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

Dear Mr. Oh,

Please accept the following public scoping comments into the administrative record for the Notice of Preparation of an Environmental Impact Report (EIR) for the Sonoma Developmental Center planning process.

These comments begin with concerns that the NOP is inadequate and needs to be rewritten and recirculated with an actual Sonoma Developmental Center Specific Plan and Project Alternatives that have been voted on by the Board of Supervisors for public review under CEQA– which the current NOP does not contain.

Detailed comments on Scoping of the EIR follow the discussion of CEQA inadequacies.

The former Sonoma Developmental Center land is a highly at-risk greenbelt in the Bay Area with a critical wildlife corridor that runs through the heart of rural Sonoma Valley. The EIR must prioritize and analyze alternatives that focus on conservation and climate values of the entire property, including the historic campus. The planning process to date has prioritized for-profit development and not provided the public or decisionmakers with a full range of options to make informed decisions about the future of these incredibly unique lands.



NOP INADEQUACY AND NEED FOR REVISION AND RECIRCULATION

The current NOP is for an EIR on *Anticipated Development Program and Specific Plan Policy Direction* for the Sonoma Developmental Center that has not been voted on or approved by the Board of Supervisors and does not meet the vigorous requirements of CEQA. It is difficult if not impossible for state and federal agencies and the public to comment on such a vague NOP for a future “anticipated” development program.

The County’s NOP does not meet the minimum standard for adequacy under CEQA as it contains scant information about the Project and **no** information about its potential environmental impacts. We respectfully request that the County revise and recirculate its NOP in order to provide substantive detail about the Project and its likely environmental impacts.

Notice of Preparation is Inadequate to Meet California Environmental Quality Act

The Notice of Preparation does not provide a draft SDC Specific Plan, or any Project Alternatives nor an adequate Project Description as required under CEQA. Instead, the NOP provides an *Anticipated Development Program and Specific Plan Policy Direction* which was never approved, adopted, or voted on by the Sonoma County Board of Supervisors. The *Anticipated Development Program and Specific Plan Policy Direction* is not a basis for CEQA review or consistent with CEQA and must be rewritten and re-circulated. See discussion that follows.

The NOP Lacks Necessary Information Regarding the Project and Its Probable Environmental Impacts:

The purpose of a NOP is to “solicit guidance from members of the public agencies as to the scope and content of the environmental information to be included in the EIR.” CEQA Guidelines § 15375; *see also* CEQA Guidelines § 15082. In order to effectively solicit such guidance, the NOP must provide adequate and reliable information regarding the nature of the Project and its probable environmental impacts.

Unfortunately, the County’s NOP does not meet this minimum standard for adequacy as it contains scant information about the Project and **no** information about its potential environmental impacts. We respectfully request that the County revise and recirculate its NOP in order to provide substantive detail about the Project and its likely environmental impacts.

To be adequate, a NOP must provide sufficient information describing the probable environmental effects of the project, in order to enable the public to make a meaningful response to the NOP. CEQA Guidelines § 15082(a)(1)(C). The County’s approach of publishing the NOP before the Project has been defined contributes to the document’s troubling lack of detail. The NOP simply lists the environmental factors that will purportedly be addressed in the EIR, but it does not provide any specificity as to the nature of these impacts. If the EIR suffers from the same lack of detail and focus, it will be legally inadequate under CEQA.

The NOP does not include a Specific Plan as required by the State of California in its legislation governing the disposition of the SDC property, nor does it provide an adequate project description or any actual alternatives for study in an EIR. All it provides is an *Anticipated Development Program and Specific Plan Policy Direction* and general guidance for these various “programs” and links to previous documents.

There is no Draft SDC Specific Plan, and the Board of Supervisors never voted on any of the above (alternatives, project description, or programs), so it is questionable as to what the EIR will analyze and whether or not this process is legal under CEQA. It is impossible for federal and state agencies and members of the public to comment on a Specific Plan that doesn't exist or for the county to undertake an EIR on an unspecific "program" without a Specific Plan, adequate Project Description, or any Alternatives.

The county must fully describe and analyze the process and whether it meets legal standards under CEQA before moving forward; and instead re-write and re-circulate a proper NOP with specific alternatives and project description that is approved and voted on by the supervisors who are elected to represent the voters of Sonoma County. *So far, all decisions on the SDC planning process have been made by non-elected county staff and consultants who have mostly been unresponsive to the public and the supervisors themselves.*

The SDC NOP Project Description is inadequate under CEQA for these reasons:

There is no draft SDC Specific Plan. The Project Description states that there is a SDC Specific Plan based on state legislation. However, there is no SDC Specific Plan in the Project Description, and the County of Sonoma never adopted or voted on a Specific Plan. The NOP refers only to various "programs" that were introduced for the first time in the NOP as the mechanism for environmental review. The NOP provides only an *Anticipated Development Program and Specific Plan Policy Direction*.

The Project Description is not specific enough to meet CEQA definition of a project. The Project Description refers generally to previous documents for background, but none of them provides an actual Project Description, SDC Specific Plan or Alternatives for the purposes of analyzing under CEQA. The Project Description describes the legislation and the intended process, but not a project.

The Project Description and Project Setting Must be Based on Current Conditions. The county must analyze the environmental impacts of a proposed SDC project based on the most current conditions, which is essentially an abandoned campus and extensive open space with walking trails. Basing the Project Description or Project Setting on conditions from the past, such as the height of residency by clients decades ago is inappropriate and illegal under CEQA.

Voter Approved Community Separators: One major omission in the NOP and associated documents is the lack of reference to the fact that almost all of the SDC lands, other than 131 acres in the core campus, are protected by voter approved Community Separators. To intensify urban, commercial or industrial development in or adjacent to the Community Separators, the county must go to a vote of the people; and any and all environmental impacts to them avoided or prevented. The NOP and EIR must analyze, prevent, avoid and disclose the impacts to the Community Separators and disclose and acknowledge the requirement for a vote of the people to allow any intensification of development in Community Separators, including but not limited to a proposed new road through the Community Separators.

Community Outreach has been completely inadequate to meet the requirements of CEQA.

- **Community Outreach delayed and truncated due to COVID restraints.** The input from the public was not and has not been adequately reflected in documents released by county planning staff. The public hearings were mostly held on Zoom and public comment limited to one or two minutes. The county is more than a year behind on the public process but refuses to seek additional time from the State of California to conduct adequate public outreach to meet CEQA.

- **Supervisors’ specific direction given to county staff on SDC plans were not incorporated.** Direction given to county planning staff by supervisors to incorporate reduced scale of development, increased conservation, and non-commercial elements at a Jan. 25, 2022, informational meeting of the Board of Supervisors to scale back the housing units, analyze public-non-profit options, transfer the open space immediately for permanent protection and eliminate a hotel, among other specific directions, were not incorporated into the NOP or the *Anticipated Development Program and Specific Plan Policy Direction*.
- **The Public Advisory Team was not open to the public;** and it was never consulted or had any opportunity to review the various draft alternatives, project descriptions or programs that were presented by staff; and ultimately never voted on by the board of supervisors.
- **The Spanish language public hearings were attended by 10 or less people.**
- **The Sonoma County Human Rights Commission issued a lengthy statement detailing the extreme lack of public outreach** to diverse stakeholders and members of the public such as people of color, low-income communities, and people with developmental disabilities. See <https://sonomacounty.ca.gov/Human-Rights/Sonoma-Developmental-Center-Statement/>

SCOPE OF ENVIRONMENTAL IMPACT REPORT

In the event that the county moves forward on an EIR despite the failings of the NOP and the public process under CEQA, the following alternatives, issues and other considerations spelled out below must be analyzed, prevented, avoided and/or disclosed in the EIR.

No Alternatives are Provided in SDC NOP – Violating CEQA

As a first step before moving forward on an EIR, the county must outline and detail a SDC Specific Plan with a range of alternatives, per CEQA and state legislation. Currently there is no SDC Specific Plan. All the NOP provides is an *Anticipated Development Program and Specific Plan Policy Direction*

The EIR must include a reasonable range of alternatives which would feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant effects of the project.

Currently the NOP does not provide any alternatives; and the previous draft alternatives presented in November 2021 were three variations on one alternative; and none of which were ever adopted or published as final nor voted on by the supervisors. While the supervisors discussed a “project description” without alternatives they never voted to approve it. And then, out of the blue with no previous mention or discussion, the NOP appeared with its *Anticipated Development Program and Specific Plan Policy Direction*. Nobody has ever heard of such an approach or what it even means legally or otherwise. The county has never explained it.

ALTERNATIVES NEEDED

An EIR for Redevelopment of SDC must contain several alternatives, including an environmentally preferred alternative. The following EIR Alternatives must be studied:

1. No Project Alternative based on current conditions.
2. Environmentally Preferred Alternative

I also request that you analyze the following alternatives to provide the public and decisionmakers with a full range of alternatives as required under CEQA:

Conservation and Climate Alternative: Analyze an alternative that prioritizes the permanent protection of the open space and the historic main campus to serve conservation and wildlife movement and natural resource protection with no housing, no commercial development and no hotel or retail.

This Conservation and Climate Alternative should consider the highest and best of the entire SDC property for conservation, passive recreation, preserving cultural history, and addressing our climate emergency. This alternative should not include residential, commercial, or industrial development of any kind. The Marin Headlands would be a good model for this alternative.

The Conservation and Climate Alternative should analyze and disclose the following:

- immediate transfer of all open space and historic campus to a public or non-profit entity for permanent protection
- designating the entire property and campus for public or non-profit uses
- restoration of Sonoma Creek, riparian habitat, wetlands, oak woodlands, and other important habitat
- climate emergency actions including carbon sequestration such as protection and planting of native trees and plants; soil improvement; surface and groundwater quality and protection
- determining the carbon sequestration value of maintaining the entire property and all open space lands for conservation (and compare to cutting down trees and removing habitat for development)
- dark-sky standards to prevent and reduce lighting that disturbs the environment, people, and wildlife
- limited access for cars and parking
- reuse of existing buildings that serve conservation and prioritize wildlife movement and natural resource protection and removal of buildings that cannot be rehabilitated.
- passive recreation that doesn't impact wildlife movement or natural resources, such as primitive camping, a visitor center, nature outings, school visits (but no events or organized or commercial activities such as weddings, foot races, bike competitions or the like)
- adding the entire property to the State of California's 30 X 30 Initiative
- the types of entities and potential funding sources for a conservation alternative including donation by the State of California to a public or non-profit entity
- clean up of the site by the State of California

Land Back Alternative: The county must also analyze and disclose a Land Back Alternative in the EIR in consultation with appropriate traditional owners.

SCOPING COMMENTS ON EIR ELEMENTS

Environmental Justice

The State of California requires consideration of Environmental Justice under CEQA. It is not listed among the EIR elements nor mentioned anywhere in the NOP. The County must analyze and disclose Environmental Justice issues when analyzing the *Anticipated Development Program and Specific Plan Policy Direction*.

Population and Housing

The EIR must analyze and disclose as well as avoid and prevent the potential environmental impacts to population and housing from the *Anticipated Development Program and Specific Plan Policy Direction*, **including** but not limited to the cumulative growth impacts, and base the analysis on actual population, housing and demographic trends in Sonoma Valley, Sonoma County, and the State of California.

Currently the housing numbers in the *Anticipated Development Program and Specific Plan Policy Direction* are not based on any official population or housing numbers or documents. Housing numbers are not based on any population projections, state-mandated housing numbers, or regional growth patterns. It does not reference the county or city General Plan, Housing Element, RHNA numbers, or any other official document related to housing needs and numbers. **No housing numbers should be allocated to SDC until county and city Housing Element updates are completed, which will be completed by law by the end of December 2022 to take effect in 2023 through 2031.**

The EIR must analyze and disclose that Sonoma Valley is not projected to grow much and is in fact losing population. The updates of the Housing Elements will be addressing all these issues with facts about growth, population, housing, etc. We need those facts before we make any decisions about housing at SDC. Most of the housing and population in the county and across the region will be in the cities on major thoroughfares, not in rural areas like Sonoma Valley.

Under Population and Housing, the EIR must analyze, disclose and avoid/prevent the impacts of:

- Current county Housing Element and RHNA numbers
- Housing Element update now underway
- Next cycle RHNA numbers
- The fact that SDC has NOT BEEN CONSIDERED for housing in current RHNA cycle, nor in current General Plan or the new Sonoma Valley Groundwater Basin Sustainability Plan, the draft Springs Specific Plan, the County or City of Sonoma General Plan, the Sonoma Valley Sanitation District plans, the Valley of the Moon Water District plans, or in any school district or any other current county or district planning documents.
- The EIR needs to analyze the impacts on all relevant agencies and district planning and capacities.
- The EIR needs to analyze the impacts on police, fire, and other public agencies.
- Growth projections from the most recent Plan Bay Area.
- The actual and projected population growth in Sonoma Valley and Sonoma County and California, including the loss of population in recent year.
- The effect of placing 1,000 new housing units in a rural landscape
- The effect of placing 1,000 new housing units in a CalFire designated very high fire danger area.

The EIR must analyze, disclose and prevent/avoid the impacts on:

- Existing General Plan and Housing Element Policies regarding city-centered growth.
- The voter approved Urban Growth Boundaries in Sonoma, Santa Rosa and all nine cities in Sonoma County.
- The voter approved Community Separators including the fact that all but 131 acres of SDC is protected by a voter-approved Community Separator.

In fact, the EIR must analyze and disclose that any SDC plans must go to a vote of the people if any Community Separator lands are impacted by SDC development.

The EIR must analyze and disclose:

Putting the proposed housing in the City of Sonoma and the Springs Urban Service Area where there is room for additional housing under existing General Plans and Housing Elements.

The EIR must analyze and disclose the following facts:

Between the City and Springs, at least 1,700 or more housing units can be built where services, shops and schools already exist, based on the draft NOP for the Springs Specific Plan and the City of Sonoma Housing Element and RHNA numbers.

City of Sonoma: There is definitely room to add housing units within the City of Sonoma's Urban Growth Boundary. The city's state mandated RHNA number for the next 8-year cycle is 311 and the City of Sonoma is meeting its previous cycle quotas.

During the Sonoma UGB campaign, it was estimated at least 1,000 new units are possible, with some rezoning. City of Sonoma planning staff recently did a presentation at that time showing the potential housing sites and is currently updating its Housing Element.

Springs: According to the Springs Specific Plan Notice of Preparation of an EIR, there is potential for 700 new housing units just inside those boundaries. The county Housing Rezone EIR has also identified parcels for higher density housing in the Springs which would result in additional housing in the Springs.

Housing Pipeline: 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 and SDC was neither referenced nor considered as a location for housing.

Historic Campus Development – Inconsistent with State Legislation: The SDC Specific Plans and Vision and Guiding Principles produced by the county planners and consultants to date are inconsistent with state legislation because they propose an entire new community with a significantly increased intensity of development than current conditions and beyond what is explicit in state legislation.

Housing required on the site per the state legislation is as follows (emphasis added): *The agreement shall require that **housing** be a priority in the planning process and that any housing **proposal determined to be appropriate** for the property shall include **affordable housing**. It is further the intent of the state that priority be given to projects that include housing that is **deed restricted to provide housing for individuals with developmental disabilities**.*

The EIR needs to analyze an alternative for housing per the legislation that is exclusively deed-restricted for individuals with developmental disabilities and affordable housing AS APPROPRIATE. The legislation does not call for any market rate or high-end or other housing, so the EIR should analyze and disclose alternatives that no NOT include market rate housing of any sort.

Biological Resources

The Center for Biological Diversity and Sonoma Land Trust are providing extensive details for the EIR Scoping to address biological resources, endangered species, and the Sonoma Valley Wildlife corridor, among other related issues. I/we support their comments in full.

In addition, we would like to highlight these issues to analyze and disclose in the EIR regarding biological resources:

Analyze and disclose the potential that the highest and best use of the entire SDC lands is for conservation and protection of natural and biological resources and that any development on the currently empty and abandoned campus will create significant environmental impacts that cannot be mitigated.

Analyze and disclose the potential that lighting, noise, traffic, new fencing, new residents and other elements of the *Anticipated Development Program and Specific Plan Policy Direction* will forever compromise the only wildlife corridor between the Berryessa Snow Mountain National Monument and the Pt. Reyes National Seashore on the coast. Once fragmented by development, it will lose its value to biodiversity in our Valley and county forever.

The EIR must analyze and disclose the regional impacts of development in the Sonoma Valley Wildlife Corridor.

The EIR must analyze and disclose that Greenbelt Alliance, in its 2017 At Risk report, identified the 945-acres of the Sonoma Developmental Center lands as one of the most at-risk greenbelts in the Bay Area, with a critical wildlife corridor that runs through the heart of the property and Sonoma Valley. Of that 945-acres, 825 acres¹ were designated in 2016 as protected community separators by the 83 percent of the voters of Sonoma County. This county policy prevents intensification of development on those lands and needs to be analyzed, disclosed and prevented/avoided if possible, through measures and mitigation and ongoing monitoring as part of the EIR analysis on any SDC Specific Plan.

Endangered and Threatened Species

The endangered, threatened, and sensitive species that occur in or otherwise utilize Sonoma Creek, wetlands, oak habitat and other lands and waters of SDC must be inventoried and methods, mitigation, and monitoring to protect them in perpetuity analyzed and disclosed in the EIR.

The facts and inventory contained in the INaturalist Project “Sonoma Developmental Center Natural History” that reports 14,622 observations of 1,142 species as of March 7, 2022, providing a snapshot of the incredible biodiversity and importance of the SDC lands.

Preventing increased threats to wildlife that utilize the SDC lands, particularly in regard to interactions with humans. If more people live, work, and visit SDC, then the likelihood of wildlife interactions increasing must be considered.

Human – Wildlife Interactions

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

The EIR should analyze a mitigation measure that requires all residents and workers at SDC to take wildlife education courses once a year; and to sign legally binding agreements saying that they will not harm wildlife, alter wildlife habitat or install fences or security lighting or alarms or take any actions that would interrupt the natural behavior of wildlife.

A mitigation measure to require wildlife cameras throughout the SDC campus and open space lands to track the movement of wildlife; and to determine how and if wildlife movement or presence is being negatively impacted by development.

A mitigation measure to require a baseline study of existing conditions and the density, quantity and quality of wildlife, habitat, water, air quality, and rare, sensitive and endangered species to be conducted and completed before any development on SDC; along with requirements to monitor and report every year on any changes to the baseline conditions and need for mitigating actions to prevent degradation of all of the above.

A mitigation measure that will require removal of people or enterprises or objects such as lighting, fences, or buildings; and or a temporary or permanent end to activities and operations if they are found to negatively impact wildlife movements or habitat or to reduce the density of wildlife, particularly sensitive or endangered species.

A mitigation measure that prohibits pet dogs and cats from being on site in residences or work or other sites on campus. Dogs should be allowed only on leash on trails for day use walking by visitors.

Greenhouse Gas Emissions

The EIR must analyze and disclose the fact that building a new community in Sonoma Valley is inconsistent with City-Centered Growth and Climate Resiliency policies of the county, region, and state of California by significantly increasing and generating new GHGs that would never occur otherwise.

The GHGs from any use of SDC should be considered as new increases in GHGs in the county.

The GHGs should be quantified, analyzed, disclosed and prevented/avoided and/or mitigated for all aspects of the *Anticipated Development Program and Specific Plan Policy Direction* including:

VMTS from all mobile and stationery sources:

Resident driving, delivery trucks, postal vehicles, visitors, workers, repair people, construction workers, building rehabilitation, building demolition (including embodied carbon that was released when originally constructed using cement, concrete and other materials).

The threshold of significance should not be relative to the entire state of California's or Bay Area Regional thresholds but must be disclosed and considered entirely new emissions sources compared to the Sonoma County baseline GHGs and projections from the county Regional Climate Protection Authority.

Land Use and Planning

The EIR must analyze and disclose the fact that the *Anticipated Development Program and Specific Plan Policy Direction* is inconsistent with and conflicts with decades of city-centered growth policies contained in the Sonoma County General Plan, voter-approved Community Separators, the nine cities' voter approved Urban Growth Boundaries in Sonoma County, Plan Bay Area, and state General Plan, CEQA and Climate Policies.

The EIR must analyze and consider the fact that the *Anticipated Development Program and Specific Plan Policy Direction* is a sprawl project in a rural community without adequate transit, fire, police, shops, schools, or other public services.

The EIR must analyze and consider the fact the *Anticipated Development Program and Specific Plan Policy Direction* requires a vote of the people of the County of Sonoma due to impacts on Community Separators and also requires General Plan Amendment because is it inconsistent with the General Plan and the Housing Element.

Here are some of the core issues and concerns that need to be analyzed, disclosed and avoided/prevented in the EIR related to the intensification of development proposed at SDC to date:

- A new community at SDC/Eldridge is not in the county General Plan.
- A new community at SDC/Eldridge has not been proposed in state legislation, only housing.
- There is an existing community: Glen Ellen. Glen Ellen has a market, coffee shop and services.
- The neighboring communities of the Springs, City of Sonoma and Kenwood also provide services.
- The impact of a new community in the heart of Sonoma Valley is likely to impact the other communities' environment and economy.
- Creating a new community on rural lands in the middle of open space and wildlife corridor is in direct conflict with state, regional and county goals for city-center growth.
- There is no regular or reliable transit in Sonoma Valley and won't be any time soon.
- People who live at Eldridge will have to drive everywhere which will increase GHGs and VMTs,
- The EIR is most certainly going to find huge increases in GHGs, VMTS and significant environmental impacts.
- The environmental impacts of a new community will be significant and very difficult if not impossible to mitigate.

- Building a whole new community at SDC/Eldridge will be significantly growth inducing.
- Creating a new community at SDC/Eldridge is likely to accelerate the urbanization of Sonoma Valley from Glen Ellen to 8th St. East.
- Minimize any new development and “transfer” the proposed housing into Glen Ellen, Springs, and the city of Sonoma. All are slated to provide more housing in the next decade and beyond.
- Ultimately, SDC and Sonoma Valley are not going to be a place for huge amounts of growth and housing; and no one at the state or regional or county level are planning for that. As all policies state, growth is going, as it should be, mostly into city centers.
- If the county and community want to see the Valley more developed and urbanized, it is time to consider the big picture and the likelihood of it being at all sustainable; and how much affordable housing will actually be built.

Transportation and Traffic

The EIR must analyze and disclose the fact that most driving and vehicle trips are within Sonoma Valley and/or within Sonoma County, not in or out of the County. Virtually all driving in the county, nearly 80 to 90 percent is all within the county; and in Sonoma Valley it is almost all between the city and the Springs.

The EIR must analyze and disclose the fact that few people commute into the County or Sonoma Valley for work, school or any other reasons. The EIR must disclose that new development at SDC will exacerbate the current level of VMTs, crowding on rural roads, stress the capacity of current roads and public services that respond to accidents; and do nothing to reduce driving.

Yes, there are folks who drive in/out to the county for work and to visit, but the number is less than 10 percent of VMTs. We need to look at facts not anecdotal stories. We can't even get a decent shuttle to work in the Valley or go to Santa Rosa. Building a bunch of houses on rural lands in the middle of ag lands will only exacerbate the problem.

The EIR must analyze and disclose the data compiled by the Sonoma County Transportation Authority about VMTs and driving patterns in Sonoma Valley and Sonoma County using cell phone data and other up-to-date traffic and other analyses that are now available.

The EIR must analyze and disclose that Sonoma Valley does not have adequate transit, never has, and what the costs and ridership would be required to institute an adequate transit system to meet the thresholds to receive state and federal and transportation dollars.

The EIR must analyze and consider the fact that there is no major transit hub at SDC as defined in state law and by Plan Bay Area.

The EIR must analyze and consider the fact that SDC lands are not considered a Priority Development Area nor an opportunity zone; and that it is rural land dominated by open space and agricultural zoning.

The EIR must analyze and consider that public services to serve any potential residents are readily available in Glen Ellen, Kenwood, the Springs, or the City of Sonoma. These four existing communities provide basic services and are available close by to meet most basic resident needs.

Wildfire Hazards

The SDC lands are designated as a in high-risk area for wildfire by CalFire. The county's SDC EIR must analyze and disclose wildfire hazards and require avoidance of any development that will increase wildfire risk to humans or the environment.

Mitigations and measures must be analyzed and required to improve wildfire resilience for people and the environment at SDC and in the Sonoma Valley over baseline conditions.

Safe evacuation routes and an evacuation plan must be analyzed and be required to be prepared before any development occurs at SDC. Shelter-in-place must be avoided as a wildfire mitigation measure and used only as a last resort if at all.

Others have prepared more detailed wildfire hazard comments, including the Center for Biological Diversity, Sonoma Mountain Preservation, which I support.

CONCLUSION

The Sonoma Developmental Center is an incredible conservation and climate opportunity for the people of Sonoma County and the State of California. Please do the right thing and revise and recirculate the NOP for the EIR as requested above so that we can achieve the best possible outcomes for the environment and community.

If you continue on the current path, then please respond to and incorporate all of my scoping comments and recommendations for analysis, disclosure, studies and avoidance of environmental harm in the EIR.

Sincerely yours,



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

Parcel 054-090-001 512 acres – CS 498.52 [12 not in CS] **Parcel: 054-150-010** 290.89 – extending CS 162.08.

054-150-005 119 acres none in CS **054-150-013** 35.83 acres Existing CS

Totals: 825 in CS 131 Not in CS