



SAFRR

State Alliance for Firesafe Road Regulations

To: SDC@sonomacounty.gov Sonoma County
From: State Alliance for Firesafe Road Regulations (SAFRR)
Date: September 27, 2025
RE: Sonoma Developmental Center EIR Scoping and Alternatives

State Alliance for Firesafe Road Regulations (SAFRR) is a 501(c)(3) public benefit association dedicated to public safety, especially during evacuations. The mission of SAFRR is to ensure that new California development fully complies with land use laws, fire codes and road safety standards, including the State Minimum Fire Safe Regulations, which are designed to save lives by providing for civilian evacuations while ensuring unimpeded access by large firefighting and emergency equipment.

The new Sonoma Developmental Center (SDC) proposal will require an adequate EIR, informed by technical studies, including a cumulative impact analysis of all proposed large-scale projects. The community proactively completed the studies necessary to ensure compliance with laws pertaining to Wildfire Evacuation (CEQA Appendix G Environmental Checklist XX. WILDFIRE, the State Minimum Fire Safe Regulations, among others).

The KLD Associates evacuation analyses and findings met both compliance objectives, and the methodology is proven and sound. SAFRR requests the Sonoma Area Fire Evacuation located on the VOTMA website (SAFE - ETE study by KLD) be incorporated into the Administrative Record for this new Environmental Impact Report. Also requested to include in the Administrative Record this letter and attachments:

- Validation of Evacuation Time Estimates. National Evacuation Conference. By Todd Smith PhD, Emergency Preparedness Specialist, US Nuclear Regulatory Commission. 2016 (This is the technically defensible methodology used by KLD Associates).
- Toward Simulating Dire Wildfire Scenarios. By Tom J. Cova. Natural Hazards Review. American Society of Civil Engineers. 2021.

At current traffic levels, the evacuation routes in recent fires have, and will continue to

experience gridlock and hours to evacuate. The cumulative impact of the additional developments unequivocally increases travel times - from about three (3) hours to nearly five (5) hours to reach a safe area.

These results are sobering - actually horrifying in light of the loss of life in ever increasing wind-driven wildfires. Recent Community Burn Over tragedies include:

25 souls in the Oakland Hills, CA (1991 Tunnel Fire) – ignition origin adjacent to Burn Over

22 souls in Sonoma County, CA (2017 Tubbs Fires) – ignition origin distant in Napa County

85 souls in Paradise, CA (2018 Camp Fire) – ignition origin adjacent to Burn Over

102 souls in Lahaina, HI (2023 Maui Fire) – ignition origin adjacent to Burn Over

29 souls in Los Angeles, CA (2025 Palisades/Eaton Fires) – ignition origin adjacent to Burn Over

The geography of the Sonoma Valley, along with our communities' real-world experiences in 2017, 2019 and 2020 fire evacuations show that the location of the SDC merits the defensible modeling of multiple fire scenarios that inform project alternatives, i.e. an alternative that does not significantly impact current evacuation scenarios.

The recent Sonoma and Napa fires were ignited miles away and flames and embers took hours to advance upon our communities. In 2017 (Tubbs Fire ignited in Calistoga, Napa County), emergency communications in our County were beyond lacking, resulting in chaotic Community Burn Over. Firefighters are not fighting fires until people are evacuated. **Post 2017, emergency communications have significantly improved, but this alone does not ensure safe evacuation. It is unfounded to assume that all future fires will ignite miles away allowing for "orderly evacuations"**. The 2020 Glass Fire (ignited in Napa County) and the 2019 Kincaid Fire (ignited in the Geysers) took hours to evacuate communities, and only the distant fire ignition origins allowed for this scenario. Plausible fire behavior and evacuation scenarios should include ignition closer to the SDC – referred to by fire modeling professionals as "dire scenarios" (Cova article is referenced above and attached for the Administrative Record). SAFRR asks that the EIR scoping include technically defensible fire behavior modeling, traffic evacuation modeling, and accounting for dire evacuation scenarios. The data and technology exist; the County has only shown a lack of will to instruct the EIR consultant to analyze and disclose (as required by CEQA) the range of evacuation scenarios.

This time, SAFRR requests that the County and EIR Consultants take the time to plan the SDC's long-term purpose, and scale correctly. As to scoping: There are 3 years of previous input and more input from the community. The Board of Supervisors should direct staff to evaluate an alternative that better reflects the years of community input that prioritize city-center commercial development and housing, rather than a subdivision, hotel and commercial center located in a vulnerable rural area.

This time, we ask the County to define alternatives that promote safe evacuation (including consideration of dire fire evacuation scenarios) and scale the project to fit in with the rural infrastructure and insufficient road capacity of the area.

SAFRR respectfully asks that the County prioritize the safety of existing communities.

Sincerely,

Marylee Guinon
President, State Alliance for Firesafe Road Regulations

Attachments:

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