



Draft for NSV MAC and community review, 3/14/22

March 17, 2022

Mr. Brian Oh  
Permit Sonoma  
Address / 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.

#### **WILDLIFE CORRIDOR**

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.

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.

#### **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.

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

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\* 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>



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.
- 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.

#### **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 and analyzed 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 since 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 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. Should new, expanded codes being considered as a fire mitigation effort?
- 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, and Highway 12 must be factored into the analysis as these roads are used for commuting between Santa Rosa 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, Chairman, North Sonoma Valley Municipal Advisory Council*

cc: Susan Gorin  
Tennis Wick  
Rajeev Bhatia  
Other?