for the next two decades, and their comparison to the 2000-2010 decade?
  6. Snowpack in the Northern Sierra’s 8-Station Index fell to 61% of normal between 2019-2022. Santa Rosa has received only 55% of normal rainfall in the 2019-2022 period. Using these conditions, and given that they were not included in any estimate or calculation of water supplies in the DEIR, what is the Permit Sonoma prediction of expected water supplies for the Valley of the Moon Water District for the next decade?
- Table 13 of Appendix D attempts to show that even in multiple dry years the supply exceeds the demand. Yet on its face, this cannot be true. Multiple dry years imply that demand exceeds supply for several years in a row. This never occurs in Table 13. In fact supply remains exactly as it was during normal years.
    7. **How can the yearly supply not diminish during multiple dry years?**
    8. **Why is the VOMWD supply in a normal year 3200 AFY and in a multiple dry year still 3200 AFY?**
    9. **Where is there evidence of ANY dry year??**

#### **WILDFIRE EVACUATION**

- The SDC Specific Plan DEIR utilized the study by Wong, Broader, and Shaheen to establish the fraction of the working and living population present during a wildfire evacuation.
  10. **Many if not most of the evacuations used in the Wong et al. study occurred at night, not during rush hours. How would your two scenarios’ results change if a scenario had been provided at midnight?**
  11. **The Wong study was used to establish the number of people needing to evacuate. However, at the chosen time, rush hour, many residents would be returning home.**

- Did the studied scenarios include the presence of residents returning against the evacuating traffic to retrieve their spouses and important documents?
12. Did your two scenarios include the neighborhoods of Glen Ellen, Kenwood, Oakmont, the Springs, and/or Sonoma?
  13. Having seen multiple evacuations since 2017, it is typical that state and local police routinely force traffic to go ONLY in the evacuating direction. Was this included in the two utilized evacuation scenarios?
  14. If such police action was not simulated, then how are your time results changed by such an addition of forced traffic directions?
  15. All such evacuation/traffic computer codes require benchmark testing to establish their credibility. What benchmark evacuation was utilized to confirm your code's credibility?
- You have multiple individual experiences from the Nun's Fire of Oct. 8, 2017 that cascaded through Glen Ellen at 11:30PM. Participants can tell you exactly how long they took to evacuate. (Most times were in the hour range, not minutes as you O
  - 16. Why did you not use the Nun's fire as your benchmarking calculation?
  - 17. What results would you get, if you ran your calculation for Glen Ellen at 11:30PM at night?
- On Aug. 17, 2022 the Board of Forestry approved the updated Minimum Fire Safe Regulations, applicable state-wide.
  - 15. How will the new regulations impact SDC Specific Plan housing density, road configurations, road widths, dead-end roads, etc. to maintain consistency with the new rules?
- Cal Fire Hazard Zone maps were last published in 2007. New maps are being redrawn to account for the many wildfires beginning in 2017 that are largely the result of a warming, drier climate. The map changes are mostly going from lower hazard levels to higher hazard levels and are expected to be published during the Fall 2022.
  - 16. Did estimates of fire susceptibility of the SDC area take such changes into consideration?
  - 17. Did estimates of fire susceptibility of the SDC area account for the wildfires of 2017 that penetrated Glen Ellen? Did they account for the multitude of wildfires in Sonoma County during 2018-2021?

#### AIR QUALITY

- SDC DEIR p. 183 uses the same tired argument that since the Specific Plan VMT adds only 1.1% to the whole of Sonoma County, that thus its contribution is Less than Significant. This absurd argument is deafened by the observation that most auto trips are less than 5 miles in length, and thus the correct VMT for comparison is the local VMT, not the County VMT.

18. Why did this calculation not compare the VMT added from the Specific Plan to that of existing Glen Ellen, where in fact this traffic will reside?

### POPULATION AND HOUSING

- (p. 364 of DEIR) Sonoma County appealed its original RHNA for the unincorporated County, of which the Springs Specific Plan is a part. HCD did not accept the appeal and kept the RHNA at 3881 new dwelling units during 2023-2031. Within the RHNA Appeal Request, Sonoma County accepted the 7% growth estimate which has no factual basis. The HCD uses Population Projection data from the Dept of Finance Demographics Research Unit (DRU), whose data is presented below for Sonoma County:

**Sonoma County Population Best Estimates & Projections  
from DRU**

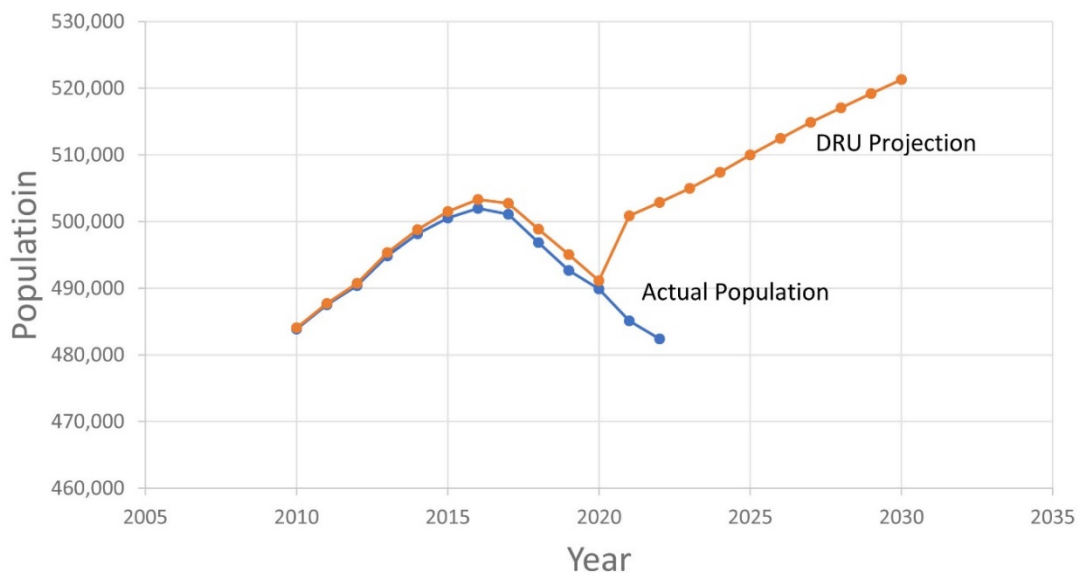


Figure 1

These data come directly from both DRU Estimates (actual census data plus births, deaths, DMV registrations, and more), and DRU Projections (based upon decades of prior history plus demographics). Their spreadsheets are available to all online from the Dept. of Finance and are attached to this email. Note the great difference between the speculation of the DRU Projection, when compared to the Actual DRU Population Estimates. The actual population of Sonoma County has been decreasing since 2016, continuously decreasing, and NOT INCREASING. Thus the push for added market-rate housing to accommodate a growing population is an unsupportable assumption. This DEIR on p. 364 blindly accepts their projections for population growth. Clearly the writers of this EIR did not read the source DRU data.

- 19. Why did the DEIR accept the 9% growth rate, since County population has been decreasing from 2017 through Jan. 2022, based upon Dept. of Finance DRU data, and since there is no factual basis upon which to base the Projection?**
- 20. How could the County rewrite the SDC Specific Plan to demonstrate the greater likelihood that County population will be static or slightly decreasing?**
- 21. On p. 367 the SDC DEIR acknowledges that from 2010 to 2020 the Sonoma County total population increased by only 1.3% (also seen in plotted data above), however, they then, without evidence, presume that the total County population will INCREASE by 9% during 2020-2040. Since the actual on-the-ground evidence is that Sonoma County's population has been continuously decreasing, how does this DEIR justify its supposed population increase?**
- 22. Did the writers of this DEIR look at the actual County population data before writing this section on Population and Housing?**