



North Sonoma Valley Municipal Advisory Council
 Notice of Meeting and Agenda
March 16, 2022



PLEASE NOTE: In accordance with AB 361, Governor Newsom’s March 4, 2020 State of Emergency due to the COVID-19 pandemic, Sonoma County Public Health Officer’s Recommendation for Teleconferenced Meetings, and the Sonoma County Board of Supervisors Resolution 21-0399, the North Sonoma Valley Municipal Advisory Council meeting will be held virtually.

Join Zoom Conference Meeting:

<https://sonomacounty.zoom.us/j/96947214980?pwd=N3NDNVJzcTRhR0xBcDdqUFM2amNBQT09>

Meeting ID: 969 4721 4980

Passcode: 376069

Join by Phone: 1 (669) 900-9128

5:30 p.m.

Contact: Hannah Whitman, Board Aide for Supervisor Susan Gorin – hannah.whitman@sonoma-county.org

1. Call to Order 5:33

Roll Call: Vice Chair Handron

Present: Cooper, Chair Dawson, Dickey, Doss, Eagles, Nardo-Morgan, Newhouser, Oldroyd

Absent: none

Chair Dawson, the meeting will be terminated if hacked.

2. Invocation: Judy Talaugon

Chair Dawson, thanked all for their participation and engagement in the meeting, explained the purpose of NSV MAC—serves the community of Glen Ellen (GE), Eldridge, and Kenwood and represents people who live and work outside of incorporated cities like Sonoma or Santa Rosa. The MAC serves as our community voice at county government to learn about & access county resources and as a place to identify challenges & opportunities and to innovate solutions in partnership with our supervisor.

I’d like to acknowledge that the citizens and communities served by the Council occupied the unseeded ancestral lands of the Coast Miwok who are closely related to neighboring indigenous peoples, the Pomo, the Wappo, and others. As Chair, I’d like to ask forgiveness for past transgressions that their ancestors have experienced and humbling invite them to join us in person or in spirit. Recognizing how much we benefit from their continuing presence as culture keepers and teachers, we commit ourselves to building positive and lasting relationships with our local indigenous community and with all the diverse peoples of this region. Welcomed Judy Talaugon, an indigenous Californian.

Judy Talaugon, thanked Arthur Dawson & the community. I am honored, I’m also a visitor here. I am graced & given by the acknowledgment & grace of the Wappo people, the Pomo Nation that I do belong. This is a partnership of the people who still reside from Napa to Manchester. I’d like to begin by acknowledging all 4 quadrants of the world, the medicine wheel, all four directions & races... the North and the South quadrants, the East, and the West. My people are the keepers of the West, and the Mohawk 6th nation are the keepers of the East. We ask all spirits to guide us today, to guide our words to be tempered & kind to ourselves & others in this time of chaos, of great sorrow & loss. We acknowledge these quadrants & our brothers and sisters; the black, the red, the white, and the yellow. These great spirits will guide us. There are two more directions we will acknowledge, the sky people, the star people and we thank them with deep gratitude. And to the earth underneath our feet, grounding ourselves to Turtle Island. We’re all children of Turtle Island. Big changes coming. I am available to speak to these because I am advised by the women in the Arctic, the women in the East and in the South. It’s the time of the women to raise their consciousness so that we can create more balance on earth & the universe. Acknowledge all 4 directions, thanking and being grateful to all 4 directions. Oh!

3. Approval of February 16, 2022 minutes

Chair Dawson, any amendments, or corrections to the February minutes?

Councilmember Nardo-Morgan moved to approve the February minutes. Vice Chair Handron seconded. Motion passed unanimously.

4. Public Comment

Chair Dawson, From Deb Pool, re property on Horne Ave. It has come to her attention that it has been sold. Although may be a rumor, she has heard that all 5 homes will be turned into short-term rentals, which means the 5 occupants of those homes will be evicted. If State and County are looking to offer more housing, it is puzzling to allow more housing stock to be turned into short-term rentals. Does not make sense to evict people. Allowing short term rentals to take up vital housing stock in residential areas that are surrounded by exclusion zones is problematic.

Teresa Murphy, pleased to announce that the Glen Ellen Historical Society has submitted nomination papers to the national registry of historic places for the Eldridge California property. The property owners have been notified and we're expecting further communication from the state office of historic preservation on this national nomination process.

Chair Dawson, that's a huge thing to nominate SDC for historical status and you guys pulled it off.

Nick Brown, the GE Forum would like to extend an invitation to our community social outdoors at Jack London State Park on Sunday, April 3rd from noon to 3 at the picnic area. We'll be having a great band. Last time we had a GE community social was about 2 years ago. You don't need to live in GE to attend, everyone is welcome.

Councilmember Nardo-Morgan, thank you to Judy. As she said, at this time of great chaos, it was very moving and very special to have someone so spiritually connected to our ancestors open this session and I'm really grateful.

Councilmember Oldroyd, re Kenwood Ranch, the visual effects of the grading that they're doing is very visible for the residents of Kenwood and it disrupts the scenic corridor, so I'm wondering if we can have any impact on that?

Chair Dawson, we'll have Supervisor Gorin answer that in a minute.

Councilmember Cooper, that's right in my backyard. I drove up there, looked around and talk to the builders up there. They said that they're going to completely green that out with plants and things so that ugly brown stuff will disappear. Who knows if that'll happen, but that's what they're saying.

Councilmember Newhouser, both issues are related, not just the development of Kenwood but also what Deb is referring to. I was wondering if it'd be appropriate for us to respond with a recommendation for the citizen's advisory commission to address these issues?

Chair Dawson, we can hear from Supervisor Gorin and put that on a future agenda.

Councilmember Oldroyd, the result of having a historic facility has a big impact on many things- particularly good in accessibility, which is why it allows the existent building to work in a way that is a lot looser than the ADA requirements that they are subject to, so it's a good thing to be nominated.

Chair Dawson, maybe that's something we can add to the letter.

Councilmember Newhouser, Susan, are there other protections extended to these buildings, in other words, now if it does get included in the registry, would it actually protect the buildings and make it harder to remove the..?

Councilmember Oldroyd, yes, on specific buildings. Usually select buildings are protected.

5. Supervisor Gorin Update

Supervisor Gorin, going to the Yosemite Council to talk about climate change, transportation, public policy, etc. Provided a Board briefing. **Board meeting on Tuesday mostly devoted to Cannabis** about the challenges the industry is having, e.g., high price of cannabis. Many cultivators can't sell their product or selling low with no profit. There's a national supply and demand issue all throughout the Western U.S. The Board decided to decrease taxation to 45%. The State levies about 3 quarters of tax load. Permitting & cultivation have been challenging. For those not necessarily fans of cannabis cultivation- hearing more about giving up the business, cleaning up the site, or code enforcement requiring them to clean up the site- the latest I heard is on Bennet Valley on Grange Rd. Also discussed the scoping of EIR about permitting cannabis in the future, it's on the last item if the board agenda.

The Sheriff's Department helicopter is very expensive to operate. Purchased a new helicopter a few years ago. We are the responder and mutual aid provider for several counties around us. Agreed to fund the helicopter for a year. In the meantime, we continue to explore to figure out how we can afford to keep it flying. David Rabbit hosted a **drought town hall**. I am concerned about our vulnerability of fire. Create defensible space & do the vegetation management. How do we develop exclusion zones, especially in GE?

Thanked Deb Pool for alerting us about the purchase. Trying to remember how we develop the vacation rental exclusion zones, especially in GE. Focused on houses on R1 zoning. Outreach to planning commission that will go through the vacation ordinance. We are continuing to struggle with the impacts of **housing rentals**, especially threat to our housing supplies. Have been concerned about the grading at the Kenwood Resort, especially the long driveway going up the hill. I've had long conversations with Permit Sonoma. The grading permits have been approved long ago, not much we can do. They will be required to look at revegetation. It would have been a well-done resort with the kind of work that the McNair brothers had been doing at preserving the trees, then the fire came through and devastated that site. They are in process of taking out many dead trees. It may be good for you to invite a rep of Permit Sonoma to talk about the Kenwood Resort. We don't have control of what approved or what has been approved.

Public meetings for the SDC have been announced, next Tuesday at 5:30 and next Saturday morning at 10:00, they will be virtual. They are asking about policies that can be implemented on the site. There's will be an in-person Spanish meeting at La Luz Center on the 25th at 11:00 am. We have lots to learn on outreach.

Re the **registry of buildings**, there is only 1 building on the national registry. Potentially a home for a boutique hotel and maybe meeting gathering space. It is my understanding that the state/owner of the land must agree. I know Nick & other folks have suggested other areas to be included in the historic district. I should warn you that this is the time that the state is preparing an RFP for proposals for the site.

Councilmember Eagles, re the policy meetings, I found them on sdcspecificplan.com, there's a blue box you click. There's not much detail on there, can you help us with that? How does this fit in with current process around the EIR, where does this fit?

Supervisor Gorin, that's exactly my point. I've been working on this issue for 9-10 years. All my advice has been rejected. I've asked to put out in a press release the differences in the scoping of the EIR and the process that we've been through versus policy statements and give us examples of what policy statements might look like. None of that was included.

Chair Dawson, I feel confused as well. You mentioned the wildlife corridors, isn't that part of what the NOP is?

Supervisor Gorin, I'll try to get better info to have added to FAQ's about what this process is and what it should do. I'll jot that down.

Chair Dawson, if there's something that comes up in the NOP under policy, do they just transfer that over?

Supervisor Gorin, feel free to offer your suggestions.

Chair Dawson, I will be out of town next week, what's the deadline?

Supervisor Gorin, a number of days after that, within the next couple of weeks. They'll be recorded so you can review them. Even experienced PAT members were scratching their heads, so they emphasized to get comments in the chat or send them via email.

Chair Dawson, how do we request an in-person meeting? It disturbs me that some people are getting in-person meeting and others aren't.

Supervisor Gorin, at La Luz Center in Spanish at 11:00 am. Come by if you speak Spanish. Bicultural folks of other cultures are renescent to speak out. They want to feel safe & secure and want to have communication in their own language in a place they are familiar with and feel comfortable at. I would love if we could have an in-person for 500 but I don't think we'll be able to have that in the next months. We are planning a meeting about the Springs Plaza. No one assume that its safe gathering together because that's certainly not the case.

Councilmember Copper, realizing the SDC is the main topic, as it should be, re the Kenwood Resort is there any other kind of influence we can have around that building process?

Supervisor Gorin, that's done.

Councilmember Copper, nothing we can do?

Supervisor Gorin, no, but I think it's a good idea to invite Permit Sonoma to your meeting to ask what's going on. How are the plans moving forward, what was permitted, what's the timeline?

Councilmember Copper, do you think it would be better to approach it that way, or just as a good group of people to try to influence that way?

Supervisor Gorin, you can't influence. Everything is entitled and permitted, so the best you can do is ask how are you working with the owner and the landscaper to prepare for fire and to work on the vegetation recovery from the scars of the grading?

Chair Dawson, now we'll open for public comments.

Tracy Salcedo, re what's happening in Kenwood and that nothing can be done to mitigate what development is happening right now. That doesn't go well for future development in the North Valley, we can permit something now and conditions change. What was permitted at the time is no longer appropriate. We need a Trust down there, that's the only way we can ensure that dev can do what it needs to, whether handling mitigation for fire, providing housing, having a park. We need a Trust that can have some control over what happens there over time.

Charles Mikulik, I am the lead author on the national register nomination for the SDC. I'm concerned about misinformation; I've heard a few things that have come up that are not quite accurate about what this process is. I'd like to offer my time to communicate with you, answer questions & address any concerns. I've had multiple communications with the office of historic preservation about how this is going to work. It's going to happen, the district is coming. There's nothing that can stop the nomination.

Supervisor Gorin, Tracy, it's always good to hear you. Understanding how circumstances change especially with fires, that may be a good policy recommendation for the specific plan. A policy that can help guide community discussions for recovery. Like the earthquake fall running through Sonoma Valley. Think extensively. Let's put into place policies that will help community participate in recovery. Charles, thank you, I am not an expert about historical preservation. You can nominate it but I think the state has to accept it because they own the land— I think that's a good conversation for the future.

6. Sonoma Valley Collaborative Presentation

Chair Dawson, introduced Caitlin Cornwall, Collin Thomas, Celia Kruse De La Rosa, and Blanca Escobedo.

Caitlin Cornwall, Project Director for the Sonoma Valley Collaborative (SVC)– a forum of community leaders from a wide range of sectors across Sonoma Valley finding solutions & taking action to address our community’s biggest challenges. The point of the collaborative is that there are issues that are too big to tackle, so we need a group.

Geographic Scope:

The entire Sonoma Valley basin, including the hills that frame the valley bottom, from Napa-Sonoma ridgeline to Sonoma Mountain, and from N of Kenwood to S of Schellville.

Values:

- A sustainable community
 - Environment: a healthy climate & environment
 - Equity; social well-being for all
 - Economy: economic security
- We don't make any statement or take any position or pursue any projects that does not advance all three of these things

Membership includes various organizations, memberships shift slightly over time. If anyone is involved with an organization that represents. A distinct interest group or sector, we can talk about taking on new members.

Practical Consensus:

- The Sonoma Valley Collaborative makes decisions using “practical consensus”
- Thumbs up = in agreement w/ the proposal
- Thumbs sideways = not my first choice but I can live with it
- Thumbs down = we need more discussion, I don't agree with the proposal as it stand, and here is why
- If all thumbs are up or sideways, then the proposal passes

Current Focus Areas:

- A more sustainable Sonoma Valley
- Working together across boundaries to increase, improve & preserve housing that is affordable for people who live or work in the Valley, within already developed areas, to create diverse, safe, complete neighborhoods.
- The future of the SDC

A Stronger Collaborative:

- Expanding civic youth participation
- Recruiting more younger & more diverse Council and Steering Committee members

Celia Kruse De La Rosa, Sonoma Valley Hospital supports the forum that the collaborative provides to learn, listen, share & provide input. Being a part of this convo is important to us. We find it to be a good place for the hospital and the healthcare district to be a part of.

Collin Thomas, change advocate at Disability Services & Legal Center. It's important to be a part of this to make sure the needs of people with disabilities is included in the development plans to make sure housing is ADH accessible and inclusive.

Caitlin Cornwall, read the statement of the new staff member (Blanca Escobedo) at Greenbelt Alliance serving the whole North Bay. They participate in the collaborative so they can achieve more of their priorities with groups & individuals that have shared values and goals, particularly planning for a more resilient areas to live in, areas that are resilient from climate change disasters and able to provide housing for all, through infill smart housing that will be accessible, safe & affordable.

Ann, represents mobile homeowners in Sonoma Valley and the county. As an advocate for mobile homes, they've been able to elevate their profile for unsubsidized affordable housing. Through the collaborative they have expert consensus. The whole community is affected by lack of affordable housing.

Influencing the Future of SDC

- Finds points that all or most interest groups agree on & advocates for those outcomes
- Focused on highlighting input from groups whose perspectives aren't always heard in land use planning, such as youth, Spanish speakers, and local-serving businesses
- The 30 members of the SVC have advocated for homes/housing that are accessible to people who cannot afford Sonoma Valley market prices, whether to rent or own.
- Diversity of home prices & styles— single-family, cottage, missing-middle, multifamily— focused on ordinary-size homes for households who will live there full time.
- The 700 acres of open space are protected permanently, along with the wildlife and biodiversity resources, water, and wildlife passage across Sonoma Valley.

Vice Chair Handron, I am impressed with the diversity of the group and advocacy for all the people in the community and I'm wondering if you have any tips for us to increase our diversity and the people that we reach & participate in the meeting.

Caitlin Cornwall, it takes a lot of time and takes going to their places, going to their meetings, going to their conversations and building relationships and listening. We don't have young people coming to our meetings, if we want to work with young people, we go to Teen Services at 3:30 on a school day and try to make the conversation sound interesting enough for them to be part of it. People are busy, so we have to go and do things the way they need them done.

Councilmember Dickey, Caitlin, this is the 1st presentation you make to the MAC and GE. You say it's a collaborative, but I personally don't know anyone who is a member of your group, you have 30 members. And I've lived in this valley for 40 years and I don't know anybody that has even participated with you guys. This feels like it has been done in secrecy. I would like you to address and transparency.

Caitlin Cornwall, the collaborative kicked off in 2017 after the fires. We very consciously were looking for organizations that could represent interest groups like youth, health, emergency, business, environment. It was only later that we began looking for geographic representation. We do actually have a North Sonoma Valley representative, Tracy, maybe she can speak on this.

Tracy Salcedo, I have been the Glen Ellen Regional Representative for the SVC for going on 2 years now. I apologize to Glen Ellen that you don't know more about the fact that I have been talking to the with collaborative and with the council about Glen Ellen. That's mainly why I asked Caitlin to join because we've been talking about SDC and SDC has a lot of housing. The SVC was talking about housing and I thought it was important for Glen Ellen to have a voice on that, I may not be the best voice, and that's something this group can tackle...talk about how best Glen Ellen and Kenwood and Oakmont... all of these voices are heard on the SVC.

Chair Dawson, going forward, would the MAC be a potential member of the collaborative? That feels like a good idea to be connected in.

Caitlin Cornwall, sure... yes.

Councilmember Dickey: there are 30 members of this group. There was no support offered by the SVC towards the Glen Ellen MAC letter that went out to the supervisors, is that because the 30 members of your organization didn't agree? You mentioned you didn't do anything unless they all agreed to it.

Caitlin Cornwall, there was a lot in your letter. There were parts of it that didn't seem exactly consistent, but the biggest issue is that the collaborative meets once a month, we get 1.5 hrs per month and we spend that time finding consensus

inside-out from our membership. Many of our members did read your letters but with the limited time we had, we had to prioritize talk among our members.

Councilmember Dickey, it took us less than 3 weeks to come up with the letter.

Caitlin Cornwall, I meant in terms of hours. There was a fair amount of overlap. You can see all of our statements on our website, it's not wildly different.

Councilmember Dickey, I would say your density proposals are different.

Caitlin Cornwall, we don't actually have a density proposal. There is not consensus on the SVC for either a number of houses or a density.

Councilmember Dickey, so in the private meetings you have with Permit Sonoma you don't discuss housing density?

Caitlin Cornwall, the meetings we've had with Permit Sonoma have been about helping get youth voice represented. Potentially partnering on meetings to get Spanish speaking voices represented, which they then decided to do on their own. We haven't had secret access to Permit Sonoma. In our statements there's nothing about numbers or density, there's not even a number about percent affordable, just that we wanted it higher than the original versions.

Councilmember Dickey, I'd agree there's little distinction between what we want and what the collaborative group is proposing, so I'm wondering why you've chosen to differentiate yourself from the GE community? One person as a community participant seems like a meager voice, considering the impacts. You mentioned mobile home construction, is that part of the proposal that you would encourage for SDC?

Caitlin Cornwall, that is not part of anything that the collaborative has said about SDC. We have a deeply researched blueprint called Homes for Sustainable Sonoma County; it was written before SDC started its process. It's about increasing the amount of affordable housing in Sonoma Valley as a whole. In that paper, one of the many, many suggestions is recognition of and preservation of mobile homes because makes up a substantial portion of non-subsidized affordable housing. Nothing that we've talked about with revelation to the SDC.

Councilmember Dickey, when I look through the list of groups, I didn't see anyone in the construction world or adaptive reuse despite what your group might think is a very affordable way in a broad spectrum of both impacts & financing for providing affordable housing and your group has basically said we're rejecting that concept.

Caitlin Cornwall, no actually I didn't put up every single point in every single one of our letters, but there is a point that's been in one or maybe even both of our letters that we would support deeper analysis of any buildings that are appropriate for repurposing and reuse. That is in our letters. We have not tried to take a position about whether we know how much or which buildings or anything like that, it's not something that we know about. We do have a construction person on the council, Roger Nelson from Midstate Construction. He's relatively new member and has built commercial projects, market projects, and also 100% subsidized affordable housing projects.

Councilmember Dickey, I think they're the ones who are responsible for the housing near the Charter School on Highway 12 and also, they're the ones that are going to do the affordable housing project proposed on El Verano Ave.

Caitlin Cornwall, I think that's right.

Councilmember Newhouser, is SVUSD part of your collaborative?

Caitlin Cornwall, the school district is in a world of hurt, we don't have a main point of contact. Right now, we have no one because there's so much chaos going on. Schools, them as a giant employer...

Councilmember Newhouser, I fully support having them be part of your collaborative. We're responsible for communicating as much as you are. The reason I ask is because there have been several ideas about relocating Dunbar to the SDC. The school district has not indicated any interest. There is a lack of communication or involvement of getting people interested in this. I look forward to that because I haven't given up on that. I am really glad you have mobile home advocates. I think it's a critical issue. There are several mobile home parks throughout the valley and in the city proper that I think are seriously threatened through speculation and redevelopment. For example, Rancho de Sonoma, I remember about 15 years ago at a City Council meeting, the owner came in and convinced the city to allow them to privatize and sell off individual trailers and those lots there. If you look at that place now it's being carved up and gentrified. I am also glad to see the Greenbelt Alliance supporting you. I'm wondering how you're balancing the significant need for affordable housing? We know that if we have a dense development there it's going to have impacts on the viability of the wildlife habitat corridor. I think that's something we haven't been able to quantify and it's one of those big questions as to how that's going to be evaluated and how they set the development standard, and I'm wondering how you are doing this noble effort to bring all these disparate interests together, how you're balancing that with your environmental core beliefs & interests?

Caitlin Cornwall, SVC memberships includes Sierra Club, The Ecology Center, in the past, Sonoma Land Trust, and many of the other people. Many have a long history in Sonoma Valley, they care deeply about the beauty and health of this place. That's why something like the collaborative can be more successful in a small place than a big place. Because of the decision-making approach that we use, the collaborative cannot take positions that can be environmentally destructive. In our housing declaration there's a phrase in there that says we support affordable housing that's within already developed areas. The intent is there for increasing density in places that have already been developed. The different already developed parts of the valley should share the burdens and the benefits of urban places, so we shouldn't put all the needed housing in the Springs, it needs to be shared among the different parts of the valley, the affluent & the less affluent. Our statements do not get into specifics about how many houses and what density because we have disagreement on that. There's so much that is actually agreed on and that we need. We need to act like it, we need to work together on those things and not let the things we disagree about divide us too much.

Chair Dawson, would there be a process to get involved with the collaborative?

Caitlin Cornwall, I think that can be a conversation between you and I and Tracy. I would just want to make sure that whoever is coming on and the MAC in general is really familiar with our charter, and what it what it means to be a member. No big hurdles. The collaborative itself is not a legal entity. It is a coalition of the willing, we have no power, there's no authority. It is housed under the 501c3 of the Sonoma Ecology Center. The collaborative is a way for the Ecology Center to participate in these issues that go way beyond the environment.

Councilmember Dickey, Caitlin, re affordable housing, my personal view is to make it 100% affordable housing. How does your group feel about that? You recognized in your statement that the financial feasibility question is sort of not supported if we can come up with a model where we were reducing density proposals but increase the percentage of affordable housing, how would you feel about that?

Caitlin Cornwall, affordable housing means different things to different people, so we have to talk about the details. The consensus of the collaborative is that the housing that the collaborative members care about on SDC is housing that would not otherwise get built in the market, it's not just like the lowest paid people who can't find housing it's also their middle-paid people who can't find housing. We usually say we're promoting housing for the SDC and general, from the middle on down, which is very vague.

Councilmember Dickey, but your supportive of higher percentages of affordable housing at the expense of market rate housing, correct?

Caitlin Cornwall, pretty close. As the representative for these 30+ organizations I have to be very careful... all we got as credibility is that staff don't misinterpret the members. I think we're very close on what you're saying, I would want to run it by a little bit.

Councilmember Eagles, you mentioned housing prioritized over jobs and I've been thinking a lot about the jobs and housing population synergies and if there are any that we can assume, and in my conclusion is not really. We just don't know enough. I don't think we see any evidence that isn't necessarily something that can happen in any sort of formal planned way. Does your group have any views on that?

Caitlin Cornwall, we've had a subgroup talk about SDC issues some time ago, so we had a subgroup of our business-oriented members who are also the bigger employers, the Chamber of Commerce, Vintners & Growers...I asked about jobs. They are much more concerned about the lack of affordable housing than the lack of jobs. That interest is swamped by the emergency level issue of affordable housing. The collaborative statements very much de-emphasize jobs it's like they're considered a bad thing, but the housing is so much more overwhelmingly important.

Councilmember Eagles, I just wondered if you made any assumptions in any of your assessments about jobs on site, but it sounds like that's not what I'm hearing, is that was not a focus because housing was such a priority that you didn't necessarily have the analysis like that in the context of the collaborative.

Public Comment

Tracy Salcedo: I've been the GE Regional Representative on the council and I'm happy to continue in that but I think it's important for all to recognize that to go to the collaborative and present the viewpoint of such a large community with so many diverse interests... these are things that move slowly. If you're talking about the SVUSD or the Sonoma Valley Hospital, you have to bring these statements back to your group. I don't feel like a person can stand up and say that they represent a community when they don't have that backbone, some groups are better prepared to do that. And that's something that I would hope you guys, if you chose to take on a position with the collaborative, making sure that you go back to the community and that's one of the places where I feel like I've kind of fallen down. It's important that if we're going to be part of a collaborative that we also collaborate amongst ourselves, and that we're actually truly representing the entire community to the best of our ability, so that that's what I would share with you as you're contemplating what that NSV MAC can do.

Elisa Stancil, thank you all. I'm here just to represent the fact that you can have faith and pray and move forward and be collaborative as a group here in GE and all through the valley and we have proven it over and over. There is no contest between one perspective and another. Thankful for the collaborative, we just need to join together and come forward. I'm working a lot on the remediation and the issues about toxins that are in the existent buildings at SDC and I everything is going to be ok, also with the preservation portion.

Jerry Berhaut, can you give us a clearer definition of the missing middle and what's the relationship between the collaborative and the Eldridge enterprise which I understand has a considerable emphasis on jobs, thank you.

Caitlin Cornwall, I actually don't want to define the missing middle, there's a lot of accepted definitions for it. For purposes of this conversation, a number of those items are just meant to be housing that is for people who make too much to qualify for traditional subsidized housing, but not enough to buy a house on the open market in Sonoma Valley. And re the Eldridge Enterprise, the SVC has heard formally and informally about a lot of the different proposals for the SDC, including Eldridge Enterprise. The collaborative is not terribly interested in the enterprise. The housing affordability and mixed integrated neighborhood with services that provides a high quality of life for a large range of people, that's where we've been focusing.

Jim, thank you Caitlin, I heard there's a differentiation between what we'd call workforce housing and affordable housing, as opposed to affordable housing. And my understandings of those definitions is that we're really looking for workforce housing so I'm wondering if you can address that issue for us to help us understand how do we differentiate those things and sort of how that fits in to the collaborative vision of what might be possible?

Caitlin Cornwall, again, I think a lot of these phrases are defined differently by different people. I don't want to provide definitions or choose one or the other. A lot of the members of the collaborative are not housing experts, they're

experts in what they do every single day and what they know is that the lack of affordable housing is affecting what they do, their mission.

Teresa Murphy, I do support affordable housing. Why is the SVC making consensus decisions on GE when two major entities of GE are not part of that process and that's the GE Historical Society and the GE Forum? We do love Tracy and we value her participation, but those organizational stakeholders need to be part of that activity. I also take exception to the slide that said historical preservation should not divert funding from affordable housing, but I think that affordable housing & historic preservation can cooperatively enhance each other and that you can also keep the cultural integrity of the property, so I don't think one excludes the other.

Bean Anderson, does your group have a stand on vacation rentals? It looks like in unincorporated Sonoma we have 2,000 vacation rentals, which is a huge amount of housing stock that's being lost, so in terms of getting more housing stock, I wonder how you guys feel about vacation rentals?

Caitlin, this question really illustrates what a coalition or a collaborative based on consensus can do and cannot do. The table includes hospitality and real estate representation. Even though many of our members feel passionately about vacation rentals... that there are too many of them and they're taking away housing for people who live & work here, there's no consensus on the collaborative to take a stance for restricting vacation rentals. We don't we have no position on vacation rentals, we've had great conversations about it that have been very informative, but the collaborative as a whole cannot find a position on that.

Alice Horowitz, I am feeling a little confused about the collaborative, it feels like the collaborative wants to be taken as a serious voice for the SDC planning but also mentioned constraints on time to review the letter. The collaborative never really discussed it as a collaborative, correct me if I'm wrong. I'm feeling some disconnect.

Caitlin Cornwall, there are meaningful differences between the NSV MAC and SVC. The geography is quite different, SDC is happening not just to GE, there's a lot of communities that SDC is meaningful to, so we're operating on a different scale. The NSV MAC is everybody who lives in a certain area, that's who gets to have a say. The collaborative is constructed differently, it's these interests: the economy, the environment, equity, and sub-interests within those. It's just going to have different perspectives than residents of the NSV MAC. We're a different collection of players at a different geography.

Chair Dawson, we did get people from all over the valley sign our letter, I think about 600 signatures from people outside the valley and 300 from people in GE. But I understand it's a different situation. Thank you to the SVC, hopefully well be working together. We certainly share concerns on similar things.

7. Review Scoping Comment Letter: Sonoma Developmental Center

DRAFT LETTER:

March 17, 2022
Mr. Brian Oh, Comprehensive Planning Manager
Permit Sonoma
County of Sonoma
2550 Ventura Avenue, Santa Rosa, CA 95403
Brian.Oh@sonoma-county.org

SENT VIA EMAIL

Dear Mr. Oh,
On behalf of the North Sonoma Valley Municipal Advisory Council (NSV MAC), I respectfully submit the following comments pertaining to the Notice of Preparation (NOP) of a Draft EIR for the Sonoma Developmental Center Specific

Plan, as issued by Sonoma County on 2/9/22. While this letter is reflective of community input, it is not intended to be exhaustive or to take the place of individual comments from community members and other interested parties. The NSV MAC notes that the NOP does not provide a proposed site plan that estimates the size of non-residential development density, nor does it provide the location of utilities, a wildlife corridor, proposed roadways, drainage solutions, or any related topographic mapping. Potential comment regarding specific impacts is limited because a more detailed site plan was not provided. The NSV MAC also notes that “economic feasibility” was mentioned in the NOP information sessions held by Permit Sonoma, and request that this be clearly defined in the Draft EIR (EIR), especially in discussions of the site alternatives. In October 2020, Governor Newsom called for accelerated use of nature-based solutions to deliver on California’s climate change goals through Executive Order N-82-20. The EIR must evaluate and align any proposed activities at the SDC with this cohesive strategy and identify land management actions that help protect climate-vulnerable communities, achieve carbon neutrality, improve public health and safety, and expand economic opportunity.

WILDLIFE CORRIDOR & OPEN SPACE

The primary wildlife corridor on the SDC campus should be specifically located and considered as a primary feature of any site plan scenario assessed through the EIR process. Mitigation measures for the project's significant impacts on wildlife must be considered under the EIR, to include specific performance standards that ensure the effective implementation of these measures.

Large-scale residential and business development has the potential for significant impacts on the wildlife corridor running through the SDC campus. The effects of human and vehicular traffic, lights and noise can disorient wildlife and result in significant harm to their normal behavioral patterns. The EIR must provide expert biological opinion evaluating the range of impacts on the wildlife corridor corresponding to the range of projected development.

The designation of the wildlife corridor should be distinguished from recreational open space and safeguards established to prevent outdoor recreation from impacting wildlife movement. Mitigation measures should include specific mitigation measures, including trail designs that prevent conflict by separating recreational use from wildlife use.

HOUSING DENSITY

At 1,000 units, the proposed maximum range of housing density in the NOP is inconsistent with the adjacent communities and is not accompanied by a land use planning methodology. The NSV MAC requests that the EIR assessment of environmental impacts include thorough and transparent evaluations of noise and light pollution, and water/creek and wildlife migration protections.

Both the low (450 units) and high density (1,000 units) housing specified in the NOP must be evaluated equally, as part of the proposed project. The EIR must include specific mitigation measures for the environmental impacts of this range of housing density proposed in the NOP, as well as the corresponding service and resource requirement impacts, both on and off-site, for the range of SDC populations represented, to include:

- Health services, particularly in an isolated, fire-prone location
- Schooling
- Shopping for food and household
- Policing
- Fire safety/ emergency services

Project alternatives and mitigation plans should be developed to account for the cumulative impacts of additional development projects, as is further detailed below.

ADAPTIVE REUSE OF EXISTING BUILDINGS – EIR ALTERNATIVE

The NSV MAC requests that adaptive reuse of existing buildings be thoroughly evaluated as an alternative that would preserve the site’s historical significance, provide diverse housing options, achieve project objectives, and reduce the need for demolition and new construction. This alternative should be assessed comparatively in the EIR against the environmental impacts of new construction. The EIR should also consider factors of aesthetic and historic significance (see also Historic Preservation).

The potentially favorable environmental benefits of adaptive reuse, as compared to new construction, that should be considered in the EIR are:

- Reduction in greenhouse gases.
- Architectural design features that help meet current energy code, e.g., larger overhangs, steeper

roof lines, thick reinforced masonry walls.

- Reduction in traffic and transportation impacts due to waste removal of demolished buildings
- Land use planning: the existing buildings do not require new building envelopes.
- Reduced impacts from noise and vibration due to reduced building demolition.
- Air quality: potential hazardous materials will not filter into the air during demolition, nor will hazardous materials be transmitted into the air during demolition or materials transport.
- Existing underground utilities may continue to be used without removal, thus not disturbing the existing soil and geology.
- Assess the waste stream and released carbon from demolition debris.

New construction, whether residential or commercial in nature, is among the most wasteful and environmentally damaging industries in the world.*

The review of the cumulative environmental impacts of new construction should be required for the SDC EIR, regardless of any cost assumptions associated with new construction versus costs associated with adaptive reuse.

CULTURAL RESOURCES / HISTORIC PRESERVATION

The Sonoma Developmental Center is a significant historic site and a cultural landscape. A nomination for the formal listing of SDC in the National Register of Historic Places and California Register of Historical Resources is currently pending at the Office of Historic Preservation and the Glen Ellen Historical Society expects that eligibility will be considered and passed this year by the State Historical Resources Commission. The Glen Ellen Historical Society prepared the attached proposal for a Gateway to Sonoma Mountain in 2021, GEHS-Historic-Buildings-Proposal-v2Download

In the vicinity of Sonoma House, already proposed for rehabilitation, other important resources should be rehabilitated to form a preservation area that reflects the SDC's important history. This should include, but not be limited to, these buildings: Slater, McDougall, Oak Lodge and the Firehouse. These significant and important buildings should not be demolished but should be adaptively reused and rehabilitated.

As stated above, The NSV MAC requests that the EIR study a potentially feasible alternative that rehabilitates at a minimum more of the site's historic resources for adaptive reuse than are reflected in the current project. This should be based both on an environmental assessment, as well as historic and aesthetic considerations.

Appropriate uses could include a museum and visitor's center; but regardless of their eventual purposes in this huge and magnificent property, it is surely feasible to retain these buildings. Their loss would cause needless significant unavoidable impacts, for which no feasible mitigation exists.

UTILITY INFRASTRUCTURE

The NSV MAC requests the following considerations be included in the EIR with respect to the SDC site's utility infrastructure:

- A confirmation that "will serve" letters have been, or will be, received from public and private agencies affirming that energy, water and sanitation services are readily available for all of the various development scenarios to be assessed in the EIR.
- An assessment as to whether public service need projections will account for likely future climate change issues and scenarios related to access to energy, water and sanitation services, including additional, foreseeable development within Sonoma Valley.
- An assessment of a site-specific electrical microgrid system as an alternative to a centralized electrical grid power provided such as PG&E.
- An assessment of potential locations within the SDC development plan designated for potential alternative on-site sources for water, energy and sanitation resources.
- Evaluation of the cumulative impacts on air quality, greenhouse gas emissions and other global climate change metrics based on the proposed SDC development.

A. Sandilands, "Construction Waste: 'Out of Site,' Out of Mind?", <https://resource.co>, Avon, United Kingdom, Resource Media Limited, 6/8/2018, <https://resource.co/article/construction-waste-out-site-out-mind-12677>

Evaluation of the impacts of global climate change on the SDC development in terms of the availability of water, energy and sanitation resources, and the mitigation measures proposed over a time frame of 50-100 years.

FIRE / EMERGENCY PREPAREDNESS

The Sonoma Valley has experienced several large-scale wildfires over the last five years; the SDC is in a high wildfire risk area. CEQA requires an analysis of a project's exacerbating effects on existing evacuation routes, and the EIR must evaluate the range of impacts of the 450 – 1,000 housing units cited in the NOP—as well as reasonable assumptions for additional populations in the undefined-as-of-yet commercial areas on site, as well as nearby populations that must use the same roads —on the safe and suitably rapid evacuation in the event of future wildfires.

It is essential that an evacuation plan be part of the proposed development and analyzed in the EIR. It's also requested that organizations directly responsible for fire safety in the SDC area participate in the EIR process to provide their assessment of whether they will have adequate emergency response resources both to mitigate fire danger and to fight a large-scale fire on the fully developed SDC site. This EIR evaluation should assume cumulative on-site residential and work populations in all traffic impact, emergency response, and evacuation evaluations. Significant live/work population synergies cannot be reasonably assumed at this time.

The proposed access road linking SDC directly to Highway 12 should be evaluated as a means of diverting traffic off of Arnold Drive and on to Highway 12, but not as a means of reducing the total volume of traffic exiting the Sonoma Valley in an emergency via Highway 12 and Arnold Drive. This must be transparently evaluated in the EIR as part of the assessment of how increased SDC site traffic will impact safe emergency evacuation.

The proposed road from Arnold to Highway 12 must be evaluated for impacts on the existing wildlife corridor, particularly at key highway 12 crossings. The highway culverts for Butler Creek, adjacent tributary, and associated wetlands are critical components of the wildlife corridor that should be protected from impacts of a new or improved road. The existing evacuation route alignment cuts directly through this corridor, with a stream crossing that is in a location that risks significant impact to wildlife if this alignment is adopted as a permanent route. Potential impacts on wildlife due to a permanent road from Arnold to Highway 12 must be evaluated as both a continuous use arterial road and as an evacuation only route.

The EIR should also consider mitigation for fire evacuation to potentially include roadway improvements for Arnold Drive or Highway 12 to provide adequate emergency evacuation for an increased population. Also for consideration:

- Emergency preparedness is not only associated with fire. Differing disasters require different forms of emergency preparedness and the EIR should also consider preparedness as relates to earthquake and flooding.
- Wildlife-urban interface building codes may no longer be adequate for construction in fire zones. All applicable codes and policies should be evaluated for fire safety and resilience
- Climate change resiliency should be considered in a large-scale development. Alternative plans for water and energy resources should be considered in the EIR as mitigation measures for climate change.

TRAFFIC

The NSV MAC requests that the traffic impacts and estimates of Vehicle Miles Traveled (VMT) be assessed through an independent and thorough traffic analysis, with full disclosure of methodology and assumptions. The SDC site is a non-urban, relatively isolated site, with little adjacent commercial zoning (in Glen Ellen), approximately 15 and 6 miles from the centers of Santa Rosa and Sonoma, respectively. The commercial and job development specifics remain undetermined and were not provided in the NOP. As mentioned in the fire evacuation section above, the traffic analysis must include an evaluation scenario based on the housing number range (450 - 1,000) and an assumption that few of the SDC site residents will stay on site for jobs, and that travel to work, medical appointments, goods/service providers, or local schools (particularly high school and college) will require multiple daily vehicle trips per household. Furthermore, existing and future cumulative traffic on Arnold Drive, Warm Springs Road, Sonoma Mountain Road, Bennett Valley Road, Highway 12, Highway 121, and Highway 37 must be factored into the analysis as these roads are used for commuting between Santa Rosa, Sonoma State University, and the Bay Area.

With no public transportation hub (and it cannot be assumed that the site will be served by a future

transit hub given its remote location), a high dependence on daily vehicle trips off of the SDC campus must be considered in the EIR analysis. On a related note, we request that the EIR re-evaluate the non-auto mode trip numbers estimated in Sonoma County's SDC Alternatives Report (18-20% of trips) to include an evaluation based on assumptions of 5-10% non-auto, non-recreational trips. This request is based on the SDC's non-urban location and the limited NOP detail around commercial development or on-site services at this time.

The SDC Alternatives Report indicated that traffic would reach the lowest "Level of Service" (LOS F) for already congested areas of Arnold Drive and Highway 12, with assumed housing levels at between 990 and 1,290 units. While we understand that Level of Service is not the current assessment metric, we request that the EIR evaluate the equivalent Level of Service impacts on the roads surrounding the SDC at the 450-1,000 housing unit range specified in the NOP.

The NSV MAC also requests that:

- The EIR provide a means of evaluating road impacts that worsen beyond an LOS F or equivalent;
- Areas of EIR impact assessment also include public safety and public transport assumptions; and
- Congestion and related safety impacts in the village of Glen Ellen be carefully evaluated.

COMMERCIAL SPACE / JOB CREATION

There is no commercial space detail provided in the NOP, so it's difficult to request specific impact assessments in this category as pertains to scope, density or location. We welcome job growth in the Sonoma Valley and want to see our Valley workforce housed locally, however as mentioned above, the EIR should evaluate a scenario in which there is minimal cross-over between SDC residents and SDC site workforce. We have no evidence at this time that SDC residents will find suitable work on site or vice versa, and therefore it's important to include an analysis that considers these aggregate populations, e.g., for fire evacuation, traffic, and services, as detailed above.

CUMULATIVE EFFECTS

We request that the scope of the EIR include an assessment of the numerous other housing, hotel, resort, and commercial projects that are moving ahead, or are considered likely to move ahead, within Sonoma Valley. The EIR should include mitigation plans for the proposed project's contribution to these cumulative impacts:

- Traffic and road use (residential, commercial, construction, demolition)
- Greenhouse gas and other emissions
- Fire hazards
- Emergency evacuation plans
- Public services and natural resources (sanitation, water, fire services, health services, energy resources)
- Wildlife movement

Thank you for the opportunity to comment and for your consideration of this letter.

Sincerely,

Arthur Dawson

Chair, North Sonoma Valley Municipal Advisory Council

cc: Susan Gorin

Tennis Wick

Rajeev Bhatia

FINAL LETTER:

March 17, 2022

Mr. Brian Oh, Comprehensive Planning Manager

Permit Sonoma

County of Sonoma

2550 Ventura Avenue, Santa Rosa, CA 95403

Brian.Oh@sonoma-county.org

SENT VIA EMAIL

Dear Mr. Oh,

On behalf of the North Sonoma Valley Municipal Advisory Council (NSV MAC), I respectfully submit the following comments pertaining to the Notice of Preparation (NOP) of a Draft EIR for the Sonoma Developmental Center Specific Plan, as issued by Sonoma County on 2/9/22. While this letter is reflective of community input, it is not intended to be exhaustive or to take the place of individual comments from community members and other interested parties.

The NSV MAC notes that the NOP does not provide a proposed site plan that estimates the size of non-residential development density, nor does it provide the location of utilities, a wildlife corridor, proposed roadways, drainage solutions, or any related topographic mapping. Potential comment regarding specific impacts is limited because a more detailed site plan was not provided. The NSV MAC also notes that “economic feasibility” was mentioned in the NOP information sessions held by Permit Sonoma, and request that this be clearly defined in the Draft EIR (EIR), especially in discussions of the site alternatives. In October 2020, Governor Newsom called for accelerated use of nature-based solutions to deliver on California’s climate change goals through Executive Order N-82-20. The EIR must evaluate and align any proposed activities at the SDC with this cohesive strategy and identify land management actions that help protect climate-vulnerable communities, achieve carbon neutrality, improve public health and safety, and expand economic opportunity.

WILDLIFE CORRIDOR & OPEN SPACE

The primary wildlife corridor on the SDC campus should be specifically located and considered as a primary feature of any site plan scenario assessed through the EIR process. Mitigation measures for the project's significant impacts on wildlife must be considered under the EIR, to include specific performance standards that ensure the effective implementation of these measures.

Large-scale residential and business development has the potential for significant impacts on the wildlife corridor running through the SDC campus. The effects of human and vehicular traffic, lights and noise can disorient wildlife and result in significant harm to their normal behavioral patterns. The EIR must provide expert biological opinion evaluating the range of impacts on the wildlife corridor corresponding to the range of projected development.

The designation of the wildlife corridor should be distinguished from recreational open space and safeguards established to prevent outdoor recreation from impacting wildlife movement. Mitigation measures should include specific mitigation measures, including trail designs that prevent conflict by separating recreational use from wildlife use.

HOUSING DENSITY

At 1,000 units, the proposed maximum range of housing density in the NOP is inconsistent with the adjacent communities and is not accompanied by a land use planning methodology. The NSV MAC requests that the EIR assessment of environmental impacts include thorough and transparent evaluations of noise and light pollution, and water/creek and wildlife migration protections. Both the low (450 units) and high density (1,000 units) housing specified in the NOP must be evaluated equally, as part of the proposed project. The EIR must include specific mitigation measures for the environmental impacts of this range of housing density proposed in the NOP, as well as the corresponding service and resource requirement impacts, both on and off-site, for the range of SDC populations represented, to include:

- Health services, particularly in an isolated, fire-prone location
- Schooling
- Shopping for food and household
- Policing
- Fire safety/ emergency services

Project alternatives and mitigation plans should be developed to account for the cumulative impacts of additional development projects, as is further detailed below.

ADAPTIVE REUSE OF EXISTING BUILDINGS – EIR ALTERNATIVE

The NSV MAC requests that adaptive reuse of existing buildings be thoroughly evaluated as an alternative that would preserve the site’s historical significance, provide diverse housing options, achieve project objectives, and reduce the need for demolition and new construction. This alternative

should be assessed comparatively in the EIR against the environmental impacts of new construction. The EIR should also consider factors of aesthetic and historic significance (see also Historic Preservation). The potentially favorable environmental benefits of adaptive reuse, as compared to new construction, that should be considered in the EIR are:

- Reduction in greenhouse gases.
- Architectural design features that help meet current energy code, e.g., larger overhangs, steeper roof lines, thick reinforced masonry walls.
- Reduction in traffic and transportation impacts due to waste removal of demolished buildings
- Land use planning: the existing buildings do not require new building envelopes.
- Reduced impacts from noise and vibration due to reduced building demolition.
- Air quality: potential hazardous materials will not filter into the air during demolition, nor will hazardous materials be transmitted into the air during demolition or materials transport.
- Existing underground utilities may continue to be used without removal, thus not disturbing the existing soil and geology.
- Assess the waste stream and released carbon from demolition debris.

New construction, whether residential or commercial in nature, is among the most wasteful and environmentally damaging industries in the world.*

The review of the cumulative environmental impacts of new construction should be required for the SDC EIR, regardless of any cost assumptions associated with new construction versus costs associated with adaptive reuse.

CULTURAL RESOURCES / HISTORIC PRESERVATION

The Sonoma Developmental Center is a significant historic site and a cultural landscape. A nomination for the formal listing of SDC in the National Register of Historic Places and California Register of Historical Resources is currently pending at the Office of Historic Preservation. The Glen Ellen Historical Society expects that eligibility will be considered and passed this year by the State Historical Resources Commission. The Glen Ellen Historical Society prepared the attached proposal for a Gateway to Sonoma Mountain in 2021, GEHS-Historic-Buildings-Proposal-v2Download

In the vicinity of Sonoma House, already proposed for rehabilitation, other important resources should be rehabilitated to form a preservation area that reflects the SDC's important history. This should include, but not be limited to, these buildings: Slater, McDougall, Oak Lodge and the Firehouse. These significant and important buildings should not be demolished but should be adaptively reused and rehabilitated.

As stated above, The NSV MAC requests that the EIR study a potentially feasible alternative that rehabilitates at a minimum more of the site's historic resources for adaptive reuse than are reflected in the current project. This should be based both on an environmental assessment, as well as historic and aesthetic considerations.

Appropriate uses could include a museum and visitor's center; but regardless of their eventual purposes in this huge and magnificent property, it is surely feasible to retain these buildings. Their loss would cause needless significant unavoidable impacts, for which no feasible mitigation exists.

UTILITY INFRASTRUCTURE

The NSV MAC requests the following considerations be included in the EIR with respect to the SDC site's utility infrastructure:

- ☐ A confirmation that "will serve" letters have been, or will be, received from public and private agencies affirming that energy, water and sanitation services are readily available for all of the various development scenarios to be assessed in the EIR.
- ☐ An assessment as to whether public service need projections will account for likely future climate change issues and scenarios related to access to energy, water and sanitation services, including additional, foreseeable development within Sonoma Valley.
 - An assessment of a site-specific electrical microgrid system as an alternative to a centralized electrical grid power provided such as PG&E.
 - An assessment of potential locations within the SDC development plan designated for potential alternative on-site sources for water, energy and sanitation resources.
 - Evaluation of the cumulative impacts on air quality, greenhouse gas emissions and other global

climate change metrics based on the proposed SDC development.

*

A. Sandilands, "Construction Waste: 'Out of Site,' Out of Mind?", <https://resource.co>, Avon, United Kingdom, Resource Media Limited, 6/8/2018, <https://resource.co/article/construction-waste-out-site-out-mind-12677>

- Evaluation of the impacts of global climate change on the SDC development in terms of the availability of water, energy and sanitation resources, and the mitigation measures proposed over a time frame of 50-100 years.

FIRE / EMERGENCY PREPAREDNESS

The Sonoma Valley has experienced several large-scale wildfires over the last five years; the SDC is in a high wildfire risk area. CEQA requires an analysis of a project's exacerbating effects on existing evacuation routes, and the EIR must evaluate the range of impacts of the 450 – 1,000 housing units cited in the NOP—as well as reasonable assumptions for additional populations in the undefined-as-of-yet commercial areas on site, as well as nearby populations that must use the same roads —on the safe and suitably rapid evacuation in the event of future wildfires.

It is essential that an evacuation plan be part of the proposed development and analyzed in the EIR. It's also requested that organizations directly responsible for fire safety in the SDC area participate in the EIR process to provide their assessment of whether they will have adequate emergency response resources both to mitigate fire danger and to fight a large-scale fire on the fully developed SDC site. This EIR evaluation should assume cumulative on-site residential and work populations in all traffic impact, emergency response, and evacuation evaluations. Significant live/work population synergies cannot be reasonably assumed at this time.

The proposed access road linking SDC directly to Highway 12 should be evaluated as a means of diverting traffic off of Arnold Drive and on to Highway 12, but not as a means of reducing the total volume of traffic exiting the Sonoma Valley in an emergency via Highway 12 and Arnold Drive. This must be transparently evaluated in the EIR as part of the assessment of how increased SDC site traffic will impact safe emergency evacuation.

The proposed road from Arnold to Highway 12 must be evaluated for impacts on the existing wildlife corridor, particularly at key highway 12 crossings. The highway culverts for Butler Creek, adjacent tributary, and associated wetlands are critical components of the wildlife corridor that should be protected from impacts of a new or improved road. The existing evacuation route alignment cuts directly through this corridor, with a stream crossing that is in a location that risks significant impact to wildlife if this alignment is adopted as a permanent route. Potential impacts on wildlife due to a permanent road from Arnold to Highway 12 must be evaluated as both a continuous use arterial road and as an evacuation only route.

The EIR should also consider mitigation for fire evacuation to potentially include roadway improvements for Arnold Drive or Highway 12 to provide adequate emergency evacuation for an increased population. Also for consideration:

- Emergency preparedness is not only associated with fire. Differing disasters require different forms of emergency preparedness and the EIR should also consider preparedness as relates to earthquake and flooding.
- Wildlife-urban interface building codes may no longer be adequate for construction in fire zones. All applicable codes and policies should be evaluated for fire safety and resilience
- Climate change resiliency should be considered in a large-scale development. Alternative plans for water and energy resources should be considered in the EIR as mitigation measures for climate change.

TRAFFIC

The NSV MAC requests that the traffic impacts and estimates of Vehicle Miles Traveled (VMT) be assessed through an independent and thorough traffic analysis, with full disclosure of methodology and assumptions. The SDC site is a non-urban, relatively isolated site, with little adjacent commercial zoning (in Glen Ellen), approximately 15 and 6 miles from the centers of Santa Rosa and Sonoma, respectively. The commercial and job development specifics remain undetermined and were not provided in the NOP. As mentioned in the fire evacuation section above, the traffic analysis must include an evaluation scenario based on the housing number range (450 - 1,000) and an assumption that few of the SDC site

residents will stay on site for jobs, and that travel to work, medical appointments, goods/service providers, or local schools (particularly high school and college) will require multiple daily vehicle trips per household. Furthermore, existing and future cumulative traffic on Arnold Drive, Warm Springs Road, Sonoma Mountain Road, Bennett Valley Road, Highway 12, Highway 121, and Highway 37 must be factored into the analysis as these roads are used for commuting between Santa Rosa, Sonoma State University, and the Bay Area.

With no public transportation hub (and it cannot be assumed that the site will be served by a future transit hub given its remote location), a high dependence on daily vehicle trips off of the SDC campus must be considered in the EIR analysis. On a related note, we request that the EIR re-evaluate the non-auto mode trip numbers estimated in Sonoma County's SDC Alternatives Report (18-20% of trips) to include an evaluation based on assumptions of 5-10% non-auto, non-recreational trips. This request is based on the SDC's non-urban location and the limited NOP detail around commercial development or on-site services at this time.

The SDC Alternatives Report indicated that traffic would reach the lowest "Level of Service" (LOS F) for already congested areas of Arnold Drive and Highway 12, with assumed housing levels at between 990 and 1,290 units. While we understand that Level of Service is not the current assessment metric, we request that the EIR evaluate the equivalent Level of Service impacts on the roads surrounding the SDC at the 450-1,000 housing unit range specified in the NOP.

The NSV MAC also requests that:

- The EIR provide a means of evaluating road impacts that worsen beyond an LOS F or equivalent;
- Areas of EIR impact assessment also include public safety and public transport assumptions; and
- Congestion and related safety impacts in the village of Glen Ellen be carefully evaluated.

COMMERCIAL SPACE / JOB CREATION

There is no commercial space detail provided in the NOP, so it's difficult to request specific impact assessments in this category as pertains to scope, density or location. We welcome job growth in the Sonoma Valley and want to see our Valley workforce housed locally, however as mentioned above, the EIR should evaluate a scenario in which there is minimal cross-over between SDC residents and SDC site workforce. We have no evidence at this time that SDC residents will find suitable work on site or vice versa, and therefore it's important to include an analysis that considers these aggregate populations, e.g., for fire evacuation, traffic, and services, as detailed above.

CUMULATIVE EFFECTS

We request that the scope of the EIR include an assessment of the numerous other housing, hotel, resort, and commercial projects that are moving ahead, or are considered likely to move ahead, within Sonoma Valley. The EIR should include mitigation plans for the proposed project's contribution to these cumulative impacts:

- Traffic and road use (residential, commercial, construction, demolition)
- Greenhouse gas and other emissions
- Fire hazards
- Emergency evacuation plans
- Public services and natural resources (sanitation, water, fire services, health services, energy resources)
- Wildlife movement

Thank you for the opportunity to comment and for your consideration of this letter.

Sincerely,

Arthur Dawson Chair, North Sonoma Valley Municipal Advisory Council

cc: Susan Gorin

Tennis Wick

Rajeev Bhatia

8. Review MAC Priority Goals and Ad Hoc Committees

Councilmember Oldroyd, I vote on moving the last item to next meeting.

Nardo-Morgan seconded. Motion passed unanimously.

Chair Dawson, maybe we can talk about the bike path next time and the signs. Do I have a motion to adjourn?

Councilmember Dickey moved to adjourn the meeting.

Nard-Morgan seconded.

9. Consideration of items for future agenda

10. Adjourned 8:48 pm

Materials related to an item on this Agenda submitted to the North Valley Municipal Advisory Council after distribution of the agenda packet are available for public inspection in the Board of Supervisors' Office located at 575 Administration Drive, Room 100-A, Santa Rosa, CA, during normal business hours.

Note: Consideration of agenda items will proceed as follows:

1. Presentation
2. Questions by Councilmembers
3. Questions and comments from the public
4. Response by presenter, if required
5. Comments by Councilmembers
6. Resolution, if indicated

Web Links: <https://sonomacounty.ca.gov/North-Valley-Municipal-Advisory-Council/>