



September 21, 2022

Brian Oh
Comprehensive Planning Manager
Permit Sonoma, County of Sonoma
2550 Ventura Avenue
Santa Rosa CA 95403
[via email]

RE: Draft Environmental Impact Report and Preferred Specific Plan for redevelopment of the Sonoma Developmental Center in Glen Ellen

Dear Mr. Oh,

We appreciate this opportunity to comment on the draft environmental impact report (DEIR) and preferred Specific Plan for redevelopment of the Sonoma Developmental Center (SDC).

While we acknowledge the conflicting directives laid out in the legislation authorizing the specific planning process for the property and recognize the difficulty of making meaningful connections with stakeholders in pandemic times, we must express our overall disappointment with the DEIR and Preferred Plan, which do not reflect community input as we've witnessed in public meetings and in letters over the years-long planning process. The scale of proposed redevelopment of the 180-acre core campus is fundamentally incompatible with the rural character of the surrounding community and the north Sonoma Valley, presents a clear danger to the safety of current and future residents of the Valley in the inevitable event of wildfire, and threatens the integrity of Sonoma Mountain's irreplaceable natural resources — habitats for keystone flora and fauna, the health of the Sonoma Valley Wildlife Corridor, water quality, air quality, recreational opportunities, and historic, tribal, and modern cultural values.

The DEIR fails to adequately or clearly describe meaningful, enforceable mitigations for the environmental impacts of redevelopment at the scale proposed, as required by the California Environmental Quality Act (CEQA). It fails to clearly delineate cumulative

impacts. It does not provide sufficient analysis to give decision-makers all the information they need to satisfactorily draw conclusions about the environmental consequences of the Preferred Plan. It is our hope that by addressing the questions that follow, applicable, effective, enforceable mitigations will be identified and instituted that materially decrease or eliminate those impacts.

General concerns/questions

The DEIR indicates that, across the board, the environmental impacts of the Preferred Plan and the Historic Preservation Alternative (HPA), which is acknowledged as environmentally superior per CEQA, are “largely comparable.” The DEIR also states that the HPA is less superior in terms of energy use, biological resources, and wildfire risk (ES.4.2). Given the significant differences in scale of the two alternatives — the HPA is half the size of the Preferred Plan — these conclusions defy logic.

- 1) Please explain how construction of 1,000 homes occupied by 2,500 people has the same environmental impact across virtually every category studied in the DEIR as does providing 450 homes occupied by 1,125 people (a 55% reduction)? Which studies support this finding?
- 2) Please explain how providing workspace for 900 people has the same environmental impact across virtually every category studied in the DEIR as does providing workspace for 600 people (a 33.3% reduction). Which studies support this finding?
- 3) Please explain how the HPA—which translates to less demolition through adaptive reuse of historic structures, less construction, fewer vehicle miles traveled, and fewer people on the property—uses more energy, has a greater impact on biological resources, and increases wildfire risk than the Preferred Plan, as stated in the DEIR (ES 4.2). Which studies support this finding?

Impacts specific to Sonoma Mountain

The entire 945-acre SDC property, including the developed core campus, is located within one of the last rural regions on the Sonoma Valley floor, with the mostly undeveloped slopes of Sonoma Mountain forming the entire western boundary and serving as a viewshed/mountain backdrop; as an informal natural reserve/safe haven for native flora and fauna; and as an informal recreational resource for hikers, cyclists, and equestrians from throughout Sonoma County and beyond. Further, historic residential use of the SDC by individuals with developmental disabilities and their caregivers had minimal human-caused environmental impacts on the property’s open spaces. Redevelopment at the scale in the Preferred Plan creates an urban footprint within this

historically rural zone, significantly increasing human-caused environmental impacts on a number of areas identified under CEQA (i.e., Aesthetics [3.1]; Biological Resources [3.4], and Public Services and Recreation [3.13], to name a few). To mitigate impacts of any redevelopment on the historic, minimal-impact, rural quality of the property, and to ensure the viewscape is preserved, we request that:

1) The DEIR include mitigation measures to compensate for the loss of the rural attributes of the property at its current baseline, or a baseline that dates back no further than 10 years. Please specify which measures in the current DEIR address these impacts, and which studies support them.

2) Please study, provide mitigation measures, and document how incorporating adaptive reuse of buildings into the HPA proposal, with its smaller human footprint, would impact environmental goals.

3) The SDC's open space currently sees frequent use by recreationalists from all over Sonoma County and beyond. That use increased markedly during the pandemic, despite restrictions on travel. The level of use has remained high as the pandemic has waned. The addition of 2,500 residents, 900 workers, visitors to the proposed hotel and conference center, and their friends and family, as outlined in the Preferred Plan, will add an exponential burden on the property's open space, much of which is on the skirts of Sonoma Mountain. Please analyze what that increase in recreational use means for aesthetics, biological resources, cultural, tribal, and historic resources, and water and air quality, and identify mitigations for those impacts.

4) Please analyze the cumulative impacts and potential degradation of floral and faunal habitats, groundwater supply, and riparian zones across the site, including the 750+ acres identified as open space, caused by the increased housing density, noise, construction, traffic, and demolition proposed under the Preferred Plan. Please provide analysis of the impacts of redevelopment on migratory fish species, such as coho salmon. Please also analyze whether these impacts would be mitigated by a smaller redevelopment such as the HPA.

5) The intent to preserve and protect the 750+ acres of open space surrounding the 180-acre core campus has been codified by the state in its enabling legislation and has been promised by the county in the Preferred Plan. However, neither the Preferred Plan and nor the DEIR delineate clear boundaries for the open space to be transferred, identify a mechanism of transfer, clearly identify the entities that a developer must work with to facilitate transfer, or explicitly require a developer to ensure that redevelopment of the core campus be done in such a way, and with sufficient buffers, as to protect the natural values of the open space. Please add specific, enforceable guidelines for the open space

transfers, specifying acreages and minimum boundaries on both the east and west sides of Arnold Drive, and limiting allowed uses on these acreages to passive recreational uses such as hiking, mountain biking, horseback riding, photography, etc.

6) Agricultural and commercial uses should not be permitted in open space intended to be parkland. Please clarify that uses such as those identified in Table 4.3 will not be permitted in open space identified for transfer to park agencies, and that mitigations for such uses on other open space parcels are identified and enforceable.

Thank you for the time and effort you have put into developing the DEIR and preferred Specific Plan for the property. We look forward to receiving Permit Sonoma's responses to our concerns, and hope the final plan and EIR presented to the Planning Commission for comment and to the Board of Supervisors for approval reflect substantive changes that ensure the integrity of the natural values of Sonoma Mountain, and the communities that surround it, remain intact.

Respectfully,

Meg Beeler, Chairperson
Sonoma Mountain Preservation
Traditional territory of Southern Pomo, Wappo, Patwin, and Coast Miwok

On behalf of Sonoma Mountain Preservation's Board of Directors
Kim Batchelder, Bob Bowler, Arthur Dawson, Avery Hellman, Nancy Kirwan, Larry Modell, Tracy Salcedo, Teri Shore, Helen Bates, Mickey Cooke, Marilyn Goode, David Hansen, and Lucy Kortum

cc:

Senator Mike Thompson, Assembly member Cecilia Aguiar-Curry, Senator Mike McGuire, Senator Bill Dodd, Sonoma County Planning Commission, Sonoma County Board of Supervisors, Springs Municipal Advisory Council, North Sonoma Valley Municipal Advisory Council, Sonoma Valley Citizens Advisory Commission, Sonoma City Council, Permit Sonoma, Department of General Services (Gerald McLaughlin)