SIERRA CLUB
REDWOOD CHAPTER

REDWOOD CHAPTER
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September 29, 2025

Mr. Wil Lyons (Planner)
Permit Sonoma
2550 Ventura Ave.
Santa Rosa, CA 95403

VIA EMAIL TO: SDC@sonomacounty.gov

CC Via Email: Supervisor Rebecca Hermisillo, Assemblymember Damon Connolly, Senator Christopher Cabaldon

RE: Sierra Club Scoping Comments on Notice of Preparation of Environmental Impact Report for SDC Campus Specific Plan and PLP24-0005 Eldridge Renewal Project

Dear Mr. Lyons,

Sierra Club Redwood Chapter is submitting these comments into the administrative record for the Notice of Preparation of an Environmental Impact Report (EIR) for the Sonoma Developmental Center (SDC) Campus Specific Plan (Plan) and Eldridge Renewal Project (Project).

Sierra Club remains alarmed that Sonoma County and the state of California continue to move forward with a large sprawl development on the SDC historic campus. The proposed SDC Campus Specific Plan and Eldridge Renewal Project consists of 950 new housing units, a luxury hotel, 130,000 square feet of commercial facilities and 3,000 parking spaces in the middle of a regionally significant wildlife corridor in the heart of rural Sonoma Valley. The Project also abuts voter protected greenbelts designated as county community separators.

The area is far from shops, schools, public transit and public services in direct conflict with multiple state, regional and local land use and climate policies and commitments. The historic campus is surrounded by high wildfire risk zones. Given these realities, Sierra Club asserts that this location is not a sustainable or rational place to build a new subdivision (the biggest in the region since the 1970s). Instead, the County and State should consider that the campus would best serve the people of California for low impact conservation, climate resilience and recreational use and as a historic park.

Nevertheless, the Sierra Club appreciates the opportunity to comment on the current round of environmental review. We urge the County to ensure that the new EIR is fully adequate to meet the requirements of the California Environmental Quality Act (CEQA) including:

- providing robust evaluation of negative environmental impacts
- avoidance of impacts
- enforceable environmental mitigations
- a mitigation monitoring and enforcement plan
- a range of alternatives including a no project alternative and a Conservation and Climate Alternative as described in our comments.

The previous so called "self-mitigating" EIR for the SDC Specific Plan fell far short of CEQA and was decertified by a judge. Please do not revisit that approach.

Sierra Club Redwood Chapter is a volunteer-run organization with thousands of members that works to conserve and protect our outdoor spaces as well as foster a meaningful connection to the environment for the community to value and enjoy. The Redwood Chapter of the Sierra Club is a geographically vast region composed of six local groups and encompassing all or part of nine counties in Northwest California: Lake, Mendocino, Napa, Solano, Sonoma, Del Norte, Humboldt, Trinity and Western Siskiyou Counties.

ENVIRONMENTAL IMPACTS

Our primary areas of concern for full protection from negative environmental impacts from urbanization of the SDC campus as proposed on the Plan and Project include:

- Sonoma Valley Wildlife Corridor connectivity and functionality
- Open Space Protection and Voter Approved Community Separators
- Biological Resources including animals, plants, forests and waterways
- Climate Emissions from vehicles and operations
- Environmental Justice
- Tribal Consultation
- Housing and Population
- Wildfire
- Air and Water Quality
- Lighting and Noise

Detailed comments on these environmental impacts follow.

INADEQUACY OF THE NOP

Sierra Club asserts that the County's NOP does not meet the minimum standard for adequacy under CEQA. The NOP contains vague information about the Plan and Project and little 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 Plan and Project and its likely 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.

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.

HOW THE NOP IS INADEQUATE

For example, the Project Description is inconsistent and lacks enough detail to provide the public, agencies and other stakeholders with enough information to offer comprehensive comments.

In fact, the Project Description is presented with three different titles in the NOP which is confusing:

- SDC Campus Specific Plan and PLP24-0005
- Sonoma Developmental Center Campus Specific Plan and Housing Development Project
- Sonoma Developmental Center Campus Specific Plan and Eldridge Renewal Project

Which is it?

The NOP also contains many elements without definitions that need to be described clearly such as:

Affordable Housing – does this mean very low, low, moderate and/or above moderate and how much of each is proposed?

Missing Middle – what is the exact definition in terms of housing price and household income?

Micro-manufacturing – what is that exactly? We recently saw a potentially polluting plastics plant proposed and turned down in Rohnert Park. Could a plant like Resynergi be allowed?

Typical building height would be two to three stories – Is it two or three? How many two or three?

All Project structures would maintain at least a 100-foot setback from top-of-bank for Sonoma Creek and a 50-foot setback from top of-bank for Mill Creek, and in many cases even greater setbacks.—Clarify what is meant by "and in many cases even greater setbacks."

These are only a few examples of the vague language in the NOP that must be defined.

SDC Campus Specific Plan

The Campus Specific Plan is described in a few short paragraphs with a map and few details. Is it the same as the campus portion of the SDC Specific Plan that was decertified? Is it essentially the same as Eldridge Renewal's development project? This needs to be clarified.

The NOP also indicates that the EIR will not review areas that are outside of the immediate campus but included in the Plan/Project such as the proposed new CalFire station, which has received zero public or environmental reviews of any kind.

The SDC Campus Specific Plan needs additional description with details of the planned development; and the EIR must analyze the environmental impacts from all areas of the proposed plan/project.

Eldridge Renewal

Like the SDC Campus Specific Plan, the Eldridge Renewal project relies on structures, roads and other construction in areas outside of the campus that were not included in the NOP as part of the EIR. The NOP needs to be amended to include those areas of development and disturbance for environmental review and inclusion in the Project.

The campus plan and urban development cannot be parceled out from the entirety of the SDC lands, open space and other environmental elements and reach adequacy under CEQA. Piece-mealing is not allowed under CEQA.

EIR – New, Revised, Supplemental?

The NOP does not make clear whether the EIR for the SDC Campus Specific Plan and/or the Eldridge Renewal project will be a completely new EIR, a revision of or supplement to the decertified SDC Specific Plan EIR (which would require court review and approval) and/or whether it is some combination of the above. NOP needs to make that clear to the public.

BASELINE CONDITIONS

The Project Description and Project Setting Must be Based on Current Conditions. The county must analyze the environmental impacts of the proposed SDC Campus Specific Plan and Eldridge Renewal development project based on the most current conditions. The current conditions comprise an abandoned campus and extensive open space with deteriorating buildings, streets, pipes and other infrastructure. 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.

Specifically, the baseline conditions at SDC have changed significantly since the Sonoma Developmental Center Existing Conditions Assessment was published in 2018. (WRT, August 2018) Since then, SDC lands have been essentially vacant for the past eight years and conditions on the campus and across the landscape have changed significantly.

During COVID shutdown, these lands, like many others, returned to a more natural state as human presence decreased significantly. Wildlife activity is likely to have increased, such as mountain lion and bear crossings through the wildlife corridor that goes through the campus based on findings from Audubon Canyon Ranch's mountain lion project and work of the North Bay Bear Collaborative. (See NOP comments from Sonoma Land Trust, Sonoma Ecology Center, Audubon Canyon Ranch for details on current wildlife crossings.)

After COVID, however, and in more recent years, public use of the SDC lands appears to have increased, with more people walking, fishing, riding bikes and even using drones and piloting model airplanes on site. This has resulted in more trash, erosion, noise and disturbance on the campus and open space. The few trash cans around are overflowing with bags of dog poop and other garbage. The state has now abandoned SDC other than a few security vehicles, so conditions will certainly deteriorate.

All these new conditions must be assessed with a new or revised baseline conditions report and analyzed and avoided or mitigated to less than significant in the EIR.

ENVIRONMENTAL IMPACTS

In addition to our comments here, we incorporate by reference the NOP comments on environmental impacts submitted by the Center for Biological Diversity in their entirety.

SONOMA VALLEY WILDLIFE CORRIDOR

As described in the NOP, the Sonoma Valley Wildlife Corridor is a regionally significant critical linkage for wildlife moving from as far east as the Berryessa Snow Mountain National Monument to Pt. Reyes National Seashore on the coast. Full protection of the Sonoma Valley Wildlife Corridor from urban development of the historic campus and the multitude of environmental impacts is essential if it is to remain functional.

The EIR must provide detailed maps with exact boundaries of the wildlife corridor based on current science and wildlife tracking. An accurate and detailed mapping of the wildlife corridor is needed to reflect the ongoing and historic passage of wildlife through the SDC lands and the historic campus. What we have seen is rough references to the wildlife corridor around the edges of the campus, when indeed the corridor goes right through the campus as mapping by several sources has indicated.

Many millions of dollars of private and public funds have been invested in protecting the Sonoma Valley Wildlife Corridor to date. With a quick google search, we were able to estimate that over the last 10 to 15 years alone, at least $10 to 12 million dollars of public and private monies have been invested in studying the wildlife corridor, restoring sections of Sonoma Creek and Stuart Creek, and conserving land through acquisition and conservation easements. As existing maps show, almost all the land around the historic campus is protected as a result of these longstanding efforts and public investment.

These investments must be recognized in the EIR and any negative environmental impacts to these public lands by a private developer (or anyone) must be prevented, avoided and disclosed to the public.

Avoidance and Mitigations

As avoiding impacts to the wildlife corridor is the best approach, the EIR must analyze all possible ways to avoid any impact to the passage of wildlife through the campus and SDC lands.

Avoidance measures:

The best approach would be to incorporate the historic campus into the park land; that must be evaluated.

Other avoidance measures to consider would be to eliminate development on the historic campus and/or scale back development to minimal reuses of existing buildings for non-profits and special housing needs (developmentally disabled, veterans, senior, homeless).

Possible mitigations to analyze include:

- No fencing on campus or in open space; minimal use of "wildlife friendly" fencing, no backyard fences
- No lighting on campus or in open space; minimal use of "dark sky" lighting, no stadium lighting on ball fields or conference center; no nighttime games or concerts or events that require lighting; no holiday lights or tree lighting or decorative lighting outside of buildings and structures, minimal use of streetlights or safety lights
- No loud noise on campus or in open space; no amplified outdoor concerts, no amplified or loud events, no sporting events, no fireworks, no parades, no noise that disrupts wildlife particularly during night, daybreak and dusk
- No dogs, cats or other pets on campus or open space (despite that I love walking my dog there; we are already seeing too many dogs and too much dog excrement on the land). Barking dogs disturb wildlife.
- No use of drones, motorized boats or planes, no off road vehicles
- Maximum possible setbacks from Sonoma Creek, Mill Creek and other waterways, at least 200 feet
- Prohibit the use of pesticides, rodenticides, and poisons on campus and all SDC lands.
- Prohibit removal of any wildlife without California Fish and Wildlife predation permit
- Preserve all trees; no tree removal without public notice and multiple arborist inspections
- Follow current county tree ordinance and go beyond to protect tree species not covered.

OPEN SPACE

SDC is surrounded by 9,000 acres of parkland and conservation easement-protected properties and is the center of a large greenbelt between Sonoma and Glen Ellen on Highway 12 that creates a natural, open landscape and a buffer against growing development pressures. A 2015 natural resources assessment prepared by Sonoma Land Trust and the Sonoma County Agricultural Preservation and Open Space District concluded that SDC is "*integral to the character of the Sonoma Valley, and the ecological health of the North Bay*."

While 650 acres of open space has been transferred to state parks (instead of 750 acres as promised and described in previous EIR and SDC Specific Plan), the impacts on the natural resources and environment from the proposed project and plan will have significant negative impacts. The full protection of the Open Space in and around proposed development is essential for environmental, climate and community health. See avoidance and mitigation measures above under Sonoma Valley Wildlife Corridor that would also apply to protecting the open space.

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 the core campus, are designated as voter approved Community Separators through a ballot measure that passed by 83 percent of county voters in 2016. 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 the Community Separators 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.

While we understand that the county is making the assumption that under the Builder's Remedy that no county General Plan or Zoning policies apply to Eldridge Renewal, the fact that the community separator designations are in county statute through the voters means that they carry more legal weight.

Given that the so-called "agrihood" is located directly in the community separator requires that the environmental impacts be analyzed, avoided, mitigated, and approved by a vote of the people of California. See Measure K attached and map of Community Separators and overlap with SDC lands.

CalFire Carve Out

In addition, the EIR must consider the last-minute carve out of 100 acres of designated open space by the state for a new CalFire facility without any public consultation or environmental review. The CalFire carve out is also in a voter approved community separator that prohibits any intensification of development without a vote of the people of Sonoma County.

This "carve-out" is out of conformance with the SDC state enabling legislation which specifies the general parameters of parcels to be developed (e.g., the 180-acre core campus) and parcels to be set aside as parkland in perpetuity (e.g. 750 acres of open space surrounding the campus). (Section 14670.10.5(a)(9): "*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.")

In addition, we understand the carve-out that follows the route of a proposed road linking Arnold Drive to Highway 12 — a road that was only considered by Sonoma County as for emergency vehicle access (Figure 3-1, SDC Specific Plan), not as a link between development on the campus and development alongside the highway. This potential road would traverse wetlands and likely trigger CEQA as well as delineation and mitigation under the Clean Water Act Section 404.

State 30 X 30 Goals: The State of California Natural Resources Agency has made several public commitments to add the SDC open space lands to the state's 30 x 30 Initiative but has not done so to date. Apparently, the delay is due to a lack of boundary mapping of the open space lands that have been transferred to state parks.

The EIR needs to include specific mapping of the SDC open space lands and measures to protect and to avoid negative environmental impacts from the campus development, agrifood in the community separator and the CalFire carve out.

Open Space Possible Avoidance and Mitigation

- Adding the entire SDC property into the State of California's new initiative to conserve 30 percent of the state's lands by 2030, known as 30 X 30.
- Remove agrihood from community separator
- Remove CalFire facility from community separator
- Reduce size and scale of development
- See list under Sonoma Valley Wildlife Corridor

BIOLOGICAL RESOURCES AND BIODIVERSITY

The SDC lands including the campus are known to provide habitat for multiple at risk species and plants as well as keystone species that must be protected from negative environmental impacts from the proposed plan and development:

- At risk species: Species of special concern: SDC provides documented habitat for: 1 special-status reptile, 22 special-status birds, 1 special-status fish, 1 special-status invertebrate and potential habitat for: 2 special-status amphibians and 9 special-status mammals. These include Northern Western Pond Turtle, California

Red-legged Frog, Foothill Yellow-legged Frog, Northern Spotted Owl, Pallid Bat, Townsend's Big-eared Bat, Steelhead – Central California Coast, California Freshwater Shrimp.

- At risk plants
    - SDC provides potential habitat for 6 special- status plants: Big-scale balsamroot ,Fragrant fritillary, Franciscan onion, Jepson's leptosiphon, Napa false indigo, Narrow-anthered brodiaea
    - Habitat includes oak woodlands, grasslands, remnant redwood forests, wetlands and a lush riparian corridor along Sonoma Creek.

Keystone species that also utilize SDC lands and the campus include river otters, black tailed deer, badgers, black bears, mountain lions, bobcats, and others.

According to INaturalist data compiled in Sonoma Valley, more than 1,500 species of animal and plant life has been recorded at the Sonoma Developmental Center. https://www.inaturalist.org/projects/sonoma-developmental-center-umbrella-project

The EIR must include current studies and references to the biological resources and biodiversity at SDC and provide avoidance and mitigation measures to prevent environmental harm to these biological resources.

CLIMATE CRISIS, EMISSIONS AND VMTs

As found in the previous EIR, the proposed development at SDC is certain to produce "significant and unavoidable" climate and 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. That EIR offered no mitigations or conditions of approval to reduce or avoid the amount of driving.

As cited in our December 13, 2022, letter to the Board of Supervisors regarding the Final EIR on the SDC Specific Plan (which was later decertified), the following mitigations for reducing climate emissions and VMTs in particular should be analyzed.

- Restricted Private Vehicle Ownership (e.g., in all "agrihood" dwellings east of Arnold Drive). A restriction on private vehicle ownership (accompanied by a robust car sharing service) is entirely feasible, as described and recommended by the World Economic Forum (July 3, 2022): https://www.weforum.org/agenda/2022/07/3-circular-approaches-to-reduce-demand-for-critical-minerals/

- Other feasible mitigations to reduce private car usage are described in a recent meta-analysis by Kuss, P. and K. Nicholas 2022: https://www.sciencedirect.com/science/article/pii/S2213624X22000281
- Streets serving the SDC Community should be designed for speeds of 15 MPH or less, with sidewalks and bike lanes that invite people to engage in healthy, active transportation.
- Arnold Drive shall be re-constructed to accommodate speeds of less than 30 MPH between Glen Ellen and the City of Sonoma, together with Class 4 bike lanes, and there shall be a 30 MPH speed limit.
- Sonoma Transit shall provide shuttle bus service between the City of Sonoma, Eldridge, and Glen Ellen, with 5-minute headways during peak hours, and 10-minute headways at other times. The transit vehicles shall accommodate all riders with bikes, scooters, etc.
- Each group of approximately 20 living units at SDC shall be designed to accommodate the following modes of transportation:
    - Approximately 20 electric golf-cart-size vehicles with a range of about 10-miles per recharge.
    - 20 to 40 electric-cycles, scooters, skateboards, etc., with a range of 5 to 15-miles per recharge.
    - Two shared, standard electric vehicles or vans, with ranges up to 300 miles.
    - There shall be no more than five parking places for private motor vehicles, and they shall be leased at prices according to demand.
- Secure and convenient bike-racks should be provided at every office and commercial area.
- All public parking spaces in the Sonoma Valley shall be metered and priced at rates that encourage the use of active transportation.

The EIR should adequately analyze the numerous feasible opportunities for VMT reduction and GHG mitigation contained in the following published plans:

- County's own Vision Zero Action Plan
- County's own Comprehensive Transportation Plan
- County's own Transit Integration and Efficiency Study
- County's own Climate Mobilization Strategy
- County's own Climate Emergency Mobilization Strategy Framework
- MTC/ABAG's Plan Bay Area 2050, including the "more than 80 specific actions" for feasible VMT reduction and GHG mitigation contained therein.

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 Campus Plan and Eldridge Renewal.

Free access to nature, hiking trails, fishing, and picnicking on the SDC lands are already well used by families from the Springs area of Sonoma Valley. A ropes course on the property is still used by school classes and run by non-profits.

In particular, the Springs community must be directly and effectively consulted during the EIR public process. The proposed development is likely to displace and/or discourage families with different economic and social status from venturing into a high end, 80 percent market rate subdivision to access existing nature. Use of the property by the Springs community needs to be assessed as part of a new baseline conditions report.

Other cumulative impacts to the Springs community also need to be analyzed and prevented such as gentrification, growth inducing, air pollution from increased vehicle emissions, public, health due to increased emissions, travel delays due to increased traffic, and other relevant impacts.

TRIBAL CONSULTATION

The EIR must conduct meaningful tribal consultation on the SDC proposals that will uplift tribal sovereignty and co-stewardship. We know that these lands were occupied historically by Native American tribes including the Wappo and that Native American Archeological sites are known to exist on the property.

POPULATION AND HOUSING—GROWTH INDUCING

The EIR must analyze and disclose as well as avoid and prevent the potential environmental impacts to population and housing from the campus plan and development but not limited to the cumulative and growth inducing impacts, and base the analysis on actual population, housing and demographic trends in Sonoma Valley, Sonoma County, and the State of California.

The EIR must analyze and disclose that Sonoma Valley is not projected to grow much and is in fact losing population. 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
- 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 years.
- The effect of placing 1,000 new housing units in a rural landscape

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.

WILDFIRE

The SDC historic campus is surrounded by lands that have recently burned several times. These adjacent lands on both sides of the campus project are designated as Very High Fire Risk Hazard areas by CalFire in new maps that were not available during the previous public environmental review process. Neighboring Glen Ellen suffered catastrophic loss of homes during the 2017 wildfires. The roads were jammed for hours as people tried to flee the wildfire.

The county's 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.

WILDFIRE NEW INFORMATION FOR MITIGATION

Lake County Mitigations: In particular, Sierra Club refers the county to the detailed mitigations required by the State of California's Attorney General Robert Bonta in a lawsuit settlement for the large Guenoc Valley development in Lake County which has many similarities to the SDC development plans. See *People ex rel. Bonta v. County of Lake* (2024) and https://oag.ca.gov/news/press-releases/attorney-general-bonta-announces-settlement-address-wildfire-ignition-risks-and Also see attached legal settlement with wildfire measures.

Sonoma Grand Jury Report: The EIR must also consider the recent findings from the Sonoma County Grand Jury 2025 report on emergency evacuation plans which found that Sonoma County has not met the state's requirements for comprehensive evacuation planning by the 2030 target, which includes mapping neighborhoods with limited exits, identifying emergency shelters, and evaluating route capacity.

The report found that the County of Sonoma is unprepared for large-scale evacuations during wildfires and floods, citing delayed compliance with state-mandated evacuation planning laws and inadequate road infrastructure. Key evacuation routes remain dangerously narrow or prone to bottlenecks, while communication systems, particularly in rural areas, lack the reliability needed for timely alerts. Although the County has a written emergency plan and active operations center, it has postponed full evacuation route mapping and traffic signal upgrades until 2030. (Valley of the Moon Alliance website https://votma.org/news)

SAFE Study: We also urge the county to include the findings of the Sonoma Area Fire Evacuation (SAFE) Study that found that*: an hour after an evacuation is announced, traffic on Arnold Drive and Highway 12 between Kenwood and the Sonoma City limits, normally 45 mph, will slow to 1-2 mph for another 2-3 hours, seldom approaching 5 mph. New projected developments of thousands of residences at the Sonoma Developmental Center (SDC), Hanna Center, and the Springs Area would significantly slow evacuation further, adding another hour of 1-2 mph travel time.*

See: https://votma.org/evac-study

Sonoma Land Trust NOP Comments on Wildfire Resilience: In addition Sierra Club supports and incorporates by reference the detailed comments about wildfire resilience, impacts and alternatives that were included in the NOP Scoping letter submitted by the Sonoma Land Trust, Sonoma Ecology Center, Audubon Canyon Ranch and Jack London Partners.

AIR AND WATER QUALITY; NOISE AND LIGHTING

Sierra Club shares the concerns and recommendations on air and water quality and noise and lighting with other commenters: Center for Biological Diversity and the Sonoma Land Trust et al. The EIR must assess, analyze and

prevent, avoid or mitigate the increased air and water pollution and noise and light disturbance from the Plan and Project.

ALTERNATIVES NEEDED

The EIR for SDC Campus Specific Plan and Eldridge Renewal Project must contain several alternatives in order to comply with the California Environmental Quality Act, including an environmentally preferred alternative. The following EIR Alternatives must be studied:

1. No Project Alternative based on current conditions.

2. Environmentally Preferred Alternative

3. Alternatives for scaled back development provided by the Sonoma Valley 100 and SCALE groups

4. A public alternative, that is, giving or selling the property to a public community or land trust

5. 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.

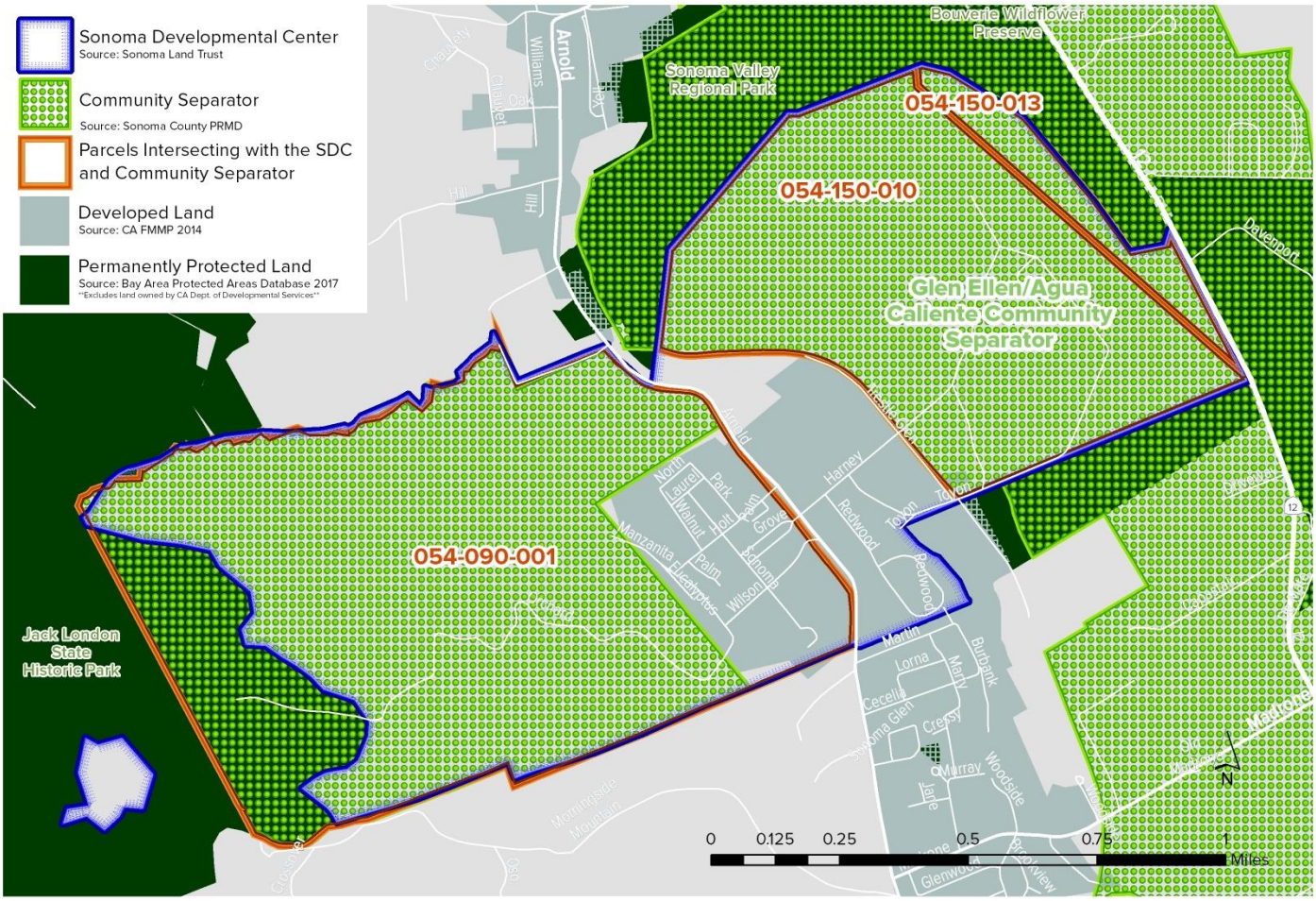
Sierra Club Redwood Chapter appreciates this opportunity to once again provide recommendations on how to move forward with the repurposing of the Sonoma Developmental lands for the benefit of the people of California.

Teri Shore Sincerely yours,

Teri Shore

Conservation Chair Redwood Chapter

And Redwood Chapter Executive Committee

https://www.sierraclub.org/redwood/region

Parcels Intersecting with the Community Separator and Sonoma Developmental Center