



DEPARTMENT OF PARKS AND RECREATION

Armando Quintero, Director

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To: Wil Lyons, Planner III
County of Sonoma
Permit & Resource Management Department
2550 Ventura Avenue
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Date: September 25, 2025

Subject: Sonoma Development Center Campus Specific Plan and Eldridge Renewal Project, Notice of Preparation of a Draft Environmental Impact Report, SCH No. 2025081410, Sonoma County

Dear Mr. Lyons,

The California Department of Parks and Recreation (California State Parks) appreciates the opportunity to comment on the Notice of Preparation (NOP) for the Sonoma Developmental Center Campus Specific Plan and Eldridge Renewal Project. We are providing these comments as a **Trustee Agency** under the California Environmental Quality Act (CEQA), (California Code of Regulations, Title 14, Section 15386) as we have statutory responsibilities related to the Project due to our direct adjacency to the Sonoma Developmental Center (SDC) Campus and our jurisdiction over a portion of the former SDC lands.

The primary purpose of this letter is to ensure the Environmental Impact Report (EIR) is environmentally sound, legally sufficient, and supportive of outcomes that are consistent with California State Parks' core mission and responsibilities.

Concerns Regarding Wildfire Buffer, Water, and Infrastructure

The NOP describes the project as including a "49-acre wildfire buffer that rings the core campus on its western, northern and eastern perimeters". The NOP also states that this "300-foot-wide wildfire buffer" would be "managed by the State as landscaped open space in accordance with regional fire resiliency best practices".

However, the NOP does not specify which state agency would be responsible for its management, how it would be managed, or what the potential impacts on natural and cultural resources would be. It is apparent from the NOP that the wildfire buffer that "surrounds" the Core Campus encroaches on the Open Space that is now managed by State Parks. The NOP should be revised to clarify and address, and the EIR should analyze and mitigate, (1) encroachment of the wildfire buffer on the preserved Open Space, and (2) ownership, development, and management of the wildfire buffer.

While we are committed to being a partner in ensuring wildfire resilience on the State Park open space that we manage, managing the buffer is not directly related to State Park's core mission, and as such, we lack the resources or capacity to be responsible for managing the buffer. The NOP states that the fire buffer would be managed as landscaped open space including mowing or grazing grasslands, providing fire resistance landscaping, etc. The EIR must analyze and explain the specific approach to and responsibility for wildfire buffer management and ongoing maintenance, including its interface with and potential impacts to resources on and adjacent to State Parks' property.

Furthermore, the NOP provides no clarity on the project's approach to managing water and infrastructure. While approximately 650 acres of open space were transferred to State Parks, the water infrastructure, including pipelines, reservoirs, diversions, and a water treatment plant, was retained by the Department of General Services (DGS) under its jurisdiction. We understand that these assets may be transferred to the developer as easements over State Parks property. The EIR must analyze all proposed project activities, including those occurring on State Parks' Open Space property, and explain how these will be managed without impacting State Parks' property and resources.

The NOP states that the Core Campus would be served by a "self-contained water system" that includes "lakes, natural springs, and wells" and contemplates a "1.8 million-gallon-per-day treatment plant". However, the lakes, springs, other surface waters and groundwater that would supply the system are within the Open Space and the Park, not within the Core Campus. The NOP fails to consider the biological impacts, including impacts on species and habitat, that will result from using these sources of water to supply the residents and visitors at this scale following the proposed Core Campus development. The EIR must analyze and mitigate the environmental impacts of supplying and using water for the project, including impacts on Fern Lake, Suttonfield Lake, other surface waters, and groundwater within the park.

Potential Impacts to Natural, Cultural, and Tribal Cultural Resources, and Recreation

The EIR must comprehensively analyze and mitigate potential impacts to natural, cultural, and tribal cultural resources. Of particular concern are:

- Recreation and Access:** The NOP lacks consideration for how the project would impact public access to primary trailheads and roads that serve SDC Open Space managed by State Parks. The project controls access to these trailheads and roads, and the EIR must address how this access will be maintained and enhanced. Increased population from the project will likely lead to increased visitation to adjacent open spaces, potentially causing encroachments, unauthorized access, and the creation of illegal trails. This increased use will also strain existing trails and recreational infrastructure, which could result in impacts such as increased garbage, maintenance needs for restrooms, and issues related to dogs and other pets. The NOP acknowledges and promotes the "connections to the surrounding trail systems" for residents and visitors but does not address the impacts of potentially unrestricted access to the Open Space and the Park. The EIR should analyze and mitigate impacts to species and habitat in

the Open Space and the Park resulting from unrestricted access to these areas by Core Campus residents and visitors following development.

- **Water Resources:** The EIR should analyze the impacts of managing water infrastructure, including pipelines, reservoirs, diversions, and a water treatment plant, as easements on State Parks' jurisdiction. This analysis must also include the potential for new utility lines and the effects of ongoing operations and maintenance.
- **Habitat and Biodiversity:** The EIR should evaluate the project's impacts on sensitive species and plant communities. This must include an analysis of impacts to threatened and endangered species and their habitats. The EIR must also consider the potential for the introduction and spread of non-native and invasive species that could impact native flora and fauna.
- **Cultural and Tribal Cultural Resources:** The EIR must consider any potential impacts to cultural and tribal cultural resources on and adjacent to the project site. The analysis should include consultation with all relevant tribal entities to identify and protect any resources that may be impacted.
- **Access for utilities and other infrastructure:** The EIR should contemplate needed third party access for public and private utilities to service and maintain infrastructure, including water, sewer, electricity, and cell towers situation on and across State Park lands.

Natural Resources Alternative

The EIR for the Sonoma Developmental Center Campus Specific Plan and Eldridge Renewal Project must include a Natural Resources Alternative. Alternatives are required under California Code of Regulations, Title 14, § 15126.6, which mandates that an EIR describe a range of reasonable alternatives to the project or its location that could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. The Natural Resources Alternative should be designed to reduce the severity or eliminate direct and indirect impacts on natural and cultural resources, including water resources.

An alternative focused on natural resources would provide decision-makers with a better understanding of how impacts could be reduced beyond the proposed mitigation measures.

We look forward to reviewing a comprehensive EIR that fully addresses these concerns and requests. If you have any questions, please contact Matthew Allen at Matthew.Allen@parks.ca.gov.

Sincerely,

DocuSigned by:

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Matthew Allen
Deputy District Superintendent