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September 26, 2025

Via E-Mail

Wil Lyons, Planner III
County of Sonoma
2550 Ventura Avenue
Santa Rosa, California 95403
sdc@sonomacounty.gov

Re: Sonoma Developmental Center Campus Specific Plan and Eldridge Renewal Housing Development Project

Dear Mr. Lyons:

Thank you for the opportunity to provide comments on the Notice of Preparation ("NOP") for the Environmental Impact Report ("EIR") for the Sonoma Developmental Center Campus Specific Plan ("Plan") and Eldridge Renewal Project ("Project"). We submit these comments on behalf of the Sonoma Land Trust ("SLT"), a local, non-governmental, nonprofit organization with the mission of partnering with local communities to protect the open, natural, and working lands and waters of Sonoma County to secure healthy and thriving futures for all.

SLT firmly believes that with intelligent planning, the Sonoma Developmental Center ("SDC") property can play a pivotal role in protecting our County's ecological and recreational values for future generations. Additionally, because SDC is state owned, the Plan and Project present a rare opportunity for California to take a leading role in demonstrating how redevelopment projects can deliver climate resilience, biodiversity, and affordable housing that meets the needs of the community. As currently proposed, however, SLT is concerned that the Plan and Project will have significant impacts to the local environment not identified in the NOP—most notably to wildlife habitat and connectivity, water resources, and increased wildfire risk—without providing a significant contribution to Sonoma County's affordable housing goals. Without reductions to the development footprint and scope of development, the Project will result in significant impacts to the wildlife corridor and natural environment as well as wildfire risks that will endanger public health and safety.

As an initial matter, the Project described in the NOP omits critical information about the Project and its probable environmental impacts. Next, any EIR prepared for this Project must fully identify, avoid, and mitigate impacts to wildlife and the surrounding community. The Legislature has given the County clear mandates to preserve the biological and ecological value of the SDC property and to provide affordable housing for County residents (Gov. Code 14670.10.5). Meeting these mandates is imperative given the ecological significance of the Sonoma Valley Wildlife Corridor ("Wildlife Corridor")—which depends on the SDC property to connect critical habitat throughout the region—and the dearth of affordable housing in the area.

It is therefore crucial that the EIR use the best available science to ensure the Plan and Project will truly minimize impacts on natural resources and wildlife while prioritizing affordable housing over market-rate alternatives. Without such diligence, this Project cannot meet the shared goal of the state and the County to re-invigorate the historic SDC as a "…vibrant and sustainable community," which includes the ability of wildlife to use and disperse through SDC.

The Campus has been largely vacant since 2018. Many of the impacts to wildlife, water, and other natural resources which were present during historic periods of operation, have been absent in the last seven years. Our best information about natural resources is information that has been obtained since 2018. As such, the EIR should use conditions at the time of the current Project application as a baseline when assessing impacts at least for natural resources. To utilize a pre-2018 baseline would require the Lead Agency to discard the best available information about wildlife habitat use, and other natural resource conditions.

Finally, the Sonoma Land Trust feels strongly that the EIR should include analysis of a resource protection alternative that prioritizes avoidance of natural resources on the site and incorporates critical mitigation measures outlined in this letter below. Such an alternative would not jeopardize the project's feasibility. Instead, it would make this a more sustainable project that meets the legislative directive to provide for both permanent protection of natural resources and affordable housing.

I. The Notice of Preparation is insufficient to understand probable impacts of the Project, does not identify the permits required to build the Project, and does not contain a complete list of probable environmental impacts.

The NOP fails to serve its most basic purpose to provide the public and reviewing agencies "with sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response." *CEQA Guidelines § 15082(a)(1).* At a minimum, this information must include a description of the project, a description of the project location, and a description of the project's probable environmental effects. CEQA makes clear that an EIR must (i) scrutinize in detail the Project's significant environmental effects, many of which are already known; (ii) develop feasible alternatives that would avoid obvious impacts; (iii) develop meaningful thresholds of significance for identifiable impacts, and (iv) adopt appropriate mitigation.

The NOP suggests that the EIR will not meet this burden. For example, the Lead Agency has proposed to limit the EIR analysis to the core SDC campus, despite the fact that the Project proposes significant activities on additional SDC lands now owned by the California Department of Parks and Recreation or CalFire. Under CEQA, a lead agency may not piecemeal analysis of a project. All foreseeable development related to the Plan and the Project must be analyzed in the EIR. In order for agencies and interested parties to provide comments, it is imperative that the NOP contains a description of the Project's probable environmental effects. Although the NOP provides some of this information, there are major omissions.

Project Description: The Project Description and Location does not include portions of the Project that would occur outside of the Core Campus Area defined in the NOP. It is critical that

the EIR analyze all proposed activities, not just those impacts within the Core Campus and wildfire buffer. In particular the Project proposes to:

- Repair, Replace, Reconstruct, and Operate an extensive water system, which is mostly located on SDC Open Space lands outside the Core Campus managed by State Parks. Figure 8 in the NOP shows the existing water distribution system but does not show the existing system of surface water diversions, reservoirs, and pipelines located on SDC Open Space lands, nor does it show the proposed water system. Previous reports (Sherwood Hydrology and Site Infrastructure Report 2018 and 2023 System Report) note that many features of the water system (raw lines, treated lines, inlets, diversions, siphons, settling ponds, pump stations, etc.) "need replacing" or "are near the end of their useful life". (SDC Existing Conditions Report Hydrology and Site Infrastructure, Sherwood Engineers 2018, pg 2. and Water System Assessment Report, Wood Rogers, 2023, pg. 28-73.) Operating the water system will involve maintaining many pieces of infrastructure, changing reservoir water levels, renewing or increasing water diversions from wetlands, flushing of tanks, and maintenance. The water system is critical to the feasibility of the project, and implementation of all of the elements are likely to result in significant impacts. Therefore, the entire water system must be considered in the EIR.

- Construct an emergency-only road and bicycle connector to highway 12, across SDC land proposed for a CalFire Headquarters. Figure 12 of the NOP shows this road leaving the proposed Project Area.

- Construct a multi-use path along Arnold Drive, north of campus (Figure 7 of NOP).

The Project Description presents an unstable project description. There are several project components mentioned that "could" be included, especially in regard to a water/wastewater treatment plant, which would effectively increase Project water supply.

Permits required: The NOP lists a variety of permits required, but given the potential impacts that we've identified, the Project will also need to obtain the following permits:

- Lake and Streambed Alteration Agreement
- Domestic Water Supply Permit (State Water Resources Control Board)
- State Construction General permit (stormwater)
- Municipal Separate Storm Sewer Systems Permits (MS4)
- Section 404 (Clean Water Act) for placement of fill into Sonoma Creek
- Federal Incidental Take Permit, in regards to federally listed species, after consultations with USFWS or NMFS, for steelhead, California freshwater shrimp, western pond turtle, and California red-legged frog
- State Incidental Take Permit, after consultation with CDFW, in regards to California freshwater shrimp and steelhead.

Probable environmental impacts: The NOP omits many probable environmental impacts. Below is a list of potential impacts that should have been included. We give more detail as to the nature of these impacts below.

- Biological impacts to:
  - State and Federal TES Species
  - State special status species
  - Common wildlife species
  - Sensitive vegetation types
  - Wildlife connectivity
  - Bed and Bank of Streams
  - Hydrology of streams
- Greenhouse Gas Emissions: substantial carbon dioxide releases related to demolition (versus preservation/reuse), tree removal, and no renewable energy generation proposed
- Hydrology and Water Quality
  - Increase in stormwater runoff, due to increase in impermeable surfaces, resulting in erosion due to existing conditions and insufficient stormwater design
  - In-stream impacts to creeks
  - In-stream impacts from construction, demolition, and water system repair
- Recreation
  - Deterioration of infrastructure and natural resources on adjacent public lands including SDC Open Space, unless EIR specifies more safeguards
- Utilities
  - Unreliable water supply for multiple dry years
- Wildfire
  - increased exposure to wildfire as result of Project
  - Increased risk of ignitions, due to increase in people on landscape
  - Impacts to environment from creation and operation of a shaded fuel break
  - Exposure to post-fire hazards including debris flows and water contamination
- Mandatory Findings of Significance:
  - Environment: potential for significant impacts to the health and function of Sonoma Creek, via on-site impacts to habitat quality for protected species, decreases in water quality, and blocking terrestrial species from using it as a connectivity corridor.
  - Cumulative impacts: Two other projects are proposed for former SDC lands, including the addition of Open Space lands to the State Parks system, and the construction of a regional CalFire Headquarters to the east of the Project area, both with potentially significant impacts on similar resources (sensitive habitat, protected wildlife species, wildlife connectivity).
  - Safety: due to slowed evacuations, increased fire risk, increased exposure to wildfire, exposure to post-fire hazards, exposure to dam failure, and exposure to multi-year drought impacts on water supply

A. The NOP fails to disclose all probable environmental impacts and the EIR's approach to the analysis.

Between Spring 2024-Spring 2025, project developers submitted four rounds of increasingly detailed revisions and descriptions of the Project, before their application for subdivision and development was accepted as complete by Sonoma County. In this process of revisions, project proponents provided detailed plans for the Project, including detailed maps, plan sets, and reports in regards to the water system, tree removal, and other aspects of the Project.

We have no reason to believe that any of the plans or information contained in a February 2025 submittal to the county (available here: https://share.sonoma-county.org/link/7NXJIdFZm-A/) have changed in advance of the preparation of this NOP. Based on the February 2025 submittal, we have identified the following likely impacts from the Project description:

1. Impacts to the Sonoma Valley Wildlife Corridor

The NOP describes goals for, and impacts to, wildlife connectivity, but does not incorporate the necessary design elements to protect wildlife connectivity function. One of the goals for the development plan includes: "*...the plan would establish riparian setback areas along creeks to….ensure adequate riparian corridors for wildlife movement".* The NOP also acknowledges that "*there is an established regionally important wildlife corridor that adjoins the northern edge of the Project Area, linking large habitat areas of the Sonoma and Mayacamas mountain ranges. This corridor is a critical habitat connection for special-status species, as well as other local wildlife, including mountain lions. As such, the EIR will need to evaluate potential impacts to the functionality of the wildlife corridor. Rigorous analysis will be required to identify potential impacts and inform mitigation strategies that can reduce or avoid significant environmental impacts at both the programmatic and project level.*"

However, the Project falsely represents the wildlife corridor as a distinct geography that can be avoided, versus designing the Project to protect wildlife connectivity especially along Sonoma Creek, Mill Creek, and in allowing wildlife to move around the edges of campus. If the Lead Agency adopts our suggested threshold for defining significant impacts (below), the analysis would find a significant impact, as the Project has the potential to prevent wildlife from moving across the Project Site, by blocking (or at least discouraging) some animals from moving along Sonoma Creek and Mill Creek. If appropriate design alternatives and mitigation measures are adopted, this impact could be avoided. The width of the proposed riparian setbacks along creeks is narrower than the recommended buffer for species present in those locations.

The Project has the potential to sever wildlife connectivity, especially along creeks. Due to habitat removal, habitat degradation, residential activities (domestic pets, social recreation, etc.), light and noise, and recreation, the direct and indirect impacts of this Project on individual species would include:

- Behavioral changes such as altered foraging or hunting strategies due to human activities (many species)
- Reduced habitat quality leading to local reduction in effective population (California freshwater shrimp, steelhead)
- Reduced fitness and more human conflicts, leading to shorter lifespan or reduced mating opportunities (mountain lion, black bear)
- Reduced chance for dispersal of juveniles or adults to a new habitat (yellow-legged frog)
- Genetic isolation of breeding populations (pond turtle, red-legged frog)
- Local extirpation due to habitat degradation and isolation
- Impacts on neighboring properties / ecosystems as a result of blocked dispersal (i.e. black bears which recently crossed the wildlife corridor)
- Cumulative effects of increased human activity throughout the wildlife corridor due to expected projects on other former SDC lands

At a minimum, the EIR needs to include the following information and analysis:

- Adequately describe the setting
  - Describe the location and nature of the wildlife connectivity and wildlife corridor at the SDC, using more sources than the 2013 *Critical Linkages* report. Identify where multiple studies indicate wildlife connectivity exists and use areas of overlap as a baseline for assessing Project impacts.
  - Identify and assemble information about the corridor and species that use it (local studies, regional studies, species responses to human activity), and fill in missing gaps about special status species locations and habitat use through focused field-based biological surveys, especially for amphibians and reptiles with potential habitat on the SDC (see "special species" for more info). CDFW and Sonoma Land Trust recommended this in 2022.
- Describe Project elements, activities, uses, and locations in sufficient detail to allow impact assessment, especially in riparian areas.
- Establish an appropriate threshold of significance for impacts. We suggest: "Will the Project result in changes that will significantly reduce the ability of multiple common species or a single special status species to move *across* or *around* the Project site?"
- Analyze Project impacts to wildlife connectivity, using the adopted threshold. An analysis would need to integrate information about actual or modeled species populations and movement potential on campus, species responses to human infrastructure or activities (i.e. noise or recreation), and the design and layout of the Project.
- Craft Project alternatives that reduce or avoid obvious impacts of the Project, especially along Sonoma and Mill Creeks.
  - Especially: Use best available science to design riparian buffers with widths and features (i.e. line of sight) that protect species who use that location for connectivity. Best available science would include information about the distance at which animals "flee" human activities

proposed adjacent to the creek, literature summarizing behavioral and population responses as compared to distance from development, and/or refer to literature that recommends buffer distances for a given species or groups of species. Figure 22.

- Implement a variety of best management practices to manage light, noise, sight-lines, and off-trail recreation**.**

2. Removal or degradation of sensitive natural communities.

Our analysis found that the Project removes 9.4 acres of sensitive habitat types (aka "sensitive natural communities" as defined by CDFW) due to grading during construction. There are some locations where habitat removal during grading is most egregious, and avoidable. The Project proposes ~27 homes along the South and West edges of campus, outside of the zone of previous development. Not only does the placement of these homes remove native forest through grading, it also increases fire risk, fire exposure, increases impacts on wildlife habitat and connectivity, and reduces the scenic resources of the site. In one location (along Sonoma Creek on Railroad Street), the Project proposes removal of ~one acre of Valley Oak forest, placement of ~1 acre of fill into a stream channel, for the sake of building three homes along the creek. Furthermore, the Tree Protection Plan (NOP Figure 11) does not seem to address forest removals in these two locations, missing almost two acres.

The Project would also disturb (or modify) another 26.54 acres of sensitive habitat types as a result of Project activities, particularly due to wildfire buffer management, enclosure of sensitive vegetation into backyards, disturbance from reconstruction of the campus water/sewer system, and potentially due to vegetation clearance within 100' of homes in common areas.

A significant proportion of the habitat degradation would occur on lands outside the proposed Project Area, on SDC Open Space managed by State Parks. The Project proposes the placement of structures within 100' of intact riparian vegetation along creeks, such that the Project must choose between increasing fire risk for structures, or impacting the environment, depending on whether the 100' defensible space envelope is ignored or implemented.

Although the Project proposes tree protection and mitigation activities designed to fulfill Sonoma County ordinances, it does not propose measures to avoid, or mitigate for, the removal or disturbance of sensitive natural communities or more generally forested habitat. This level of avoidable habitat destruction is not compatible with stated Project goals.

3. Removal or disturbance of another 43.25 acres of vegetation.

After subtracting out sensitive habitat types, our analysis found that grading removes another 15.4 acres of vegetation on the Core Campus, largely composed of non-native forest and mixed oak forest types. Another 27.85 acres would be potentially degraded (or modified) by wildfire buffer management, re-constructing the water/sewer system on

State Park lands, and by enclosing intact vegetation into backyards.

Many mature non-native trees will be removed that provide abundant habitat for many native wildlife species, and provide important ecosystem values. Of the ~1500 trees identified in the arborist report, 547 trees are "protected" by the Sonoma County Ordinance. The Project would "mitigate" for the removal of 275 protected trees under the County, but proposes no mitigation for the removal of another 275 mature street trees that don't meet the definition of protected under County ordinance, or vegetation disturbed or removed by other Project actions.

4. Impacts resulting from the re-construction and operation of the SDC water system.

The Project proposes to re-develop a public water supply using surface water rights located largely on State Parks from two reservoirs, four creeks, and one perennial spring complex. This water system is largely on lands outside of the Project Area described in the NOP. Existing infrastructure is in partial or total disrepair, requiring not only repair, but also re-construction of points of diversion, raw water pipelines, water treatment plant, treated water pipelines, pump stations, intakes in reservoirs, above ground ditches, and creek crossings, and associated electrical service and defensible space around infrastructure (Sherwood Hydrology and Site Infrastructure Report 2018, SDC Water System Assessment Report 2023).

There are multiple foreseeable impacts to the environment from water system re-development, due to the 1) overlap between water infrastructure and riparian features during construction, and 2) the presence (or suitable habitat for) protected species like pond turtles or red-legged frogs in Project water sources during operation, and 3) reliance of the Project on a single water source. An EIR that focuses only on the Core Campus would miss evaluation of these impacts.

5. Reliance on a single water source.

The Project's Water and Wastewater Feasibility Study (2025) shows that the available water supply during a normal year is 405 acre-feet per year (AFY), and the estimated water demand is 402 AFY. Water supply calculations rely heavily upon Roulette Springs, especially during consecutive drought years when Roulette would provide 50% of total annual water supply. This fact alone demonstrates the Project's significant reliance on a single water source, and suggests that reservoirs would be fully drawn down during drought years, leading to potential environmental impacts.

6. Presence of special status species in waters to be altered by the Project.

Roulette Springs is a year-round "spring complex" located amongst forest/wetland vegetation, northeast of Fern Lake. It then flows 0.21 miles, joins Asbury Creek, and runs another 0.64 miles into Sonoma Creek. Water diversions from Roulette Springs ceased in 2018 when the SDC water treatment plant was shut down. Since then, Asbury Creek,

which ran completely dry by late June in recent years/decades, has become a perennial creek again, at least from the Roulette Creek tributary down to Sonoma Creek. Historically a steelhead-bearing stream, but without evidence of anadromy for decades, observations of steelhead in Asbury Creek have recently been made by Sonoma Ecology Center just 6-7 years after the return of perennial flow. It is presumed that other protected species like California freshwater shrimp might eventually return to Asbury Creek, or utilize it for part of the year (red-legged frog) as well, if they haven't already.

Another example: the two primary reservoirs (Fern Lake and Lake Suttonfield) both have known populations of northwestern pond turtles, proposed as threatened by USFWS. Fern Lake has suitable habitat for endangered California red-legged frog, but no focused surveys have been conducted. Full drawdown of these reservoirs during periods of drought could dramatically impact populations of species living in these reservoirs.

Given this, the EIR needs to consider the many potential direct and indirect impacts of re-constructing and operating the water system and also explore alternatives that decrease the Project's reliance on a single water source, and avoid foreseeable impacts to species.

The Project has multiple options to reduce reliance on Roulette Springs and increase system resilience including: increasing storage capacity, lowering the elevation of diversion(s), connecting to the Sonoma Aqueduct, building a greywater treatment plant, building a treatment plant sufficient to remove arsenic and boron from Lake Suttonfield water, reducing water demand, or utilizing groundwater.

At a minimum, the Project must examine impacts of water system reconstruction and operation on biological resources, including direct and indirect impacts due to construction and operation, as well as impacts of re-diverting waters that have been flowing naturally since campus shutdown.

7. Impacts to stream channels, wetlands, and riparian setback areas.

Our analyses found multiple instances where the Project proposes to directly disturb the bed and bank of streams inside and outside the Project area through: 1) demolition of existing infrastructure, 2) grading during construction, 3) connecting to and repairing water and sewer pipelines during construction, 4) installation (or re-use) of new stormwater outfalls, and anticipated repair or reconstruction of water infrastructure and points of diversion prior to the Project horizon date. It also seems likely that the Project would need to repair or replace one or more bridges in the Project Area, especially Harney bridge crossing Sonoma Creek.

Campus streams are known habitat for endangered and special status species, and also provide wildlife aquatic and terrestrial wildlife connectivity. In our impact analysis, we found:

- Six locations where new water or stormwater lines will cross the Project's top of bank line.

- Four locations where new or replaced stormwater outfalls will be inside the top of bank.
- Many locations where past water system reports indicate water or stormwater lines cross top of bank, but are not shown on Tentative maps. Will the Project abandon this infrastructure or remove it?
- Needed repairs to water infrastructure within top of bank of Sonoma Creek: pumphouse, point of diversion, at least 2 siphons crossing creek.
- Disturbance of small streams and wetlands resulting from raw water pipeline replacement on State Lands.
- Disturbance of wetlands.
- Placement of ~one acre of fill inside what is arguably the bed and bank of Sonoma Creek.
- 5832 linear feet of utility lines (water, sewer, stormwater) within Project riparian setbacks, as a result of new construction or re-use. This would create initial impacts to riparian areas, and on-going impacts from repair and maintenance.
- A demolition limit that is contiguous with (or within a few feet of) the top of bank for 6000+ linear feet along Sonoma and Mill Creeks. Existing infrastructure is on or beyond the top of bank in many locations.
- The Project does not propose re-vegetating "demolished" infrastructure located in expanded setback zones, missing an opportunity to improve riparian function.
- Harney Bridge over Sonoma Creek is owned by the State, and has a roadway width of 20 feet, less than the recommended minimum (24 feet) for a two-lane bridge with light traffic. At a minimum, the EIR should describe what conditions would trigger widening or replacement of this bridge and any other bridge on campus, and consider environmental impacts along with those listed above.

According to the Project's Biological Analysis submitted to Sonoma County (Monk and Associates, 2024), any work within the bed and bank of Sonoma Creek or Mill Creek would trigger formal consultations and review with USFWS, NMFS, CDFW, (or other permits), due to the known presence of endangered and special status species in these waterways, and the potential for use of these creeks as connectivity and dispersal by red-legged frog.

8. Insufficient design and management of riparian setbacks to protect wildlife connectivity, riparian function, and water quality.

Riparian areas along Sonoma Creek and Mill Creek, and the creeks themselves, are critical for many ecosystem services. The creeks provide habitat for protected aquatic and amphibious species. Riparian areas provide critical functions for wildlife who rely on the cover and food sources for movement during different stages of their development. They also provide critical services that directly benefit people, like shade, water filtration, biodiversity, and flood protection. More specifically, Sonoma Creek and Mill Creek

provide important wildlife connectivity functions, for special status and common terrestrial animal species including mountain lions, yellow-legged frog, beaver, otter, as well as freshwater shrimp, steelhead, chinook, and many others.

Although the Project proposes "expansion" of riparian buffers by demolishing some existing infrastructure, the NOP and Project documents make no mention or discussion of how riparian buffers will be restored, managed or utilized over the Project lifespan. Additionally, Project maps show clear overlap between Project uses and riparian areas, indicating that the Project will have ongoing impacts and uses in the riparian area (especially vegetation management for defensible space, social recreation, edge effects of residential uses, and maintenance of Project utilities). This is an inadequate approach to protect the valuable natural resources on Sonoma and Mill Creek.

Potential impacts of the current approach include:

- Degradation of water quality, and erosion, due to increased impervious cover, reduced number of stormwater outfalls, and re-used stormwater outfalls with known erosion issues
  - The NOP proposes vague low impact development stormwater practices
  - Certain portions of Sonoma Creek have extensive eroding banks, that are not considered
- Degradation of habitat quality through management by an unnamed entity
- Degradation through annual mowing and fuel reduction
- Impacts to wildlife habitat and connectivity from:
  - Social recreation
  - Backyard edge effects (domestic animals, lights, noise, herbicides)
- Direct impacts to special status species living in creeks

It is critical to design riparian setbacks along creeks that have the space and features needed to meet stated Project goals for riparian areas, including community benefit and property values. To be complete, the EIR must include:

- A design for riparian setbacks that details the width and features needed to meet the multiple functions proposed by the Project (i.e. wildlife connectivity, sense of place, habitat for sensitive animals, recreation, stormwater filtration), using best available science and best practices available (for example General Technical Report SRS-109, USDA).

- A plan for what entity and funding source will be used to manage riparian setbacks.

9. Degradation of water quality in Sonoma Creek as a result of an insufficient stormwater plan to filter pollutants, reduce peak flows, or prevent erosion.

Sonoma Creek is a "303d-listed" impaired water body under the Federal Clean Water Act and is only eight miles upstream from wetlands and waters in San Pablo Bay. The Project

seemingly proposes to use sidewalk-adjacent bioswales and stormwater, while increasing impermeable surfaces on site. This approach does not seem sized to accommodate high-intensity precipitation events that are becoming more typical as the climate warms. Furthermore, there are 43 existing stormwater outfalls in the core Project area. The Project proposes to re-utilize nine outfalls and install four-five new outfalls. By reducing the total number of outfalls from 43 to 14 and re-directing that water into existing outfalls that are already experiencing erosion, the Project is likely to increase erosion issues and destabilize bed-and-bank where new outfalls will be constructed. The Project is also likely to increase the concentration of 6PPD-quinone, from vehicle tires, in Sonoma Creek and its tributaries; this chemical is toxic to salmonids and other aquatic species. The Project needs to 1) describe how their stormwater plans will sufficiently filter pollutants to avoid impacting water quality or erosion, and 2) design stormwater systems with multiple low-impact designs to avoid impacts on special status aquatic species living within Project waterways.

10. Impacts to known habitat or potential habitat for a number of protected species.

Although it is difficult to determine specific impacts, due to the limitations in the description of the Project, there are many special status species present within the area where the Project proposes activities.

a. *Northwestern pond turtles* (proposed for federal listing; known from the two reservoirs on site), as a result of water system operation, increased development in upland habitats, increased human and pet presence in their nesting habitat, and increased traffic.

b. *California freshwater shrimp* (endangered at the state, federal level), as a result of in-stream construction impacts in Sonoma Creek, impacts of altered hydrology from water system operation, and due to decreased water quality from an insufficient stormwater system .

c. *California red-legged frog* (federally listed as threatened, CA Species of Special Concern; potential habitat in reservoirs/creeks), as a result of water system operation, and development near creeks.

d. *Foothill yellow-legged* frog (CA Species of Special Concern; known from Sonoma Creek and Asbury Creek with potential habitat elsewhere), as a result of water system operation.

e. *California giant salamander* (CA Species of Special Concern; known from Asbury Creek and Fern Lake, and east of SDC in Butler Canyon Creek, with potential habitat elsewhere), as a result of water system operation and road development.

f. *Red-bellied newt* (CA Species of Special Concern; potential habitat in the creeks and Roulette Springs), as a result of water system operation.

g. *Steelhead* (federally listed as threatened), California freshwater shrimp (federally and State listed as endangered) and fall-run Chinook; all known from the SDC stretch of Sonoma Creek, where beds and banks will be disturbed and stormwater will be released; and water quality impacts from increased 6PPD-quinone concentrations.

h. *Mountain lions* (a specially protected mammal in California, under the CA Wildlife Protection Act of 1990; documented to use the site extensively), as a result of increased development, defensible space clearing, human and dog presence, lighting, and traffic, reducing habitat utilization and movement opportunities.

i. *Vaux's swift* (a species of special concern), known from chimneys on Campus.

j. *Bat species:* there is unknown use of built and natural vegetation by sensitive bat species. We recommend visual and audio recorder surveys.

Appropriate surveys for many species have not been conducted, despite years of opportunity to address concerns raised in the first EIR process and attempts by our organization to obtain permission to conduct these surveys.

11. Ongoing impacts during the Project's decades of operation, on birds, other wildlife, and their habitats.

The Project will have negative impacts on migratory birds, other common and special-status wildlife species, native vegetation, and water quality as a result of 1000 housing units, 150 hotel rooms, commercial businesses, 3000 residents and their dogs, cats, cars, kids, outdoor lighting, night-time activities, pesticides and herbicides, fertilizers, invasive species, and increased human presence in and around natural areas.

12. Cumulative impacts on wildlife connectivity due to proposed development on other former SDC lands adjacent to the Project.

Known nearby Projects include 1) construction of a new road from the Project area eastward to Highway 12 that would cross Butler Creek, documented to be a movement route for western pond turtle and other wildlife, as well as other smaller drainages and a large wetland, 2) a proposed CalFire regional headquarters (also in the location of Butler Canyon Creek), and 3) recreation development on former SDC open space lands now owned by State Parks.

13. Recreational Impacts to adjacent State and Regional Parks.

The NOP makes no reference to the fact that the Project site controls access to SDC Open Space lands located to both sides of the Project. This approach conflicts with many goals listed in the NOP. If the Plan or Project do not take certain actions, there is likely to be Project impacts on recreation, as well as on wildlife, and fire risk due to recreation by Project residents.

The EIR should either:

- Describe impacts of 3000 additional people on recreational and natural resources on SDC Open Space and Sonoma County Regional Parks, describing changes in fire ignition risk, use of social trails, issues with parking, and incompatible uses by Project residents or visitors with existing Parks management plans; or

- Add design features or mitigation measures listed in the following Section 3.

14. Impacts to wildfire exposure, risk, and post-fire hazards.

The Project recognizes that it is located in a fire prone location, adjacent to a State Responsibility Area (SRA) rated as Very High Fire Hazard Severity. Some of the wildfire buffer and much of the water system are *within* a State Very High Fire Hazard Severity zone.

By definition, wildfire hazard is influenced by both fire risk (i.e. likelihood of fire, or ignition probability) and by fire exposure (i.e. the damage that fire would cause if it happened, influenced by the location, condition, and arrangement of human infrastructure in relation to flammable fuels). The Project proposes to mitigate fire risk in part by manipulating intact native vegetation in a perimeter fire buffer, developing evacuation routes, and hosting a fire station. However, the NOP does not address the ways the Project might increase fire risk, nor whether the proposed fire buffer would be effective at protecting the Project from wildfire.

Our analysis found:

- Ineffectiveness of wildfire buffer despite potentially significant impacts to the environment: The 300' wildfire buffer around campus is generally uphill and more than 100' from almost every structure, suggesting the fire buffer will be ineffective at reducing wildfire risk, except for a handful of structures including the hotel. There is a total overlap of ~2 acres between the fire buffer, and 100' defensible space envelope, for a ~49 acre fire buffer.
  - See Syphard and Keeley (2019) and Troy et al (2022) which study structure survival in California finding that the chance of structures burning is only weakly linked to vegetation management beyond 100'.

- Increased ignition risk, exposure to fire, and impacts to environment
  - Building ~ 27 single family homes partially outside the existing footprint of development *at the bottom of a mountain where ignitions might travel quickly uphill*
  - Adding ~3000 people to the landscape, given that the large majority of ignitions in this region are started by people.
  - Exposure to post-fire hazards through potential debris flows down Mill Creek, or contamination of Project water supplies from VOCs or other

pollutants.

The EIR should:

- Adequately describe the setting, including factors influencing *existing* fire likelihood, fire intensity, wildfire exposure, and wildfire susceptibility. Although the standard CEQA checklist asks if the Project is within or near high or very high fire hazard severity zones (which it is), fire hazard maps are intended for coarse-scale planning actions. At the scale of a project like this, a more focused description of existing and changed conditions is important to describing and determining Project impacts. See https://wildfirerisk.org/understand-risk/
- Adequately describe Project elements, in a manner that allows analysis of effectiveness at reducing wildfire risk or environmental impacts.
  - What specific activities, prescriptions, and timing would be employed in the wildfire buffer? How often? The entire buffer, or only portions of the buffer? Will areas in the riparian buffer be treated? How will fuels be removed (pile burning, broadcast fire, chipping, transport off site)?
  - What actions will be taken in riparian buffer areas, managing vegetation in relation to fire risk? Snag removal? Invasive species management? Management within 30' of bridges and roadways?
  - What fuel management activities will be conducted near water diversion, treatment, and delivery infrastructure? Along access roads to water infrastructure? Around pumping stations along Sonoma Creek, and planned or existing facilities on State Parks owned land?
  - How will likelihood of wildfire, intensity of wildfire, exposure to wildfire change as a result of this Project?
- Analyze Project impacts and factors contributing to increased/reduced fire hazard, as a result of the Project, and set thresholds of significance;
- Design Project Alternatives that avoid impacts and avoid the need for the fire buffer by not building structures or private backyards outside of the existing footprint of development.
- Evaluate post-fire hazards; avoid if possible, plan for the hazard.

Because no amount of vegetation clearing or defensible space can mitigate evacuation timing, or increased exposure to wildfire if homes are built in the forest, this Project should take every available step to avoid the need to manage fuels by adopting alternatives that set back development from natural vegetation, and reduce the footprint of any development outside of the existing campus envelope. An alternative that reduces the Project's footprint and intensity of development is needed to avoid health and safety impacts associated with fires.

15. No plan for management and maintenance of "common space" areas.

The Project proposes many common use areas (parks, natural areas, fire buffers), but there is no plan for what entity will be responsible for managing these areas or how this

work will be funded. Without an entity to manage open space areas, which has sufficient funding, expertise, and connections to local resources, there could be additional impacts on human safety and the environment.

B. The EIR should include a "Natural Resource Protection" Project Alternative and mitigation / avoidance measures to avoid and reduce impacts to resources.

The EIR should include a Natural Resources Protection Alternative that includes:

1. **A sustainable water supply that is resilient to multi-year droughts, minimizes impacts on protected species and hydrology, and ensures reliable water supply for residents.**

    - Increase water supply resilience by:
        - Increasing storage capacity, lowering the elevation of diversion(s), creating inter-system connections to the Sonoma Aqueduct or a local water district, building a treatment plant capable of producing greywater or removing boron/arsenic present in Lake Suttonfield water, reducing water demand, utilizing groundwater, or capturing rainwater.
    - Permanent cessation of dry-season water withdrawals from Roulette Springs. The Project is highly reliant on this single water source, but full utilization would impact protected species downstream in Asbury creek, and degrade the hydrology of wetlands.
    - Plan dry-season water releases from the water system into Asbury Creek to help aquatic species survive during critical lstages of their life.
    - Develop reservoir and water management plans that protect sensitive resources present (western pond turtles and potentially other herpetofauna, as well as wetlands).

2. **A re-designed riparian setback and interface with proposed construction to avoid impacts to wildlife connectivity and special species habitat, and provide additional economic and community benefits.**

    An updated design would include:

    - Active ecological restoration (i.e. native vegetation planting and bank stabilization) of the ~12 acres where existing pavement and buildings will be removed in riparian areas, to deliver biodiversity, water quality, and wildlife connectivity benefits.
    - Implementation of Low Impact Development stormwater features in the riparian setback, in conjunction with ecological restoration.
    - Design Project to "front" on creeks, rather than homes "backing" on creeks, with benefits to community (increased access to nature, better filtration of water, property values), reduced impacts on wildlife (due to backyard lights, pets, pesticides), incorporating for example:
        - Habitat restoration (0-50' from Top of Bank, along Sonoma Creek)
        - Stormwater features and habitat restoration (50'-100')

  - Trails or sidewalks that provide public opportunities for recreation, versus informal recreation in setbacks behind backyards (100-175', width varies)
  - Tightly defined zones of public use, using visual barriers and plantings to discourage social use of wildlife corridors and decrease sight-lines to wildlife (100')
  - Potential for linear park features along multi-use trail
- Width of riparian setback determined by:
  - site conditions (to make room for steep eroding banks)
  - needs of wildlife species present (informed using a thorough literature and data review), recognizing that some species (i.e. mountain lion) may need larger widths than is currently proposed to protect existing function.
  - Flexibility in adjusting parcel lines while meeting minimum lot sizes, impacting feasibility of an expanded creek setback
- Resources for alternative buffer design might include:
  - HT Harvey and Associates, 2024. Light, Noise, and Development Impacts on Wildlife. Literature Review and Recommendations. https://drive.google.com/file/d/1282XBL9xPD-zhSp5CtfhpoHv-UHmVID_/view
  - General Technical report SRS-109, 2008. USDA. Conservation Buffers. Design Guidelines for Corridors, Buffers and Greenways.
  - Literature-informed wildlife buffer recommendations from Santa Clara Open Space Authority: https://www.openspaceauthority.org/sites/default/files/2025-01/Linkage%20Design%20Parameters%20%28SWCA%2C%20Aug%202024%29.pdf

3. Re-locate 3 parcels on Toyon St (GG3-11 to GG3-9).

Where tentative map shows grading into sensitive oak vegetation, use of the "floodplain limit" rather than "top of bank" to define appropriate setback from the creek. This would avoid the placement of fill into what is arguably the bed and bank of a stream, avoid direct impacts on habitat quality by avoiding residential activities within the riparian corridor, and avoid the need for defensible space in a riparian forest context.

4. Avoid wildfire related impacts.

- Restricting development to the existing footprint on the South and West edges of campus would reduce the need for an environmentally damaging wildfire buffer, reduce exposure to wildfire, and reduce the risk of ignitions spreading onto Open Space lands.
- It would also avoid impacts to sensitive vegetation communities by avoiding removing vegetation during grading, and degradation by enclosure in backyards.
- More specifically, move or reduce the footprint of:
  - Parcels BB17-BB21, since they require removing 1 acre of intact native oak forest.

  - Parcels BB21-BB28 should be reduced in size by about half, with forested areas to the south managed as an Open Space for wildlife passage and forest health (remove French broom). This design would avoid degradation of sensitive habitat types, reduce wildfire risks, allow wildlife to move around the south edge of Campus, and reduce Project impacts to neighbors.
  - Parcels K1 - K17 (southwest of Manzanita street) should be reduced in size, such that grading does not expand the existing developed footprint, and that private backyards do not include intact native forest.
- Reduce the footprint of the Hotel, or move structures away from the edge of campus, removing the need for the wildfire buffer to reduce fire risk.

- Include an alternative that reduces the Project's footprint and intensity of development to avoid health and safety impacts associated with a fire.

5. Reduce potential impacts of defensible space on riparian areas, by setting new development back at least 100' from the edge of riparian vegetation.

This approach is described in Sonoma County Code Chapter 26-65-040(K) "*New development located within one hundred feet (100') of any riparian corridor shall be allowed with a zoning permit only where there are no feasible alternative development locations that do not require vegetation removal for fire protection and fire resistive construction materials are used to avoid or minimize the need for vegetation removal in the riparian corridor"* (underline added).

The Project proposes a design where roughly eight acres of riparian area (Project riparian setback, and vegetation within top of bank) are less than 100' of homes. A re-designed riparian buffer as described above, where homes are placed across a street or trail from riparian buffers, would reduce this impact.

6. Provide recreational connections and opportunities to the community to protect natural resources from impacts of recreational uses and to fulfill goals related to open space, recreation, and sense of place, including:

- Align development such that it maintains public access to the four primary trailheads located on SDC Open Space lands in Jack London State Historic Park.
- Create public-use parking lots for at least two trailheads (one west and one east of Sonoma Creek) located on the campus, not on State Park land.
- Plan infrastructure and signage to discourage off-trail recreation, within the wildfire buffer, behind the hotel, and along riparian areas.
- Consider using the north end of Railroad street (near Suttonfield Lake) as a location for an East Trailhead and Parking lot.
- Provide an opportunity for public access to Sonoma Creek, in one location with well-defined boundaries and rules for use. We recommend downstream of Harney bridge on river left (northeast bank) of Sonoma Creek.

- Instead of routing a multi-use trail along Arnold Drive, route multi-use trails along redesigned riparian setbacks, with one spur designed to get people to the economic zone of the Project, and connections/wayfinding to SDC Open Space trailheads.

7. Remove the development of an "emergency use only road" connecting the Project to Highway 12 from the plan.

- A recent evacuation study evaluated the utility of such a road in reducing evacuation timing for the Project, and found that the addition of this road would make no difference to overall local or regional evacuation times.
- Because this road would bifurcate the open space and is likely to result in environmental impacts, and because it cannot mitigate the safety impact of increased evacuation timing, the development of this road should be removed from the Project.

C. Both the Specific Plan and the Project should consider measures to mitigate and avoid Project impacts including:

1. Specific Plan - Mitigation and Avoidance Measures

- Create a sufficient and sustainable funding source overseen by trusted third parties to restore, repair, maintain, and manage use of proposed "common space" natural areas including fire buffer and riparian areas, which must be managed differently than parks and landscaped areas to maintain natural value.
- Define how the Plan and Project will utilize SDC Open Space Lands, transferred to State Parks. The line between the Core Campus, and State Parks is unclear, as are the actions the Plan and Project will take to construct and manage the wildfire and water system infrastructure located on Open Space Lands. Without identifying, avoiding, or mitigating potential impacts of redevelopment on these lands, the Project may undercut the protections afforded by transfer to State Parks, contrary to enabling legislation for the disposal of the SDC. Define the legal mechanisms by which the Project or a State Agency would take jurisdiction over water system infrastructure, wildlife buffer, a water treatment plant, or any other infrastructure for purposes of construction or long-term management.
- Develop a management plan for wildfire buffer focused on ecological health and wildfire resilience, versus fuel reduction. Biodiversity, stormwater management, preventing soil disturbance and weed invasion, and forest health should feature in a management plan. The plan should focus on use of natural processes (i.e. prescribed fire) versus weed whacking, forest cleaning, or grazing. This would better align with the legislated intent of the fire buffer (it is on SDC Open Space) and State Parks approach to land management. These lands are fire adapted, but generally have not seen fire in over 100 years. By

managing invasive species, using prescribed fire as a management tool, and clearing along trails and roads, the needs of both humans and ecosystems can be met. Priority activities in the wildfire buffer might be: 1) Removal and management of French broom - an invasive species that exacerbates fire severity, 2) Coordination with State Parks to utilize prescribed fire (pile burning and broadcast burning), to reduce surface and ladder fuels and encourage the health of fire-dependent species, and 3) Thinning fuels within 20-30' of existing trails and roads, to create conditions that lend themselves to wildfire suppression and use of prescribed fire. Grazing, mowing, "removing logs and stumps", and "reducing brush" are not regionally accepted best management practices for fire resilient management. Use CalVTP programmatic EIR as guidance or mechanism for describing the setting, describing management activities, and defining mitigation and avoidance measures to protect sensitive resources from fuel reduction work.

- Develop a management plan and entity to manage riparian setback and other natural areas for the health of sensitive resources present. The Plan needs to have an entity, funding stream, and plan in place to manage "natural" areas on campus, with a focus on ecological health. If the Plan or Project manages riparian areas as if they were parks, instead of sensitive natural areas, there will be significant impacts to species and many other biological resources. The Plan should define what fuel reduction / defensible space activities will take place and define goals and methods for managing invasive species.
- Provide specific evaluation criteria for determining significance of impacts.

2. Project - Mitigation and Avoidance Measures

These mitigation and avoidance measures are in addition to avoidance recommendations listed above in the "Alternatives" section.

a. **Biological resources - sensitive vegetation communities, special species habitat, wildlife connectivity**

- Consult with CDFW, USFWS, and NMFS about Project activities beyond the top of bank, water system operation, and other topics, in order to develop appropriate protective measures for protected biological resources.
- Conduct field-based focused surveys for special status amphibian and reptile species in/near aquatic resources associated with the SDC water system, including seasonally appropriate night-time surveys for California red-legged frog, California giant salamander, foothill yellow-legged frog and northwestern pond turtle at Fern Lake, Lake Suttonfield, Mill Creek, Asbury Creek, Roulette Springs, and unnamed tributaries. Although "construction" may not occur at Fern Lake, manipulation of water levels will, so identifying species present is critical to developing water management strategies (i.e. impacts of fluctuating reservoir levels on pond turtles).
- Mitigation for impacts to water-dependent species and habitats could include

implementing restoration actions described for Site 4, or other nearby sites on Sonoma Creek, as described in the *Upper Sonoma Creek Restoration Vision*, https://sonomaecologycenter.org/wp-content/uploads/2024/08/Upper-Sonoma-Creek-Restoration-Vision-Booklet.pdf

- Use the California Handbook of Vegetation to map sensitive habitat types within any portion of the Project (wildfire buffer, creeks, development footprint), and work with CDFW to mitigate for the loss or disturbance of these areas, or for guidelines on appropriate management.
- Mitigation of impacts to wildlife connectivity in the Sonoma Valley Wildlife Corridor could be accomplished through an Advance Wildlife Connectivity Mitigation Program. Projects could include:
  - Working with landowners along nearby creeks (e.g. Butler, Whitman, Hooker, Asbury, other sections of Sonoma Creek) to improve wildlife connectivity through fence removal or wildlife-friendly fencing, increasing riparian setbacks, etc. thereby improving connectivity along alternate routes of passage.
  - Work with CalTrans to improve wildlife crossings along Highway 12, and reduce wildlife vehicle collisions.
  - Work with Sonoma County to improve wildlife crossings along Arnold Drive, Madrone Road, or other nearby County Roads, especially where they cross Sonoma Creek.
- Establish an educational or stewardship program on Campus, aimed at educating residents about their proximity to sensitive resources, and steps to protect them.
- Adoption of additional best practices related to Artificial Light and Noise (follow Dark Sky International's Responsible Outdoor Lighting Guidance).
- Update Arborist report to include ALL areas planned for grading / tree removal, including the approximately 2 acres of sensitive vegetation currently missing.
- Avoid enclosing intact native vegetation within private parcels, especially along the South and West edges of campus (Walnut Court, Manzanita Dr). Many parcels have lot sizes larger than required, and reducing the size of private parcels is feasible.
- See Hydrology, Wildfire (below), for additional relevant mitigation measures
- Use native species cultivars in campus landscaping, but use local seed sources when re-vegetating natural areas.
- Include a variety of pollinator and culturally significant plants in landscaping or stormwater systems (e.g. indian hemp, narrow leaf milkweed, Sonoma sage, basket sedge, purple aster)

b. **Greenhouse Gas Emissions**

- To mitigate the greenhouse gases emitted by demolition, tree removal, and additional vehicle miles driven, create renewable energy generation on the Project site, through projects such as micro-hydro, microgrid and/or rooftop solar.
- Reduce carbon emissions from demolition by re-using buildings or building materials where possible.

c. **Hydrology and Water Quality**

- Adopt low-impact design measures, including multiple stage treatment before stormwater is discharged into Sonoma Creek (i.e. sidewalk-adjacent bioswales, plus second stage settling ponds in the expanded riparian setback), to protect salmonids from Erosion
- Toxic tire dust. Implement projects identified in the *Vision for Water Management and Climate Resilience at SDD* (https://sonomaecologycenter.org/wp-content/uploads/2025/09/SEC-Vision-for-Water-Management-and-Climate-Resilience-at-SDC_Final.pdf). This report identifies many places where restoration could increase infiltration, decrease erosion, increase groundwater recharge, and improve in-stream habitat on Core Campus and Open Space Lands. Do not place stormwater outfalls which might exacerbate existing erosion issues on Sonoma Creek or its tributaries.
- Set back development by an appropriate amount to enable stabilization and restoration of steep eroding banks on Sonoma Creek and Mill Creek.

d. **Recreation**

- Provide access, parking, and signage to at least 2 trailheads originating from the Project Area.
- Establish rules and practices consistent with neighboring parks to ensure compatible uses, signage, and regulations.
- These actions will produce long-term economic benefits to the Project and community.

e. **Utilities**

- See Natural Resource Protection Alternative (above) for options to improve water supply resilience to multi-year drought, and avoid impacts on special status species.

f. **Wildfire**

- Avoid necessity of wildfire buffer by limiting new development and private backyards to the existing developed envelope (see Alternatives, above).
- Avoid new development within 100’ of riparian vegetation, to avoid the conflict between impacts to riparian areas from fuel reduction or increasing

fire risk to structures near riparian zones

- Evaluate post-fire hazards, then develop emergency plans or avoidance measures that could include:
    - Evaluate potential for post-fire debris flows originating in the headwaters of Mill Creek, and the exposure of proposed development to such occurrences
    - Evaluate options and strategies to avoid infrastructure damage during fire, and post-fire contamination of campus water supply
- If wildfire buffer is deemed necessary,
    - Avoid impacts to the environment by managing wildfire buffer for forest health and wildfire resilience (see Plan Mitigation Measures above),
    - Minimize size of wildfire buffer to the area within 100-300' of structures, depending on slope
    - Develop and adopt mitigation, monitoring, and protection measures defined in the CalVTP programmatic EIR.
- Put in place restrictions on human uses and activities in places where ignitions pose a risk to safety, including trailheads, riparian buffers, and backyards, addressing activities like smoking, fireworks, closure during red-flag warnings, etc.

II. CONCLUSION

In sum, the EIR must consider a smaller scale project to mitigate the Project's significant impacts to the wildlife corridor and natural environment as well as to avoid wildfire impacts that will endanger public health and safety.

Barring a smaller scale project, SLT's proposed redesign, alternatives, and mitigation are critical to a more sustainable project that meets the legislative mandate to provide for both permanent protection of natural resources and affordable housing

Sincerely,

Eamon O'Byrne
Executive Director