



SONOMA GROUP OF THE
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sierraclub.org/redwood/sonoma

March 11, 2022

Brian Oh
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Via Email: Brian.Oh@sonoma-county.org, copy to bos@sonoma-county.org,
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senator.mcguire@senate.ca.gov, senator.dodd@senate.ca.gov

Re: Sonoma Developmental Center - Notice of Preparation of Environmental Impact Report – Scoping Comments

Dear Mr. Oh,

Sierra Club Sonoma Group is submitting the following public scoping comments into the administrative record for the Notice of Preparation of an Environmental Impact Report for the Sonoma Developmental Center planning process.

In previous comments dated January 13, 2022, we urged the Board of Supervisors to reject the three alternatives then proposed for the Sonoma Developmental Center (SDC) Specific Plan and to develop new alternatives for the historic campus. We asked that the board also request that our state legislators act to provide more time and resources to create a visionary plan that honors and serves the best interests of the people and lands of Sonoma County and the State of California.

Now we are concerned that the County of Sonoma is moving forward without acting on or addressing the issues we raised and are seeking public scoping comments for an Environmental Impact Report without a Specific Plan or any specific alternatives but instead based on an *Anticipated Development Program and Specific Plan Policy Direction* for the Sonoma Developmental Center – and that was never adopted or voted on by the Board of Supervisors.

Sierra Club Sonoma Group questions whether this approach is adequate to meet the California Environmental Quality Act. We urge the county planners and county counsel to provide an explanation for how this approach is adequate under CEQA.

Nevertheless, given that the County of Sonoma intends to move forward with scoping and the EIR, we offer these comments on what should **be analyzed and the environmental impacts that should be prevented, avoided and disclosed in the EIR:**

- 1) Full and immediate mapping and protection of SDC open space and wild lands in perpetuity including the Sonoma Valley Wildlife Corridor and Sonoma Creek with scientifically based setbacks.
- 2) Adding the entire SDC property into the State of California's new initiative to conserve 30 percent of the state's lands by 2030, known as 30 X 30.
- 3) An alternative for significantly scaled back housing and redevelopment of the rural campus and that is focused within the existing building footprint and profile for deed-restricted affordable housing for low income families and people with developmental disabilities; and specifically analyze 50 to 100 units of such housing, eliminating market-rate housing.
- 4) Actions, measures and mitigations to ensure the development meets and does not exceed or conflict with the thresholds as established by the county's climate emergency resolution and policy commitments to significantly reduce greenhouse gas emissions.
- 5) Actions, measures and mitigations to prevent and avoid climate change impacts from the proposed development, specifically associated extreme events such as wildfires and flooding; including potential flooding, erosion and other negative impacts; and an assessment of the status and vulnerability of existing dams at SDC.
- 6) How the proposed development impacts the communities adjacent to the site, Sonoma Valley, and Sonoma County as a whole; and how it is consistent or inconsistent with existing General Plans, Housing Element and growth or population projections.
- 7) An alternative that transfers the entire property to a public or non-profit entity for the entire property and instead of selling it to a private developer.
- 8) How driving and associated Vehicle Miles Traveled and Greenhouse Gas Emissions from the proposed SDC development would undermine decades of city-centered growth policies.

As outlined the *Anticipated Development Program and Specific Plan Policy Direction* conflicts with Sierra Club's Climate, Housing and Infill policies as well as local, county, regional and state polices to reduce climate-changing emissions, achieve equitable housing and preserve biodiversity.

- 9) Environmental Justice must be analyzed and included in the EIR as required in CEQA.
- 10) Small scale, low impact, organic farming for food and fiber on lands where the SDC farm was previously located should be analyzed in the EIR.
- 11) Rehabilitation and reuse of existing buildings for any and all developments need to be analyzed as priority approach for redevelopment in the EIR.

12) Historic preservation of the main building, restoration of the cemetery, and a visitor center and/or interpretive displays addressing the full scope of human history on site must be analyzed.

13) Examine the environmental impacts of clean up and remediation of the existing campus and the resources needed to complete.

14) Assessments of construction, operational and embodied GHGs are all needed to capture the comprehensive emissions profile of the SDC development alternatives. “Embodied carbon” from the extraction, production, and transportation of materials and the fabrication and demolition of structures must be added to “operational carbon” (which has long been the main focus of building energy code and CEQA analyses).ⁱ

15) Analyze the carbon sequestration value of conserving open space lands and campus in existing conditions versus loss of such values with proposed development; and actions and measures to avoid and prevent such loss; and ways to enhance and increase carbon sequestration above existing conditions.

Thank you for your consideration. Please keep us informed and on your list of interested stakeholders as the Sonoma Developmental Center planning process continues.

Sincerely yours,



Shirley Johnson, Chair
Sonoma Group Executive Committee-Shirley Johnson (Chair), Richard Sachen, Tom Conlon, Theresa Ryan, Dan Mayhew, Ellen Hathaway

ⁱ Embodied Carbon White Paper, © 2022 GeoPraxis (for SDC Campus Project) 2022-01-10 – tconlon@geopraxis.com