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Sent VIA EMAIL



September 21, 2022

To: Permit Sonoma, Board of Supervisors and Sonoma County Planning Commission

Copies to: Senators Mike McGuire and Bill Dodd

RE: Public Comments on Sonoma Developmental Center Draft Environmental Impact Report (DEIR) and Specific Plan – Revise EIR to Meet CEQA, Scale it Back and Protect Open Space!!

Dear Permit Sonoma, Board of Supervisors and Sonoma County Planning Commission,

As a long-time resident of Sonoma Valley who cares deeply about the lands, wildlife and people who live here, I do not support the Sonoma Developmental Center (SDC) Specific Plan as proposed by Permit Sonoma and find that the DEIR is inadequate to meet the requirements of the California Environmental Quality Act. Please see my general comments followed by comments on the DEIR and a detailed table with more detailed comments.

GENERAL COMMENTS on SDC DEIR, Specific Plan and Planning Process

Reversal of County Land Use Policies: The proposed SDC Specific Plan and DEIR comprise a complete reversal on decades of city centered growth and open space protection in Sonoma County. Instead of providing a visionary plan that addresses climate change and environmental protection while providing appropriate affordable housing, the County of Sonoma is deciding to forever urbanize the heart of rural and agricultural Sonoma Valley. Whether or not the Specific Plan is implemented or not, the rezoning of these lands for residential, hotel, commercial, retail and other new land uses will forever transform these lands.

Public Land for Public Good: This public land has always served the public good. For decades, everyone from local residents to county elected officials to open space agencies and the general public have envisioned these lands for protected open space and serving the needs of people with developmental disabilities and others who may need housing and services. So, it is extremely heartbreaking to realize that the county is instead intent on building a giant new subdivision here despite the many other options that have been forwarded by the community and stakeholders. The state statute is being willfully misinterpreted by the County of Sonoma to the detriment of the people of California who own these lands. Turning public lands over to private developers for profit is simply wrong when there are many models for repurposing public lands without doing so, such as Marin Headlands, Presidio Trust, and Mare Island.

Open Space: My comments are primarily focused on the open space lands surrounding the campus. These lands are critical for conservation, biodiversity and habitat linkage at a regional and state level. These lands qualify for and are prioritized for recognition in Governor Newsom's 30 X 30 Executive Order among environmental leaders such as Sierra Club, Sonoma Land Trust and Sonoma Mountain Preservation.

It is unfortunate that the DEIR and Specific Plan do not give these treasured lands the level of analysis and protection as the development on the historic campus. Definitions are unclear and there are no requirements or details on how, when or through what process the open space will be permanently protected in public ownership.

No doubt it is because the primary focus has been on urban planning. It might be a very good urban plan for a town or city but not for the center of the Sonoma Valley Wildlife Corridor and open space that provides easy access to nature and quiet recreation for all, across the income spectrum. Here the urban plan constitutes old fashioned sprawl.

Housing: While we all recognize the need for affordable housing, we also know that we can't build our way out of it. Just look to the rest of the Bay Area and places like Los Angeles where affordable housing is even more scarce. There is room in existing cities and towns to provide affordable housing for the people who need it. But of course, we need to change the way we provide housing; build-baby-build isn't it. The SDC lands are the wrong place for massive housing development comprised primarily of market rate housing. This will simply create another high-end wine country enclave and profits for private developers.

Timeline: While I don't have any confidence that the county intends to change course, I do request that the county provides the public, Planning Commission and Board of Supervisors adequate and appropriate time to review and finalize the DEIR and Specific Plan. The County must ask the State of California for more time to accomplish this important planning process. The County and State should not adopt a plan just to meet an arbitrary deadline. There is no rush given that the SDC property will be in transition for decades to come.

DEIR COMMENTS

1. **REVISE DEIR TO MEET CEQA:** Revise and strengthen the Draft Environmental Impact Report to meet the requirements of California Environmental Quality Act by analyzing and preventing or reducing all negative environmental impacts generated by the proposed Specific Plan by scaling back project, avoiding impacts and providing legally enforceable mitigation measures in a Mitigation and Monitoring Program. As drafted the DEIR is not adequate to meet CEQA. It has zero mitigations for any environmental impacts, including two that are "significant and unavoidable:" historic preservation and VMTs.
2. **REVISE SELF-MITIGATED SPECIFIC PLAN:** Revise and strengthen the Specific Plan Conditions of Approval to be legally enforceable requirements and recast as mitigation measures in the DEIR, as above. As drafted, the "self-mitigating" Specific Plan does not mitigate significant negative environmental impacts. The Conditions of Approval (CofAs) only apply to half of the environmental areas required for study under CEQA. And there are none for critical issues such as wildfire. Most of the CofAs for biological resources apply only to construction, not operations or maintenance, and are based

mostly on existing state law or Best Management Practices, which are not in statute and therefore not legally enforceable.

All Specific Plan Goals and Policies need to be specific, strong and enforceable. Otherwise, they are practically meaningless. Please remove vague words such as “promote” or “encourage” or “if feasible.” Replace with “require”, “shall” or “must.” These strengthened Goals and Policies then need to be made Conditions of Approval and recast as Mitigations in the DEIR in a Mitigation and Monitoring Program.

If CofAs, policies or goals can't be made specific, then remove them as they do not mitigate environmental impacts. Having a Self-Mitigated Plan is not part of CEQA and does not necessarily meet CEQA; and certainly not in the case of the SDC Specific Plan and DEIR.

3. **SCALE BACK DEVELOPMENT AND CHANGE PREFERRED ALTERNATIVE:** Scale back the development to 450 or fewer homes in scale with the rural character of the property; utilize existing buildings, preserve historic features. Require that 100 percent of the homes be affordable to low, very low- and moderate-income working people and to individuals with developmental disabilities. Require that all homes and buildings meet Visitability Standards for access by Americans with Disabilities (ADA), prioritizing those who currently live in Sonoma Valley.
 - Eliminate the hotel, retail and commercial space that is not needed as those services already exist nearby in Sonoma Valley.
 - Change the Preferred Alternative to the Historic Preservation Alternative, which is the most environmentally sound, and amend to reflect the requirements above.
4. **ANALYZE OPEN SPACE AND PUBLIC INSTITUTION ALTERNATIVES:** All the alternatives studied by the County of Sonoma are variations on a major mixed-use development that maximizes urban style use. The scaled back Historic Alternative is the closest to what the public and community has asked for over the years. However, the Open Space and Public Institution Alternatives that were dismissed by the County of Sonoma offer significantly difference alternatives that deserve further analysis. The Marin Headlands and Presidio Trust are good examples of how public land was repurposed without overdevelopment that could be analyzed further in the Open Space Alternative.

Providing more details on the Historic, Open Space and Public Institution Alternatives will serve to meet CEQA criteria to provide the public and decisionmakers with a true range of alternatives.

While the DEIR claims that these alternatives were dismissed due lack of consistency with state statute, I would argue that the various development alternatives that were presented are too narrow and also inconsistent with state statute. State statute calls for housing as appropriate on the SDC site and to prioritize affordable housing and housing for developmentally disabled individuals. What's present is very much out of scale and not appropriate for rural land. In addition, the DEIR and Specific Plan calls for the introduction of commercial agriculture throughout the preserved open space areas, which was never mentioned in state statute. Many other new land uses never mentioned in state statute are also proposed.

In there any legal, statutory or other reason why County of Sonoma should not analyze and provide more details on the Historic, Open Space and Public Institution Alternatives?

5. **PROVIDE SPECIFICS AND ADDRESS IMPACTS TO OPEN SPACE** – The Specific Plan and the DEIR mentions open space protection in general terms in several places, in various ways, but fails to provide a clear definition of “preserved open space,” or to give the exact boundaries (other than in one general overlay map), or give details on how or when it will be protected, transferred or managed.

Vague Goals and Policies contained the Specific Plan and DEIR do not suffice, such as “*future developers at the site must work with the County to ensure proper management and stewardship*” and “*Work with Sonoma County to dedicate the preserved open space as regional parkland.*” Not resolving these issues is likely to create confusion and conflict later for all involved, as elected officials, agency staff and developers change over time.

The DEIR and Specific Plan cannot rely on state statute to protect the open space lands as that language is vague, only as “feasible” and in the “best interests of the state.”¹

These inadequacies need to be resolved in the DEIR and Specific Plan by adding clear descriptions of the open space lands with exact boundaries; likely mechanisms for transferring the lands and to what possible entities or types of entities; a timeline; and how the lands will be managed and under what authority. Environmental impacts and mitigations for impacts to the open space lands from development of the campus and ongoing operations must be provided.

Preserved Open Space and Agriculture: The Specific Plan and DEIR make sweeping statements about “historic agriculture” but do not explain the extent of past agriculture in terms of types or amount of acreage. The impacts of allowing commercial agriculture on open space that is currently not in agriculture must be analyzed and the environmental impacts avoided or mitigated in the DEIR.

Unacceptable New Uses in Preserved Open Space: Table 4-3 (attached) of the Land Use Section of the Specific Plan outlines many new uses in “preserved open space” including wine tasting rooms, timber conversion, wholesale nurseries, sports facilities and several others that have not been analyzed under CEQA or addressed at all in the goals, policies or CofAs of the Specific Plan. These “permitted” new uses in Preserved Open space must be analyzed, avoided or prevented and mitigated as required under CEQA and in my view NOT ALLOWED OR PERMITTED in Preserved Open Space.

¹ *The disposition of the property or property interests shall provide for the permanent protection of the open space and natural resources as a public resource to the greatest extent feasible and shall be upon terms and conditions the director deems to be in the best interests of the state.*

SHOULD NOT ALLOW AS PROPOSED THESE USES IN PRESERVED OPEN SPACE TABLE
4-2 SPECIFIC PLAN

Agricultural Crop Production and
Cultivation
Agricultural Processing
Animal Keeping: Beekeeping
Animal Keeping: Confined Farm
Animals
Animal Keeping: Farm Animals
Animal Keeping: Pet Fancier -
Farm Retail Sales
Farm Stands
Indoor Crop Cultivation
Mushroom Farming
Nursery, Wholesale
Timberland Conversions, Minor
Nursery, Wholesale
Tasting Rooms

SHOULD NOT ALLOW AS PROPOSED IN SPECIFIC PLAN WITH CONDITIONAL USE
PERMIT

Recreation and Sports Facilities: Recreation
Facility, Outdoor
Recreation and Sports Facilities: Rural
Sports and Recreation

6. SONOMA VALLEY WILDLIFE CORRIDOR MAPPING AND RIPARIAN SETBACKS:

Increase setbacks along Sonoma Creek, Riparian areas and the Sonoma Wildlife Corridor to at least 100 feet, instead of inadequate 50 feet as proposed. Explain why 50 feet is adequate to protect riparian areas and the wildlife corridor. In this section, I will defer to comments by the experts, including the Sonoma Land Trust and Center for Biological Diversity.

Mapping: Neither the DEIR nor the Specific Plan provides an accurate map of the Sonoma Valley Wildlife Corridor. The DEIR refers to Figure 1.6-3, which does not appear in the DEIR. The Specific Plan Figure 1.6-3 is a map of Existing Vegetation.

In the Specific Plan Figure 1.6-2 titled “Wildlife Constraints,” something that appears to represent the Sonoma Wildlife Corridor consists of two wavy green lines labeled as “Critical Wildlife Linkage Marin Blue Ridge.” However, that term is not defined, does not contain the words “Sonoma Valley Wildlife Corridor” and is never used anywhere else in the Specific Plan or DEIR. And, in fact, the Sonoma Valley

Wildlife Corridor does not appear to be specifically mapped anywhere in the Specific Plan or DEIR that I could find.

To meet CEQA by providing the public and decisionmakers with accurate information, the Sonoma Wildlife Corridor needs to be clearly mapped and defined with consistent terms. You must revise the DEIR and Specific Plan to specifically map and describe the boundaries of the Sonoma Valley Wildlife Corridor.

7. **WILDFIRE:** There are no mitigation conditions of approval for wildfire; and the goals and policies are based on a future Emergency Response Plan that will be developed at some point. This is inadequate under CEQA. The DEIR and Self-Mitigating SDC Specific Plan do not eliminate risk or wildfire hazard to insignificant levels. Develop and add enforceable Mitigations in the DEIR and Conditions of Approval in the Specific Plan for Wildfire to reduce and prevent risk as there currently are none.

The Evacuation Time analysis seems unrealistic and not based on fact as it suggests that “added times” for travel during an evacuation range from 1 or 2 minutes to 37 minutes to get to Napa. It took people HOURS to evacuate from Kenwood and Sonoma Valley during recent fires.

Also, the DEIR calls for the “requirement” for a shelter-in-place facility at SDC after 200 homes are built. There is no proven rationale for sheltering in place particularly in a High Fire Risk Area. Revise wildfire evacuation impacts to reflect on-the-ground experiences during recent wildfires and new state and county wildfire risk and hazard maps. Eliminate the shelter-place as there is no evidence it would save lives.

The DEIR and Specific Plan must also consider a wildfire mitigation that includes retreat from wildfire areas. Please see attached article in Bay Nature from experts on land use and wildfire which explains why developing in high wildfire areas is no longer appropriate or safe.

Please include by reference the comments on wildfire and evacuation from the State Alliance for Firesafe Road Regulations and other commenters with expertise on these issues.

8. **CLIMATE CRISIS and VMTs:** The DEIR finds that the proposed Specific Plan will produce “significant and unavoidable” environmental impacts due to huge increases in Vehicle Miles Traveled that will be generated primarily by new residents driving to and from the SDC site. The DEIR offers no mitigations or conditions of approval to reduce or avoid the amount of driving.

The DEIR finds that the proposed SDC Specific Plan will undermine local, regional and state policies and commitments to address the climate crisis as it found significant and unavoidable impacts in the areas of vehicle miles traveled. That means that there is NO WAY to offset or mitigate the extra driving generated by all the new housing, retail, commercial development proposed at SDC. The County must not approve this project as proposed with these impacts if it is serious about addressing the climate crisis.

Taking this approach fails to meet the standards contained in CEQA because VMTs can be avoided and reduced by building fewer homes, reusing and demolishing fewer buildings, requiring public transit, and other measures that were never considered. The DEIR and Specific Plan must be revised to analyze and provide mitigations and measures to reduce VMTs.

- 9. CONFLICTS WITH EXISTING COUNTY AND VOTER APPROVED POLICIES:** Statements in the DEIR and Specific Plan that the proposals do not conflict with existing county policies are inaccurate. The proposed Specific Plan is a complete reversal of land use policy in the County of Sonoma dating back to the original General Plan in 1989. It constitutes urbanization of rural and open space lands not seen since the 1970s; and the type of development that paved over places such as Silicon Valley.

As proposed, the DEIR and Specific Plan violates decades of city-centered growth policies adopted and supported by the voters of Sonoma County and contained in the General Plan. Until now, the County of Sonoma has mostly upheld policies to grow inside existing cities and towns, honor voter-approved Urban Growth Boundaries, protect greenbelts and open space, and respect voter-approved community separators. The voters of Sonoma County have taxed themselves to create the Ag + Open Space District, the SMART Train, and provide expanded funding to Sonoma County Regional Parks.

The DEIR must analyze and mitigate the impacts to these long-standing land use and open space protection policies and voter-approved measures from the proposed Specific Plan and complete reversal of land use policy in order to comply with CEQA.

10. HOUSING AND POPULATION

New housing at SDC is not required or necessary for the County of Sonoma to meet its state mandated Regional Housing Needs Allocation of 3,881 housing units for the next 8-year cycle (2023-2031), as cited in the DEIR.² In fact, housing at SDC was never considered as part of the RHNA process because the property's future remains uncertain and is currently zoned for public facilities, not housing.

The DEIR cites the Association of Bay Area Governments (which also assigns RHNA numbers) that between 2020 and 2040, the number of housing units in Sonoma County will grow by 15 percent, while

² According to the Final 2023–2031 RHNA, ABAG has Sonoma Developmental Center Specific Plan determined that unincorporated Sonoma County's fair share of regional housing need for the 2023 to 2031 period would be 3,881 units. Approximately 1,632 of these units would be allocated as housing affordable to very low- and low-income households.⁹³ The ABAG Executive Board adopted the Final RHNA Plan in December 2021. It should be noted that while the present RHNA allocation is for the next eight years, full development of the SDC Specific Plan would occur over a longer time horizon, over multiple RHNA cycles.

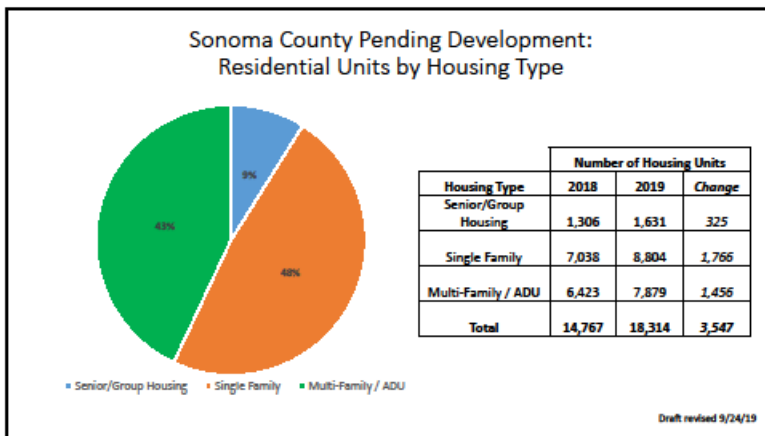
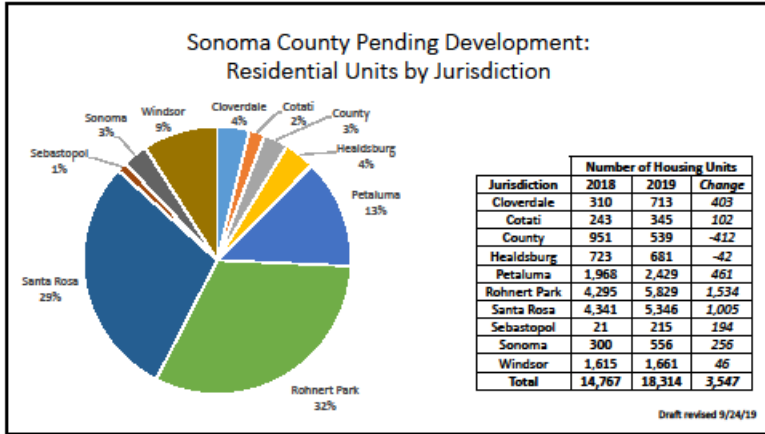
the population grows by 9 percent. These facts indicate that adequate housing units will be provided if housing units grow twice as fast as population. These projections of housing and population indicate that housing needs are likely to be met without building 1,000 units at SDC. In addition, the DEIR discloses that unincorporated Sonoma County is in fact losing population.

It is clear that the housing numbers proposed in the Specific Plan and analyzed in the DEIR do not reflect actual official population or housing needs. It is based solely on Permit Sonoma's assumptions about how to make the development profitable for developer. This is the wrong baseline and approach.

The DEIR fails to consider that Sonoma County Transportation Authority has previously determined that the county and cities could build at least 30,000 new and rebuilt (post fire) housing units without expanding outside of UGBs or existing USAs. SDC was neither referenced nor considered as a location for housing.³

³ Sonoma County Transportation Authority/Regional Climate Protection Authority Board Meeting Packet, October 14, 2019, 4.3.2. Housing – update on pipeline projects (REPORT)*

Sonoma County Transportation Authority/Regional Climate Protection Authority Board Meeting Packet, September 10, 2018, 4.5. SCTA Planning Item 4.5.1. Housing – housing projects in the pipeline and update on housing items (REPORT)*



The DEIR fails to make note that the City of Sonoma has adequate room to meet and exceed its RHNA allocations for the next 8-year cycle; or that according to the Springs Specific Plan Notice of Preparation of an EIR, there is potential for 700 new housing units there. The county Housing Rezone EIR has also identified parcels for higher density housing in the Springs and around the unincorporated county which would result in additional housing.

With these facts in mind, the DEIR must analyze and mitigate the growth inducing impacts of adding 1,000 extra housing units to Sonoma Valley and the County of Sonoma. One alternative the DEIR should consider

is putting those 1,000 units into existing towns and cities, possible through a Transfer of Development Rights agreement with cities and the county of Sonoma itself.

11. ENDANGERED, THREATENED SPECIES

The DEIR and Specific Plan fail to adequately analyze or mitigate the negative environmental impacts to endangered and threatened species on the SDC lands. The mitigations, goals, policies and Conditions of Approval are inadequate because they are weak with unenforceable actions, rely primarily on existing laws that have to be followed anyway, and/or rely on future studies and assessments as assessments – all of which fail to meet CEQA.

In addition, the DEIR and Specific Plan fail to provide any analysis or even discuss the fact that mountain lions and bears and other predators utilize the SDC lands; or any of the research on this wildlife and others that is published or available. The DEIR and Specific Plan must recognize and provide details on this wildlife and provide analysis and mitigations to reduce negative environmental impacts; and prevent human-wildlife interactions – at the least.

I will defer to comments on this section to the experts including Center for Biological Diversity and Sonoma Land Trust.

12. COMMUNITY BENEFITS AGREEMENTS

The DEIR and Specific Plan need to consider and analyze the benefits of the use of a Community Benefits Agreements at SDC with the community, labor, and public and appropriate stakeholders as a way to provide certainty that the mitigations and measures to protect the environment and community are upheld over the decades as SDC is being transformed.

For example, county residents, particularly in the Sonoma Valley could determine what is most important based on community needs and particulars of the project once a property owner or manager is identified. For example, we could require the property owner or manager to commit to high levels of affordable and workforce housing, good, living wage jobs, protecting wildlife corridors, supportive and accessible housing for disabled people, and much more. We could fill in the gaps that the DEIR and Specific Plan don't provide, particularly if the state choose a different plan and/or the county never adopts or implements the Specific Plan.

13. **STATE STATUTE:** The County of Sonoma needs to revisit its interpretation of the state statute in respect to the Specific Plan and EIR as follows:

Housing: State Statute says the following:

It is the intent of the Legislature that priority be given to affordable housing in the disposition of the Sonoma Developmental Center state real property.

*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**.*

Nowhere does the statute call for maximum urbanization of the SDC nor to create a new town, hotel, commercial or retail. The scale of housing and development is not appropriate for the rural property surrounded by ag land. Therefore, the County of Sonoma's Specific Plan and DEIR are not consistent with and misinterpret the state statute. Both need to be revised to align with state statute and public comment by scaling back the development, eliminating market rate housing and other development, and providing deed-restricted affordable housing to individuals with developmental disabilities.

Open Space: State Statute says the following:

The Department of General Services recognizes the exceptional open-space, natural resources, and wildlife habitat characteristics of the Sonoma Developmental Center.

*It is the intent of the Legislature that the lands outside the core developed campus and its related infrastructure be preserved as **public parkland and open space**.*

*The disposition of the property or property interests shall provide for **the permanent protection of the open space and natural resources as a public resource to the greatest extent feasible** and shall be upon terms and conditions the director deems to be **in the best interests of the state**.*

The state statute makes clear that the permanent protection of open space lands is for public parkland and natural resources as a public resource. The County's Specific Plan and DEIR are inconsistent with state statute as they propose introducing agriculture, sports fields and other uses without consider the negative environmental impacts of doing so.

However, the state statute also conditions protection of the open space "to the extent feasible" and to "be in the best interests of the state." That is why the county Specific Plan and DEIR must provide details on how, when and with what entities that the open space will be protected. If not, then the state legislature will need to act to ensure the protection of the open space and that none of it is sold off for development or other inappropriate use.

Economic Feasibility: State Statute says the following:

*The planning process shall facilitate the disposition of the property by amending the general plan of the county and any appropriate zoning ordinances, completing any environmental review, and **addressing the economic feasibility of future development**.*

The County of Sonoma's entire Specific Plan and DEIR is tied to this one mention of economic feasibility to the exclusion of just about everything else. The state did not mandate that the project be economically feasible or financially feasible but to address it. Economic feasibility changes constantly with market conditions. Specific Plans and General Plans are written for long periods of time when economic feasibility is certain to change. The County is misinterpreting state statute to maximize urban development at the SDC site. The proposal could also be economically feasible if, for example, the state paid to clean up the site, then transferred it to state parks or another public

conservation entity. A bond measure or initiative could be written. However, the County looked at only one option or alternative: making profits for a private developer. This lacks vision and is inconsistent with state statute and CEQA

The Planning Commission must direct Permit Sonoma to revise the Specific Plan and DEIR to be consistent with state statute and public comment and provide new alternatives that don't focus entirely on urbanization and developer profits.

There are many other concerns that I have regarding the DEIR and Specific Plan, but these are what I am able to provide with the time and energy that I have at this time.

PLEASE SEE DETAILED TABLE OF COMMENTS BELOW AS WELL AS ARTICLE MENTIONED ABOUT WILDFIRE RETREAT.

Sincerely yours,

A handwritten signature in black ink that reads "Teri Shore". The signature is written in a cursive, flowing style.

Teri Shore
terishore@gmail.com

Shore Detailed Comments Focused on Open Space Related Definitions, Goals, Policies and CofAs from DEIR

DEIR		Comment or Question	Action Requested
<p>Open Space Related Definitions, Goals, Policies and CofAs from DEIR</p>		<p>The permanent preservation of open space lands in public ownership in perpetuity is not fully addressed nor the impacts to those lands adequately analyzed or mitigated by the DEIR and Specific Plan.</p> <p>While there is extensive discussion of the core campus, the open space is treated with vague and conflicting terms; even though it comprises the most acreage in the Specific Plan at 755 acres. Open Space definitions inconsistent, confusing. Agriculture is included in some places, not others, and never clearly defined in DEIR. Neither state nor community ever envisioned commercial agriculture in protected public open space. State statute never mentions agriculture or commercial agriculture.</p> <p>How when and by what mechanisms the open space lands will be permanently protected in public hands is never adequately described.</p>	<ol style="list-style-type: none"> 1. Fully address, analyze and mitigate impacts to prioritized preservation of open space lands in public ownership in perpetuity as priority in the DEIR and Specific Plan, where now very little if any attention is given to the 755 acres outside the core campus development. 2. Provide clear, consistent definition for open space, preserved open space, permanent protections, open space in core campus, parks, paseos. 3. Open space should be defined as all the lands outside the core campus that will be permanently protected for natural resources, wildlife habitat, the Sonoma Wildlife Corridor, riparian corridors, wetlands, passive recreation and no development; other than maintaining and operating existing dams and improving trails. 4. Open space definition needs to include terms “public lands” as in “permanently protected as public lands in public hands for the public good.” Make clear that open space will not be in developer or other private hands. 5. Remove agriculture and commercial

			<p>agricultural uses from definition of open space; and/or conduct analysis of impacts to open space from new commercial agricultural land uses that is now completely missing from DEIR.</p> <p>6. Provide details on how, when and by what mechanisms the open space lands will be protected in perpetuity in public ownership.</p>
Page 3 – ES 1.1	755 acres of contiguous open space, and the 11-acre non-contiguous Camp Via grounds within Jack London State Historic Park.	Is 11-acre Camp Via part of open space? Seems it should have a separate definition as a former camp. Unless intention is to remove and restore camp.	Define Camp Via as separate from public open space; or analyze impacts from removing and restoring as open space and deeding to Jack London State Park.
	Open space includes many acres of valuable wildlife habitat, former agricultural land, recreational uses, and the Eldridge Cemetery, as well as an existing network of trails and access roads	Here open space includes agriculture and the cemetery. The extent of historic agriculture is never defined. Commercial agriculture never existed on site, only for food for facility clients and staff. Cemetery is separate entity. State statute never mentions agriculture or commercial agriculture.	Remove agriculture from definition of public open space; or conduct analysis of impacts to open space from new commercial agricultural land uses that is now completely missing from DEIR. Define actual uses and acreage of historic agricultural uses; and commercial ag if it existed. Define Cemetery separately from open space.
Page 5 – ES3.1	preserved open space and parkland	Here preserved open space and parkland and mentioned together, but not defined. What parkland? Where?	Provide clear definition of preserved open space and parkland.
Page 10 ES 3.1	open space in the Core Campus	What? Open space in the Core Campus? Does that count toward the 755 acres of open space? Very confusing.	Define open space in the Core Campus as something other than open space to avoid confusion; and because a park next to buildings is not really open space but more like a park.
Page 11 ES3.1	preserved open space	Needs to be defined.	Define; remove agriculture from definition per above.

Page 11 ES3.2	Active open space areas (parks, paseos).	Active open space area is a new term introduced here with no definition. Same for parks and paseos.	Define active open space areas, parks, paseos.
Page 12 ES3.3	reclaimed as open space	What? This suggests that buildings will be removed and reclaimed as open space. That would not be open space. Maybe a park or greenspace?	Define reclaimed areas where buildings have been removed other than as open space.
Page 55 2.1.2.3	contiguous open space		Define what you mean by contiguous open space.
Page 55 2.1.2.3	Open space includes former agricultural land, recreational uses, the Eldridge Cemetery, and many acres of valuable wildlife habitat.	Here open space includes agriculture and the cemetery. The extent of historic agriculture is never defined. Commercial agriculture never existed on site, only for food for facility clients and staff. State statute never mentions agriculture or commercial agriculture. Cemetery is separate entity.	Remove agriculture from definition of public open space; or conduct analysis of impacts to public open space from new commercial agricultural land uses that is now completely missing from DEIR. Define Cemetery separately from open space.
	Embedded in the open space is an existing network of trails and access roads as well as a water system consisting of two surface water reservoirs, aqueducts, spring head, storage tanks, treatment plant, pipelines and a water intake in Sonoma Creek.		Analyze and mitigate how maintenance and operations of existing infrastructure in open space as described will impact the open space, habitat, wetlands and other natural resources.
Page 61 2.2.1	The legislation recognizes the exceptional open-space, natural resources, and wildlife characteristics of SDC, and it is the intent of the legislature that the lands outside of the core developed campus and its related infrastructure be preserved as public parkland and opens space.	Here for the first time the DEIR uses the terms “preserved as public parkland and opens space.” Is open space the same as parkland? How much will be open space and how much parkland?	Define preserved open space as above; and define public parkland. Describe how much land will be open space and how much parkland. My recommendation is that all open space be designated as parkland.
Page 63 2.3	surrounding open space, recreational, and agricultural areas,	Here open space, recreation and agriculture are lumped together as if one. State statute never	Remove agriculture and define separately. If the intention is to allow commercial agriculture,

		mentions agriculture or commercial agriculture.	then analyze and mitigate the impacts and provide land use and zoning over areas that county wants open to ag.
	The surrounding open spaces flourish as natural habitats and as agricultural and recreational land linked to regional parks and open space systems.	Here open space, recreation and agriculture are lumped together as if one. State statute never mentions agriculture or commercial agriculture.	Remove agriculture and define separately. If the intention is to allow commercial agriculture, then analyze and mitigate the impacts and provide land use and zoning over areas that county wants open to ag. Analyze and mitigate the impacts to introducing ag into open space.
	vast protected open space of oak woodlands, native grasslands, wetlands, forests, creeks, and lakes that provide habitats and wildlife movement corridors; agricultural land; and recreational open space integrated with the surrounding park systems.	This seems to be a more accurate definition for preserved open space, except for reference to agriculture.	Remove agriculture and define separately. If the intention is to allow commercial agriculture, then analyze and mitigate the impacts and provide land use and zoning over areas that county wants open to ag. Analyze and mitigate the impacts to introducing ag into open space.
Page 68 2.4.3 Key Planning Strategies	Further, the campus will be surrounded by a vast network of permanently preserved open spaces.	Yes, this is the most accurate and correct description. But doesn't define permanently protected or by what means.	Define permanently preserved open spaces and describe by what means they will be permanently protected.
Page 70 2.4.3.1 Land Use Classifications	Single-Family Detached. Single-family units that are detached from any other buildings (with the exception of accessory dwelling units) and have open space on all four sides.	Inaccurate use of open space. The green spaces between dwelling units are typically called yards. If it is for communal use, then use and define an appropriate term such as green space, park, pocket park or something.	Define areas around buildings as yards, green space, park, pocket park or something other than open space, which refers to the lands outside the core campus.
Page 72	The Institutional designation accommodates adaptive reuse and new construction of a retreat/conference center located at the southern terminus of Sonoma Avenue, this area is envisioned as making use of the open spaces and	Not clear what open space is being referred to here. If it is green areas between buildings, then define and describe as above. Or if the conference and retreat center is making use of public open space.	Clarify use of public open space by private retreat or conference center; and/or redefine area around buildings in core campus as parks, greenways or appropriate term.

	<p>scenic setting to support a conference center.</p>		
	<p><i>Parks and Recreation</i> The Parks and Recreation designation provides for parks, recreation fields, and landscaped trails and pathways, and associated infrastructure structures. Park spaces may be active or passive, and could include dog parks, play areas, and other uses. These areas are intended to primarily consist of outdoor spaces, but they may contain support structures such as restrooms or small utility buildings. Park and recreation areas may have a secondary function as stormwater treatment and infiltration areas.</p>	<p>Does Parks and Recreation designation apply only in core campus? Please make clear. It should not apply to public open space.</p>	<p>Clarify that Parks and Recreation designation does not apply in public open space.</p>
	<p><i>Buffer Open Space</i> The Buffer Open Space designation encompasses managed open space areas that create transitions between open space habitat and development. Along the edges of the Core Campus, the Buffer Open Space is intended as a defensible fire buffer area, with fire resilient landscaping that protects buildings from fire, along the creeks, the Buffer Open Space creates floodable areas for stormwater management and ensures adequate riparian corridors for wildlife movement. Agricultural and active recreation uses are allowed within this designation as long as they are located further than 50 feet away from</p>	<p>Agriculture is allowed in Buffer Open Space, but the impacts are never analyzed or mitigated. Why is 50 feet adequate to protect riparian areas from agriculture? Why isn't 100 feet a more adequate setback. Why not mitigate by prohibiting agriculture in open space buffer. Does Open Space Buffer overlap with preserved public open space? Agriculture is never mentioned in state statute.</p>	<p>Analyze and mitigate impacts of introducing agriculture into Open Space Buffer Areas. Explain whether this new land use and land use designation overlaps with preserved public open space; and mitigate and analyze the impacts.</p>

	the top of Sonoma Creek’s banks. Within the Buffer Open Space areas, built elements should be limited to trails and planters, permeable fencing, and informational signage.		
	<i>Preserved Open Space</i> The Preserved Open Space designation is intended to preserve open spaces outside of the Core Campus for habitat, recreation, ecological services, water resources, and agricultural uses. This space also contains some infrastructure, including water infrastructure, that is important for the continued functioning of local water systems.	Neither state nor community ever envisioned commercial agriculture in protected public open space. State statute never mentions agriculture or commercial agriculture.	Remove agriculture and commercial agricultural uses from definition of open space; and/or conduct analysis of impacts to open space from new commercial agricultural land uses that is now completely missing from DEIR.
Page 75	western open space	What is this? First time that term is used.	Define western open space.
Page 76	<i>Agrihood</i> The Agrihood District is envisioned as a new neighborhood that is a nod to historic agricultural lands, with physical and visual connections to the historic agricultural areas, low-impact development at a lower intensity, and a smooth visual transition between higher intensities to the west and the agricultural open space at the east.	See comments above about agriculture. The Agrihood appears to overlap with preserved public open space and community separator lands. What the heck is agricultural open space?????	Conduct analysis and mitigate impacts to preserved public open space from new commercial agricultural land uses that is now completely missing from DEIR. Conduct analysis and mitigate impacts to preserved public open space from new “agrihood.” Describe how the agrihood overlaps with community separators; and how a vote of the people is likely to be required as it intensifies development. Define this new term: agricultural open space.
Goals and Policies	Open Space Related	Comment or Question	Action Requested
Page 94 3.1.3.3 Relevant Policies			

and Implementing Actions			
<i>Pg 94, 131 Open Space and Resources and Hazards</i>	2-A Open Space: Preserve the open space surrounding the core campus in public ownership in perpetuity, preventing further development in undeveloped areas and ensuring ongoing stewardship in partnership with neighboring State and regional parks and other institutions and organizations.	While I support this, there is no analysis, description or detail or how or when this will be accomplished. This language is far too vague to provide adequate mitigation. It needs to be more detailed and added to Conditions of Approval. The DEIR needs to provide specifics such as naming prioritized entities such as California State Parks, Sonoma County Regional Parks, Sonoma County Open Space District, California Coastal Conservancy and other “conservation” institutions and “non-profit” and “public” organizations. How will it be accomplished, such as through conservation easements, fee-title, inter-agency transfer or other mechanisms. A timeline, such as within three years of the adoption of the DEIR. Right now, there is nothing in writing; and the state statute is vague, conditional on “feasibility.”	Add specific details for how, when and through what mechanisms the preservation of the open space in public ownership in perpetuity will be accomplished, and provide detailed options, as well as a timeline. Preservation of open space in public ownership in perpetuity needs to be added as a DEIR Mitigation and a Condition of Approval in the Specific Plan.
	2-B Balance: Promote a balance of habitat conservation, agriculture, and recreational open space, reflecting the recent historic use of the surrounding open space.	Balance and Promotion is not an action or requirement. Does not serve as an enforceable mitigation or condition of approval. Agriculture needs to be removed or analyzed and mitigated as a new land use. Define historic use. Recreational use is another new term introduced here without definition.	Either remove this entirely as “balance” and “promote” have no enforceability to serve as a mitigation or condition of approval; or change to “require habitat conservation and protection of natural resources of open space in public ownership in perpetuity.” Remove agriculture. Remove or define “historic use.” Remove or define “recreational open space.”
	Policies	Work with is vague and meaningless. Who is	Add specific details for how, when and through

	2-1 Work with Sonoma County to dedicate the preserved open space as regional parkland.	supposed to work with Sonoma County? Isn't this a Sonoma County document? This needs detailed description of how, when and by what mechanisms that the preserved open space will be dedicated for public ownership in perpetuity. Here you say it will be parkland. In other places you say it will be agriculture. I support making it all parkland. But what does regional parkland mean? Does that prevent the land from going to state parks?	what mechanisms the preservation of the open space in public ownership in perpetuity will be accomplished, and provide detailed options, as well as a timeline. Preservation of open space in public ownership in perpetuity needs to be added as a DEIR Mitigation and a Condition of Approval in the Specific Plan. Define what you mean by "regional parkland."
	2-7 Prohibit lights within the wildlife corridor and along the creek corridor.	Support.	
	2-11 Implement "dark skies" standards for all public realm lighting and all new buildings on the site, including by requiring that all outdoor fixtures are fully shielded, that outdoor lights have a color temperature of no more than 3,000 Kelvins, and that lighting for outdoor recreational facilities be prohibited after 11pm.	Support.	
Page 95	2-20 Require that new development preserve existing trees to the fullest extent feasible. Locate new construction and public realm improvements around existing landscaping features.	Inadequate. "As feasible" is unenforceable. This does nothing to save a single tree, nor does it provide any information on the tree canopy that exists at SDC or the conservation or climate benefits they provide.	The DEIR needs a full assessment of the trees and tree canopy; and needs to require protection of mature trees and by size and species and historic value. The conservation and climate values of the existing trees need to be analyzed.
	2-20 Require that new development preserve existing trees to the fullest extent feasible . Locate new construction and public realm	Inadequate. "Fullest extent feasible" is unenforceable. The use of the word "require" is meaningless here.	The DEIR needs a full assessment of the trees and tree canopy; and needs to require protection of mature trees and by size and species and historic value.

	improvements around existing landscaping features.		The conservation ad climate values of the existing trees need to be analyzed.
Pg 101 Standard Conditions of Approval	MOB-2 Construction of the Highway 12 connector should avoid damage to scenic and open space resources such as trees, rock outcroppings, and historic buildings to the greatest extent feasible .	Inadequate. "Fullest extent feasible" is unenforceable. The use of the word "require" is meaningless here.	Provide actual requirements and conditions of approval to prevent damage to scenic and open space resources such as trees, rock outcroppings and historic buildings.
Page 102	Preserved Open Space land use designation is intended to preserve open spaces outside of the Core Campus for habitat, recreation, and agricultural uses.	Remove agriculture from definition of preserved open space. Agriculture is never mentioned in state statute.	Remove agriculture from definition of preserved open space; and/or conduct analysis and mitigations for introducing ag into open space, and land use designations as described above.
Page 105	preserving the site's open space framework	Define open space framework. Is that just a map?	Define and describe the open space framework.
Page 123 3.2.2.4 Planning Area Overview			
Agricultural Resources	The Planning Area is a located in a rural setting within the vastly agricultural area of unincorporated Sonoma County. Parcels immediately to the south of the Planning Area in the eastern portions are currently being used as vineyards. In this rural context, there is some land within SDC that was historically used for agriculture within the Planning Area.	Inadequate. Vague. Unclear.	Define amount of acreage and actual agriculture uses at SDC. Clarify whether they are commercial ag uses or just for growing food for residents and staff at SDC.
	This area contained historic agriculture uses, including animal husbandry and grazing, orchards, vineyards, crop production and the former Sunrise Industries farm.	Inadequate. Vague.	Define amount of acreage and actual agriculture uses at SDC. Clarify whether they are commercial ag uses or just for growing food for residents and staff at SDC.

	The presence of rich soils and the mandate to preserve open space on the SDC site suggests that agricultural uses could again become an important land use on the SDC site.	Commercial agriculture as the Specific Plan and DEIR propose is a new land use compared to the food and farming conducted at SDC for residents and staff.	As above, either remove agriculture or conduct an analysis of the impacts of introducing commercial agriculture into open space. Define amount of acreage and actual agriculture uses at SDC. Clarify whether they are commercial ag uses or just for growing food for residents and staff at SDC.
Page 124	Approximately 610 acres within the Planning Area is designated as Grazing Land and 98 acres is designated as Farmland of Local Importance.	Yes, but there is no commercial grazing or agriculture being conducted on site; and it is unlikely there ever was.	See above.
	However, there are no current grazing activities occurring within the Planning Area.	Exactly.	Introduction of grazing is a new land use that requires analysis and mitigation in the DEIR.
	No land within the Planning Area is currently zoned as Agricultural in the Sonoma County General Plan; the entire Planning Area is currently zoned as Public Facilities. The only agricultural and resource-based land use permitted in this zone is beekeeping, and agricultural processing is conditionally permitted.	Exactly.	Introduction of new commercial agricultural uses as proposed requires analysis and mitigation in the EIR.
Page 131 3.2.3.3 Relevant Policies and Implementing Actions The following relevant policies and implementing actions of the Proposed Plan address agriculture and forestry resources:	2-D Biological Resources: Promote conservation of existing habitat, including creeks, groundwater recharge areas, and open spaces, through intentional water and energy conservation, sustainable food production, top-tier sustainable building practices, and aggressive waste reduction strategies in order to protect natural resources and critical wildlife habitat, maintain wildlife linkages, and foster environmental stewardship.	Inadequate. Promote is not adequate to protect or mitigate environmental harm to biological resources.	Change promote to "require" and provide some actual mitigations.

	<p>Policies</p> <p>2-1 Work with Sonoma County to dedicate the preserved open space as regional parkland.</p>	<p>Inadequate. Vague. Unclear. “Work with” has no clear definition. Given this is one of the most important assets and elements of the Specific Plan and state statute, the DEIR needs to provide far more detail and actual requirements, mitigations and enforceable measures and conditions of approval to meet CEQA.</p>	<p>Add specific details for how, when and through what mechanisms the preservation of the open space in public ownership in perpetuity will be accomplished, and provide detailed options, as well as a timeline.</p> <p>Preservation of open space in public ownership in perpetuity needs to be added as a DEIR Mitigation and a Condition of Approval in the Specific Plan.</p>
	<p>2-2 Work with agricultural community partners and local farmers to reintroduce agricultural uses in the agrihood and within the managed landscape buffer to promote local production and regenerative farming practices, honoring the site’s history and enhancing the site’s connection to the land.</p>	<p>As above, “work with” is an inadequate term to meet CEQA mitigation requirements. New land uses including the agrihood and agriculture need to be analyzed and mitigated. If the intent is to prioritize regenerative farming and local production, that needs to be made clear. Commercial agriculture is not that.</p>	<p>Analyze and mitigate impacts to open space lands from new land use of “agrihood.”</p> <p>See comments above about agrihood, community separators and agriculture in general.</p>
	<p>2-21 Preserve and enhance the wetlands east of the core campus as a fire break, groundwater recharge, and habitat area.</p>	<p>Required by law to protect wetlands. Therefore, this is not a mitigation.</p>	<p>Analyze and mitigate impacts to wetlands as use as fire break and groundwater recharge area, which are new land uses for wetlands that are protected by federal law.</p>
	<p>2-26 Prohibit the use of all pesticides, rodenticides, and poisons in materials and procedures used in landscaping, construction, and site maintenance within the Planning Area. This restriction should be included in all Declarations of Covenants, Conditions and Restrictions (CC&Rs) to ensure that future homeowners are aware of the requirements.</p>	<p>Support.</p>	<p>Support.</p>
	<p>The proposed Agrihood District (Goal 5-M) would</p>	<p>Exactly. And the impacts of this have not been</p>	<p>Analyze and mitigate impacts of Agrihood on</p>

	<p>support new agricultural uses, with physical and visual connections to the historic agricultural areas, low-impact development at a lower intensity, and a smooth visual transition between higher intensities to the west and the agricultural open space at the east. It is also noted that the County's Zoning Code would be concurrently amended to incorporate the Proposed Plan's new and modified land use districts and overlays, use and development standards, and density and intensity limits, if the Proposed Plan is adopted.</p>	<p>analyzed or mitigated in the DIER.</p>	<p>open space lands that is currently missing from DEIR.</p>
	<p>Given that the Proposed Plan supports agricultural uses as permitted by existing zoning and that the Planning Area does not include any Williamson Act contract lands, this impact would be less than significant</p>	<p>This is nonsensical conclusion. What does it even mean?</p>	<p>Explain.</p>
<p>Page 136</p>	<p>The Proposed Plan would introduce new and modified land use districts and overlays that will accommodate proposed land use classifications including residential, employment center, flex zone, institutional, utilities, parks and recreation, buffer open space, preserved open space, and a hotel overlay zone.</p>	<p>Exactly. And the impacts from all that on open space lands are not adequately analyzed or mitigated.</p>	<p>Fully analyze and mitigate all the environmental impacts to open space lands and Sonoma Valley from Proposed Specific Plan, which has not been adequately done in the DEIR, as comments show.</p>
	<p>In addition, the proposed Agrihood District (Goal 5-M) is planned on the eastern side of the Core Campus and would support new agricultural</p>	<p>New land use.</p>	<p>See above on agriculture as a new land use at SDC and on open space lands.</p>

	uses in recognition of the Farmland of Local Importance, which historically supported agricultural uses on the eastern portion of the site.		
	In addition, the proposed Agrihood District (Goal 5-M) is planned on the eastern side of the Core Campus and would support new agricultural uses in recognition of the Farmland of Local Importance, which historically supported agricultural uses on the eastern portion of the site.	New land use.	As above, new land use needs to be analyzed and mitigated in DEIR.
Page 196 3.3 Air Quality	It is noted that quantified operational emissions do not include potential agricultural uses that would be allowed in the Agrihood district and Buffer Open Space and Permanent Open Space designations of the Proposed Plan. However, as discussed in the Methodology and Assumptions section above, these uses would be located away from future sensitive uses including residential areas (i.e., outside the Core Campus), and permitted agricultural activities are unlikely to occur on a scale that would result in daily operational emissions of the Proposed Plan (Table 3.3-8) exceeding BAAQMD's thresholds for particulate matter.	Inadequate analysis. This is giant leap. The DEIR needs to analyze and mitigate, not make giant assumptions based on no facts or evidence.	Analyze and mitigate impacts of potential new ag uses on open space and SDC property, future and current residents of the area. Provide actual mitigations that are enforceable.
	Limited agricultural uses would be allowed in the Agrihood district as well as the Buffer Open	What are the limited agriculture uses.	Analyze and mitigate new agriculture uses.

	Space and Preserved Open Space areas outside of the Core Campus.		
Page 237 3.4.3.3 Relevant Policies and Implementing Actions <i>Open Space and Resources and Hazards</i>	Goals 2-D Biological Resources: Promote conservation of existing habitat, including creeks, groundwater recharge areas, and open spaces, through intentional water and energy conservation, sustainable food production, top-tier sustainable building practices, and aggressive waste reduction strategies in order to protect natural resources and critical wildlife habitat, maintain wildlife linkages, and foster environmental stewardship.	Promote is not an adequate mitigation.	See comments above to require actual requirements and mitigations, replace “promote” with actionable and enforceable measures.
	2-E Wildlife Corridor: Maintain and enhance the size and permeability of the Sonoma Valley Wildlife Corridor (as shown in Figure 1.6-3) by ensuring a compact development footprint at the SDC site and by minimizing impacts to wildlife movement and safety from human activity and development at the campus.	Inadequate. How exactly will impacts be minimized to wildlife movement and safety from human activity and development at the campus.	Provide adequate analysis and mitigations for minimizing impacts to wildlife movement and safety from human activity and development at the campus.
	2-7 Prohibit lights within the wildlife corridor and along the creek corridor.	Support.	Support
	2-8 Maintain wildlife crossing structures by periodically checking for and clearing debris, vegetation overgrowth, and other blockages from culvert and bridge crossing structures; within the Core Campus, the Project Sponsor should develop and execute a maintenance	Inadequate. What does periodically mean? Who will do the checking? How is a project sponsor equipped to develop and execute a maintenance program? The word should needs to be “shall.”	Provide an enforceable requirement for maintaining wildlife crossing structures.

	2-9 Within the wildlife corridor, meet but do not exceed the defensible space requirements of the County Fire Department to maintain wildlife habitat while maximizing fire safety.	Inadequate. What the heck does this mean exactly?	Explain and define what this means exactly; and who would be responsible.
	2-14 Prohibit all unleashed outdoor cats, and restrict off-leash dogs and other domestic animals to private fenced yards and designated areas.	Support.	Support.
	2-15 Collaborate with local wildlife protection groups to create and distribute educational information and regulations for residents and employees to guide safe interactions with wildlife onsite. Materials should be accessible to all ages and abilities and could include posted signs, disclosures, fliers, or informational sessions, among other things.	Inadequate. Collaborate does not constitute and enforceable mitigation.	Change collaborate to “require SDC property owner and open space managers to”
	2-17 Adhere to residential nighttime noise standards to the extent feasible.	Inadequate. Meaningless.	Provide actual enforceable noise mitigations.
	2-20 Require that new development preserve existing trees to the fullest extent feasible. Locate new construction and	Inadequate. Meaningless.	Provide actual enforceable tree preservation mitigations.
Page 239	2-25 Include protective buffers of at least 50 feet along Sonoma and Mill creeks, as measured from the top-of-bank and as shown on Figure 2.2-1: Open Space Framework, to protect wildlife habitat and species diversity, facilitate movement of stream flows and ground	Inadequate. Why does 50 feet provide adequate protection? Why not 100 feet? What is the Open Space Framework? Just a map? Manage how?	Provide adequate analysis and mitigations for protective buffers, define and describe open space framework, and explain how protective buffers will be managed.

	water recharge, improve water quality, and maintain the integrity and permeability of the Sonoma Valley Wildlife Corridor, and the ability of wildlife to use and disperse through the SDC site. Manage protective buffers so that they support continuous stands of healthy native plant communities.		
	2-27 Ensure that all development adheres to Sonoma County Municipal Code Sec 26-65 on riparian corridor protection.	Following existing law is not a mitigation or measure. It is required by law. How will you ensure it is followed?	How will county ensure that the riparian corridor protection regulations will be followed and enforced; and by whom?
	2-28 Prior to the commencement of the approval of any specific project in the Proposed Plan area, Project Sponsors shall contract a qualified biologist to conduct studies identifying the presence of special-status species and sensitive habitats at proposed development sites and ensure implementation of appropriate mitigation measures to reduce impacts to sensitive habitat or habitat function to a less than significant level.	Inadequate. Future studies do not provide mitigation.	Inadequate.
Page 240 3.4.3.4 Impacts Summary of Proposed Plan	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. Impact 3.4-1 Implementation of the Proposed Plan would not	So here the DIER states that the Preserved Open Space Land Use would remain undeveloped and not be developed, except for recreational daytime uses. Agricultural use and development are not mentioned here. I support that, but it is inconsistent with other parts of the DEIR and Specific Plan. Remove agriculture to be consistent. You can't say there is no impact when	Remove agriculture from preserved open space.

		the impacts of agriculture haven't been analyzed.	
Page 242	Outside of the developed areas, the Proposed Plan establishes dedicated open space areas. Managed open space in these areas would preserve and, in some cases, enhance the quality of sensitive habitats such as wetlands, native grasslands and oak woodlands. Several special-status wildlife and some plant species would be positively impacted by the preservation of these habitats. The open space would preserve the Sonoma Valley Wildlife Corridor and maintain its permeability for the movement of wildlife at a regional scale.	Support, but needs more detail and explanation on how the open space will be managed and how it will enhance habitats and wildlife. I agree that preservation would be beneficial. But once again, the issue of agriculture is not addressed, which could be extremely harmful to everything here.	Reconcile definition and use of preserved open space throughout DEIR and Specific Plan; remove agriculture.
Page 254	The Proposed Plan is intended to contain development within the already developed area (Core Area) and protect open space for recreational and preservation uses. The	Exactly. No agriculture.	See previous comments on agriculture.
Page 255	Because the Proposed Plan preserves the overwhelming majority of the SDC parcel in open space, it ensures continuation of regional connectivity for wildlife, serving as a conduit for transit of wildlife between significant habitat blocks to the east and west.	Inadequate. Just preserving the 755 acres of open space in itself does not protect the natural resources or ensure connectivity for wildlife. Plus, there is a huge amount of inconsistency on how open space is defined and a lack of specificity on how it will be preserved.	Explain in detail how the Proposed Plan ensures continuation of regional connectivity for wildlife, serving as a conduit for transit of wildlife between significant habitat blocks to the east and west.
Page 257	Moreover, the 750 acres of Planning Area that will be preserved as open space will help offset some of the emissions generated by development under the Proposed Plan, though	What? Please provide detailed analysis and assumptions on this point. Looks like another great leap. Particularly since there is no plan for protecting trees, and there is no analysis of the	Please provide detailed analysis and assumptions on this point. Looks like another great leap with very little actual evidence.

	<p>not necessarily on a magnitude sufficient to achieve carbon neutrality for the Planning Area. Nevertheless, this significant source of carbon sequestration supports the 2022 Scoping Plan’s emphasis on natural and working lands.</p>	<p>impacts of introducing commercial agriculture.</p>	
<p>Page 307 3.10.1.1 Historical Land Use</p>	<p>SDC operations made use of the significant open space for recreation and agriculture, with programs that made use of the land to support the clients. Institutional decline in the 1970s and 1980s led to the eventual transfer of several hundred acres of what was identified as surplus land to the county and state park system, including approximately 600 acres that were transferred to the adjacent Jack London State Historic Park in 2002. With its remaining 945 acres, the SDC continued to operate agriculture and recreation programs on the property and kept much of the land in active use until the State announced closure of developmental centers in 2015 and closed the SDC in late 2018.</p>		
<p>Page 319</p>	<p>As described in the Biological Resources Chapter, the campus will be surrounded by a vast network of permanently preserved open spaces to protect natural resources, foster environmental stewardship, and maintain and enhance the permeability of the Sonoma Valley Wildlife</p>	<p>It is not clear how the Specific Plan and DEIR will adequately accomplish this.</p>	

	Corridor for safe wildlife movement throughout the site.		
Page 396	<p>Policies</p> <p>2-1 Work with Sonoma County to dedicate the preserved open space as regional parkland.</p> <p>2-4 Streamline the existing trail system by mapping, improving, and clearly marking designated trails for recreational use in order to minimize negative effects on the open space from recreational use.</p>	<p>As above, “work with” is not an enforceable mitigation.</p> <p>How will streamlining the trail system improve and mitigate impacts from recreation use?</p>	<p>See comments above about this policy and use of term “work with.”</p> <p>Explain how streamlining the trail system will improve and mitigate impacts from recreation use.</p>
	<p>2-5 Consider creating a designated area for water recreation at Suttonfield Lake, such as an access point near the trail from Arnold Drive with rail fencing and clearly marked signage and rules for swimming, dogs, and non-motorized boating.</p>	<p>Not a good idea. That will require a huge amount of supervision, new fences and roads, lighting and all kinds of things that are not conducive to preserving open space, natural resources and wildlife habitat. Plus, it is drinking water.</p>	<p>Remove this concept.</p>
Page 397 <i>Community Design</i>	<p>5-16 Develop a cohesive and integrated system of parks and open spaces, to fulfill the active and passive recreational needs of the community, building on the overall framework outlined in Figure 5.1-1.</p>	<p>Is the entire framework based on one map?</p> <p>How, who and when will a cohesive and integrated system of parks and open spaces, to fulfill the active and passive recreational needs of the community be accomplished?</p>	<p>Explain the framework. Describe in detail how, who and when will a cohesive and integrated system of parks and open spaces, to fulfill the active and passive recreational needs of the community be accomplished.</p>
Page 403	<p>Moreover, 755 acres of the Planning Area will be retained as open space that will be publicly accessible and integrated into the regional parks system (proposed Policy 2-1).</p>	<p>Yes. Support, but many elements of the Specific Plan and DEIR conflict with this and fail to address impacts from new land uses such as agriculture. Also, why limit to regional park system? What about state?</p>	<p>Explain why regional parks and not state parks?</p> <p>Explain how the 755 acres of open space will be “retained” and by whom, when and by what mechanisms.</p>
Page 524	<p>Full Open Space and Public/Institutional Use alternatives were also considered; however, for reasons discussed in Section 4.3, these alternatives were</p>	<p>While I appreciate that these alternatives were considered, they could have been more fully analyzed and evaluated to provide public and decision makers with</p>	<p>Provide more analysis and detail on the Full Open Space and Public/Institutional Use alternatives to provide the public and decision makers</p>

	<p>determined to be inconsistent with project objectives and infeasible, and therefore not analyzed in detail.</p>	<p>another option for the SDC property. While it is true that this option is not specifically mentioned in state statute, when it comes to housing, it states “as appropriate.” The Specific Plan goes far beyond “appropriate” for housing. It also introduces agriculture which was never mentioned in state statute.</p>	<p>with additional options for the future of SDC.</p>
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Wildfire smoke near Mineral, California. (Photo by Mark Gunn, [Flickr](#))

Fire

A Case for Retreat in the Age of Fire as Dozens of Wildfires Threaten Homes in the West

by *Emily E. Schlickman, Brett Milligan and Stephen M. Wheeler*

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After the 2018 wildfire in Paradise, Calif., many fire-damaged homes were razed. [Justin Sullivan/Getty Images](#)

[Emily E. Schlickman](#), *University of California, Davis*; [Brett Milligan](#), *University of California, Davis*, and [Stephen M. Wheeler](#), *University of California, Davis*

*More than **90 large fires** were burning across the parched Western U.S. landscape in mid-September 2022 following a record-setting heat wave, and thousands of people were under evacuation orders. One wildfire had **burned about 100 homes** and buildings in the Northern California town of Weed. As fire risk rises, is it time to consider managed retreat? Three environmental design and sustainability experts explore the options.*

A case for retreat in the age of fire

Wildfires in the American West are getting **larger, more frequent and more severe**. Although efforts are underway to create fire-adapted communities, it's important to realize that we cannot simply design our way out of wildfire – some communities will need to begin planning a retreat.

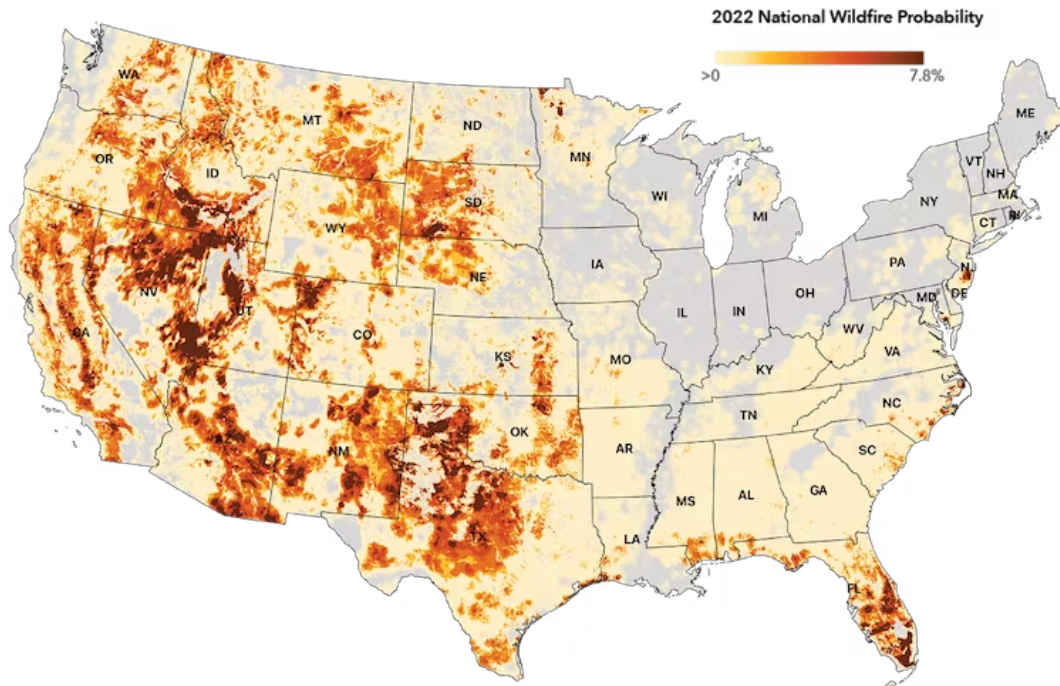
Paradise, California, **worked for decades to reduce** its fire risk by removing dry grasses, brush and forest overgrowth in the surrounding wildlands. It built firebreaks to prevent fires from spreading, and **promoted defensible space** around homes.

But in 2018, a fire sparked by wind-damaged power lines swept up the ravine and destroyed over 18,800 structures. **Eighty-five people died**. It's just one example.

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undeveloped land and urban areas where both wildfires and unchecked growth are common. From 1990 to 2010, new housing in the wildland-urban interface in the continental U.S. **grew by 41%**. By 2020, **more than 16 million homes** were in fire-prone areas in the West.

Whether in the form of large, master-planned communities or incremental, house-by-house construction, developers have been placing new homes in danger zones.



Assesses fire risk at the local level can help communities understand and prepare. The map reflects the probability wildfire will occur in an area in 2022. **First Street Foundation Wildfire Model**

It has been nearly four years since the Paradise fire, and the town's population is now **less than 30% of what it once was**. This makes Paradise one of the first documented cases of voluntary retreat in the face of wildfire risk. And while the notion of wildfire retreat is controversial, politically fraught and not yet endorsed by the general public, as experts in urban planning and environmental design, we believe the necessity for retreat will become increasingly unavoidable.

But retreat isn't only about wholesale moving. Here are four forms of retreat being used to keep people out of harm's way.

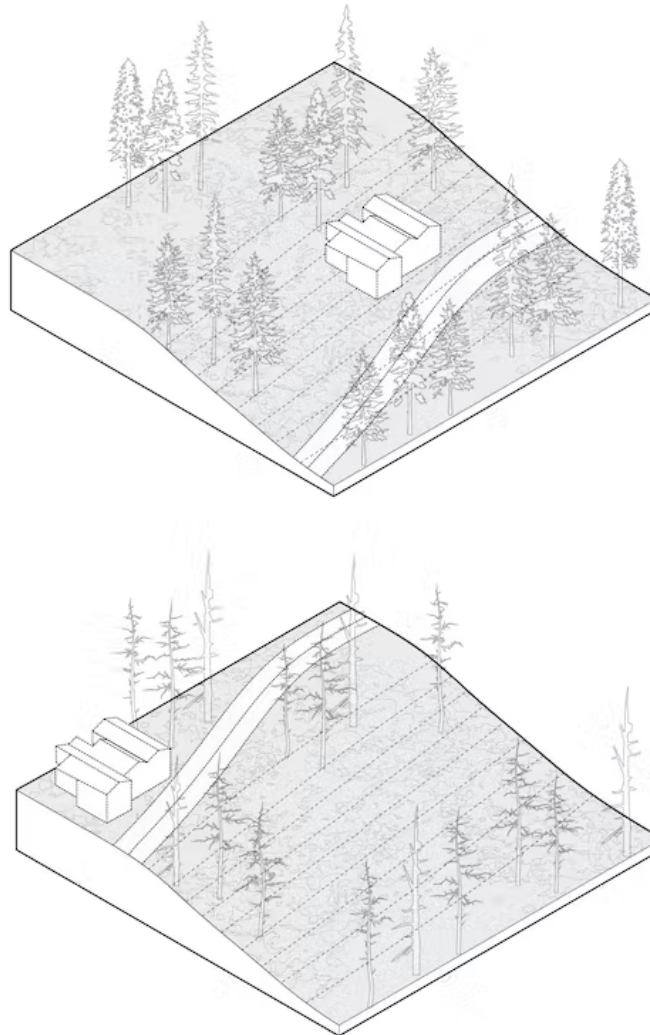
Limiting future development

On one end of the wildfire retreat spectrum are development-limiting policies that create stricter standards for new construction. These might be employed in moderate-risk areas or

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significant grade change, as wildfires burn faster uphill. In the guidelines, steep hillsides have a gradient of at least 25% and a vertical elevation of at least 50 feet. In most cases, new buildings cannot encroach into this zone and must be located **at least 30 feet from the hillside**.

While development-limiting policies like this prevent new construction in some of the most hazardous conditions, they often cannot eliminate fire risk.



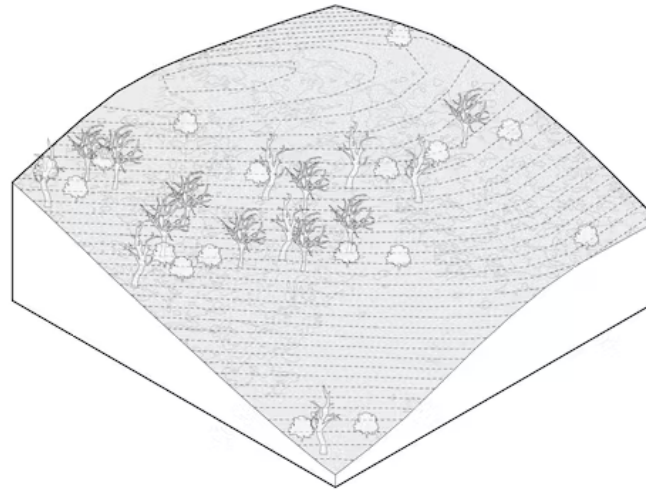
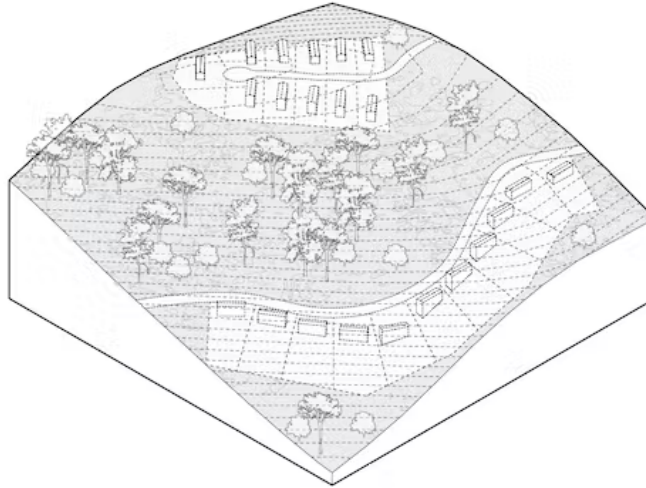
Development-limiting policies can include stricter construction standards. The illustration shows the difference between a home on a steep, wooded hillside that is hard to defend from fire and one farther from the slope. Emily Schlickman

Halting new construction

Further along the spectrum are construction-halting measures, which prevent new construction to manage growth in high-risk parts of the wildland-urban interface.

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example, Los Angeles County recently updated its **general plan to limit new sprawl in wildfire hazard zones**. Urban growth boundaries could also be adopted locally, as many suburban communities north of San Francisco have done, or could be mandated by states, **as Oregon did in 1973**.



Halting construction and managing growth in high-risk parts of the wildland-urban interface is another retreat tool. Emily Schlickman

To assist the process, states and the federal government could designate **fire-risk areas**, similar to Federal Emergency Management Agency flood maps. **California already designates zones** with three levels of fire risk: moderate, high and very high.

They could also develop fire-prone landscape zoning acts, similar to legislation that has helped **limit new development along coasts, on wetlands and along earthquake faults**.

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time, states or federal agencies could refuse funding for local authorities that enable development in severe-risk areas.

In some cases, state officials **might turn to the courts** to stop county-approved projects to prevent loss of life and property and reduce the costs that taxpayers might pay to maintain and protect at-risk properties

Three high-profile projects in California's wildland-urban interface have been stopped in the courts because their environmental impact reports fail to adequately address the increased wildfire risk that the projects create. (Full disclosure: For a short time in 2018, one of us, Emily Schlickman, worked as a design consultant on one of these – an experience that inspired this article.)

Incentives to encourage people to relocate

In severe risk areas, the technique of “incentivized relocating” could be tested to help people move out of wildfire's way through programs such as voluntary buyouts. Similar programs have been used after floods.

Local governments would work with FEMA to offer eligible homeowners the pre-disaster value of their home **in exchange for not rebuilding**. To date, this type of federally backed buyout program has yet to be implemented for wildfire areas, but some vulnerable communities have developed their own.

The city of Paradise created a buyout program funded with nonprofit grant money and donations. However, only **300 acres of patchworked parcels have been acquired**, suggesting that stronger incentives and more funding may be required.

Removing government-backed fire insurance plans or instituting variable fire insurance rates based on risk could also encourage people to avoid high-risk areas.

Another potential tool is a “transferable development rights” framework. Under such a framework, developers wishing to build more intensively in lower-risk town centers could purchase development rights from landowners in rural areas where fire-prone land is to be preserved or returned to unbuilt status. The rural landowners are thus compensated for the lost use of their property. These frameworks have been used for growth management purposes **in Montgomery County, Maryland**, and in **Massachusetts** and **Colorado**.

Incentivized relocating can be used in severe risk areas by subsidizing the movement of some people out of wildfire's way. The illustrations show what before and after might look like. Emily Schlickman

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Vulnerable communities may want to relocate but don't want to leave neighbors and friends. "Wholesale moving" involves managing the entire resettlement of a vulnerable community.

While this technique has yet to be implemented for wildfire-prone areas, there is a long history of its use **after catastrophic floods**. One place it is currently being used is Isle de Jean Charles, Louisiana, which has **lost 98% of its landmass since 1955 because of erosion and sea level rise**. In 2016, the community received a federal grant to plan a retreat to higher ground, including the design of a **new community center** 40 miles north and upland of the island.

This technique, though, has drawbacks – from the complicated logistics and support needed to move an entire community to the time frame needed to develop a resettlement plan to potentially overloading existing communities with those displaced.

In extreme risk areas, wholesale moving could be an approach – managing the resettlement of an entire vulnerable community to a safer area. Emily Schlickman

Even with ideal landscape management, wildfire risks to communities will continue to increase, and retreat from the wildland-urban interface will become increasingly necessary. The primary question is whether that retreat will be planned, safe and equitable, or delayed, forced and catastrophic.

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