



Sent via email

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Re: Sonoma Developmental Center - Notice of Preparation of Environmental Impact Report – Scoping Comments

Dear Mr. Oh,

Sonoma Mountain Preservation is writing to express our concerns regarding the Specific Plan Notice of Preparation (“NOP”) of an Environmental Impact Report for the Sonoma Developmental Center. Sonoma Mountain Preservation has been advocating for open space and scenic preservation of the mountain since 1993.

These comments begin with concerns that the NOP is inadequate and needs to be rewritten and re-circulated. They are followed by specific comments on scoping of alternatives and elements for the Environmental Impact Report on the *Anticipated Development Program and Specific Plan Policy Direction* for the Sonoma Developmental Center.

The Notice of Preparation does not provide a draft SDC Specific Plan (required by the State of California in its legislation governing the disposition of the property), any Project Alternatives, or an adequate Project Description as required under CEQA. Instead, the NOP provides an “*Anticipated Development*

Program and Specific Plan Policy Direction” which was never approved, adopted, or voted on by the Sonoma County Board of Supervisors.

In addition, site maps in Attachment 5, “Vision Plan Frameworks, Potential Development Types and Outcomes,” are vague and inconsistent with legally defined boundaries, such as the Community Separator established by public vote in 2016. Because the Project is incompletely described, meaningful public review of the project is a moving target and none of its impacts can be fully analyzed.

The *Anticipated Development Program and Specific Plan Policy Direction* is not a basis for CEQA review or consistent with CEQA. We respectfully request that the County revise and recirculate its NOP in order to provide substantive detail about the Project and its likely environmental impacts, along with a clearly delineated site map, the specific alternatives being studied, and a clear scope of the EIR with NOP. If the EIR suffers from the same lack of detail and focus, it will be legally inadequate under CEQA.

SMP urges Permit Sonoma and the County to analyze alternatives and mitigation measures that would reduce the scale and footprint of the Plan; minimize impacts to wildlife connectivity and wildfire risk; delineate and officially protect the over 800 acres of open space not included in the development footprint; protect and expand the wildlife corridor with science-based analysis of species present and traveling patterns; address wildfire mitigation and evacuation routes; and be based on current conditions. We urge you to analyze ways of enhancing the environment of SDC to the benefit of the entire ecological—including human—community of Sonoma Valley and Sonoma County.

Here are SMP’s key recommendations for scope clarification, analysis, and mitigation:

I. Reduce the scale, footprint, and density of housing and all other proposed development. This reduction should include vertical and horizontal density.

II. Mapping

SMP requests that Permit Sonoma provide specifically delineated, overlay mapping documents depicting overlapping physical and political constraints

so that “alternatives” can be commented on during scoping and the EIR process. For example, agencies required to comment, such as the Dept. of Fish and Game, cannot comment on un-delineated corridors, creek setbacks, or biological diversity requirements.

Specifically, SMP notes that existing, legal community separators protect all but 131 acres of the SDC property, according to Sonoma County records and established by public vote in 2016. This means that over 800 acres should be preserved, and 131 acres are available for development. This is direct conflict with the “proposed” 180 acres of development. **Overlay maps should include:**

1. **Community separator boundaries.**
2. **Specific new zoning proposed** for development, as required in a Specific Plan.
3. **Proposed open space land transfer boundaries.**
4. **Riparian areas** described by location and size, and taking into account the cumulative needs for water quality, wildlife corridors, vegetation management, groundwater recharge, wetlands restoration, human access, and fire safety. Include in this mapping the optimal development setbacks from creeks, including Sonoma Creek, Asbury Creek, and Mill Creek. Note that research on recommended buffers around aquatic resources for wildlife often exceed 100 meters (~325 feet); see p. 6 of the Center for Biological Diversity letter regarding the NOP dated 3.4.22 for a more detailed analysis.
5. **Wildlife corridors**, including consideration of wildlife corridor redundancy—the availability of alternate pathways for movement, along with the most frequently used paths by predators, prey, large and small mammals, birds, and aquatic creatures. Science-based, *up-to-date* studies need to inform this mapping. For background, see material collected by Sonoma Ecology Center and Sonoma Land Trust in support of the designation of SDC as a Wildlife Corridor, and materials provided by Quinton Martins of Wild Lands on the movement of mountain lions in the vicinity of SDC.
6. **Current topographical and hydrographical map** showing landforms, soil types and stability, lakes, streams both permanent and seasonal, springs, known groundwater, historical channels and wetlands, drainage ditches, and artificial channels.

7. **Biological resources**, including endangered and at-risk species, like the Western Pond Turtle, likely to be impacted by development and increased population density.
8. **“High and Very High Risk Fire Area,”** as described in California State law, that requires notification of sellers to buyers if their land is within the High and Very High Fire Risk areas as those designations pertain to development at SDC. For example, fire maps provided by Dyett and Bhatia were inaccurate and misleading. An updated assessment of fire risk maps, taking into account current and historical fires on the property, must be included. Note that Cal Fire is currently updating fire maps statewide.

Only with these overlay mapping documents in the public domain can any “alternatives” be commented on during scoping, or legally studied, in the EIR.

II. Alternatives to be studied

SMP requests that Permit Sonoma study the following most-needed alternative, herein called **Small Affordable (SA): 200 units** of affordable housing for developmentally disabled, deed restricted, specifically for workforce housing and based on real local wages—earned by agricultural workers, teachers, fire people, and the like. These wages correspond to Sonoma County’s standard designations of “low” (80% of AMI), “workforce” (60% of AMI), and “very low” (50% of AMI) housing (see County of Sonoma website “Using Choice Voucher Income Limits”).

This alternative, which specifically addresses #6 in the SDC “Draft Guiding Principles” regarding the range of housing and housing for developmentally disabled, should be based on SDC’s current building footprint, and emphasize reuse rather than new building, to reduce release of sequestered carbon. This alternative should include no commercial development since most services exist in Glen Ellen, and the population would not feasibly support small businesses. This alternative should meet the requirement listed in State law about low income and developmentally disabled housing, which is not mentioned anywhere in the NOP.

SMP additionally requests that Permit Sonoma also study the **450-units alternative proposed by the North Sonoma Valley MAC.**

SMP notes that the SDC Specific Plans and Vision and Guiding Principles produced by the county planners and consultants to date are inconsistent with state legislation: they propose an entire new community with a significantly increased intensity of development than current conditions and beyond what is explicit in state legislation.

Housing required on the site per the state legislation is as follows (emphasis added): *The agreement shall require that housing be a priority in the planning process and that any housing proposal determined to be appropriate for the property shall include affordable housing. It is further the intent of the state that priority be given to projects that include housing that is deed restricted to provide housing for individuals with developmental disabilities.* The legislation does not call for any market rate or high-end or other housing, so the EIR should analyze and disclose alternatives that do not include market rate housing of any sort.

III. Open Space

The SDC campus is surrounded by community separator overlays on multiple parcels of the property and over 800 acres of open space containing an unmaintained trail network that sees high use, especially on weekends, by hikers, trail runners, dog walkers, mountain bikers, and equestrians. Impacts of development of the campus on the surrounding open space—which encompasses the Sonoma Valley Habitat Corridor—that should be analyzed include:

1. Mapping of the open space boundary, including necessary buffers.
2. Mapping of proposed trailheads and associated facilities, including parking areas, ranger stations and/or visitor and interpretive amenities, restrooms, and picnic facilities.
3. Analysis of current use, including number and type of user and times of day when use is heaviest.
4. Analysis of anticipated numbers and types of user under the proposed residential development alternative(s), including times of day when use is anticipated to be heaviest, and impacts of that increased use on the resource (trail maintenance; trail additions and/or realignments; habitat disturbance by off-trail users; increased noise, other impacts).

5. Analysis of anticipated numbers and types of user under the proposed commercial development alternative(s), including times of day when use is anticipated to be heaviest, and impacts of that increased use on the resource (trail maintenance; trail additions and/or realignments; habitat disturbance by off-trail users; increased noise, other impacts).
6. Analysis of impacts of increased trail use on water sources, including seasonal streams, year-round streams, lakes/reservoirs, and springs, including erosion, off-trail travel, and travel when trail surfaces are muddy.
7. Mitigation methods that would address all anticipated impacts.

IV. Wildlife Corridor and Biological Resources

The Center for Biological Diversity (letter dated 3.4.22) and Sonoma Land Trust provide extensive details for the EIR Scoping to address biological resources, endangered species, and the Sonoma Valley Wildlife corridor, among other related issues. SMP supports their comments in full.

In addition, we would like to highlight the following issues for analysis and disclosure in the EIR regarding biological resources:

1. Analyze and disclose the potential that the highest and best use of the entire SDC lands is for conservation and protection of natural and biological resources and that any development on the currently empty and abandoned campus will create significant environmental impacts that cannot be mitigated.
2. Analyze and disclose the potential that lighting, noise, traffic, new fencing, new residents and other elements of the *Anticipated Development Program and Specific Plan Policy Direction* will forever compromise the only wildlife corridor between the Berryessa Snow Mountain National Monument and the Pt. Reyes National Seashore on the coast. Once fragmented by development, it will lose its value to biodiversity in our Valley and county forever.
3. Analyze and disclose the regional impacts of development in the Sonoma Valley Wildlife Corridor.

The 945-acres of the Sonoma Developmental Center lands are one of the most at-risk greenbelts in the Bay Area, with a critical wildlife corridor that runs

through the heart of the property and Sonoma Valley. Of that 945-acres, 825 acres were designated in 2016 as protected community separators by the 83 percent of the voters of Sonoma County. This county policy prevents intensification of development on those lands and needs to be analyzed, disclosed and prevented / avoided if possible through measures and mitigation and ongoing monitoring as part of the EIR analysis on any SDC Specific Plan.

Endangered and Threatened Species

The endangered, threatened, and sensitive species that occur in or otherwise utilize Sonoma Creek, wetlands, oak habitat and other lands and waters of SDC must be inventoried and methods, mitigation, and monitoring to protect them in perpetuity analyzed and disclosed in the EIR. If more people live, work, and visit SDC, then the likelihood of wildlife interactions increasing must be considered.

The facts and inventory contained in the iNaturalist Project “Sonoma Developmental Center Natural History” that reports 14,723 observations of 1,152 species as of March 24, 2022, provides a snapshot of the incredible biodiversity and importance of the SDC lands.³

Human – Wildlife Interactions

The EIR needs to consider mitigations to prevent wildlife interactions, such as requiring all bear-proof trash containers on site; requiring residents, workers and visitors to agree to taking all precautions to protect wildlife and to take *no lethal* or other actions to prevent wildlife from moving freely through the site, even if a bear, mountain lion, bobcat or other animal is seen or does something unpopular like break into a trash can or car or backyard.

The EIR should analyze the following mitigation measures:

1. To require wildlife cameras throughout the SDC campus and open space lands to track the movement of wildlife; and to determine how and if wildlife movement or presence is being negatively impacted by development.
2. To require a baseline study of existing conditions and the density, quantity and quality of wildlife, habitat, water, air quality, and rare, sensitive and endangered species to be conducted and completed before any development on SDC; along with requirements to monitor and report every year on any

changes to the baseline conditions and need for mitigating actions to prevent degradation of all of the above.

3. To require removal of people or enterprises or objects such as lighting, fences, or buildings; and or a temporary or permanent end to activities and operations if they are found to negatively impact wildlife movements or habitat or to reduce the density of wildlife, particularly sensitive or endangered species.
4. To require all residents and workers at SDC to take wildlife education courses once a year; and to sign legally binding agreements saying that they will not harm wildlife, alter wildlife habitat or install fences or security lighting or alarms or take any actions that would interrupt the natural behavior of wildlife.

V. Wildfire

In the inevitable event of wind-driven wildfire, such as the region has experienced in 1923, 1964, 2017, and 2020, the EIR must examine and mitigate impacts on existing and future residents seeking to evacuate. As recent successful litigation has demonstrated, failure to adequately address and mitigate these concerns in the EIR can render a proposed project unfeasible (see [Martis Valley](#) proposal, Lake Tahoe; [Guernoc Hills](#) proposal, Lake County; [Fantia Ranch](#) proposal, San Diego County). Impacts of increased development on properties in the wildland-urban interface that should be studied as part of the EIR include:

1. The number of vehicles that must be accommodated on Arnold Drive and Highway 12 by new development on the SDC campus (including dwelling units and commercial enterprise), coupled with vehicles for existing residents of Glen Ellen and throughout the Sonoma Valley, in the event of a *zone-driven evacuation scenario* (a paced evacuation).
2. The number of vehicles that must be accommodated on Arnold Drive and Highway 12 by new development on the SDC campus (including dwelling units and commercial enterprise), coupled with vehicles for existing residents of Glen Ellen and throughout the Sonoma Valley, in the event of a *wind-driven evacuation scenario* (an emergency evacuation as experienced in 2017).

These analyses must take into account that either route may become compromised or rendered impassible by the effects of wildfire itself (smoke, fallen trees), as well as congestion that may already be present as residents not yet under an evacuation warning or order seek to remove themselves from danger.

VI. Open Space Transfer

The EIR must analyze and require a mitigation to map the boundaries of the open space lands at SDC, and place in permanent protection separately and independently from the historic campus planning process, by holding and/or transferring the lands to an appropriate conservation entity, investigating options such as conservation easements and other legal mechanisms with non-profit or public entities such as but not limited to Sonoma County Regional Parks, Jack London State Historic Park, Jack London Partners, Sonoma County Agricultural and Open Space District, California Coastal Conservancy and state and national land trusts and conservation non-profits.

As part of this analysis, the two dams in the open space lands must be assessed for status of their current condition, and operations and maintenance requirements, and the state's fiscal responsibility for this infrastructure analyzed and disclosed.

VII. Additional Environmental Issues That Should Be Analyzed

Please analyze, disclose, prevent impacts and/or mitigate the following in the EIR:

Water including protection of water quality, groundwater recharge, needs of salmonid species and other species (mammalian, reptilian, amphibious and insect), human use of existing water resources, protection from erosion of existing waterways, protection of riparian plant communities and reduction or at least not increase in impermeable surfaces.

Drainage and Absorption Analyze and disclose the multiple years of drought in Sonoma Valley and how water drainage and absorption is a crucial component of knowing how much water is available to the community and the

development either through collection in the lakes or through groundwater recharge, which is dependent on retaining hardscaping and building footprints at the square footage.

Wetlands The EIR must map the wetlands on the SDC property and restoration studied and plans disclosed, or if restoration is not planned, how impacts to wetlands will be avoided or mitigated.

Vegetation The EIR must map and analyze the vegetation types and habitat and impacts to the vegetation analyzed, avoided or prevented as the wildlife corridor it is dependent on vegetation types for cover and forage of the wildlife that utilize it; as well as the location of places to bed down and inhabit throughout the animal's life cycle.

Vegetation also underlies fire risk issues like fire breaks, which must be analyzed and environmental impacts disclosed under the wildfire risk section of the EIR.

Habitat including habitat for large mammals, primary predators, grazers, small foragers, birds, and among others insects taking into account the impact of climate change, invasive species, drought, flooding, fire safety understory clearance, noise, light, and movement on resident species or especially those crucial to survival of the other local species. Plant community is also in need of cataloging and management through removal of invasive species, management of old trees, fire safety management through prescriptive burns, and the use of grazers to manage open space environments.

Public Services A study of the adequacy of public services including water, sewage, electricity, WIFI, gas and electricity, and postal services plus potential for access to readily available private services commensurate with the number of houses built.

Light Pollution Light pollution should be analyzed, disclosed and mitigated as this development is in a Wildlife Corridor and light during demolition, construction and habitation will all impact the survival of the wildlife.

Cumulative Environmental Effects As there will be more traffic, more lights, more noise, more people, more pets, more fences, more roads, years of impact of heavy trucks both on site and on local roads, increased fire risks due to inadequate fire breaks, evacuation routes and construction in the WUI, loss of

wildlife corridor expanse, loss of biodiversity due to over development, and loss of aesthetic and visual tranquility, the full cumulative environmental, growth and other impacts to Sonoma Valley by the proposed development must be analyzed, disclosed, avoided and mitigated to the maximum extent.

Under Cumulative Environmental Effects, the following issues need to be analyzed, disclosed, avoided and/or mitigated:

1. Projects already under construction in Sonoma Valley described and shown by acreage, number and type of residences, access roads and their carrying load, and their location in terms of fire risk.
2. Any institutional developments, their acreage, and an estimate of the number of people to be serviced, access to roads and their carrying load, and location in terms of fire risk.
3. Any commercial and agricultural enterprises being constructed including but not limited to resorts, hotels, clubs, shopping areas, restaurants, vineyards or other agricultural enterprises by its acreage, estimated number of people serviced, access to roads and their capacity and location in terms of fire safety.
4. Projects in Sonoma Valley submitted for consideration by Permit Sonoma, approved and not yet under construction or still going through the approval process.
5. Known Projects in Sonoma Valley being considered for submission to Permit Sonoma in Sonoma Valley. To the extent that information is available to Permit Sonoma those projects known to be under consideration in Sonoma Valley that meet any of the two requests described above.

VIII. Conclusion

We are in the midst of a global extinction crisis. The County and State must work to safeguard the region's biodiversity and remaining wildlife habitat. Because the Plan could further degrade connectivity for sensitive and imperiled species, reduce climate change resilience and biodiversity, and increase wildfire risk, we ask the County to consider Plan alternatives that would reduce the scale and footprint of the Plan and implement effective mitigation measures to minimize impacts to the surrounding rural community, wildlife connectivity,

habitat loss, and wildfire risk. We further urge the County to delineate and officially protect the over 800 acres of open space not included in the development footprint. We urge you to analyze ways of enhancing the environment of SDC to the benefit of the entire ecological—including human—community of Sonoma Valley and Sonoma County.

Thank you for the opportunity to submit comments to the Plan. Please include SMP in your notice list for all future updates to the Plan, and do not hesitate to contact SMP with any questions at the email addresses below.

Sincerely,

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¹ The SDC property comprises approximately 945 acres, including the main property and Camp Via (934.08 acres and 11.42 acres respectively; APNs 054-090-001, 054-150-010, 054-150-005, and 054-150-013). CS = Community Separator

Parcel 054-090-001

512 acres – CS 498.52 [12 not in CS]

Parcel: 054-150-010

290.89 – extending CS 162.08

054-150-005 119 acres none in CS

054-150-013 35.83 acres Existing CS

825 in CS, 131 not in CS

² <https://www.inaturalist.org/projects/sonoma-developmental-center-natural-history?tab=stats>