



December 13, 2022

Sonoma County Board Supervisors

Address Info

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Via Email:

RE: Comments on SDC Specific Plan and Final EIR

Dear Sonoma County Supervisors,

As our community's voice within Sonoma County government, the North Sonoma Valley Municipal Advisory Council (NSV MAC) has been deeply engaged in soliciting and communicating the thoughts and desires of our citizens with respect to the Sonoma Developmental Center (SDC) Specific Plan and the related Environmental Impact Report. Given that our previous letters on SDC redevelopment, submitted to you in January, March and September this year, were based on years of community input and extensive public engagement, we include them as addenda to this letter. Over the last year, and in fact since the first large public meeting on SDC was held in 2015, our community vision for the property has been remarkably consistent and has not fundamentally changed. This vision is extensively detailed in our earlier letters. We request that you review these before making your final decision on the Final EIR and Specific Plan.

Based on our analysis, and public input, the NSV MAC finds the Final EIR to be significantly inadequate in its evaluation of the impacts of such a large-scale development on a rural site. Likewise, the County's responses to comments on the Draft EIR did not sufficiently address the shortcomings pointed out in its analyses. To give one example: our request that a third evacuation scenario be addressed with a fire start on or near the SDC Core campus was denied (page 97 in the FEIR). The reason given was that "Historically, a fire approaching from the west may be less likely, and therefore did not warrant further specific analysis." This is a surprising statement given the damage wrought in 2017 and 2020 in areas that had no history of catastrophic wildfire. In addition, it is well demonstrated that population density is "an important determining factor" for wildfire ignitions. Over time, more people will mean more ignitions nearby. Certainly, a fire coming from the West, starting in the open space adjacent to the SDC Core Campus, would allow minimal evacuation time for residents.

Most of the inadequacies of the EIR are related to its underestimation of impacts of the proposed large-scale residential and commercial development included in the Specific Plan. While there is agreement that a substantial amount of housing, especially affordable units, should be built at SDC, there is also broad community consensus that the specific plan needs to be significantly scaled back. To various degrees, a scaled-down plan would mitigate key project impacts: traffic, evacuation times, wildlife, water, historic preservation, and others, as well as the unquantified costs to the County (e.g., for the new Highway 12 road connection).

We request that the Board certifies the EIR for a smaller project and approves a scaled-down Specific Plan that is consistent with the Historic Preservation Alternative (HPA), identified as the environmentally superior alternative in the EIR. This would help address many of the EIR inadequacies and meet the tight State timeline.

We also request that phasing requirements be incorporated into the Specific Plan, based on performance standards and an ongoing mitigation monitoring plan. As the plan currently stands, there



is no requirement to build housing first and there is no mechanism to track the effectiveness of proposed plan policies in mitigating impacts.

Two years ago, at the beginning of the Specific Plan process, the county invited the public to make their ideas and opinions known. The message, as stated on a prominent sign at SDC was: "Shape the future of the Sonoma Developmental site! Learn more and get involved. SDC Specific Plan: Our Valley, Our Future." The public took this as a promise that if we got engaged, we could have significant influence over the outcome. Throughout the process, public opinion has been clear. Consensus for something smaller has been voiced by the Sonoma City Council, the Citizens Advisory Commission, Oakmont Village Homeowner's Association, Bennett Valley Homeowners Association, many other groups, and the 2400+ individuals who have signed a petition in support of the North Sonoma Valley Municipal Advisory Council's January letter advocating for a smaller project.

Yet the project's size has not shifted at all. A year ago, it was 1,000 units and it remains at 1,000 units, or even more due to ADUs and density bonuses not being included in the 1000-unit plan. If all the robust and thoughtful engagement of the public has not been enough to change the outcome, what would have been required to do so?

The specific plan process has seriously eroded trust in our county government to work in the public's best interest. As Supervisors, you have an opportunity to turn this around. We urge you to seriously consider our requests. Thank you for this opportunity to provide comment and for your consideration of this letter.

Sincerely,

Kate Eagles, Chair
on behalf of the North Sonoma Valley Municipal Advisory Council

cc: ?

Attachments:
Letter of January X, 2022
Letter of March X, 2022
Letter of September X, 2022