

SDC Campus Project

sdccampusproject@gmail.com

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

Re: Sonoma Developmental Center Specific Plan and Draft Environmental Impact Report (“DEIR”)

Dear Mr. Oh and County of Sonoma Supervisors,

Thank you for the opportunity to submit further comments on the recently issued Sonoma Developmental Center (SDC) Specific Plan and Program Environmental Impact Report (PEIR). The following comments are submitted on behalf of the SDC Campus Project

1. Permitted Uses in Preserved Open Space

It has come to our attention that in the Draft Specific Plan, Table 4-3, Permitted Uses, under Preserved Open Space, the following uses are included as P, permitted:

Agricultural Crop Production and Cultivation
Agricultural Processing
Animal Keeping: Confined Farm Animals
Animal Keeping: Farm Animals
Farm Retail Sales
Farm Stands
Indoor Crop Cultivation
Mushroom Farming
Nursery, Wholesale

Timberland Conversions, Minor
Tasting Rooms

In the Draft EIR, Section 3.4.3.4 Impacts:

“Summary of Proposed Plan

The Proposed Plan would include residential development in the following districts: Marker Place, Core North Residential, Historic Core, Fire House Commons, Core South Residential, Creek West Residential, Agrihood, and Eldridge North. Approximately 1,000 housing units are planned to be developed throughout these districts as well as commercial, institutional, and public land uses and an Highway 12 connector road. The existing undeveloped portions of the Planning Area would be designated as Preserved Open Space land use.

Development is not proposed to occur within Preserved Open Space, where current daytime recreational uses would continue.” (emphasis added)

The DEIR concludes as follows: “3.4-1 Impact.

Implementation of the Proposed Plan would not have a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. (Less than Significant)” (DEIR p.241)

While residential development is not proposed within Preserved Open Space, the permitted uses identified in Table 4-3, including Agricultural Crop Production and Cultivation and Timberland Conversions, clearly contemplate vineyard development. Vineyard development involves deep soil disturbance, vegetation and tree removal, with likely significant habitat impacts for Special Status Species Yellow Legged Frog and California Giant Salamander, listed as present on SDC land in DEIR Table 3.4-1. The deep ripping of the soil to plant grape vines will be especially harmful to salamanders, who live part of their lives in underground tunnels.

“Agricultural Processing” likely is meant to permit wineries. This reading is supported by permitting tasting rooms. These uses, in addition to habitat destruction, will also involve construction activities, vehicular traffic. Farm retail sales will generate vehicular traffic. Keeping farm animals raises concerns about impacts on wildlife. The Relevant Policies and Implementing Actions listed in Section 3.3.3.3 of the DEIR, do not adequately address the reasonably foreseeable significant impacts on wildlife likely to result from these permitted uses. Allowing these permitted uses is not consistent with the reasonable understanding by the public of what is meant by protecting the preserved open space.

While the SDC Campus Project supports organic food crop agriculture in a specifically designated approximately five -acre area in the southern end of the east open space, we do not support the permitted activities in the Preserved Open Space listed in Draft Specific Plan Table 4-3. Food agriculture in this limited area will provide a public benefit without significant impacts on biological resources.

Respectfully submitted by,

Jerry Bernhaut

Attorney for The SDC Campus Project

Law Office of Jerry Bernhaut

Telephone: 707-595-1852

Email: j3bernhaut@gmail.com