



**Comments for Sonoma Developmental Center NOP
SDC Campus Specific Plan and PLP24-0005**

Water Supplies and Waste Water Treatment

The EIR analysis of the developer's proposal, the Specific Plan, and alternatives needs to address the source(s) and the quantitative adequacy of water supplies to meet the respective needs of those proposals, the legal rights to use that water, whether groundwater is to be extracted to supply the project or its alternative and, if so, how much and the effect of such wells' groundwater extraction on the Valley aquifers. If groundwater extraction is to occur, the analysis should also include an assessment of groundwater extraction on streamflow amounts and duration and on any associated impact on riparian habitat.

The water supply analysis needs to include the water rights and needs of the roughly 700 acres being transferred to California State Parks and the roughly 50 acres being transferred to the new CalFire campus to be developed on former SDC property. If the State is transferring its water rights from the State Parks land, the terms of such transfer need to be explained, and the EIR should assess the magnitude and environmental effect of transferring the water from State park land to the SDC development.

A comparable analysis is required for ensuring that adequate wastewater collection and treatment facilities are available for the proposals, and if the existing collection and treatment facilities need upgrading to properly handle, identify that fact and who is responsible for such upgrades and what their impacts are.

The EIR needs to clearly distinguish the differences in impacts on water supplies between the proposed project and alternatives, as well as the respective impacts on wastewater collection and treatment.

The relative consequences of storm water runoff in the proposals should also be analyzed.

The EIR should also analyze the feasibility of the proposed project, with regard to the financial commitment necessary to ensure that the necessary water supplies and rights are available for that project. Further, the EIR should identify who would bear those costs – the County or the project proponent.

This comment incorporates by reference the issues and questions in the February 24, 2025 Valley of the Moon Alliance submission to Permit Sonoma Re: PLP24-0005 Eldridge Renewal LLC. That letter is already in Permit Sonoma's records, so there is no apparent reason to attach it again to this submission.

Fire Evacuation Analysis

Earlier this year, VOTMA provided Permit Sonoma and all County Supervisors with a *Sonoma Valley, California Wildfire Evacuation Time Estimate Study*. The study was conducted by KLD Associates, a nationally recognized firm with expertise in evacuation planning and years of experience working with federal government (including the Federal Highway Administration and the Federal Emergency Management Agency) and numerous city and county government agencies. We recognize that the County EIR will undertake an analysis of the capacity of the existing Sonoma Valley road infrastructure to handle evacuations, as well as fire evacuation needs and consequences of the proposed alternative uses of the SDC property. This set of comments incorporates that KLD study by reference, as it is already in Permit Sonoma's records and there would seem to be no need to attach it to this document again.

As the KLD study was performed by a highly respected and knowledgeable firm with expertise on the subject, and was funded by hundreds of Valley residents concerned about this issue, the EIR should identify where its analysis may differ with the KLD study and the reasons for the different views.

Building Density and Fire Risks

In analyzing the fire risks of the developer's proposal and alternatives, the analysis should consider:

- the effect of housing density and population size on fire risk and its spread (including how close together structures are);
- while new construction would need to meet fire codes, existing buildings proposed for reuse are likely made of concrete and masonry with considerable fire resistance; and
- the water supplies and locations needed for effective fire-fighting.

Transportation Infrastructure

The EIR should analyze whether any improvements to road infrastructure connecting public roads (including Arnold Drive and Sonoma Highway) to the project would be needed under the developer's proposal or alternatives. If improvements are needed, what are they and who would be responsible for funding those improvements? Would the same improvements (e.g., an EVA connecting to Sonoma Highway) be needed for the different alternatives, including the lesser density alternative?

Although Level of Service (LOS) analysis has been supplanted in CEQA by VMT (and LOS cannot be found to be a recognizable impact), there is no prohibition for using LOS analysis for land use policy purposes in General Plans or Specific Plans. Particularly with the CalFire project proposal on the table, in the context of the SDC Specific Plan, Permit Sonoma should conduct an LOS assessment to gauge the effects of those two projects together

Air Quality and Greenhouse Gas Emissions

The EIR should analyze the full environmental life cycle differences in greenhouse gas and air pollutant production between the developer's proposal of demolition and substantial new construction and the balanced Provide, Protect and Preserve alternative, which focuses much more on reuse of existing structures.

The environmental analysis of the proposed massive demolition needs to include: 1) consideration of the steps necessary to comply with California state and federal regulations governing lead paint in older buildings, including regulations to contain dust, minimization of its creation, and proper disposal of LBP-contaminated waste; 2) the destinations where the materials will be transported for ultimate disposal; and, 3) the vehicle miles travelled and emissions produced from disposal of such materials.

Hazardous Materials

During the first NOP/DEIR scoping exercise, VOTMA identified an apparent gap in testing for hazardous materials. See letter from VOTMA to Permit Sonoma dated March 24, 2022 (to the attention of Brian Oh), which is incorporated by reference in these comments. In VOTMA's view, the work to date to uncover and assess the presence of toxic materials and other hazards that do or would pose risks to the environment in terms of the broad scope of known and future development of the Project site has been inadequate. The 2017 and 2018 analyses were limited, and even they stated that more work needed to be done. VOTMA has no record of these concerns or our March 2022 letter being addressed or further testing being done. If there are hazardous materials present from the 125 or so years of operation as a public developmental center, those hazards should be identified and the State of California has an

obligation to face that responsibility. It should not be allowed to simply transfer these public lands for development and holding by private or other non-governmental parties with potentially significant unknown or unassessed hazards present as latent risks for those who follow and for the public generally. At a minimum, potential developers are entitled to know what risks they are buying into and assuming.

Cumulative Impacts

In developing the Specific Plan for the property, the SDC Enabling Legislation defines the property as “all state-owned real property comprising the Sonoma Developmental Center”. This includes the State Park lands and the property proposed for a CalFire training center that have been part of the SDC property. The CalFire project needs to be assessed as a cumulative impact of a known project that will interact with the SDC project development, including what the water demands and water source proposed will be, including whether groundwater will be used.

State Parks should also disclose its plans for development and use of the acreage already transferred to it, particularly as it relates to the effects on the wildlife corridor and to water rights and usage that the Eldridge Renewal proposal appears to assume it will have some access to. Those rights and usage need to be defined and assessed.

Finally, unless the Hanna Center proposed development has been permanently withdrawn, its effects should be considered in a cumulative impact analysis.

Enabling a Fair and Open Feasibility Comparison

In assessing the economic feasibility of the Eldridge Renewal project and the Provide, Protect and Preserve alternative, the analysis needs to include, inter alia, the alternative’s

- o Avoidance of the costs of demolition and long-haul disposal of hazardous waste at specialized out-of-state disposal sites, as well as the environmental consequences of such demolition and disposal;
- o Avoidance of costs of rebuilding and expansion of the street system;
- o Avoidance of the cost of removing the present underground utility system, and of replacement with a new system required before any construction can begin on the site, compared to the alternative’s new connections to existing trunk mains (water and sanitation) at a fraction of the cost of complete replacement
- o No significant extra load on existing utilities in the alternative, and
- o Substantial tax credits for converting existing historical structures to housing under the alternative, rather than tearing down such structures.

Finally, in order to facilitate an accurate feasibility comparison as between the ER project operating as the proxy Specific Plan and other alternatives, the consideration and terms under

which that property would be transferred by the State to Eldridge Renewal, and the allocations of risk for future costs, including potential contamination costs, should be publicly disclosed. Without that information the feasibility analysis process is not transparent and likely to be biased. At a minimum the purchase price should be disclosed.

Respectfully submitted,

The Valley of the Moon Alliance

September 2025