



## North Sonoma Valley Municipal Advisory Council

Notice of Meeting and Agenda

**September 21, 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/95314144535?pwd=N2pWbzJlVXZid2VSa2JVRElyRUNLdz0>

**9 Meeting ID:** 953 1414 4535

**Passcode:** 160950

**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](mailto:hannah.whitman@sonoma-county.org)

### 1. Call to Order, Pledge of Allegiance, Roll Call

**Call to Order: 5:33pm**

**Roll Call:** Vice Chair Handron

**Present:** Chair Dawson, Councilmember Dickey, Councilmember Eagles, Councilmember Newhouser,

Councilmember Nardo-Morgan, Councilmember Oldroyd, Councilmember Cooper

**Absent:** None

### Land Acknowledgement:

We acknowledge that the citizens and community served by the NSV MAC, occupy the unseeded ancestral lands of the Coast Miwok, closely related to neighboring indigenous peoples: Pomo, Wapo, and others. Asking forgiveness for past transgressions they and their ancestors experienced, we humbly invite them to join us in person or in spirit as we give gratitude for their ongoing stewardship of this place since time in memorial. 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 to honor all the diverse peoples in our region.

**Chair Dawson,** The NSV MAC serves the communities of Kenwood in Glen Ellen, which includes the former SDC at Eldridge and as the most local arm of County government, we represent people who live and work outside of Incorporated cities like Sonoma or Santa Rosa. We are in many ways a country Town Council. Like other advisory councils in Sonoma County, we were established by the Board of Supervisors to act as a two-way communication channel. The MAC serves as our community voice at county government as a means for us to learn about and access county resources and as a place to identify challenges and opportunities and innovative solutions in partnership with our supervisor. Our bylaws limit us to issues concerning transportation, health and human safety, community projects, and emergency preparedness, but others can be added at the request of our supervisor. There are no limitations on subject matter during the public comment section coming up in the next couple of minutes. Thank you everyone for being here. The meeting will be rescheduled if the meeting appears to be hacked. Items seven and eight on the agenda have been removed from the agenda because presenters were not able to make it.

### 2. Special Guest Opening Remarks

**Chair Dawson,** This week we have Bean Anderson from the Glen Ellen Historical Society and I brought him in because I thought that you had some valuable things to share with our community, so Bean, welcome to the MAC Meeting.

**Bean Anderson,** For the past seven years starting in 2015, people in Sonoma Valley have been meeting at coffee shops, around kitchen tables, living rooms, in classrooms, and auditoriums and God knows how many Zoom meetings to discuss the future of SDC. A lot of great ideas and principals come out of those meetings. In the last two years, these have all been discussed and communicated with Permit Sonoma. Some of the really key principles to emerge from these discussions were to choose a rural scale of the development compatible with the surrounding communities, protect the open space, the wildlife Corridor, guarantee that the local community has a strong say in the future of the land, and then to protect the land in perpetuity. However, as you all know, the proposed specific plan didn't incorporate any of these communities plans or principles, especially as it relates to scale. We were told the community's plans and vision were not financially feasible, so building over 1,000 homes, a hotel and resort, the demolition of most historic buildings and the disruption of the important wildlife corridor, these were the ways that progress could be made only because it had a pencil out. It was clear to us that we couldn't trust Permit Sonoma to act on behalf of the people in Sonoma Valley. We could not depend on the kindness of developers, so what was needed was a mechanism to preserve the community's voice in the decision-making process and we needed a plan that would pencil out. On Friday, August 26th, a small organizing team took on the task to write a new community proposal that would incorporate all the ideas that have come out and if possible, show how it's possible to build truly affordable housing, repurpose historic buildings, protect the wildlife corridor and local environment, cut greenhouse gasses, and still have it pencil out. In addition, the land would stay in public hands in perpetuity and the community would have a decision making say in the project and development of the former SDC land. Thank you to the sponsor, the Glen Ellen Historical Society. This proposal was delivered to DGS on Friday September 9th, just in time to meet the deadline. This proposal envisions the creation of the Sonoma Mountain Community Services District to manage the land and development projects and it also creates a community trust to develop responsible policies for the development in stewardship of the site. This proposal shows how funding will work, how the community maintains control over the future of the land, how affordable workforce housing can be built at an appropriate scale, how health facilities and job training can be incorporated, and how wildlife and environment needs to be back in a responsible manner. To keep this fully public, all the details including the proposal and some summary pages and other information are all available on Eldridge for all. Thank you for the opportunity.

**Chair Dawson,** comments or questions for Bean?

So like he said, you can find it on the Eldridge for All website and Bean, do you mind sending a copy of the proposal to Hannah?

**Bean Anderson,** Yes.

**Councilmember Eagles,** One question. The proposal has been submitted to the department of general services of DGS. We have no knowledge about their process at this stage, or when they will make their determination or any of those details. Is that correct?

**Bean Anderson,** I think they have a date of when they would like to have a decision made. I don't remember what it is. They haven't said whether they would make any of the proposals public. We want it to be very open and public about it. I know people have filed a request to actually see any and all proposals that come in.

## **Public Comment for items not on the agenda:**

**Thomas**, I'm an anthropologist, civil engineer and environmentalist. I was hoping to hear you know some details about the history. I just sent something to Hannah. Hopefully she can send that to each of the members and anyone else on the call. I don't know about what I believe is the essential history of Sonoma and the Valley of the Moon and the characterization of that name. It turns out Sonoma has these great phonemes attached to it that are really historic, Su and Noma. These things actually mean something. The mean, what it is about the value of the Moon, meaning that you know in translation it's very hard to really understand something with somebody else, particularly spiritual people are talking about when they're talking about something physical, physical people or essential people that can't really understand the same language and they just pointed to the Moon as it touched the mountains and said well that's you know what Sonoma means and we said Valley of the Moon but it really means where the spirit is touching there and it has to do with a whole other context. I believe that Sonoma is really a world heritage site, relative to the mountains there and where you can see that. Making a big development there is actually going to impede that.

### **3. Approval of August 17, 2022 minutes**

**Chair Dawson**, Are there any amendments or corrections to the minutes from last month? Do I have a motion to approve the minutes from last month?

Councilmember Eagles, moved to approve minutes.

Council member Nardo-Morgan, seconded.

Minutes unanimously approved.

### **4. Public Comment**

**Thomas**, I did actually communicate with DGS with a proposed project alternative and sent that to them. I haven't heard back from them, so I don't know if it was timely but hopefully if it was and that would be something to talk about in the future maybe, but I do look forward to the rest of the agenda. Thank you.

### **5. Supervisor Gorin Update**

First of all, thank you Arthur. You've been such a note of professionalism, voice to the community, absolutely intent on helping the council members come together with a vision and with certainly words and letters around SDC and other things. I really appreciate you diving in there to up the game of all the municipal advisory councils throughout the county. To you Kate, thank you for stepping forward. We look forward to working with you and I have every confidence that you will follow in Arthur's footsteps, working with Arthur of course and other council members to do great things in the two years ahead. Thank you for your efforts.

I had a conversation with Greg Car. I'm ever so thankful for him for serving on the Planning Commission and we're trying to scope out a pace and scale of work that will accomplish the goal of creating a better, more cohesive plan and so stay tuned. There's going to be some meetings added over the next month for sure. I want to thank all of the planning commissioners in advance for their willingness to add onto their calendars. I hope that they feel as we do, that the Sonoma Developmental Center is not only important to Sonoma Valley but it is important to get it right for the rest of the county because it's not just the valley residents commenting on the plan. It's many folks. Stay tuned and stay abreast of the schedule of the planning commission. It may mean that it will come to the board a little bit later but I'm convinced that the state will be rather insistent that we try to adhere to the original timeline. But they're eager to get a plan adopted in place. I actually think that when they negotiate with the development team and when they have

selected the specific plan, I think it will be pretty close to being in sync and then the community can work with the development team in moving to a more specific proposal site. That will take a while. It may be a little fluid and so everybody pay attention to the schedule. You may have seen that there's going to be a tour for the planning commissioners of the SDC the coming Saturday, September 29th, so there will be a number of folks wandering around the site. For those of you who want to join, you can but I would encourage you to just give the planning commissioners the time and space to absorb the beauty and the richness of the site and the complexity of redevelopment moving forward.

Short meeting yesterday. We must have been on good behavior. We did approve a policy for special events for cycling, foot races and maybe other events that use the public right away that may have mass starts. Some groups were not happy that we chose to support the recommended threshold of 100 riders with a mass start. I've participated in some of the organized rides and for the most part they are very well organized and certainly the Gran Fondo is in a league of its own and Ironman in League of their own and professional organizers know what they're doing. We have a lot of roads that are being used by bicycle groups and large numbers. First Responders the fire agencies are concerned that the events are happening without them being notified of potential road closure so we did approve that and we also approved the vacation of a residual county right away easement, in front of the Verano hotel. I've known since Sonoma Splash proposed their pool that that residual triangle piece needed to be dealt with.

The Harvest Fair and Harvest Festival, for the first time, is being supported by the Sonoma Valley Vintners and Growers, bringing back some of the great activities of the festival, so I hope that you can participate in that. Of course we all love the Glen Ellen Village Fair and I will be there so thank you all for your effort tonight and in the future.

**Councilmember Cooper**, this is kind of procedural for me, but is it correct to understand the state issued RFPs to developers? Is all the work that we're doing to give input for things to be done, when does that come into play?

**Supervisor Gorin**,

I met with one of the developers to turn in a proposal. Keith Rogal, master developer of Napa Pipe. I asked him that question, why does the specific plan matter? It really matters to a developer/ developing team because they have a strong sense of what the community would like to see. They jump start. They can skip a year or two of community outreach to really come to the point that we are developing now so it is value-added for any developer to have us go through the process and so that they can take advantage and understand the community and then move forward with more engagement with the community to refine any potential proposal. I don't see it as a disconnect at all. It would've happened one way or another. It solidified who we are and what we want to see on the site.

**Councilmember Cooper**, So the information that we gather goes to each developer that received an RFP?

**Supervisor Gorin**, The deadline is over and three developers have turned in proposals, one local and two somewhat from the area. They undoubtedly are following closely, perhaps the discussions of the NSV MAC, and talking to community members as well as following the planning commission discussions over the next month because they will get a lot of great information and it will inform their plan going forward. It's my understanding that the proposals that they've turned in are really aspirational without a lot of form and function and specifics, so they're going to be developing those specifics over the next number of months, as well as negotiating with the state for whatever they can squeeze out of the state.

**Councilmember Oldroyd**, I just wanted to say I appreciate your email letter that remembered the five year anniversary of the Tubbs Fire. It was very comprehensive and sad at the same time.

**Supervisor Gorin**, Thank you. I received a lot of good comments and I told Hannah that I would give credit where credit is due. She often is the words that are behind the beautiful prose that you read. This time it was a joint effort but I still appreciate Hannah's gift with words and her passion and intellect going forward, so thank you Hannah. I know you're on here tonight and we all have to give you credit for that and remember we may have suggested to you that we're going to be looking for folks, fire survivors, to lend us a paragraph of their reflections and I hope maybe Arthur and maybe a few other folks listening tonight will lend us some of the memories; painful, horrifying, gratifying to move forward

through recovery. I hope he does feel that way cuz he always has a gift for poetry and maybe we can twist this arm to lend some prose/poetry. If you are a fire survivor and want to contribute some memories/ reflections on the 5th year anniversary, please contact us. Know that there will be a commemoration of the Tubbs Fire on October 8th and Coffee Park. I believe it's at 10 o'clock. It's not just a commemoration of the Tubbs Fire. They really want to be inclusive and really talk about all of the fires.

Please know that James Gore and I are meeting with the trustee of the Survivor Trust at the end of October and trying to understand the pace of the scale and maybe the methodology behind some of the determinations and offered awards. Why did one person receive this for trauma and one person receive that? The attorney's fees are different from this amount than that amount. We know that there is legislation sitting on the governor's desk, which may have been signed already, exempting the awards from taxation of the state. Congressman Thompson has proposed legislation at the federal level, and we hope that that will be signed.

**Councilmember Dickey,** I'm wondering in the event of a sequel lawsuit, does the Sonoma County General Council Office defend that suit? And are the residents of Sonoma County on the hook for the expense?

**Supervisor Gorin,** I predicted early on that there would be litigation at the end of the specific plan approval and EIR approval. The groups vary. I have it from good authority. We've hired an outside sequa firm and so we've been guided by very good professional advice in developing EIR. Does that mean there won't be lawsuits? No. Does it mean it may be defensible in court? Probably. Who pays for it? The county initially, maybe with an outside council and we would look to receive payback from the developer team to defend this. As happens with any litigation over EIR. Usually it's the applicant that pays for the litigation defense. I suspect they may anticipate some litigation. I hope not but there may be. I'm putting my energy and Greg Car is putting his energy into developing the best plan possible to meet the goals of the community and ask appropriate questions about the EIR. Hopefully we get to a place that everyone suggests that, okay I didn't get everything I wanted but I can live with this.

**Councilmember Nardo-Morgan,** Hi Susan. Thanks for being here tonight. I'm not actually sure this is even in your purview but maybe you can at least help direct me to help answer this for people that have come to me. Remember that little earthquake we had a couple weeks ago in Santa Rosa, everyone got alerts on their phones. However, quite a few people came up to me and said you know I signed up for the alert and my partner got it or my sister got it, my husband got it, I didn't get it and they were very concerned about that. I didn't really know other than the Soco emergency, how to help them resolve that. Was that just a little glitch? What happened? Should they be concerned? Everybody's thinking about the fires and really they want to be contacted, so I don't know.

**Supervisor Gorin,** Good question. I don't recall getting notified. I know I'm signed up for Nixle and Soco alerts. I would encourage everybody to sign up again. I'm talking with Chris Godley, Director of Emergency Management. What keeps him awake at night is knowing that we may experience a very large earthquake and we are experienced at establishing the connections and the collaborations and a community outreach for fires and evacuations. Earthquakes are very different. You may not be able to evacuate after a major earthquake so be prepared within your home. Have that water (1 gallon per day, per person), sleeping bags, tents. I'm not prepared for that yet but it did occur to me after the earthquake that I better get prepared.

#### **Public Comment:**

**Thomas,** Supervisor Gorin, in respect to your response regarding the potential for Napa Pipe or any developer to come in, the specific plan is going to allow them to uphold that as the community's response, they won't have to because the EIR is not responsive. Referring to an earlier comment, I believe Sonoma is a world heritage site. I think that's the center of it. This type of development is far too grandiose and would reflect negatively on a world heritage site, such as it is. If it's completed, as it appears to be with respect to the specific EIR plan, if they comply with everything, they wouldn't even have to have an EIR per say. The specific is helpful for a developer but it is also confusing because the comments have not been carried into the EIR or specific plan.

**Laurie,** Thank you Susan for keeping us well informed. I'm curious as to who will be leading the tour of SDC on the 29th?

**Supervisor Gorin**, I can imagine it's Permit Sonoma.

## **6. Election of Chair & Vice Chair**

**Chair Dawson**, I just want to preface the election with: I really enjoyed being Chair and I appreciate all the council members. People have done a great job and really been engaged. It's been a real pleasure to serve with everybody. This is my last meeting as Chair. If someone would like to nominate me for Vice Chair, I would be willing to take a position, which would allow some continuity, so it's up to you guys and I checked with the County Council. It should be okay for the Chair to become the Vice Chair but if someone else wants to take the position that's totally fine as well. I do have a nomination for Chair but I'm going to wait to see if anybody else has a nomination.

**Councilmember Nardo-Morgan**, nominated Chair Dawson as Vice Chair.

**Councilmember Eagles**, asked about Vice Chair Handron's preferences.

**Chair Dawson**, Vicki has decided to step down from that position for a variety of reasons but thanks for your service. We'll still see you on the council, is that right?

**Vice Chair Handron**, That's right.

Councilmembers thanked Vicki for her service.

**Vice Chair Handron**, Councilmember Eagles, are you interested in being the Chair?

**Councilmember Eagles**, I would consider it.

**Vice Chair Handron**, I think it would be a good idea from the SDC ad hoc committee to be the Chair because that seems to be an issue that has taken a lot of our time.

**Chair Dawson**, Seconded nomination for Councilmember Eagles as Chair.

Councilmember Eagles accepted nomination.

**Chair Dawson**, do I have a second for my nomination as Vice Chair?

**Vicki Handron**, seconded.

No other nominations as Vice Chair.

### **Public Comment:**

**Alice**, Arthur, thank you so much for everything. You've been an awesome Chair. Councilmember Eagles, you're going to be awesome too. I'm so thrilled that you accepted that nomination. Thank you so much everyone for your service. I appreciate you and so does Tracy. She's here with me.

**Nick**, I'd like to echo what Alice and Tracy just said. You've been an amazing Chair. I'm blown away by the hard work that you've done and the whole council. You have been exemplary. I'm so proud that you have been representing at the lead of our council. I'm super happy that Kate may accept to be the Chair now. I could not be happier for your leadership and Kate's anticipated leadership.

**Ellie**, I'm speaking for the Sonoma Ecology Center and I really appreciate the time to read the statement.

We at Sonoma Ecology Center, have been working hard to clarify our approach to the complex SDC development process and know that many in the Glen Ellen Community have been wondering what we're thinking. The future of SDC is very important to us and our mission and we're happy to share our approach with you. If SDC's redevelopment continues to proceed along conventional lines as described so far in the draft SDC's specific plan with a lot of market-rate housing, hotel, conventional car center transport and unconstrained use of the wild lands, then Sonoma Ecology Center like many will not be supportive. We are submitting and will publish a detailed letter on the draft EIR and plan which describes a number of natural resources constraints for development of any kind. For example, we submitted a data set of plant and animal observations to Permit Sonoma that was not used, which if accounted for, would constrain development and ecologically sensitive areas throughout the site. We also provided science-based recommendations on stream setbacks, wetland and water management and wildlife protection that has not been analyzed. We will persist in getting these considerations into the planning through our draft EIR comment letter in other means. A positive visionary outcome is still possible at SDC when it creatively responds to the urgent needs of our community, our watershed, our state, and our planet. We want the strongest possible protections for equity, community, and the environment. We're also advocating for phasing and performance standards. If those can be established we can support maximizing affordable housing and public benefit activities in the core campus and minimizing or removing tourism uses. We think that this visionary redevelopment will require the state as an active partner. We welcome input on your ideas. We'll strive to communicate more and are grateful for the positive energy our community continues to muster. Thank you.

**Thomas**, I have been trying to reach the land trust and the Sonoma Ecology Center for some time. What method do they recommend for reaching them?

**Chair Dawson**, send an email to Hannah and I will get an email address for the Ecology Center as well as phone numbers.

We have a nomination for Kate Eagles for Chair and a nomination for myself as Vice Chair. All in favor of Councilmember Eagles as Chair, raise your hand.

All in favor of myself as Vice Chair, raise your hand.

Unanimous election of Councilmember Eagles for Chair and Chair Dawson for Vice Chair.

## **7. Sonoma County Transit: Bike Racks and Benches (continued 8.17.22)**

**Bryan Albee, Transit Manager for Sonoma County**: I wanted to talk to you about what kind of bus stops are in your area. I understand your service areas run from Kenwood to roughly the Hanna Boys Center, is that correct?

**Chair Dawson**, more like Madrone Road and just the neighborhood South of Madrone Road.

**Bryan Albee**, I think we have about 40 stops, 20 on each side of the road.

The service that we provide in your area is Route 30, which operates a daily schedule with our first trip starting about 6:15am and our last trips are about 7:30pm or 7:40pm. We operate between Santa Rosa, Kenwood, Oakmont, Glen Ellen. We also have Route 34, which provides weekday commute period service between downtown Santa Rosa and the Sonoma Plaza. For passengers traveling from Sonoma Plaza and the Petaluma Transit Mall on Copeland Street, Route 40 provides weekday service between Sonoma Plaza and downtown Petaluma to Copeland Street.

We're installing new stops or new benches in the Oakmont area. I think pretty much all the stops that we

have in Oakmont now have what's called **Simme seats** and these are very flexible, very adaptive to places restricted right away with primarily in your service area. They run for \$1,500 to be installed, probably about \$2,000 each.

We are working with the MAC in the Springs area on a **bicycle rack project**. This will also be at bus stops. Demonstrated a visual of a white bicycle rack in the form of a bicycle.

**New Real-Time Passenger Information Signs**- Using information provided by NextBus

**New Tolar Shelters**. We have old bronze shelters being replaced. New design will be gray and blue. Considering unique colors for different areas.

### **Funding Bus Stop Benches, Bike Racks, Shelters, and related improvements**

- TDA (Transportation Development Act) is ¼ cent of the State Sales Tax that returns to Sonoma County and its cities on a per-capita basis.
- TDA provides primary financial support for Sonoma County transit operations and its capital program.
- TDA funds must be spent to support transit services.

**Councilmember Eagles**, can you go back to the bike rack? How would that bike rack work? Do you look at ridership numbers to prioritize sites for work and are those accessible to us? How would you set your priorities?

**Bryan Albee**, I think that we do look at stops with higher usage and high demands. That all plays into this. I think in your service area, it's the right of way and the limitations we have to put in these types of amenities. This bike rack was suggested by the Sonoma Springs MAC. They were thinking of doing some kind of contest, painting unique colors.

**Councilmember Newhouser**, Thank you for the presentation. Few questions. I noticed that the bike rack was placed on the other side, away from the curb, so that kind of seems counterintuitive to what you said about the Simme seats needing to be next to the curb. Related to that, you mentioned that just bus stops would be covered in your funding, but does the bike rack need to be next to a bus stop in order to be funded? One last question: that digital/automated sign, I'm assuming that's the time remaining before the next bus comes?

**Bryan Albee**, I will start with the sign. They are real time so they count down after 20 minutes. In terms of the placement of the bike rack, they require more space and they would likely go back up a block, so that does interfere with people's lawns and fences, so that limits where we can install them. We have to be creative with how we do this and certainly not every stop will lend itself to the installation of a bike rack. It is only limited to bus stops because the funding has to be supportive of transit.

**Councilmember Newhouser**, one more follow up question to the shelters. I'm sure those take more space and a much greater expense. It would be nice to have a couple in Glen Ellen. How do you make that decision of how frequently it is used?

**Bryan Albee**, Yeah. We would look at that and usage would play a big part. Coming from Glen Ellen, I'm not sure if more people are traveling from Sonoma or Santa Rosa. Maybe it's fifty-fifty, so then we would look to put a shelter on both sides of the street. We would take counts at the stop, and then also look to see where we have space or create space to install shelter.

**Public Comment:**



**Tracy,** The white color of the bike rack, there are the bikes that are put up along the highway for people who've been killed in accidents and they are white so that was the first thing that I thought. I was just like oh my gosh it looks like you know those bikes and so I would encourage the Transit Agency to maybe paint them so they don't look like that. I'm a bike rider and putting a bunch of bikes on that, I'm not really sure how that would work or what that would look like. I'm wondering if people double park their bike there, how would that work?

**Bryan Albee,** Yeah well I think you make a good point about the white racks but I think they're going to be painted by the community and we're working with the Springs MAC to solidify how we do that. These racks would only work for two bikes.

## **8. Review Draft EIR Comment Letter: Sonoma Developmental Center**

### **EIR DRAFT LETTER:**

September 13, 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 Public Review Draft of the Sonoma Developmental Center (SDC) Specific Plan (Proposed Plan) and the SDC Specific Plan Draft Environmental Report (DEIR), as issued by Sonoma County in August 2022. 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.

Given the tremendous amount of input from Sonoma Valley residents and business owners concerned about the project size and its impacts, as well as this MAC's own request and the Board of Supervisors' direction to scale back the Specific Plan, it is surprising that the proposed Specific Plan still contains over 1,000 homes and approximately 940 jobs. It appears that the DEIR fails to disclose the full extent of impacts that will result throughout Sonoma Valley from this large-scale development outside of an urban growth area, as is further detailed in this letter.

The Specific Plan represents one of the largest, if not THE largest, developments in the history of Sonoma Valley and is in conflict with County General Plan policies calling for city-centered growth. Furthermore, the proposed plan is inconsistent with its own guiding principles calling for a balance between redevelopment and historic preservation; the plan will destroy the very qualities that make the historic SDC site unique and its implementation will have far-reaching, significant adverse impacts on Sonoma Valley residents.

With this in mind, we provide the following comments, by general category:

### **PROJECT SCALE & HOUSING**

Increasing the supply of affordable and workforce housing is broadly supported by the Sonoma Valley Community, but not at any cost to the environment and the health and safety of Sonoma Valley residents. Our understanding is that the DEIR should help the community better understand the scale of the environmental impacts of the Specific Plan, how they will be mitigated, what options were considered, and

why these options were dismissed. We do not believe the DEIR has yet met these objectives.

For example, the DEIR identifies the smaller-scale Historic Preservation Alternative (Historic Alternative) as the environmentally superior alternative. It is not ruled out in the DEIR because it meets the required objectives, but it is dismissed from full consideration. Why?

If this alternative is environmentally superior and substantially reduces impacts of the proposed plan; if it more effectively meets some of the fundamental project objectives as outlined in the Specific Plan guiding principles, including Preservation of Historic Resources and Balancing Redevelopment with Land Use (DEIR pages 5 and 6); if it provides 450 new homes (still the largest project in Sonoma Valley); and meets the state's statutory objectives regarding the disposition of the SDC site, why is this alternative (or a version of it that addresses some of the issues identified) not being put forward as the proposed plan?

"Overall, the Historic Preservation Alternative is the environmentally superior alternative, although significant impacts of the Proposed Plan and the two alternatives are largely comparable, and the Historic Preservation Alternative would be less superior in some environmental features such as energy use, biological resources, and wildfire risks. Additionally, this alternative would not support key project objectives related to increased housing supply, varied housing opportunities, community vibrancy, and long-term fiscal stability to the same degree as the Proposed Plan." (DEIR page 14)

We do not find adequate data in the DEIR that supports the "less superior" distinctions above, or any reason why these couldn't be readily addressed. There is no requirement that maximum housing be developed, especially if it means significant impacts in several issue areas. In terms of biological resources, the analyses on page 563 of the DEIR indicates that the Historic Preservation Alternative would be "similar or slightly better" than the Specific Plan. In terms of energy use, the older historic buildings are presumed to be less energy efficient, but it's not clear how the net calculation was made since "energy use" is also cited in conjunction with construction and demolition GHGs, which would be significantly higher in the Specific Plan. The increased wildfire risk with this lower density plan is presumably solely because of the arbitrary exclusion of the Hwy 12 connector road in this alternative. How would the proposed Specific Plan fare in comparison to the Historic Preservation alternative if it also excluded the Hwy 12 connector road, or if both included the Hwy 12 connection?

Scale is the most obvious way to mitigate impact. While the types of impacts of the Historic and proposed Specific Plans may be the same, they are not equal in magnitude.

## FEASIBILITY

If the Historic Preservation alternative was dismissed because of an assumption that feasibility will require higher development densities, how is a feasibility analysis considered in the DEIR and shouldn't this be more transparently addressed in the Proposed Plan?

Since it's unclear what "economic feasibility" means for the SDC campus at this time, shouldn't there be an economic feasibility analysis as part of this evaluation process? The market demand study that was prepared for the alternatives report does not fill this need (and is inconsistent with the Specific Plan in any case in that it reports little demand for non-residential uses).

## MITIGATION MONITORING / PERFORMANCE STANDARDS

It's of concern to the community that most of the policies in the proposed Specific Plan are not enforceable, generally because of the use of "should" in the descriptive language rather than "shall" in many instances. Terms such as "if feasible" and "assumed" are also used repeatedly and the DEIR analysis acknowledges considerable uncertainty in the impacts and thus in the mitigation measures as well.

Will the policies and conditions of the approval of the Specific Plan be put into a mitigation monitoring plan or program to ensure mitigation compliance for the project?

Given the scale of the proposed Specific Plan and absence of any phasing requirements, it's critical that performance standards be developed and tied into the phasing of the project, especially since the DEIR calls for future studies and mitigations that are not yet identified. Will performance standards be put into place, potentially to consider impacts that might include Traffic, Wildlife Function, Resources, Noise?

#### HOUSING NUMBERS

The Specific Plan states that it will result in 1,000 units and the DEIR uses that assumption, but as noted in Specific Plan Table 4.2 there could be closer to 1,210 units, even without likely density bonuses. That means that most of the environmental impacts in the DEIR are underestimated for the number of units permitted.

#### CULTURAL RESOURCES / HISTORIC PRESERVATION

The Historic Alternative meets the fundamental project objectives listed on pages 5-6 of the DEIR, unlike the proposed Specific Plan that is inconsistent with the fundamental project objective calling for balancing development with historic resource conservation.

Regarding policies and impacts on cultural resources, the DEIR does not specifically address impacts on Contributing Resources. This should be its own section, not embedded in the discussion of impacts on the district as a whole. For example, if impacts on the integrity of the historic district are considered unavoidable and this would result in removing its eligibility for the National Historic Register, under CEQA that means there are no contributing resources because there is nothing to contribute to, and that all Conditions of Approval referring to contributing resources are effectively moot and not applicable. This seems to be the rationale used under Policy 4-25, but we'd like further detail as to how this is applied.

What are the criteria to determine which building are saved, reused, or demolished? Criteria and standards are mentioned, but we don't find any specific documentation, policy or analysis to properly guide this determination in the Specific Plan. Also, the loss of eligibility for the National Register listing would have additional significant impacts. (Detail to be confirmed.)

Regarding the Sonoma House and the main building, Specific Plan Policy 2-47 uses terms like "consider" and "if feasible." Where is the text describing how these determinations will be applied? Why is this not explained through explicit mitigation measures, of which there are currently none? Analysis of impacts on individually significant historic resources are deferred to a time when individual projects

are proposed. However, since many future projects will not be subject to CEQA, doesn't this analysis have to be done as part of the Specific Plan EIR with mitigation measures identified, not deferred?

Neither the proposed Specific Plan nor the Draft EIR acknowledges the community effort to get the SDC listed in the National Register as an Historic District. Why is this not mentioned?

UTILITY INFRASTRUCTURE (Comments to come)

CLIMATE CHANGE (Comments to come)

VEHICLE MILES TRAVELED (VMT)

The Specific Plan indicates that there will be no free parking on campus. Has the DEIR studied the VMT and traffic safety impacts of this policy with respect to visitor vehicle trips to find parking off-site; the impacts

on the narrow streets in the adjacent neighborhoods, particularly the Glen Ellen streets south of the SDC (Martin, Lorna, Burbank, Sonoma Glen Circle, Marty and Madrone) where parking is free; or the public safety or emergency evacuation impacts of this policy? Has the potential limit on public access been evaluated?

There is no evidence at this juncture that anyone living on the SDC site will be employed at the site so this cannot be assumed. Has the DEIR considered this in one of its VMT scenarios?

Can the DEIR appropriately consider the completion of the Sonoma Valley Trail multi-use path, connecting the SDC site with Santa Rosa, as part of the SDC site VMT mitigation if this is a Caltrans controlled project?

Why is the downscaling or elimination of the hotel not considered part of VMT mitigation? The hotel is not identified as a priority in the state legislation pertaining to the SDC site and will contribute significantly to VMT.

In Table ES-2, the DEIR determines that VMT reduction measures cannot be guaranteed, and they may be insufficient to reduce VMT per capita below the applicable significance threshold or fully offset the effect of induced VMT. "There are no other feasible mitigation measures available." Why is this an allowed conclusion when there are certainly mitigation measures available that might justifiably be considered, even if reductions might not reduce impacts to levels that are less than significant? Examples of mitigation include a reduced scale alternative or elimination (or reduction of size) of the hotel or other commercial development.

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There is no analysis of the impacts on the wildlife corridor through the campus and no acknowledgement of the fact that animals currently use the campus and will be impacted. Also, there is no assessment of the impacts of fencing on wildlife. (Only wooden fences are prohibited on the campus.) The fencing policies appear to apply only to the open space and human/wildlife interface areas, not the campus.

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The proposed Specific Plan is both inconsistent with several project objectives, as noted above, and inconsistent with existing County General Plan policies encouraging growth in transit-oriented, urban areas. It is also inconsistent with General Plan policies calling for an overall reduction in VMT since it introduces urban uses in a non-urban area; this will necessarily increase vehicle trips to reach services in either Sonoma or Santa Rosa.

#### COMMERCIAL SPACE / JOB CREATION

There appears to be no policy saying that the hotel can't be built first. Is there anything in the proposed Specific Plan requiring the developer to build housing first?

Why is such a large-scale hotel being proposed when it's not a defined project objective, and when VMT is listed as a challenge?

#### POPULATION and GROWTH ASSUMPTIONS

The DEIR analysis of growth-inducing impacts is based on a comparison of the project size to county-wide population and employment numbers, which is an unrealistic and invalid comparison. As a distinct planning unit, Sonoma Valley should be the region of comparison. Given the relatively small population of Sonoma Valley, the proposed plan represents a substantial growth-inducing project. Alone, it will double (triple?)

the community housing numbers and draw population and employees from other parts of the county as well as from outside the county. Given its location away from necessary goods and services, it will generate pressure for additional urban land uses on surrounding and nearby unincorporated lands. This urban sprawl growth scenario is in direct conflict with climate change policies to encourage compact, in-city growth.

#### IMPACTS ON NEIGHBORHOODS SOUTH OF SDC

The Glen Ellen neighborhoods adjacent to SDC will take the brunt of both the construction and operation impacts – not to mention the ongoing impacts of traffic and safety related to parking if there is no free parking on the SDC campus. The over 200 apartments and small lot single family homes directly south of the SDC property will be subject to the aggregate effects of noise, traffic, air emissions, and visual effects. These residents' daily routines will be disrupted during a very long-term construction period. This area is home to many low to moderate-income families who have arguably not had an adequate voice in this planning process.

Has the DEIR adequately studied the effect of the Specific Plan on this neighborhood, to include the narrow Glen Ellen streets from Martin Street south to Madrone Road and along Madrone Road?

#### CUMULATIVE EFFECTS

There are several foreseeable projects within 15 miles of the SDC site that will contribute to cumulative growth and related impacts, including but not limited to: the Graywood Ranch Hotel, Elnoka Village Senior Citizens housing project, Milestone Siesta Senior Citizens housing project, Donald Street housing development project, Verano hotel and housing project, Hanna Boys Center residential development program, and the proposed ~70% membership license increase at the Sonoma Golf Club.

In the Transportation Methodology section (page 432), the DEIR states, "The model's 2040 cumulative year includes growth that is consistent with adopted general plans within the County and with regional projections contained in Plan Bay Area 2040." Were the above-mentioned projects, and any additional foreseeable projects, considered either in the general plans or by Plan Bay Area 2040? Is Permit Sonoma able to share what was included in the model?

#### FIRE / EMERGENCY PREPAREDNESS

The DEIR did not consider a fire scenario in which the fire comes in from the west, down from Sonoma Mountain. "Historically, a fire approaching from the west may be less likely, and therefore did not warrant further specific analysis" (DEIR page 515). We know that fires are now burning in ways that are outside of historical precedent due to climate change and related impacts, and that this area has not burned in recent history. With this in mind, we believe a west-approaching fire scenario west must be considered.

Did the DEIR consider an evacuation scenario where broadband and/or cell service is out, or is unreliable, affecting receipt of alerts? This occurred in both the 2017 and 2020 fires – land lines and cell service were knocked out or overloaded and people had limited information to guide evacuation.

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The DEIR indicates no significant increases in evacuation times with the Specific Plan. Tables show

evacuation times in the order of 15-20 minutes, with and without the proposed project. The Evacuation Time analysis suggests that “added times” for travel during an evacuation range from 1 or 2 minutes to 37 minutes to get to Napa. These hypothetical scenarios defy residents’ reality and the actual evacuation times experienced during recent fires: Nuns Canyon fire (2017) resulted in evacuation times out of Sonoma Valley of 1 hour or more; Glass Fire (2020) resulted in evacuation times from nearby Oakmont onto Hwy 12 of one to two hours; evacuations from Kenwood during recent fires took hours, not minutes; adding thousands of vehicles will exacerbate the problem.

Page 520 of the DEIR states that, “The additional SR 12 connector road will provide additional fire access and evacuation routes.” However, during a wildfire, it’s quite possible that residents and workers in the proposed project area will not be able to take this connector route east toward highway 12 due to the high probability of a wildfire advancing from the highway 12 direction (see Specific Plan, figure 2.3-1). Has this possibility been considered in the DEIR analysis of evacuation times? Also, can the analysis assume the Hwy 12 roadway connection when it will be subject to a separate CalTrans review and approval process and might not be approved?

The DEIR indicates that the SDC core campus is in the Local Responsibility Area (LRA) versus the State Responsibility Area (SRA) with respect to fire-related development governance. In Figure 3.16-2, it appears that the LRAs are outside of any fire hazard severity zone. However, given that parts of the LRA are immediately adjacent to medium, high and very high fire hazard severity potential zones (FHSZs), can this be accurate?

CLOSING COMMENTS (to come)

Sincerely,

North Sonoma Valley Municipal Advisory Council

cc: Susan Gorin  
Tennis Wick  
Rajeev Bhatia  
(Other tbd at NSV MAC 9/21 meeting)

**EIR FINAL LETTER:**

September 21, 2022

Mr. Brian Oh, Comprehensive Planning Manager

Permit Sonoma County of Sonoma

2550 Ventura Avenue

Santa Rosa, CA 95403

Dear Mr. Oh,

On behalf of the North Sonoma Valley Municipal Advisory Council (NSV MAC), we respectfully submit the following comments pertaining to the Public Review Draft of the Sonoma Developmental Center (SDC) Specific Plan (Proposed

Plan) and the SDC Specific Plan Draft Environmental Report (DEIR), as issued by Sonoma County in August 2022. 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.

Given the tremendous amount of input from Sonoma Valley residents and business owners concerned about the project size and its impacts, as well as this MAC's own request and the Board of Supervisors' direction to scale back the Specific Plan, it is surprising that the proposed Specific Plan still contains over 1,000 homes and approximately 940 jobs. It appears that the DEIR fails to disclose the full extent of impacts that will result throughout Sonoma Valley from this large-scale development outside of an urban growth area, as is further detailed in this letter.

The Specific Plan represents one of the largest, if not THE largest, developments in the history of Sonoma Valley and is in conflict with County General Plan policies calling for city-centered growth. Furthermore, the proposed plan is inconsistent with its own guiding principles calling for a balance between redevelopment and historic preservation; the plan will destroy the very qualities that make the historic SDC site unique and its implementation will have far-reaching, significant adverse impacts on Sonoma Valley residents.

With this in mind, we provide the following comments, by general category. Please explain the following inconsistencies in the DEIR:

### **PROJECT SCALE & HOUSING**

Increasing the supply of affordable and workforce housing is broadly supported by the Sonoma Valley Community, but not at any cost to the environment and the health and safety of Sonoma Valley residents. Our understanding is that the DEIR should help the community better understand the scale of the environmental impacts of the Specific Plan, how they will be mitigated, what options were considered, and why these options were dismissed. We do not believe the DEIR has yet met these objectives.

For example, the DEIR identifies the smaller-scale Historic Preservation Alternative (Historic Alternative) as the environmentally superior alternative. It is not ruled out in the DEIR because it meets the required objectives, but it is dismissed from full consideration. Why?

**If this alternative is environmentally superior and substantially reduces impacts of the proposed plan; if it more effectively meets some of the fundamental project objectives as outlined in the Specific Plan guiding principles, including Preservation of Historic Resources and Balancing Redevelopment with Land Use (DEIR pages 5 and 6); if it provides 450 new homes (still the largest project in Sonoma Valley); and meets the state's statutory objectives regarding the disposition of the SDC site, why is this alternative (or a version of it that addresses some of the issues identified) not being put forward as the proposed plan?**

*"Overall, the Historic Preservation Alternative is the environmentally superior alternative, although significant impacts of the Proposed Plan and the two alternatives are largely comparable, and the Historic Preservation Alternative would be less superior in some environmental features such as energy use, biological resources, and wildfire risks. Additionally, this alternative would not support key project objectives related to increased housing supply, varied housing opportunities, community vibrancy, and long-term fiscal stability to the same degree as the Proposed Plan." (DEIR page 14)*

**We do not find adequate data in the DEIR that supports the "less superior" distinctions above, or any reason why these couldn't be readily addressed.** There is no requirement that maximum housing be developed, especially if it means significant impacts in several issue areas. In terms of biological resources, the analyses on page 563 of the DEIR indicates that the Historic Preservation Alternative would be "similar or slightly better" than the Specific Plan. In terms of energy use, the older historic buildings are presumed to be less energy efficient, but it's not clear how the net calculation was made since "energy use" is also cited in conjunction with construction and demolition GHGs, which would be significantly higher in the Specific Plan. The increased wildfire risk with this lower density plan is presumably solely because of the arbitrary exclusion of the Hwy 12 connector road in this alternative. **How would the proposed Specific Plan fare in comparison to the Historic Preservation alternative if it also excluded the Hwy 12 connector road,**

**or if both included the Hwy 12 connection?**

**Scale is the most obvious way to mitigate impact.** While the types of impacts of the Historic and proposed Specific Plans may be the same, they are not equal in magnitude.

### **FEASIBILITY**

If the Historic Preservation alternative was dismissed because of an assumption that feasibility will require higher development densities, **how is a feasibility analysis considered in the DEIR and shouldn't this be more transparently addressed in the Proposed Plan?**

Since it's unclear what "economic feasibility" means for the SDC campus at this time, **shouldn't there be an economic feasibility analysis as part of this evaluation process?** The market demand study that was prepared for the alternatives report does not fill this need (and is inconsistent with the Specific Plan in any case in that it reports little demand for non-residential uses).

### **MITIGATION MONITORING / PERFORMANCE STANDARDS**

It's of concern to the community that most of the policies in the proposed Specific Plan are not enforceable, generally because of the use of "should" in the descriptive language rather than "shall" in many instances. Terms such as "if feasible" and "assumed" are also used repeatedly and the DEIR analysis acknowledges considerable uncertainty in the impacts and thus in the mitigation measures as well.

**Will the policies and conditions of the approval of the Specific Plan be put into a mitigation monitoring plan or program to ensure mitigation compliance for the project?**

Given the scale of the proposed Specific Plan and absence of any phasing requirements, it's critical that performance standards be developed and tied into the phasing of the project, especially since the DEIR calls for future studies and mitigations that are not yet identified. **Will performance standards be put into place, potentially to consider impacts that might include Traffic, Wildlife Function, Resources, Noise?**

### **HOUSING NUMBERS**

The Specific Plan states that it will result in 1,000 units and the DEIR uses that assumption, but as noted in Specific Plan Table 4.2 more units are suggested, even without likely density bonuses. That means that most of the environmental impacts in the DEIR are underestimated for the number of units permitted. If the analysis is limited to 1,000 units, why is the possibility of 1,100 or more of units included in the Specific Plan?

### **CULTURAL RESOURCES / HISTORIC PRESERVATION**

Isn't it true that the Historic Alternative meets the fundamental project objectives listed on pages 5-6 of the DEIR? Isn't it true that the proposed Specific Plan is inconsistent with the fundamental project objective calling for balancing development with historic resource conservation?

Regarding policies and impacts on cultural resources, isn't it true that the DEIR does not specifically address impacts on Contributing Resources. Please amend the EIR to include such impacts in its own section, not embedded in the discussion of impacts on the district as a whole or explain why not. Isn't it violative of CEQA for the EIR to assume that the project will be approved as proposed, without mitigations and alternatives to reduce impacts on historic resources having been determined feasible or infeasible? Wouldn't the loss of eligibility for the National Register of Historic Places remove protections for contributory resources? What environmental impacts would attend such losses of eligibility? What mitigations could avoid that loss? Please consider and analyze the benefits of the pending efforts to list SDC in the National Register.

What are the performance-based standards to determine which buildings can feasibly be restored or adaptively reused?



How is demolition of any building to be decided? What type of analysis and performance-based standards will be applied to permit demolition under the Specific Plan? Please amend the Specific Plan so that demolition of any qualified historic resource will require a Plan amendment based on codified criteria. If not, why not? Isn't protection of National Register eligibility required by CEQA if feasible?

Regarding the Sonoma House and the main building, Specific Plan Policy 2-47 uses terms like "consider" and "if feasible." How will feasibility be determined? In light of significant impacts, why are mitigation measures not identified or analyzed? Doesn't CEQA disallow deferral of analysis and mitigation of the Specific Plan's foreseeable impacts on historic resources? Isn't it true that projects consistent with the Specific Plan, including those involving demolition of currently listed or eligible historic resources will not be subject to discretionary CEQA review? If not, under what circumstances would CEQA review be required?

## **UTILITY INFRASTRUCTURE**

The Valley of the Moon Water District (VOMWD) consistently contacts customers requesting a 20% reduction in water use, further stating that penalties will be assessed if the reduction is not met. Yet, for the purposes of the DEIR and the water assessment section, the DEIR and VOMWD assert they have the resources to serve the SDC project. What assumptions underpin this assertion?

There are contradictions that should be addressed in the DEIR. For example: VOMWD's own estimates for future water deliveries and shortages are based upon single dry years, not the multiple dry year shortfalls we are already experiencing. Additionally, the Sonoma Valley Groundwater Sustainability Agency has made increasing projections for the need for groundwater re-charge throughout the Sonoma Valley, but the VOMWD has not estimated its own required contribution to groundwater re-charge and has maintained an increased groundwater "draw down" in the SDC water assessment report. What are the groundwater re-charge assumptions for the SDC site and are they included in the DEIR?

Additional areas of the water assessment report that require clarification in the DEIR:

- The report assumes the planning area will be served by local, on-site surface water sources. However, for Fern and Suttonfield Lakes, the treatment plant and the pipes/infrastructure are not a part of the core campus development. For the purposes of the DEIR and water assessment, those resources do not exist.
- What, specifically are the surface water sources the DEIR is stating are available for use?
- What becomes of those "non-available" water sources (the lakes, treatment plant)?
- Who is responsible for the evaluation of the dams that contain all of that water?
- Are the lakes going to be drained, filled in, maintained?
- The riparian rights contradict the findings of both the Sonoma Ecology Center and the Sonoma Valley Water Sustainability study that urges an elimination of riparian water rights in order to provide groundwater recharge to diminishing Sonoma Valley aquifers.
- Who maintains the riparian water rights? The VOMWD, the state, the developer?
- The SDC water treatment plan has not been licensed for operation in many years. The DEIR states it will be evaluated for re-use by the water system operator.
- Who will pay for the evaluation? If the plant requires re-construction, or is not salvageable, who pays for these updates?
- Where, on the Specific Plan, will it be located?

## ENERGY MICROGRIDS:

The DEIR language is vague in the section that pertains to an electrical microgrid. By definition, a microgrid is a locally controlled and maintained electrical grid with defined electrical boundaries. It is

able to operate in both a grid-connected and “island” mode. A stand-alone or isolated microgrid only operates off-the-grid and cannot be connected to a wider electric power system.

- Which type of system is being proposed, grid-connected or stand alone?
- Will the system have localized generating capacity?
- Where is the dedicated space on the Specific Plan for any proposed generation?
- Who pays for it and maintains it?
- Where is the electrical use projection data for microgrid design?

## VEHICLE MILES TRAVELED (VMT)

The Specific Plan indicates that there will be no free parking on campus. Has the DEIR studied the VMT and traffic safety impacts of this policy with respect to visitor vehicle trips to find parking off-site; the impacts on the narrow streets in the adjacent neighborhoods, particularly the Glen Ellen streets south of the SDC (Martin, Lorna, Burbank, Sonoma Glen Circle, Marty and Madrone) where parking is free; or the public safety or emergency evacuation impacts of this policy? Has the potential limit on public access been evaluated?

In addition, was there analysis done on the safety implications of increased VMT on the routes used by cyclists and commuters to travel from Glen Ellen to other county locations (Santa Rosa and Rohnert Park), specifically Warm Springs and Bennett Valley Roads. These narrow, winding roads are commonly traveled at relatively high speeds; their road shoulders are significantly deteriorated (no shoulder at all for significant portions). The safety implications on these roads due to the increased VMT in the Proposed Plan must be considered in the DEIR.

There is no evidence at this juncture that anyone living on the SDC site will be employed at the site so this cannot be assumed. Has the DEIR considered this in one of its VMT scenarios? On a related note, while it's noted that institutional uses associated with the former SDC have been removed from the SCTM19 model's existing land use database (DEIR page 426), historical VMT numbers are still cited in the Historical Use section (DEIR 427-428) and implied to be relevant. VMT under the Proposed Plan will not be directly comparable to the historic SDC site in terms of either resident (non-driving) or single-employer shift work VMT per capita; any assumptions made pertaining to historical VMT need to be made clearer in the DEIR analysis and narrative. Finally, the DEIR cites a VMT increase of ~631, with the existing VMT at 59,654, and the Proposed Plan VMT at 60,285 in 2040 (DEIR, page 183). How can this be accurate based on the anticipated population and the VMT summaries cited throughout the DEIR?

The DEIR's Project trip generation estimate was developed using the SCTM19 travel demand

forecasting model maintained by the Sonoma County Transportation Authority (SCTA). The specific

trip generation factors are not included in the DEIR. Thus, it is impossible to evaluate the reasonableness of either those factors or the resulting trip generation numbers.

Can the DEIR appropriately consider the completion of the Sonoma Valley Trail multi-use path, connecting the SDC site with Santa Rosa, as part of the SDC site VMT mitigation if this is a Caltrans controlled project?

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The assessment of wildfire hazards in the DEIR appears to have a number of errors and omissions, the most serious of which lead to unwarranted conclusions that underestimate this hazard ("Impact 3.8-7 Implementation of the Proposed Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. (Less than Significant)" p. 268).

Page 503: “Primary responsibility for preventing and suppressing wildland fires in Sonoma County is divided between local firefighting agencies and the State of California, Department of Forestry and Fire Protection. The SDC Planning Area is currently located in an area identified as a State Responsibility Area (SRA).”

1. The Planning Area “includes the approximately 180-acre SDC Core Campus...” (DEIR, pg. 51) According to the State Fire Marshall’s map: [https://osfm.fire.ca.gov/media/6822/fhszs\\_map49.pdf](https://osfm.fire.ca.gov/media/6822/fhszs_map49.pdf), the Core Campus is within a Local Responsibility Area (LRA. See map on page 4), not the State’s. Is this correct?

Page 503: “Under the Fire and Resources Assessment Program (FRAP) “the Planning Area...includes areas of high to very high Fire Hazard Severity Zones west of Highway 12, areas of high fire hazard severity in the hills, and areas of moderate fire hazards severity zones in the vicinity of Suttonfield Lake and Fern Lake (Figure 3.16-2). The Core Campus is not included in any of these FHSZs. “

The State Fire Marshall’s final map is not intended to show moderate and high FHSZs within the Local Responsibility Area. The State’s draft map (page 4), however does show moderate and high FHSZs covering a substantial portion of the Core Campus. While not finalized, this appears to be the best available fire risk data for the Planning Area.

Goal PS-3 from the Sonoma County General Plan 2020 (DEIR, page 497), reads: “Prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires,” with Objective PS-3.1 stating, “Continue to use complete data on wildland and urban fire hazards.”

2. How was the data gap between the SRA and the LRA within the Planning Area addressed during the DEIR’s analysis of wildfire threat? What evidence was the statement about the Core Campus (DEIR, pg 503. See above) based on? Was this conclusion reached because there is data showing low fire risk there or because lack of data was equated with low risk?

3. The Fire Constraints map (13.16-2) shows the Core Campus being almost entirely outside of any Fire Severity Hazard Zones. How would the Fire Severity Hazard data for the Core Campus, shown in the State’s draft map, change the analysis of fire hazards there? Does this change the calculus for significance under 16.1.3.1 Criterion 2: “Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.”?

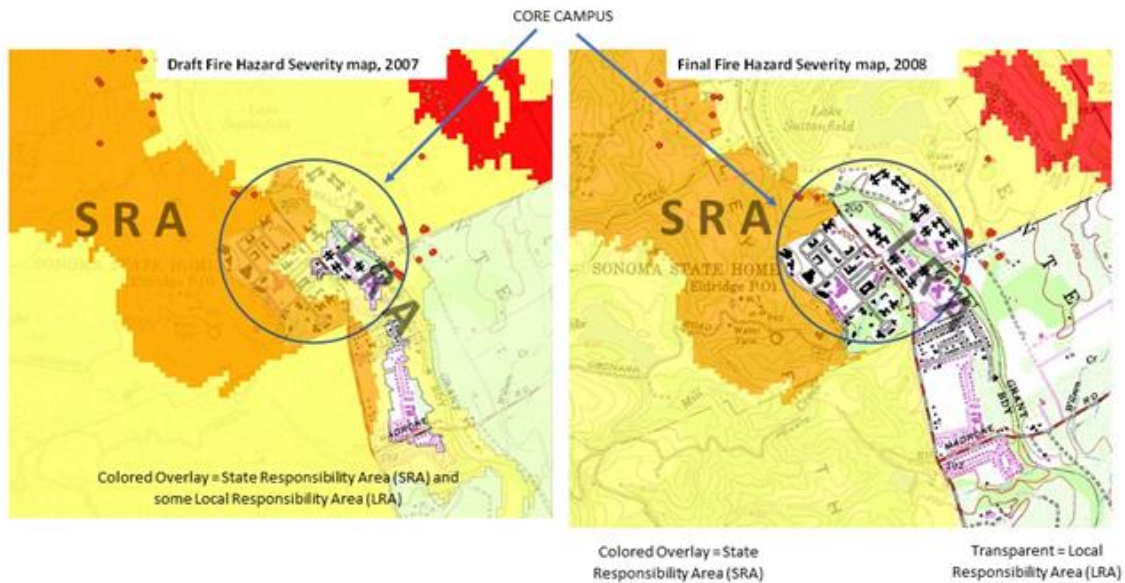
4. In addition, the Sonoma County Community Wildfire Protection Plan Update 2022 (referenced in the DEIR, 16.1.1.3. Regional and Local Regulations, p. 496) states that: “Wildland fires that start in the woods and spread into adjacent areas with relatively dense housing often result in the greatest losses of property and life. Efforts to save lives and property will take precedence over losses of wildland resources, so firefighters’ response must focus on protecting populated areas rather than fighting a fire in the most efficient way.”

Even if we assume there are no FHSZs within the Core Campus, this suggests that building dense housing at SDC adjacent to wildlands could result in high “losses of property and life.” Responding to such a fire might prevent firefighters from efficiently working to prevent further fire spread. How was this scenario taken into account during the DEIR analysis?

#### 3.16.1.3.4. Wildfire Evacuation

Hazard zones below are from the State Fire Marshall's office: <https://csfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>

HAZARD ZONES: Yellow = moderate Orange = high Red = very high Dots = structures burned in 2017 (Sonoma County GIS)



1. Wildfire ignitions are known to increase with the size of a population. How was this relationship evaluated in the calculation of fire risk in the Planning Area?

### **CLOSING COMMENTS**

As evidenced through the comments above, we do not believe this DEIR yet adequately and completely evaluates the environmental and safety impacts of the Proposed Plan. Furthermore, we remain committed to the Sonoma Valley community's consistent input calling for both affordable housing and a lower density plan alternative. A plan closer to the Historic Preservation Alternative – determined as “environmentally preferred” in the DEIR analysis – successfully meets the project objectives and the established Guiding Principles for this project and should be given strong consideration.

We remain committed to a plan that we can all support and appreciate this opportunity to provide comment. The NSV MAC letter process did not allow to adequately address all topic areas. Please respond to the public comments in the attached addendum that we received in advance of the NSV MAC meeting on 9/21/22, relating to the Specific Plan and the DEIR, which we are incorporating by reference, and give them full consideration.

Sincerely,

**Arthur Dawson**

Arthur Dawson, Chair

North Sonoma Valley MAC

cc: Susan Gorin

Tennis Wick

Rajeev Bhatia

Sonoma County Planning Commission

**Chair Dawson,** Do I have a motion to approve the letter?

Councilmember moved to approve

Councilmember Nardo-Morgan Seconded.

Letter was unanimously approved.

**Public Comment on letter:**

**Thomas,** You guys have done really terrific work, a lot of good stuff in the letter, originally and then adding the things. From my experience, it is incredibly important that you have as an addendum to all these comments and the reason is they're going to be answered by a Permit Sonoma. But what it does, it gives further standing in the case of an actual lawsuit that would allow you to participate with the others, so Permit Sonoma has to worry about that. Not just in the response, but in the actual plan that comes from that. They actually have to make a change relative to what is being asked or they can be sued and you could be a participant in it. It's incredibly important and I would ask you to change one word in that last sentence: rather than to say "please see", say "please respond". In the first part, I would say "to make everything a question" is to just say at the very beginning, "please explain the following observed program draft oversights". However they are explained in the rest of the body, they are asked this question.

**9. Funding Request – Glen Ellen Fair**

**Chair Dawson,** all in favor of paying for a \$60 table at the Glen Ellen Fair on October 9th, 2022? Will be joining forces with CWPP folks.

Councilmember Dickey moved to approve.

Vice Chair Handron seconded.

Unanimously passed.

**Councilmember Newhouser,** we should organize shifts, so not one person is trapped behind the table for the entire event. If we don't need the funding for the table can we use the funding for flyers, popsicles?

**Hannah Whitman,** Yeah, if you could take that direction with the funding request today. So you would have to amend it. I would suggest getting direction from the Mac on who's going to take this on? And having it be less than a quorum, and then we can communicate offline as to what materials you need, and if you need the funding for the table.

**10. Reports and Announcements from Councilmembers and Ad Hocs**

**Chair Dawson,** There's an update from the transportation ad hoc, and I have to confess I haven't followed up on this yet, but I did meet with Susan's staff about basically working with them to identify roads that need to work in the back area. Apologize to Susan and Jed, I haven't gotten in touch with you yet, but we do need to meet and talk about this. My thought was if we put this on the agenda for next

month, if we can get a chance to go out and look at a few roads in between, we could get public comment.

**Councilmember Newhouser**, We submitted a plan for the firehouse triangle which is a really simple little restoration plan/ beautification project, which has been in the making for over six years with the Glen Ellen forum and went through the whole process with the county and even that whole dilemma with the registrar wanting to put a drive-thru Ballot Box. Anyway, I did a presentation at the Glen Ellen Forum for the Glen Ellen form board and they followed up with a vote and approved it. We've submitted the encroachment permit to the county to do the project so that's moving forward after all these years. The CWPP is moving forward. We had a public meeting to start the mapping process. We're going to bring this large map to the village fair. We started to fill in by color some of the existing neighborhoods organized for emergency preparation so it's kind of a fun process but it's really at its inceptual stage. The plan is to have a wildfire protection plan completed by the end of the year so it's moving along but still kind of the public input stage and we reminded people we're sending out an announcement via the Glen Ellen Forum to complete the community survey so if you haven't done that yet please do that you can find the link on the Glen Ellen Forum website and I guess that's it for now.

No other announcements.

## **11. Consideration of items for future agenda**

**Vice Chair Handron**, maybe hearing more about the community benefits agreement.

**Councilmember Dickey**, Next week, we're going to be hear an update on the winery events guidelines that the CAC prepared and based on what I hear, we either can have them come in and do the presentation for ourselves or I can even just do a synopsis but I think it's probably going to be interesting as to what they say. Permit Sonoma is doing the presentation. I think it's Brian Oh.

For several years, various groups throughout the county have been trying to put together some updated guidelines for four events. You know why it's mostly just events in general to define what they are, how big they can be. You can imagine the wine industry was not content with what was developed.

**Councilmember Newhosuer**, We haven't had a chance to talk about this yet but in the not so distant future we would like to revisit an item that we had asked to include on the agenda which is a discussion about the community projects. We got some input on doing a master planning process or a suggestion to do that and that's something that I think that would be worthy of discussion so that we had the full support of the MAC before moving forward with that concept.

**Councilmember Nardo-morgan** can we email suggestions if we have some later?

**Chair Dawson**, yes email me, Hanna, and Kate.

**No Public Comment.**

## **12. Adjourned: 9:23pm**

*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/>