



SONOMA DEVELOPMENTAL CENTER SPECIFIC PLAN



Supplement #1 to the
Final Environmental Impact Report

SCH # 2022020222 | OCTOBER 21, 2022



Purpose of Supplement #1 to the Final EIR

Some letters that were received within the Draft EIR public review period were unintentionally omitted from the Final EIR. These letters and associated responses are provided below.

From: [R.S.](#)
To: [Brian Oh](#)
Cc: [Lyndi Brown-PCSC](#); [info@bennettvalley.org](#); [Craig Harrison](#); [Robert Stephens](#); [Vicki Hill](#); [Susan Gorin](#); [David Rabbitt](#); [district3](#); [Greg Carr](#); [Larry Reed](#); [Jacquelynne Ocana](#); [Johannes Hoevertsz](#); [Tennis Wick](#); [forum@glenellen.org](#)
Subject: Attn: Brian Oh - PRMD Re: Comments on the Sonoma Developmental Center DEIR 9_19
Date: Wednesday, September 21, 2022 9:16:14 AM
Attachments: [BV SDC DEIR Comments.919.pdf](#)

EXTERNAL

Attn: Brian Oh PRMD
Planning Manager at Permit Sonoma
Via email to: Brian.Oh@sonoma-county.org
Re: Comments on the Sonoma Developmental Center DEIR 9 19

Attn: Brian Oh: On behalf of the *Penngrove Area Plan advisory Committee* (PAPAC) and residents of the rural Penngrove area we are expressing our concerns and comments about the Sonoma Developmental Center (SDC) DEIR and proposed Specific Plan policies. We concur with the BVCA's comments and concerns on the SDC DEIR regarding the inadequate analysis of the subregional traffic circulation conditions on all the primary roadways. *(The PAPAC was established in 1984 and is dedicated to supporting and advocating for the Penngrove Area Plan goals and policies to preserve the rural residential character and natural environment of the Penngrove area.)*

C193-1

NOTE: attached are the *Bennett Valley Community Association* (BVCA) comments on the SDC DEIR. BVCA references the Bennett Valley Area Plan to criticize the large scale SDC project the county is proposing in the Glen Ellen area. On page two, BVCA's comments identify the Petaluma Hill Road regional traffic circulation conditions and congestion to argue that the SDC DEIR needs to properly evaluate the impacts of existing and reasonably foreseeable future "regional traffic circulation" conditions on all the primary roadway evacuation escape routes in the DEIR analysis and Specific Plan policies.

The SDC DEIR analysis and the proposed Specific Plan policies are inadequate and do not properly evaluate the subregional traffic circulation impacts and pose mitigations to maintain minimum emergency public evacuation access and response times for the Bennett Valley Area.

The SDC DEIR and Specific Plan project impacts cannot be properly evaluated in a vacuum, in isolation from the County subregional traffic circulation context in which it can best be understood and assessed. Bennett Valley is located between Glen Ellen and Penngrove and could be left without any functional roadway emergency evacuation escape routes. To the east Arnold Drive and Hwy 12 will be gridlocked and to the west the Petaluma Hill Road corridor will be gridlocked due to Rohnert Park's new developments. The SDC DEIR concludes there will be significant and unavoidable impacts regarding increased traffic, and proposes no mitigation. This is unacceptable. NOTE: *Rohnert Park's development plans alone, will add an estimated 100,000 more car trips a day along the Petaluma Hill Road corridor.*

C193-2

... from the attached BVCA comments, page 2: "The DEIR fails to describe existing wildfire hazards or properly analyze potential impacts. It is impossible to evaluate evacuation safety and the associated impacts on existing residents and employees when no baseline is provided for their evacuation utilizing the same routes. We know from the 2017 Nuns Canyon Fire, 2019 Kincaid Fire, and 2020 Glass Fire that Highway 12 was blocked, with traffic often at standstill for hours. The proposal jeopardizes the lives of Bennett Valley residents who need to flee from a fire driving east to Sonoma Valley using Route 12 or Arnold Drive. Moreover, because those routes are known bottlenecks, residents of Sonoma Valley might elect to escape a conflagration by driving west using Bennett Valley Road or even Sonoma Mountain Road. This could congest the escape routes for Bennett Valley residents who need to flee to the west."

C193-3

"The evacuation analysis for Bennett Valley needs to include the fact that during normal conditions Penngrove has become a chokepoint for traffic because of massive housing developments along

C193-4

Petaluma Hill Road. The Board of Supervisors has recognized this problem and recently approved the "Railroad Avenue traffic circulation study." The evacuation route for Bennett Valley residents via Petaluma Hill Road toward Penngrove is already compromised. The DEIR's lack of subregional traffic circulation studies to identify such problems, let alone mitigate them, jeopardizes not only Bennett Valley residents but also the thousands of others sharing these evacuation routes. This violates Public Safety Goal PS-3 of the Sonoma County General Plan ("prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires"), as well as Objective PS-3.2 (new development must minimize fire hazards to acceptable levels)."

NOTE: County DTPW is presently undergoing a Railroad Avenue subregional traffic circulation study. The study area includes Roberts Road and Crane Canyon Road, the two primary roadway evacuation escape routes for access to Petaluma Hill Road from Bennett Valley. Please consider including the new County subregional traffic circulation data on Roberts Road and Crane Canyon Road in an updated supplemental SDC DEIR.

See BVCA's regional traffic circulation comments and concerns on page two of the attachment.

Thank you for your attention and consideration.

Rick Savel
Penngrove Area Plan advisory Committee (PAPAC)
P. O. Box 227
Penngrove, CA 94951
Ph# 415-479-4466, no texting
Email: SkyPilot4u2@yahoo.com

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From: [Steve Lee](#)
To: [Brian Oh](#)
Subject: SDC Draft EIR Comments/Questions
Date: Tuesday, September 20, 2022 8:26:55 PM

EXTERNAL

Dear Mr Oh,

Steven Lee here, Senior Scientist and Research Program Manager at the Sonoma Ecology Center, and also a Glen Ellen native and adjoining property owner sharing a border with SDC on the north side squarely within the Sonoma Valley Wildlife Corridor. Mine was one of the invited voices heard on stage at the SDC commemoration event as the facility closed.

C194-1

I would like to submit the following comments and questions regarding the SDC Specific Plan Draft Environmental Impact Report.

Unlike many of the loudest voices in my community, I, speaking personally as a citizen, actually do support the basic tenets of the specific plan, including the rough number of residential units (1000 or less) and other aspects intended to recreate the jobs and economic output of the site similar to what SDC once contributed. Almost nobody I grew up with can afford to live here any more. SDC should be a place where where Sonoma Valley natives have an opportunity to find refuge, employment and home. And I recognize the large amount of land that has already been protected and is slated for protection to maintain ecological function of the wildlands, wildlife corridor and creeks. But there are aspects of the draft EIR I must question.

Speaking as both a citizen and through my role at the Ecology Center, my main issue has to do with the Valley of the Moon Water District's water availability analysis for the SDC redevelopment project/proposal. In this analysis, VOMWD arrived at the conclusion that there is adequate water to support the Specific Plan, as long as all existing SDC water sources remain available. But this analysis hinged on the water from the Roulette Springs source being part of the equation; the analysis would fall short without inclusion of this source. Just so you understand, Roulette Springs is the headwater of a tributary to Asbury Creek which, in turn, flows to Sonoma Creek. Asbury Creek used to be a steelhead stream, at least through the mid 1900s. But like many tributaries to Sonoma Creek, Asbury has been going dry by early summer for the last several decades as the climate has been changing, as the number of wells has increased, and as groundwater tables have dropped around the valley. But since SDC shut down its water system a couple years ago, Roulette Springs has been allowed to flow naturally, and Asbury Creek has once more become a perennial stream that could, given time, provide favorable rearing conditions to the struggling steelhead and chinook salmon population in Sonoma Creek, not to mentioned the endangered California freshwater shrimp. The State of California is putting hundreds of millions of dollars into its streamflow stewardship initiatives, trying to convince private landowners to give up some of their existing uses of stream and spring resources to restore dry season streamflow conditions for salmonid fish and other threatened aquatic species. The State and County should be putting their money where their mouths are here and continue to allow Roulette Springs to restore dry season streamflow to this historic steelhead tributary. Given this, can the County demand the VOMWD revisit its water availability analysis to remove dry season flow from Roulette Springs and instead provide alternative water management scenarios (such as diverting and

storing more water during the wet season) that can still support the Specific Plan?

Sonoma Creek itself is already suffering from anthropogenic land use changes that have caused the creek corridor to become steeper and deeper allowing for increased erosion and sediment delivery to the creek, and the further decline of ground water tables. Much of this has been laid out in Sonoma Ecology's *California Department of Fish and Wildlife* funded Upper Sonoma Creek Restoration Vision (<https://sonomaecologycenter.org/restoration-vision/>) which also lays out the restoration actions which must be taken within the SDC Sonoma Creek corridor to restore proper ecological function to this important section of the creek and to foster resiliency in whatever redevelopment occurs proximate to the creek. While this restoration plan, and the information within it, were made available to the developers of the Specific Plan, this plan was clearly not heeded as the Specific Plan and EIR were drafted. Due to vertically eroding banks, major creek restoration projects are in order for portions of the creek that will, by necessity, pull the "Top of Bank" back, resulting in properly sloped banks that can slow storm flows and stabilize the creek corridor. Any setbacks should be established from these new Top of Bank locations, which could be 50 or 100 feet or more back from the existing, vertical bank top. The Specific Plan should specifically codify the restored creek corridor of the SEC Restoration Vision rather than pledging some generic creek setback which assumes the baseline of existing conditions. SEC's current office area and upstream to the Arnold Drive bridge crossing, the site of the Lux building and downstream to the Burbank Street property line, including a widened Hill Creek corridor are examples of where these bank restoration areas are required. Given this, can the County demand that the EIR specifically call out that the setbacks be established in line with SEC's Upper Sonoma Creek Restoration Vision, or otherwise establish a 200 foot corridor setback for Sonoma Creek and for lower (below Redwood Drive) Hill Creek, understanding that the current creek banks will likely need to be pulled back significantly in several places?

C194-2

Traffic on the Arnold drive corridor is already horrible, especially during peak morning and afternoon hours when families are dropping off and picking kids off at district schools. Should the parameters of the Specific Plan be developed, even more young families (with school age children) will be pouring onto the Arnold Drive corridor at these peak times, which will create stop and go conditions all the way from Glen Ellen to Sonoma. Even if a road to Hwy 12 was developed on the east side of campus, Arnold Drive will still be the natural transportation corridor since that is the path of least resistance to the Valley school sites. Arnold Drive will change profoundly! But pressure relief must be created where possible, and the connection to Highway 12 is the only place where that can, and must, happen. But two specific issues must be more clearly addressed in the EIR: First, the bridge over Sonoma Creek at Harney is too narrow to support the Specific Plan. This is essentially a one lane bridge and can't safely accommodate even 25 mph regular two way traffic. This becomes even more important if this bridge is to support cross valley through-traffic. This was not adequately addressed in the draft EIR and needs to be. Can the County demand that the narrowness and 2 way traffic capability of the Harney St bridge be adequately addressed in the EIR? Second, the exact routing of the Hwy 12 corridor road was not specified in the draft EIR. If this road was routed along the continuation of Harney and toward the Sunrise building, poultry farms and to Hwy 12 from there, it would impose less impacts on the SDC neighbors to the south (Old Hill Ranch), but would produce significant environmental impacts to the open space areas, wildlife corridor movement paths, and to the proposed wetland restoration area. Alternatively, if the routing occurred along the southern property line past the John Mesa field, walnut grove and to Hwy 12, it would create relatively insignificant environmental impacts to the wildlife corridor and wetland/open space areas (because a

C194-3

fenceline along that whole property line already limits wildlife movements), but would severely impact the quality of life for the residents of the Old Hill Farm and adjacent residents who have long become accustomed to the quiet and darkness of their environment. This can't just be cast aside in brief, unspecified mention in an EIR such as this. This cross valley corridor is more critical to the Specific Plan than is being admitted to in the draft EIR. Can the County demand that a proper alternatives assessment be done on different cross valley routing corridors so that citizens can understand the resulting impacts of this critically important Hwy 12 connection?

Aside from available potable water resources, the Sonoma Valley is already over capacity in terms of its sewage infrastructure. So much sewage and stormwater (diverted into the sanitary system) already run down the Valley trunk line, that sanitary system overflows occur in the disadvantaged communities of the Springs during every large storm event. And the POTW on 8th St is already so over capacity that it has put cost increases for increased capacity on the docket almost every year seemingly for the last several decades. Creating even more capacity at that facility at the bottom of the valley isn't even optimal since there is no infrasture for pumping reclaimed water back up valley to assist in water conservation strategies and reuse. If SDC is to be redeveloped with ~1000 residential units and a large volume of commercial sewage generation as well, then a separate POTW should be installed at the location of the former SDC Junior Farm to accommodate that new sewage generation and all of the sewage produced further up valley in the Glen Ellen (and even Kenwood) areas. This would allow for reuse of reclaimed water onsite, including as part of the restored wetland areas, and further down valley. The draft EIR mentions the possibility of such a POTW facility but, like the Hwy 12 connector road, this more an idea floated, rather than something specifically addressed in alternatives analysis by the EIR. This facility would likely be a net positive for the valley, but would come with some environmental costs (placement within currently unspecified open space area). Can the County demand that a proper analysis be given in the EIR to the possibility of this north valley sewage treatment facility?

I have lots more questions and comments, but these are the most critical ones I wish to see addressed as part of this draft EIR review process.

Thank you for considering and addressing this input.

Sincerely,
-Steven Lee.

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Steven F. Lee
Senior Scientist and Research Program Manager
Sonoma Ecology Center
P.O. Box 1486, Eldridge, CA 95431-1486
p: [\(707\) 996-0712](tel:7079960712), x109 c: (818) 399-0435

steve@sonomaecologycenter.org

C194-4

Commenter	Date	Letter	Comment	Response
Rick Savel	21-Sep-22	C193-1	<p>Attn: Brian Oh: On behalf of the Penngrove Area Plan advisory Committee (PAPAC) and residents of the rural Penngrove area we are expressing our concerns and comments about the Sonoma Developmental Center (SDC) DEIR and proposed Specific Plan policies. We concur with the BVCA's comments and concerns on the SDC DEIR regarding the inadequate analysis of the subregional traffic circulation conditions on all the primary roadways. (The PAPAC was established in 1984 and is dedicated to supporting and advocating for the Penngrove Area Plan goals and policies to preserve the rural residential character and natural environment of the Penngrove area.)</p> <p>NOTE: attached are the Bennett Valley Community Association (BVCA) comments on the SDC DEIR. BVCA references the Bennett Valley Area Plan to criticize the large scale SDC project the county is proposing in the Glen Ellen area. On page two, BVCA's comments identify the Petaluma Hill Road regional traffic circulation conditions and congestion to argue that the SDC DEIR needs to properly evaluate the impacts of existing and reasonably foreseeable future "regional traffic circulation" conditions on all the primary roadway evacuation escape routes in the DEIR analysis and Specific Plan policies.</p> <p>The SDC DEIR analysis and the proposed Specific Plan policies are inadequate and do not properly evaluate the subregional traffic circulation impacts and pose mitigations to maintain minimum emergency public evacuation access and response times for the Bennett Valley Area.</p>	<p>Thank you for your comment letter. This comment is noted. Please see MR-4 regarding wildfire risk and evacuation times. See also MR-6 regarding the transportation analysis.</p>

Commenter	Date	Letter	Comment	Response
Rick Savel	21-Sep-22	C193-2	The SDC DEIR and Specific Plan project impacts cannot be properly evaluated in a vacuum, in isolation from the County subregional traffic circulation context in which it can best be understood and assessed. Bennett Valley is located between Glen Ellen and Penngrove and could be left without any functional roadway emergency evacuation escape routes. To the east Arnold Drive and Hwy 12 will be gridlocked and to the west the Petaluma Hill Road corridor will be gridlocked due to Rohnert Park's new developments. The SDC DEIR concludes there will be significant and unavoidable impacts regarding increased traffic, and proposes no mitigation. This is unacceptable. NOTE: Rohnert Park's development plans alone, will add an estimated 100,000 more car trips a day along the Petaluma Hill Road corridor.	This comment is noted. Please see MR-4 regarding wildfire risk and evacuation times. See also MR-6 regarding the transportation analysis. As stated in CEQA Guidelines, Section 15093(a), if the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." Therefore, given that State law stipulates that the SDC Specific Plan prioritize housing at the site per Government Code Section 14670.10.5, the environmental impacts of implementation of the Specific Plan on VMT may be acceptable to policymakers.
Rick Savel	21-Sep-22	C193-3	... from the attached BVCA comments, page 2: "The DEIR fails to describe existing wildfire hazards or properly analyze potential impacts. It is impossible to evaluate evacuation safety and the associated impacts on existing residents and employees when no baseline is provided for their evacuation utilizing the same routes. We know from the 2017 Nuns Canyon Fire, 2019 Kincaid Fire, and 2020 Glass Fire that Highway 12 was blocked, with traffic often at standstill for hours. The proposal jeopardizes the lives of Bennett Valley residents who need to flee from a fire driving east to Sonoma Valley using Route 12 or Arnold Drive. Moreover, because those routes are known bottlenecks, residents of Sonoma Valley might elect to escape a conflagration by driving west using Bennett Valley Road or even Sonoma Mountain Road. This could congest the escape routes for Bennett Valley residents who need to flee to the west."	The comment is noted. Please see MR-4 regarding wildfire risk and evacuation times. See also B3-27 regarding reducing wildfire risk in the Planning Area.

Commenter	Date	Letter	Comment	Response
Rick Savel	21-Sep-22	C193-4	<p>"The evacuation analysis for Bennett Valley needs to include the fact that during normal conditions Penngrove has become a chokepoint for traffic because of massive housing developments along Petaluma Hill Road. The Board of Supervisors has recognized this problem and recently approved the "Railroad Avenue traffic circulation study." The evacuation route for Bennett Valley residents via Petaluma Hill Road toward Penngrove is already compromised. The DEIR's lack of subregional traffic circulation studies to identify such problems, let alone mitigate them, jeopardizes not only Bennett Valley residents but also the thousands of others sharing these evacuation routes. This violates Public Safety Goal PS-3 of the Sonoma County General Plan ("prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires"), as well as Objective PS-3.2 (new development must minimize fire hazards to acceptable levels)."</p> <p>NOTE: County DTPW is presently undergoing a Railroad Avenue subregional traffic circulation study. The study area includes Roberts Road and Crane Canyon Road, the two primary roadway evacuation escape routes for access to Petaluma Hill Road from Bennett Valley. Please consider including the new County subregional traffic circulation data on Roberts Road and Crane Canyon Road in an updated supplemental SDC DEIR.</p> <p>See BVCA's regional traffic circulation comments and concerns on page two of the attachment.</p>	<p>This comment is noted. Please see MR-4 regarding wildfire risk and evacuation times. Current conditions for VMT are based on the most current SCTA travel demand model, which accounts for 2019 land use inventories throughout Sonoma County. See also MR-6 regarding the transportation analysis.</p>

Commenter	Date	Letter	Comment	Response
Steven Lee	20-Sep-22	C194-1	<p>Steven Lee here, Senior Scientist and Research Program Manager at the Sonoma Ecology Center, and also a Glen Ellen native and adjoining property owner sharing a border with SDC on the north side squarely within the Sonoma Valley Wildlife Corridor. Mine was one of the invited voices heard on stage at the SDC commemoration event as the facility closed. I would like to submit the following comments and questions regarding the SDC Specific Plan Draft Environmental Impact Report. Unlike many of the loudest voices in my community, I, speaking personally as a citizen, actually do support the basic tenets of the specific plan, including the rough number of residential units (1000 or less) and other aspects intended to recreate the jobs and economic output of the site similar to what SDC once contributed. Almost nobody I grew up with can afford to live here any more. SDC should be a place where where Sonoma Valley natives have an opportunity to find refuge, employment and home. And I recognize the large amount of land that has already been protected and is slated for protection to maintain ecological function of the wildlands, wildlife corridor and creeks. But there are aspects of the draft EIR I must question. Speaking as both a citizen and through my role at the Ecology Center, my main issue has to do with the Valley of the Moon Water District's water availability analysis for the SDC redevelopment project/proposal. In this analysis, VOMWD arrived at the conclusion that there is adequate water to support the Specific Plan, as long as all existing SDC water sources remain available. But this analysis hinged on the water from the Roulette Springs source being part of the equation; the analysis would fall short without inclusion of this source. Just so you understand, Roulette Springs is the headwater of a tributary to Asbury Creek which, in turn, flows to Sonoma Creek. Asbury Creek used to be a steelhead stream, at least through the mid 1900s. But like many tributaries to Sonoma Creek, Asbury has been going dry by early summer for the last</p>	<p>Thank you for your comment letter. The comment is noted. The water supply analysis in the WSA reflects the continued use of the property's existing Roulette Springs water rights, which is consistent with Government Code Section 14670.10.5 (SDC Legislation). The SDC Legislation states that all riparian water rights (including Roulette Springs) shall remain with the property. See also MR-5 regarding the adequacy of the water supply analysis.</p>

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			<p>several decades as the climate has been changing, as the number of wells has increased, and as groundwater tables have dropped around the valley. But since SDC shut down its water system a couple years ago, Roulette Springs has been allowed to flow naturally, and Asbury Creek has once more become a perennial stream that could, given time, provide favorable rearing conditions to the struggling steelhead and chinook salmon population in Sonoma Creek, not to mentioned the endangered California freshwater shrimp. The State of California is putting hundreds of millions of dollars into its streamflow stewardship initiatives, trying to convince private landowners to give up some of their existing uses of stream and spring resources to restore dry season streamflow conditions for salmonid fish and other threatened aquatic species. The State and County should be putting their money where their mouths are here and continue to allow Roulette Springs to restore dry season streamflow to this historic steelhead tributary. Given this, can the County demand the VOMWD revisit its water availability analysis to remove dry season flow from Roulette Springs and instead provide alternative water management scenarios (such as diverting and storing more water during the wet season) that can still support the Specific Plan?</p>	
Steven Lee	20-Sep-22	C194-2	<p>Sonoma Creek itself is already suffering from anthropogenic land use changes that have caused the creek corridor to become steeper and deeper allowing for increased erosion and sediment delivery to the creek, and the further decline of ground water tables. Much of this has been laid out in Sonoma Ecology's California Department of Fish and Wildlife funded Upper Sonoma Creek Restoration Vision (https://sonomaecologycenter.org/restorationvision/) which also lays out the restoration actions which must be taken within the SDC Sonoma Creek corridor to restore proper ecological function to this important section of the creek and to foster resiliency in whatever redevelopment occurs</p>	<p>The comment is noted. The Specific Plan includes policies that would ensure buffers and protection of riparian areas around creeks. Specific Plan Policies 2-25 (protective buffer of Sonoma Creek), 2-27 (County's Municipal Code for riparian corridor protection), and 2-30 (maintain standard project protection measures for any development adjacent to riparian corridors) would ensure protection of streams and riparian resources during any adjacent ground disturbing actions.</p>

Commenter	Date	Letter	Comment	Response
			<p>proximate to the creek. While this restoration plan, and the information within it, were made available to the developers of the Specific Plan, this plan was clearly not heeded as the Specific Plan and EIR were drafted. Due to vertically eroding banks, major creek restoration projects are in order for portions of the creek that will, by necessity, pull the "Top of Bank" back, resulting in properly sloped banks that can slow storm flows and stabilize the creek corridor. Any setbacks should be established from these new Top of Bank locations, which could be 50 or 100 feet or more back from the existing, vertical bank top. The Specific Plan should specifically codify the restored creek corridor of the SEC Restoration Vision rather than pledging some generic creek setback which assumes the baseline of existing conditions. SEC's current office area and upstream to the Arnold Drive bridge crossing, the site of the Lux building and downstream to the Burbank Street property line, including a widened Hill Creek corridor are examples of where these bank restoration areas are required. Given this, can the County demand that the EIR specifically call out that the setbacks be established in line with SEC's Upper Sonoma Creek Restoration Vision, or otherwise establish a 200 foot corridor setback for Sonoma Creek and for lower (below Redwood Drive) Hill Creek, understanding that the current creek banks will likely need to be pulled back significantly in several places?</p>	<p>Further, DEIR Policy BIO-1 requires a biological resource assessment for any new project. This assessment will identify potential sensitive habitats and species and make recommendations for mitigation of any project-specific impacts to biological resources to a less than significant level. As noted on page 252 of the DEIR, Policy 2-25 requires inclusion of protective buffers of at least 50 feet along Sonoma and Mill creeks, as measured from the top-of-bank, to protect the sensitive communities. Article 65 of the Sonoma County Code is referenced describing setbacks for buildings. Article 65 will be applied throughout the implementation of the project and stream setbacks will be determined during the biological resources assessment required by BIO-1, using the criteria defined by Article 65. See also Impact 3.9-2 on page 296 regarding Proposed Plan impacts on groundwater recharge. Given existing regulations and proposed policies, the Proposed Plan would not substantially decrease groundwater supplies and would not impede sustainable groundwater management of the basin, and this impact would be less than significant.</p>

Commenter	Date	Letter	Comment	Response
Steven Lee	20-Sep-22	C194-3	<p>Traffic on the Arnold drive corridor is already horrible, especially during peak morning and afternoon hours when families are dropping off and picking kids off at district schools. Should the parameters of the Specific Plan be developed, even more young families (with school age children) will be pouring onto the Arnold Drive corridor at these peak times, which will create stop and go conditions all the way from Glen Ellen to Sonoma. Even if a road to Hwy 12 was developed on the east side of campus, Arnold Drive will still be the natural transportation corridor since that is the path of least resistance to the Valley school sites. Arnold Drive will change profoundly! But pressure relief must be created where possible, and the connection to Highway 12 is the only place where that can, and must, happen. But two specific issues must be more clearly addressed in the EIR: First, the bridge over Sonoma Creek at Harney is too narrow to support the Specific Plan. This is essentially a one lane bridge and can't safely accommodate even 25 mph regular two way traffic. This becomes even more important if this bridge is to support cross valley through-traffic. This was not adequately addressed in the draft EIR and needs to be. Can the County demand that the narrowness and 2 way traffic capability of the Harney St bridge be adequately addressed in the EIR? Second, the exact routing of the Hwy 12 corridor road was not specified in the draft EIR. If this road was routed along the continuation of Harney and toward the Sunrise building, poultry farms and to Hwy 12 from there, it would impose less impacts on the SDC neighbors to the south (Old Hill Ranch), but would produce significant environmental impacts to the open space areas, wildlife corridor movement paths, and to the proposed wetland restoration area. Alternatively, if the routing occurred along the southern property line past the John Mesa field, walnut grove and to Hwy 12, it would create relatively insignificant environmental impacts to the wildlife corridor and wetland/open space areas (because a fenceline along that</p>	<p>The comment is noted. Please see MR-4 regarding wildfire evacuation times. See also MR-6 regarding the transportation analysis. Caltrans inspects the bridge annually. The last inspection was October 3, 2021. Caltrans recommended treating the deck with methacrylate resin, which the State plans to do this year. The State is planning on doing that maintenance this year.</p> <p>The existing bridge on Harney Street is approximately 31 feet in total width. The traveled-way of the bridge for motor vehicles, measured between faces of curbs, is 19.3 feet. While lane lines are not currently marked, this translates to effective lane widths of slightly over 9.5 feet. There are 15 mph speed limit signs posted on each side of the bridge. This segment of Harney Street would accommodate traffic generated by uses in the Specific Plan's "Agrihood" district. The segment would also accommodate travel associated with the new connection to Highway 12 identified in the Plan. While the connection to Highway 12 is intended to improve connectivity to the regional roadway network, it is not projected to be a high-volume roadway. As shown in Table 3.14-3 of the DEIR, the roadway segment is projected to carry approximately 1,450 daily vehicles in the future, including both vehicles associated with buildout of the Specific Plan as well</p>

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			<p>whole property line already limits wildlife movements), but would severely impact the quality of life for the residents of the Old Hill Farm and adjacent residents who have long become accustomed to the quiet and darkness of their environment. This can't just be cast aside in brief, unspecified mention in an EIR such as this. This cross valley corridor is more critical to the Specific Plan than is being admitted to in the draft EIR. Can the County demand that a proper alternatives assessment be done on different cross valley routing corridors so that citizens can understand the resulting impacts of this critically important Hwy 12 connection?</p>	<p>as background regional traffic. Peak hour volumes are projected to range between 120 and 130 vehicles, with approximately 80 vehicles in the heaviest direction of travel. Averaged over the course of the peak hour, this translates to approximately one to two vehicles per minute traveling in the heaviest direction and just under one vehicle per minute traveling in the opposing direction. Short “spikes” in traffic demand do occur and would result in periods with higher volumes, though based on the analysis it is not anticipated that there would be a steady traffic stream occurring in either direction of travel across the bridge.</p> <p>The publication A Policy on Geometric Design of Highways and Streets, 7th Edition, 2018, American Association of Highway and Transportation Officials (AASHTO), contains industry-standard roadway design guidelines used throughout the country. For local streets in urbanized areas such as the core SDC campus area, AASHTO states that lanes for moving traffic should preferably be between 10 to 11 feet wide. This is slightly more than what exists on the Harney Street bridge. AASHTO also notes, however, that where the available width imposes limitations, lanes as narrow as 9 feet wide can be used. Based on this guidance and considering the projected traffic volumes traveling over the bridge, the current lane widths of slightly</p>

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				<p>over 9.5 feet are considered to be narrow but acceptable, and would not constitute a design hazard. In the future, travel lanes on Harney Street beyond the bridge would be 10 feet wide (see Specific Plan Figure 5.1-6), meeting AASHTO guidance. The existing street width differential occurring at the bridge appears abrupt in the current condition but would be less noticeable in the future as Harney Street is reconfigured as planned.</p> <p>The streets within the Specific Plan are intended, by design, to accommodate multimodal travel at low vehicle speeds. While the Harney Street bridge would be designed differently if it were being constructed as a new bridge today, its current width is adequate to accommodate the projected traffic volumes, and in fact will serve as a form of traffic calming that will help to reinforce the low-speed environment called for in the Specific Plan.</p> <p>With evacuation, there are over 500 projected vehicles in the peak direction of the Highway 12 connector. This would be within the capacity of the bridge even with the 9.5' lanes. Since evacuation traffic would be almost entirely one-way, it is reasonable that the bridge could operate primarily as a one-way route with some type of manual traffic control to allow emergency vehicles to occasionally come the other way. There would be no problem</p>

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				<p>with the lane widths with one-way operation. The following text is also added to Policy 2-54 as follows:</p> <p><u>e. Manual control of Harney Bridge under evacuation conditions to enable one-way traffic flow (with directionality dependent on evacuation direction). It should be noted that the bridge has traffic lanes approximately 9'-7" wide, which is very close to the 10' lane widths for Harney Street in Figure 5.1-5. The street and the bridge have adequate capacity with one lane only to accommodate the projected one-hour traffic volume toward Highway 12 connector, but manual control would smoothen sporadic bottlenecks by allowing the bridge to operate primarily as a one-way route with some type of manual traffic control to allow emergency vehicles to occasionally come in the other direction.</u></p> <p>See also MR-6 and MR-7 regarding the design of Highway 12 and its impacts. As outlined on page 520 of the DEIR, "infrastructure facilities would be subject to separate project-level CEQA review as applicable at the time the design is proposed in order to identify any potential project-specific impacts and identify any mitigation as may be appropriate." Therefore, the details and impacts of the proposed Highway 12 connection and any other major infrastructural changes will be outlined in a dedicated CEQA review</p>

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Steven Lee	20-Sep-22	C194-4	<p>Aside from available potable water resources, the Sonoma Valley is already over capacity in terms of its sewage infrastructure. So much sewage and stormwater (diverted into the sanitary system) already run down the Valley trunk line, that sanitary system overflows occur in the disadvantaged communities of the Springs during every large storm event. And the POTW on 8th St is already so over capacity that it has put cost increases for increased capacity on the docket almost every year seemingly for the last several decades. Creating even more capacity at that facility at the bottom of the valley isn't even optimal since there is no infrasture for pumping reclaimed water back up valley to assist in water conservation strategies and reuse. If SDC is to be redeveloped with ~1000 residential units and a large volume of commercial sewage generation as well, then a separate POTW should be installed at the location of the former SDC Junior Farm to accommodate that new sewage generation and all of the sewage produced further up valley in the Glen Ellen (and even Kenwood) areas. This would allow for reuse of reclaimed water onsite, including as part of the restored wetland areas, and further down valley. The draft EIR mentions the possibility of such a POTW facility but, like the Hwy 12 connector road, this more an idea floated, rather than something specifically addressed in alternatives analysis by the EIR. This facility would likely be a net positive for the valley, but would come with some environmental costs (placement within currently unspecified open space area). Can the County demand that a proper analysis be given in the</p>	<p>process. Finally, the Specific Plan calls for a Highway 12 connector alignment and design study to be conducted within the first five years after plan adoption.</p>
				<p>The comment is noted. Existing and projected wastewater generation for the Planning Area is shown in gallons per day in Table 3.15-2. The SVCSD Treatment Plant is permitted to discharge an average dry weather flow of 3 MGD. Additionally, the SVCSD Treatment Plant can treat up to 16 MGD and has the ability to discharge 11 MGD. The SVCSD Treatment Plant also has 35 million gallons of equalization storage. As shown in Table 3.15-2, the estimated peak wet-weather sewer flow with buildout of the Proposed Plan in 2045 is 0.85 MGD, which is less than the 2015 record flow and represents approximately 5 percent of total wet-weather treatment capacity of the SVCSD Treatment Plant. Compared to 2020, the average dry weather flow is estimated to increase by 0.274 MGD in 2045, representing approximately 9% of the treatment plant's permitted ADFW capacity. By itself, this increase is anticipated to fall within the current available ADWF treatment capacity of the plant. The implementation of the Proposed Plan will have a less than significant impact on wastewater facilities as no new</p>

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			EIR to the possibility of this north valley sewage treatment facility?	wastewater treatment facilities aside from individual greywater systems have been determined to be required or are proposed to serve the Planning Area. The remainder of the comment is related to the Specific Plan and not the adequacy of the DEIR, thus no further response is required.

