



SONOMA DEVELOPMENTAL CENTER SPECIFIC PLAN



Supplement #2 to the
Final Environmental Impact Report

SCH # 2022020222

11/14/22

Purpose of Supplement #2 to the Final EIR

Sonoma Land Trust submitted letter B11 to comment on the DEIR. Based on comments received during the public comment portion of the Planning Commission hearing on the Final EIR and Specific Plan, County staff have expanded upon some of their responses to provide additional clarity. The associated responses provided below are an expanded version of responses provided in the FEIR. Expanded responses are shown underlined in red.

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-1	<p>Sonoma Land Trust (SLT) provides these comments on the Draft Environmental Impact Report (“EIR”) for the Sonoma Development Center Specific Plan (“Specific Plan,” “Proposed Plan,” or “Project”). The Sonoma Developmental Center (“SDC”) property can play a pivotal role in providing much-needed affordable housing while protecting Sonoma County’s ecological and recreational resources for future generations. The Specific Plan also presents a unique opportunity for California to demonstrate how redevelopment of a state-owned property can deliver community benefits such as climate resilience, affordable housing and expanded park access, while achieving priorities such as the 30x30 biodiversity conservation initiative. Because SDC is owned by the state, there is also a public trust obligation to conserve and protect the property—and especially the Sonoma Valley Wildlife Corridor—as an “ecological unit” above and beyond the specific direction provided by the 2019 legislation. Under the public trust doctrine, navigable waters, tidelands and wildlife resources are held in trust for all of the people, and the state acts as the trustee to protect these resources for present and future generations. This is acknowledged in Guiding Principles #3 and #4 of the Specific Plan. The Proposed Plan for the redevelopment of the SDC core campus will have significant and unidentified impacts to the local and regional environment—most notably to wildlife connectivity, wildfire safety, hydrology and management of water resources. As discussed in detail in Attachment A and in the analysis provided by biology, transportation, wildfire, and hydrology experts (Attachments B, C, D, E, and F),² the EIR fails to adequately inform decisionmakers and the public about the numerous environmental impacts of the SDC Specific Plan. Instead the EIR defers both the required</p>	<p>Thank you for your comment letter. The comment is noted. Specific comments are responded to in the responses that follow.</p>

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			analysis and development of mitigation measures to the future, which violates the basic requirements of the California Environmental Quality Act (CEQA).	
Sonoma Land Trust	9/26/2022	B11-2	The detailed comments of SLT focus on the additional analysis and evidence needed to fulfill CEQA’s primary responsibility of fully disclosing the environmental consequences of this large-scale development project that will significantly alter the landscape of the Sonoma Valley. The attempt to use the concept of a “self-mitigating” Specific Plan avoids the responsibility of analyzing the impacts first to understand what needs to be mitigated, before jumping to the next step of determining what measures are necessary and effective to reduce impacts to less than significant. Put simply the EIR fails to “show its work” and connect the dots between the Project’s significant impacts and the vague (and mostly deferred) mitigation measures contained in the Specific Plan.	The comment is noted. Please see MR-1 and MR-9.
Sonoma Land Trust	9/26/2022	B11-3	The incredible environmental values and assets of SDC—and the site’s history and legacy of care—require an equally exceptional EIR and Specific Plan. These will be the guiding documents for decades to come, and the rush to meet an unrealistic deadline for approval of the EIR and Project that does not enjoy strong public support is unnecessary. SLT suggests an approach that will allow the County to still move forward in a timely manner to meet Project objectives, satisfy the 2019 legislation related to the disposition and future use of SDC, and improve and correct flaws in the environmental documents. This approach meets CEQA requirements, improves consistency with the County’s General Plan and fulfills Guiding Principle #5 to promote sustainable development practices in building and landscape design. SLT recommends that the Planning Commission and Board of Supervisors decline	These are comments on the approval sequence and process, and commenter's desire to see analysis conducted after selection of a Master Developer, and not on the EIR, and are noted. See also MR-8.

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			<p>to certify this EIR and instead direct staff to use the historic preservation alternative as the starting place for a new and revised preferred project, and a revised Specific Plan and EIR that addresses the flaws identified in the Attachments to this letter. We recommend that the historic preservation alternative be revised to start with an affordable housing project of 200+/- homes (Phase 1), and to allow for future development phases consistent with whichever proposal the California Department of General Services (DGS) selects as the winning bid pursuant to their surplus property sale process for the SDC core campus. The EIR acknowledges that the County and public have no accurate estimate of how much development will actually occur at SDC, because we don't know which proposal DGS will select to enter into an Exclusive Negotiating Agreement for the sale of the campus. As the EIR states on page 77: "...development of most of the properties in the Planning Area would be implemented through the market-driven decisions that the selected buyer(s) would make for their properties, and no development rights or entitlements are specifically conferred with the Proposed Plan. Furthermore, given that the majority of future development under the Proposed Plan is residential, varying levels of density bonuses are available under the State depending on the level of affordable housing provided. Thus, it is difficult to project the exact amount and location of future development that may result." According to the schedule released by DGS, a buyer will be selected in late October, which gives Permit Sonoma, the public and the decision makers an opportunity to focus on a real-world proposal that will drive "the exact amount and location of future development." This will also resolve the problem of</p>	

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			speculating about financial feasibility and making unfounded assumptions on how much and what type of housing needs to be built on the site to subsidize the affordable housing mandates.	
Sonoma Land Trust	9/26/2022	B11-4	<p>Importantly, the historic preservation alternative also requires significant modification to expand the wildlife corridor, riparian and open space protections and setbacks. SLT's top priority is ensuring that the Specific Plan furthers Guiding Principle #3. Therefore, the revised historic preservation alternative must include and meet the following specific performance standards:</p> <ul style="list-style-type: none"> • Provide sufficient setbacks from all creeks designed to protect water quality and quantity, instream and riparian habitat, and wildlife connectivity • Provide a sufficient buffer that reduces the current footprint of the north side of the SDC campus adjacent to Sonoma Creek to allow wildlife to safely travel through the Sonoma Valley Wildlife Corridor • Ensure human activities and improvements at SDC do not impair wildlife's use • Ensure new roads and increased traffic do not create a danger to wildlife • Ensure new development does not create new sources of light, glare, or noise that would impair wildlife's use of the Corridor • Ensure new development does not increase the risk of wildfires that would harm the natural and built environments • Ensure runoff from new impermeable development does not result in erosion or contamination of creeks and riparian areas. 	<p>Commenter would like to improvements to the Historic Preservation Alternative. These are noted. The listed improvements do not pertain to the significant adverse impacts of the Project or the alternatives.</p>

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Sonoma Land Trust	9/26/2022	B11-5	<p>A) These comments provide the Sonoma Land Trust’s input on the Draft Environmental Impact Report (“EIR”) for the Sonoma Development Center Specific Plan (“Specific Plan,” “Proposed Plan,” or the “Project”). As discussed below and in the analysis that follows provided by biology, transportation, wildfire, and hydrology experts (Attachments B, C, D, E, and F to September 26, 2022 letter from SLT to Brian Oh),¹ the EIR fails to provide a stable project or analyze the full scope of impacts that would foreseeably result from the buildout of the draft Specific Plan. Relying on the Specific Plan’s goals and policies—which are replete with caveats and qualifications—the EIR treats the Specific Plan as a self-mitigating project.</p> <p>B) But the EIR does not actually do the analysis or present the substantial evidence necessary to support that conclusion. Nor does the EIR incorporate the purported self-mitigating aspects of the Specific Plan into a formal mitigation monitoring and reporting program, which program is required under CEQA to ensure that a project’s mitigating elements are meaningful and enforceable and actually achieve their stated goals. The errors in the EIR are especially consequential in this case, given the immense specificity of the draft Specific Plan. If the draft Specific Plan is adopted, the County will know substantially where specific uses will be located and what the footprint and intensity of those uses will be. The County is relying on that specificity to streamline future environmental review of development under the Specific Plan, including by avoiding altogether future environmental review wherever possible. Specific Plan at 7-3 (indicating that certain types of development under the Specific Plan might be</p>	<p>The comment is noted. In response to segment A), Please see MR-1, MR-3, MR-9, and B11-8.</p> <p>In response to segment B), see MR-1, MR-3, and MR-9. The DEIR analyzes the environmental impacts of the Proposed Plan pursuant to CEQA requirements.</p>

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			<p>exempt from further CEQA review and stating that the “County intends to rely on these provisions for exemptions and tiering to the maximum extent feasible”).</p> <p>Particularly given the County’s stated objectives, it is critical that the EIR analyze fully all foreseeable impacts of all development allowed under the Specific Plan and that it mitigate those impacts found to be significant. The EIR cannot and should not defer to future environmental review the analysis of the Project’s impacts and identification of mitigation.</p>	
Sonoma Land Trust	9/26/2022	B11-6	<p>The EIR also fails to properly include documents referenced and relied on by the EIR. For example, the DEIR references a traffic study for the Project, but fails to attach it as an appendix to the EIR. EIR at 410, Footnote 118 [references the Focused Traffic Operations Analysis for the SDC Specific Plan (W-Trans, August 2022 [actually July 6, 2022])].</p>	<p>The Traffic Operations Study is available at the project website at: https://www.sdcspecificplan.com/documents.</p>
Sonoma Land Trust	9/26/2022	B11-7	<p>Similarly, the EIR references an evacuation study for the Project site prepared by Kittelson and Associates, but fails to append this document. EIR at 506. Under well-established case-law, the lead agency is required to present all relevant reports relied upon to prepare the EIR as part of the document.</p> <p>As described below, the current EIR fails to adequately inform decisionmakers and the public about the environmental impacts of the SDC Specific Plan. The final EIR must be significantly revised to include all necessary evidence, analysis, and mitigation if it is to comply with CEQA.</p>	<p>The study by Kittelson & Associates relates to analysis conducted for wildfire evacuation, which is presented within the body of the Draft EIR. This section of the EIR was prepared by Kittelson & Associates; no separate standalone study or report was prepared and therefore all relevant reports are provided. See also MR-4.</p>

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Sonoma Land Trust	9/26/2022	B11-8	<p>The EIR fails to provide an accurate, stable, and finite project description.</p> <ul style="list-style-type: none"> The Project Description does not provide a clear description of the amount of development allowed under the Specific Plan. The EIR also does not include an accurate representation of the amount of development that is identified in the Draft Specific Plan. Table 4-2 in the Specific Plan includes a range of housing units permitted in the various districts of the SDC with a maximum of 1,210 units. The table notes that a +/- 10% deviation in each district is allowed subject to approval by the Community Development Director, which could lead to a maximum of 1,331 units (1,210+121). A footnote to Table 4-2 notes that “While the base housing unit range for each district is represented as a range, the total base number of units built across all districts should equal the total shown in the table” (emphasis added). However, there is no further detail describing how this unit count would be implemented and any lesser number (e.g. 733) enforced when each district has a range of unit allotments. Furthermore, the Specific Plan at 4-12 acknowledges that developers would be able to use State and County density bonuses for inclusionary housing and notes an additional 200 market rate units. However neither the Specific Plan nor the EIR explain how that number was developed. Furthermore, the Specific Plan identifies another planned 100-unit affordable housing project that is anticipated to be developed (with County involvement) 	<p>The Project Description is stable and has been consistently referenced throughout the document. Table 4-2 of the Draft Specific Plan that the commenter references provides a range of housing units within each district of SDC; it is not the intent of the Specific Plan that the maximum to end of the range would be achieved in every district. The last sentence of the page with the table notes that “... the SDC site is anticipated to have around 1,000 total housing units at buildout.” A footnote has been added to Table 4-2 of the Specific Plan, as follows. “This table provides a range for the total number of housing units within each Specific Plan district to provide implementation flexibility. It is not anticipated that development would be built to the maximum of the range in every district. The total number of housing units anticipated under the Specific Plan is 1,000.”</p> <p>The comment states that, “The Specific Plan could accommodate at least 1,331 units before density bonus allowances and sets no upper limit on the number of units allowed, while the EIR analyzes a maximum of 1,000 units.” First, as explained in the previous paragraph, the 1,000 housing units allowed in the EIR are inclusive of anticipated density bonuses. Approximately 283 affordable units are included within the 1,000 units, as explained in the Draft Specific Plan page 4-12. Should developers choose to provide additional affordable housing units beyond the Specific Plan inclusionary requirements (which are already higher than the County inclusionary requirements), they can seek additional density bonuses, which may result in the total of 1,000 housing units to be exceeded. Various density bonuses are available</p>

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			<p>on the SDC site. According to current State density bonus law, a 100% affordable project could seek a density bonus of up to 80%, which could lead to an additional 80 units beyond the 100 identified. The Specific Plan could accommodate at least 1,331 units before density bonus allowances and sets no upper limit on the number of units allowed, while the EIR analyzes a maximum of 1,000 units (EIR Table 2.5-1).</p>	<p>under State law. The Density Bonus is a State mandate. A developer who meets the requirements of State law is entitled to receive the density bonus as a matter of right. This would be true anywhere in Sonoma County like elsewhere in the state, and not just at SDC. Density bonuses under State law are available for affordable housing, seniors, foster youth/disabled veterans/homeless, and college students, among others. Should developers seek density bonuses that would cause the number of total housing units to exceed 1,000 or alterations in the non-residential land use program, the County at that time would need to determine whether and what level of additional environmental review is required.</p>

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Sonoma Land Trust	9/26/2022	B11-9	<p>While the Project Description residential unit count is different than the units identified in the Specific Plan, there are also sections within the EIR that cite statistics with unclear sources, leading to cloudy and unsupportable conclusions. The Project Description notes the development of 1,000 residential units and a future population of 2,400 persons (average size of 2.4 persons per household). This is in contrast with the average household size in Sonoma County of 2.6 persons per household as identified in the EIR at 369 (Population and Housing section). What is the data point to suggest that the average household size at SDC would be lower than the County-wide average? This discrepancy of 200 persons is not reflected in any of the analyses that rely on population, such as Public Service and Recreation, Utilities and Service Systems, Air Quality and Greenhouse Gas Emissions.</p>	<p>The commenter asks why an average of 2.4 persons per household was used, when the overall average countywide household size is larger. According to the State Department of Finance (see Report E-5), Sonoma County’s countywide average household size on January 1, 2022 was 2.5, a slight decrease from the average household size of 2.6 in 2020. The countywide housing stock as of January 2022 was 74.2 percent single family, which typically house larger households than multifamily units. Given that the housing type mix at SDC is anticipated to be split evenly between single family (attached and detached) and multifamily, with nearly half of the multifamily units anticipated to be for seniors, an average household size of 2.4 provides a conservatively high estimate of population that would result. For residential land uses/population, the Sonoma County Transportation Authority modeling input is housing units, not population, so a change in household size assumption would have no impact of transportation modeling results. For assumptions regarding various analyses, see response to next comment below.</p>

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Sonoma Land Trust	9/26/2022	B11-10	<p>A) Compounding the confusion over accurate unit counts and the accuracy of analyses, some of the impact sections reference different numbers than the Project Description, resulting in an unstable project description and confusion about key elements of the Project. EIR at 429 (Land Use and Transportation Network Assumptions) states that “the analysis presented in this section is based on an assumption that implementation of the Proposed Plan would result in 1,000 residential units with State and County density bonuses, including 435 single family units, 345 multifamily units, and 220 senior housing units.” But neither the EIR Project Description nor the Specific Plan indicates that the 1,000 residential units would be inclusive of State and County density bonuses.</p> <p>B) Nor does the EIR Project Description or Specific Plan identify the split between single family and multi-family units or provide for senior housing units. Where did these assumptions come from? How can they be relied upon for the Transportation analysis? Other sections that made assumptions regarding the split between units types include Population and Housing, Public Service and Recreation, Utilities and Service Systems. In the Public Services and Recreation section, Table 3.13-4 at p.402 (Student Generation Rates) analyzes 500 single family units and 280 affordable/apartment units (780 in total) to conclude a total new student population number. Not only is this assumption of the number of unit types not in the Project Description (what is the source?), but it is also a different unit split assumption than what is used in the Transportation section.</p>	<p>The comment is noted. In response to segment A), the EIR analysis impacts resulting from 1,000 housing units (in addition to non-residential development), which is the total number of market-rate and affordable units. This information is spelled out in the Draft Specific Plan (page 4-12):</p> <p>The base number of units allowed is 733, with a base of 550 market rate units allowed, roughly split between multifamily and single-family types. With inclusionary housing requirements of 25%, at least 183 additional affordable units will be produced. Developers will additionally be able to use State and County density bonuses for inclusionary housing, which, as of 2022, could lead to approximately an additional 200 market-rate units. With Sonoma County’s additional planned affordable housing development of around 100 housing units, the SDC site is anticipated to have around 1,000 total housing units at buildout. Please see Table 4-4 of projected development in the Specific Plan.</p> <p>In response to segment B), the Specific Plan does not specify a percentage or maximum or minimum amount of senior housing at the site. Based on market analysis previously conducted for SDC, 220 housing units are assumed to be for seniors; these are reflected as part of the overall multifamily totals. The Draft EIR notes (page 370), “Based on buildout projections developed for the Proposed Plan, the SDC site is expected to house 2,400 people in 1,000 housing units. Specifically, the population will include 1,872 non-seniors in 780 housing units and 528 seniors in 220 housing units. Further, intentional consideration will be incorporated into</p>

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			<p>C) Beyond transportation, what unit assumptions were used for the projected Water Demand Estimates (EIR Table 3.15-1) or the analyses for wastewater, solid waste generation, etc.? Calculations for these utilities are based on different use factors for different unit types, but the data tables do not reference the unit counts assumed and because of the lack of information in the Project Description, there is no clarity or validity to the information.</p>	<p>new development to support housing opportunities for individuals with developmental disabilities.” The commenter seeks information on what assumptions or use factors were used for various purposes, and asserts that different housing units counts and unit type mixes have been used in various analyses. This assertion is incorrect. The Draft EIR uses a consistent 1,000 housing unit count throughout, with unit mix described previously.</p> <p><u>In response to segment C)</u>, more specifically, assumptions for the topics mentioned are as follows:</p> <ul style="list-style-type: none"> • Water Supply. Appendix D: Water Supply Assessment (WSA) Table 1 shows the variety of land use assumptions in calculating water demands, including 1,000 housing units. • Wastewater Demand. Table 3.15-2 of the Draft EIR states that the wastewater demand is calculated based on Proposed Plan buildout water use estimates in the WSA with a 10% allowance for inflows and infiltration. • Solid Waste. Solid waste demand is based on countywide per capita factors as described in detail on page 487 of the Draft EIR, and as stated on that page, based on SDC population of 2,400. These per capita waste generation rates account for waste generation from all uses, not just residential. Because at buildout SDC is far fewer jobs relative to population compared to the county as a whole (Sonoma County has 0.49 jobs per resident presently whereas SDC is projected to have 0.38), the waste generation analysis is conservative. • School Student Generation. Student generation was calculated from the 780 non-senior units, consistent with information on pages 80 and 370 in

Commenter **Date** **Letter** **Comment**

Response

the Draft EIR.

- Transportation. The transportation analysis uses 1,000 housing units and 900 jobs.

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Sonoma Land Trust	9/26/2022	B11-11	<p>EIR at 77 states “While the project buildout projection reflects a reasonably foreseeable maximum amount of development for the Planning Area through 2040, it is not intended as a development prediction or cap that would restrict development in any of the five subareas. Rather, the Proposed Plan allows for flexibility in the quantity and profile of future development within and between subareas, as long as it conforms to the policies and standards, including permitted densities and FARs, in the Specific Plan” (emphasis added). This statement is problematic in that neither the Specific Plan nor the EIR identify what the maximum development potential for the Specific Plan would be at the permitted densities and FARs of each land use district. Therefore it is impossible to know the actual maximum buildout envisioned by the Specific Plan. Also, what five subareas does this this statement refer to?</p>	<p>The comment states that the EIR analysis is “problematic” because the Specific Plan and the EIR are based on a “reasonably foreseeable maximum amount of development in the Planning Area” rather than a “maximum development potential”. The Draft EIR follows well laid CEQA requirements in conducting the analysis. CEQA Guidelines Section 15064 states, “In evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment.” The population and jobs calculated represent the high end (approximately 80% of the maximum permitted densities/intensities). Furthermore, the Specific Plan outlines 1,000 housing units as the probable maximum development resulting under assumptions outlined. In a hypothetical situation where a developer provides more than the (already higher than the County required minimum elsewhere) minimum affordable housing and qualifies for and develops additional affordable housing, the additional affordable housing resulting would not be inconsistent with the Specific Plan, as that is a right to a developer available under State law. Therefore, the EIR includes language stating that amount of reasonable probable development anticipated should not be considered a “cap”. As an informational document, the Specific Plan EIR is required to study only reasonably foreseeable consequences. CEQA does not require an agency to assume an unlikely worst-case scenario in its environmental analysis. See page 4 of the DEIR for a description of subareas.</p>

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Sonoma Land Trust	9/26/2022	B11-12	Since the overall development capacity permitted by the Specific Plan is unclear, the subsequent analyses that rely on the unit count presented in the Project Description are therefore inaccurate. The unit counts identified in the Specific Plan and EIR are inconsistent and call into question analyses completed for the many of the impact areas, including the transportation section (VMT assessment), air quality and greenhouse gas emissions calculations, noise analysis, wildfire/emergency evacuation analysis, biological resources assessment, and utility needs assessment, among others. The failure to accurately describe the overall development capacity of the Project is a serious and pervasive deficiency, as it renders faulty the EIR's environmental impact analyses as well impacts. As a result of the understatement of development potential, the EIR understates the true impacts of the Project.	The comment is noted. Please see Table 4-4 of projected development in the Specific Plan.
Sonoma Land Trust	9/26/2022	B11-13	CEQA requires that the EIR analyze all elements of the project. But the EIR's Project Description omits key elements, preventing the reader from fully understanding the full scope of the Project and resulting in an EIR that fails to accurately assess the impacts of the Project. These deficiencies include the following: <ul style="list-style-type: none"> o The Specific Plan will be adopted along with amendments to the Sonoma County General Plan and Zoning Code, however details of the amendments and proposed zoning are not identified in the Project Description. 	The comment is noted. The Project Description indicates that the project includes a General Plan and Zoning Ordinance amendment in addition to the Specific Plan. The General Plan and Zoning Ordinance amendments are to add a General Plan land use designation and zoning designation for the Specific Plan and do not create impacts not studied or described in the DEIR.
Sonoma Land Trust	9/26/2022	B11-14	A portion of the Core Campus west of Arnold Drive is part of the Sonoma State Home Historic District and includes two individually contributing historic resources—the Sonoma House and the Main Building,	See Figure 4.3-1 in the Draft Specific Plan. Detailed square footage of all buildings is in Draft Specific Plan, Appendix B: Inventory of Buildings and Historic Status

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			<p>which is a National Historic Landmark. The Project Description identifies the total square footage of existing building square footage that will be retained for adaptive reuse (EIR at Table 2.5-3), but does not identify where the buildings are. Which buildings will remain and which buildings will be demolished?</p>	
Sonoma Land Trust	9/26/2022	B11-15	<p>What has been assumed for duration of site work, building demolition, and construction of new buildings as well as reuse of existing facilities? What is the phasing plan for the buildout of the Project? The Specific Plan provides only one concrete policy for phasing (Policy 4-3, which requires completion of at least 10,000 square feet of retail businesses and at least 200 housing units west of Arnold Drive before beginning construction of any housing east of Arnold Drive). But given that buildout will occur over a nearly 20 year period, phasing is critical and can ensure additional future construction occurs only if it will not result in additional significant environmental impacts.</p>	<p>Buildout of the Specific Plan will happen over 20 years. Section 7.4 of the Specific Plan: Recommended Phasing provides information on likely phasing. This information was used for the assumptions for duration of site work, building demolition, and construction of new buildings in the DEIR. The section notes that this is recommended phasing, and actual phasing will depend on market conditions and the project developers. See Section 2.5 of the DEIR regarding phasing assumptions.</p>
Sonoma Land Trust	9/26/2022	B11-16	<p>EIR at 59 notes “The site will have a system of distributed energy resources (DERs) that will generate electricity on-site, which could include solar, wind, geothermal, and methane gas co-generation, a process that captures and burns the potent methane gases that are emitted from solid waste, such as from landfills, wastewater treatment plants, dairies, and other facilities.” There is no land use</p>	<p>Figure 4.1-1 of the Draft Specific Plan shows location of utility buildings, and Table 4-3 shows districts where renewable energy facilities are permitted. Policy 6-19 of the Specific Plan gives examples of on-site co-generation, stating “... such as solar, wind, geothermal, biomass, and methane gas co-generation”. There is no specific requirement that any one of these types of energy generation be built, and if impacts from any specific generation facility will create new significant environmental</p>

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			<p>district in the Specific Plan that would allow a methane gas co-generation facility at SDC, so it is unclear where such a facility could be located. The Specific Plan and EIR contain a “Utilities” land use classification, but a gas co-generation facility is not identified in this category and there are no areas on EIR Figure 2.4-1 (Proposed Land Uses) that are designated “Utilities”. Where would this facility be located? Where are the impacts of a new methane co-generation facility analyzed? They do not appear to be addressed in any other sections of the EIR.</p>	<p>impacts, those would need to be evaluated in subsequent environmental reviews.</p>
Sonoma Land Trust	9/26/2022	B11-17	<p>Likewise, the Project Description and Utilities classifications omit geothermal, even though the SDC property has geothermal wells, which are not identified in the Specific Plan or EIR.</p>	<p>The comment is noted. The Project Description on page 59 mentions the site will have geothermal energy resources. Page 283 of the DEIR mentions natural geothermal influences in the area.</p>
Sonoma Land Trust	9/26/2022	B11-18	<p>There are existing uses outside of the Core Campus (in the agricultural area between the Core Campus and Hwy 12 and the current recreational uses on the west side of the SDC). Were they included in the baseline/existing conditions? What assumptions have been made regarding their continued operation and/or expansion of these uses?</p>	<p>The comment is noted. Existing uses outside the Core Campus area are included in the baseline/existing conditions of the DEIR. For example, the Project Description on page 53 states that there are some existing recreational uses in the Planning Area, including Camp Via and the Ropes Course in the western portion of the Planning Area. See Policy 2-1 regarding the future use of the preserved open space outside the core campus.</p>
Sonoma Land Trust	9/26/2022	B11-19	<p>The EIR repeatedly identifies the Core Campus as the focus of future development, but future uses and any improvements outside the core campus must be identified and analyzed as well – especially as they relate to impacts on sensitive resources. Since the General Plan</p>	<p>The comment is noted. See response to comment B11-18 regarding uses in the area outside the Core Campus and B11-13 regarding General Plan and Zoning Ordinance amendments.</p>

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Sonoma Land Trust	9/26/2022	B11-20	<p>amendment(s) and proposed rezoning(s) for the SDC site in its entirety is unknown, the permitted uses in areas outside the Core Campus is unclear. What land use changes are contemplated for areas outside of the Core Campus? What zoning, specific plan, and general plan land use designations will apply to SDC property outside of the Core Campus?</p> <p>A) The EIR does not fully describe the intensity and distribution of future residential and non-residential development. EIR Figure 2.4-1 identifies the location of future land use designations, but the Project Description should provide a summary table that identifies proposed land use districts, amount of land (acreage) with that designation, and the maximum development potential in that district (non-residential square foot and residential units). Without this information, it is not clear how residential units and non-residential square footage will be distributed throughout the site and what impacts that distribution might have.</p> <p>B) How many acres are identified in each land use designation? What is the maximum development potential for each land use category based on the acreage and allowed density (for both residential units and non-residential square footage)? How do the units and square footage overlay on the land use map provide a sense of development distribution throughout the Core Campus? How much development is allowed in more sensitive areas east of Sonoma Creek? How can the public and decisionmakers understand the actual impacts and correctly identify different areas and</p>	<p>The comment is noted. Regarding segment A), please see Project Buildout on page 77 of the DEIR and Figures 2.4-1 and 2.4-2. Additionally, Section 2.4.3.1 provides land use classifications and the associated density/intensity standards. Regarding segment B), Tables 2.5-1 through 2.5-3 provide buildout summaries of the Proposed Plan. East of Sonoma Creek is the proposed Agrihood neighborhood. As shown in the land use diagram, this area is designated as low/medium density residential and medium/flex density residential.</p>

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Sonoma Land Trust	9/26/2022	B11-21	subareas if the boundaries are to be determined? EIR at 51 states “Appendix A of the Specific Plan contains a Standard Conditions of Approval document that shall consist of conditions required to be implemented upon development of the Proposed Plan to mitigate potential environmental impacts. In addition, the Proposed Plan includes amendments to the County’s General Plan and Zoning Code.” Will all of the policies and standard conditions of approval that comprise mitigation to project impacts be adopted in a reporting program of some sort? How will the policies and standard conditions be enacted and implemented as effectively and with as much accountability as mitigation measures?	The comment is noted. Please see MR-1 and MR-9.
Sonoma Land Trust	9/26/2022	B11-22	EIR at 82 states that “the Proposed Plan would require the following approvals and discretionary and ministerial actions by the County of Sonoma: Adoption of ordinances, guidelines, programs, and other mechanisms for implementation of the Proposed Plan.” This is a very vague description of a long list of future actions that will need to be taken to ensure the successful implementation of the Specific Plan (and the policies/programs that are serving as mitigation for project impacts). CEQA Guidelines Section 15124(d) requires that the Project Description contain a “list of permits and other approvals required to implement the project,” so this section should be more detailed and clear. What specific ordinances, programs, and other implementation mechanisms are proposed for	The comment is noted. Please see MR-1 and MR-9. See response to comment B11-13 regarding General Plan and Zoning Ordinance amendments. <u>See also amended Policy 4-13: Sonoma County staff shall review all development to ensure consistency with the Specific Plan and all of the policies, conditions, and other requirements in the Specific Plan. To assist in this effort, the County shall prepare a checklist to be used for all proposed projects at the SDC site to ensure consistency with Plan policies and Supplemental Standard Conditions of Approval, as detailed in Appendix A. The Supplemental Standards of Approval should be updated by County staff over time to reflect changing conditions, new information, and compliance with changing local and State laws and guidelines.</u>

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Sonoma Land Trust	9/26/2022	B11-23	<p>adoption? What amendments to the Zoning Code and/or General Plan are contemplated with the adoption of the Specific Plan? What other County policy documents might be impacted/amended as a result of the Specific Plan?</p> <p>The comments presented below refer to and build on comments prepared by Prunuske Chatham, Inc. (“PCI Comments”) and Pathways for Wildlife (“Pathways Comments”) on the EIR and Specific Plan, attached below as Attachments B and C to Sonoma Land Trust’s September 26, 2022 letter to Brian Oh. The County must respond to these comments and the comments in Attachments B and C. The EIR fails to adequately analyze or mitigate the Project’s impacts on biological resources. The EIR’s analysis both understates the severity of the potential harm to biological resources within and adjacent to the proposed Project site and neglects to identify sufficient mitigation to minimize these impacts. What little analysis is present is not supported by data or substantial evidence. Given that analysis and mitigation of such impacts are at the heart of CEQA, the EIR must remedy these deficiencies to comply with CEQA. The “programmatic” nature of the proposed EIR is no excuse for a lack of detailed analysis. The EIR must provide an in-depth analysis of the Project, looking at effects as specifically and comprehensively as possible. Because it looks at the big picture, a program level EIR must provide more exhaustive consideration of effects and alternatives than an EIR for an individual action, and must consider cumulative impacts that might be slighted by a case-by-case analysis. Further, it is only at this early stage of the redevelopment of SDC that the County can design wide-ranging measures to mitigate County-wide environmental impacts. A “program” or “first tier” EIR</p>	<p>The comment is noted. Please see MR-1 and MR-9. The DEIR sufficiently analyzes impacts on biological resources. Chapter 3.4 assesses potential environmental impacts on existing biological resources, and Section 5.2.4 addresses cumulative impacts regarding the same. See Chapter 6 List of Preparers on page 611 of the DEIR. Multiple firms that specialize in this work have completed the DEIR pursuant to CEQA requirements.</p>

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			is not a device to be used for deferring the analysis of significant environmental impacts. It is instead an opportunity to analyze impacts common to a series of smaller projects, in order to avoid repetitious analyses. Thus, it is particularly important that the EIR for the Project provide detailed and comprehensive analysis of the existing conditions and the full range of development proposed by the Specific Plan, rather than deferring such analysis to when specific development is proposed at a later time. Meaningful analysis of impacts now would help inform the design and details of the Specific Plan to best minimize environmental impacts.	
Sonoma Land Trust	9/26/2022	B11-24	<p>The EIR fails to address Executive Order N-82-20, which establishes the state’s goal to conserve at least 30 percent of California’s land and coastal waters by 2030 with a particular focus on protecting and enhancing wildlife corridors.</p> <ul style="list-style-type: none"> o The Specific Plan proposes to permanently conserve approximately 755 acres of contiguous open space outside the Core Campus. How does this open space preservation fit within the State’s goals under Executive Order N-82-20? o The Sonoma Valley Wildlife Corridor encompasses over 10,000 acres of land stretching from Sonoma Mountain east across Sonoma Valley to the Mayacamas Mountains. It is a key linkage in a larger corridor from coastal Marin County to eastern Napa County. SDC lies at the heart of the Corridor. Since the 1990s, the Sonoma Valley Wildlife Corridor has been recognized as an area of significant wildlife presence and movement. The critical linkages and wildlife use have been well established by the scientific community.² Maintaining and enhancing the permeability of the Corridor and the ability of wildlife to use and disperse through SDC is therefore critical to meeting the 	<p>The comment is noted. By permanently preserving all open space outside the Core Campus as noted in the DEIR, the Proposed Plan would comply with the goals of the Executive Order. See also MR-7 regarding impacts on wildlife movement. The Proposed Plan would be required to comply with all relevant federal, State, regional and local regulations, including the Executive Order. Such regulations are outlined in the Regulatory Setting section starting on page 203 of the DEIR. Further, the Draft Specific Plan outlines numerous policies for the conservation of biodiversity resources at the site. This is outlined in the Biological Resources Impact Analysis starting on page 235 of the DEIR. The remainder of the comment relates to the Specific Plan and not the adequacy of the DEIR, thus no further response is required.</p>

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			<p>Project’s sustainability and open space conservation guiding principles and to ensure the viability and efficacy of other conserved lands in the Corridor throughout Sonoma County. E.g., EIR at 65 (Guiding Principle 3: “Integrate Development with Open Space Conservation.</p> <p>Promote a sustainable, climate-resilient community surrounded by preserved open space and parkland that protects natural resources, fosters environmental stewardship, and maintains and enhances the permeability of the Sonoma Valley Wildlife Corridor for safe wildlife movement throughout the site. Support responsible use of open space as a recreation resource for the community.”) (emphasis added). Given its recognized role in wildlife migration, how does the Specific Plan ensure protection and enhancement of the Sonoma Valley Wildlife Corridor pursuant to the Specific Plan’s guiding principles and Executive Order N-82-20?</p> <ul style="list-style-type: none"> o How would the Wildlife Corridor contribute to or impact the overall effect of land conservation efforts under Executive Order N-82-20? o Why does the EIR not address Executive Order N-82-20 or analyze the Project’s consistency with a mandate for conservation of biodiversity resources on stateowned property? o Is the Specific Plan consistent with Executive Order N-82-20? o Will the Specific Plan impact the State’s ability to meaningfully conserve at least 30 percent of California’s land and coastal waters by 2030 in Sonoma County? <p>How will the Specific Plan impact the effectiveness of conservation efforts under Executive Order N-82-20?</p>	

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Sonoma Land Trust	9/26/2022	B11-25	<p>A) There are significant information gaps regarding wildlife use at SDC that must be resolved to understand the scope of impacts from the proposed redevelopment. Obtaining this information will be critical to informing protection areas, buffer sizes, levels and location of development, and appropriate best management practices or improvements to avoid or minimize Project impacts. See generally PCI Comments; Pathways Comments.</p> <p>o For example, the EIR indicates that no site survey was completed to determine the presence or location of special-status or other species. The EIR cannot determine the impacts of development under the Specific Plan—the locations and footprints of which are known—until such survey is completed. E.g., PCI Comments at 13. The EIR should also make use of existing data sources, such as the species observation list previously shared by the Sonoma Ecology Center, which the EIR inexplicably ignores.</p> <p>B) o Similarly, the EIR does not include data regarding use of the Sonoma Valley Wildlife Corridor by special-status species or other wildlife. Pathways Comments at 10-11. The study proposal that Pathways for Wildlife prepared for Sonoma Land Trust, which was included in Sonoma Land Trust’s comments on the Notice of Preparation, is representative of the vetted and scientifically proven methodology for conducting wildlife connectivity studies. This type of study is necessary to be able to determine and analyze the Project’s impacts to Wildlife Corridor. The Sonoma Land Trust had offered to partner with the County and State to conduct this study so that this information would be available and could be used as part of the EIR,</p>	<p>The comment is noted. In response to segment A), the FEIR incorporates data shared by the Sonoma Ecology Center - see responses to letter B8. As noted on page 236 of the DEIR, no new field studies were conducted for the preparation of this EIR, because existing resources contained information on pertinent aspects of biological resources in the Planning Area at level of detail appropriate for a program level environmental assessment. Future project specific detailed biological surveys will be necessary to confirm presence or absence of sensitive resources on future development sites. Cumulative impacts related to biological resources are discussed in Chapter 5: CEQA Required Conclusions.</p> <p>In response to segment B), see also response to comment B11-90, B11-128, and B11-221.</p>

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			but their offer was not accepted prior to release of these documents.	
Sonoma Land Trust	9/26/2022	B11-26	<p>A) The County must first identify the information gaps that need to be filled in order to determine the impacts of the Project. For example, a detailed study is needed to establish a baseline of wildlife use on SDC prior to redevelopment. What other information gaps need to be filled in order to determine the impacts of the Project?</p> <p>B)</p> <ul style="list-style-type: none"> • How will the phased build-out of the Project induce or modify impacts to biological resources? • Would the impacts to biological resources be different if the Project were phased differently? • How would the impacts to biological resources vary if only a portion of the Project were built out? <p>C)</p> <ul style="list-style-type: none"> • How will the County determine whether redevelopment of SDC increases interference with wildlife movement or use within the property or across the larger corridor? What metrics will the County use to gauge impacts to wildlife movement? Which species will be analyzed? What specific performance standards must development meet to ensure that the Wildlife Corridor remains permeable and viable as development is phased in? 	<p>The comment is noted. In response to segment A), there are no significant information gaps. No new field studies were conducted for the preparation of this EIR, because existing resources contained information on pertinent aspects of biological resources in the Planning Area at level of detail appropriate for a program level environmental assessment. See MR-3 and response to comment B11-25.</p> <p>In response to segment B), construction and operational activity impacts of the Proposed Plan were analyzed under the Biological Resources Impact Analysis starting on page 235 of the DEIR pursuant to CEQA requirements.</p> <p>In response to segment C), regarding the wildlife corridor and performance standards see MR-7 and MR-9. Proposed policies and Standard Conditions of Approval would ensure that impacts to biological resources are less than significant. Alternatives analyzed in the DEIR, such as the Reduced Development Alternative, would also be less than significant with lesser impacts on biological resources than the Proposed Plan as identified in</p>

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			<ul style="list-style-type: none"> • How will the County ensure that SDC redevelopment does not result in a reduction of wildlife species diversity? • How will the County ensure that SDC redevelopment does not result in a reduction of wildlife species abundance? 	<p><u>Table 4.5-1. Case law suggests that the discussion of alternatives need not be exhaustive. CEQA Section 15126.6(f) states that the alternatives in an EIR should be governed by a “rule of reason.” If impacts are less than significant for an Alternative and the Proposed Plan, the DEIR need not define how much less significant impacts are.</u></p>
Sonoma Land Trust	9/26/2022	B11-27	<p>The EIR acknowledges that wildlife and their habitat may be considered sensitive to noise and other operational impacts. E.g., EIR at 337-338. The Specific Plan proposes more than 1,000 units of residential development in addition to commercial and visitor serving development. By contrast, in recent years, the human activity at SDC has been considerably reduced. Even before facility closure, the site only supported approximately 415 clients living there, 470,000 sf of client housing, 49,000 sf staff housing, and 643,400 sf offices, shops, etc. California Department of Developmental Services. (2012). Sonoma Developmental Center Building Use Survey. Department of Developmental Services. October 2012.</p> <ul style="list-style-type: none"> o Do the impacts identified by the EIR scale in a linear fashion based on the amount of development, the number of residents, and the extent of human activity at operation? o How did or will the County quantify the change in magnitude of operational impacts by virtue of the significant increase in population and operational activities under the Specific Plan as compared to a recent baseline? 	<p>Construction and operational activity impacts of the Proposed Plan were analyzed under the Biological Resources Impact Analysis starting on page 235 of the DEIR pursuant to CEQA requirements. Regarding the wildlife corridor and performance standards see MR-7 and MR-9. Proposed policies and Standard Conditions of Approval would ensure that impacts to biological resources are less than significant. Regarding noise impacts, see response to comments B11-225 and B11-227. <u>See section 7.4 of the Specific Plan: Recommended Phasing provides information on likely phasing. This information was used for the assumptions for duration of site work, building demolition, and construction of new buildings in the DEIR. The section notes that this is recommended phasing, and actual phasing will depend on market conditions and the project developers. See Section 2.5 of the DEIR regarding phasing assumptions.</u></p>

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Sonoma Land Trust	9/26/2022	B11-28	<p>The EIR fails to identify a consistent baseline against which the Project is evaluated. Selection of an appropriate baseline is particularly important in this case because the SDC property has been gradually vacated since the 1960s, as facility operations wound down and the facility ultimately closed in 2018.3 In the meantime, development of the surrounding area has proceeded with reduced assumptions about the level of human activity at SDC—for example, evacuation capacity of roadways, levels of sewer service, water use, and recreation. Further, SDC’s historic operations are not a reliable benchmark for the intensity of the proposed Project, as the former institutional use did not have the same level of impacts as proposed residential and commercial development. SDC residents did not drive cars and the employees operated in shifts, reducing traffic and other impacts. Estimates of this Project’s impacts should therefore be made based on comparisons to recent, rather than historic, site occupation and use.</p>	<p>The comment is noted. While there is no direct perfect comparison for new residents at the SDC site, the historical numbers are provided to give contextual reference to the fact that the site has been previously developed and has served as a home to a substantial population of residents and employees previously. The baseline used for impact analysis in the DEIR is 2022 unless otherwise noted.</p>
Sonoma Land Trust	9/26/2022	B11-29	<p>With respect to biological resources, the EIR fails to adequately describe the baseline condition of the Sonoma Valley Wildlife Corridor.</p> <ul style="list-style-type: none"> o The EIR provides no data regarding actual use of the Wildlife Corridor by individual species. o The EIR does not analyze whether or how the gradual reduction in human activity at SDC since the 1960s has changed the operational characteristics of the Wildlife Corridor. 	<p>The comment is noted. The DEIR adequately describes current conditions of the wildlife corridor on page 235 of the DEIR. Special-status species in the area are noted in Tables 3.4-1 to 3.4-3. See MR-7 and response to comment B11-224 regarding impacts on wildlife movement. See response to comment B11-28 regarding the baseline used.</p>

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			<ul style="list-style-type: none"> o The EIR does not provide data or analysis to show whether or how increasing human activity in the Core Campus in excess of historic levels will impact wildlife movements within and through the Wildlife Corridor. 	
Sonoma Land Trust	9/26/2022	B11-30	<p>A) The EIR acknowledges that wildlife and their habitats may be sensitive to noise impacts. EIR at 337-338. However, the EIR fails to analyze or mitigate for noise impacts to these specific sensitive receptors.</p> <ul style="list-style-type: none"> o The EIR relies on quantitative thresholds from the CEQA guidelines, but it fails to analyze or explain whether these thresholds are applicable to wildlife or habitat receptors. EIR at 345-346. o The EIR’s vibration threshold only contains standards for human receivers and structures. EIR at 346. It is silent as to what constitutes a significant impact to wildlife or habitat. o The Specific Plan policies that “address noise” ignore wildlife and habitat receptors. <p>§ Policy HAZ-1 defines “noise-sensitive receiver” as “residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors.” EIR at 347.</p> <p>§ Policy HAZ-1 does not impose standards for nighttime construction noise that are designed to reduce impacts to wildlife or habitat. EIR at 347-348.</p> <p>§ Policy HAZ-2 establishes quantitative vibration standards only with respect to humans and structures. Policy HAZ-2 does not establish quantitative vibration standards designed to reduce impacts to wildlife or habitat. EIR at 348-349. Notwithstanding that the</p>	<p>The comment is noted. In response to segment A), as described in the Impact Analysis starting on page 349 of the DEIR, compliance with regulatory requirements and implementation of proposed policies and Standard Conditions of Approval would mitigate impacts on noise-sensitive receivers to a less than significant level. Since wildlife is considered a noise-sensitive receptor as stated on page 337 of the DEIR, the significance thresholds pursuant to CEQA incorporate wildlife into the Noise Impact Analysis. Measures HAZ-1 and HAZ-2 develop standards that protect noise-sensitive receivers which would inherently include wildlife. Further, Policy 2-11 implements "dark skies" standards which would mitigate light impacts on wildlife. Regarding noise impacts, see also response to comments B11-225 and B11-227.</p> <p>In response to segment B), the designation of mountain lion as a Specially Protected Mammal makes it subject to rules under California Fish and Game Code specific to actions that would intentionally take and/or result possession of a mountain lion. Its most notable use is a prohibition of recreational hunting for the species. Mountain lion is not listed on CDFW's special animal list and was not considered a special status species for the purposes of this evaluation because the project does not have potential to result in intentional take or</p>

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			<p>Specific Plan defines “noise-sensitive receiver” to exclude wildlife or habitat, the EIR concludes that construction noise impacts to “noise-sensitive receivers, such as Special Status species and their habitat ... would be less than significant” because, inter alia, nighttime construction noise would be subject to the Sonoma County General Plan 2020 noise standards. EIR at 349-350. This conclusion is unsupported and is contradicted by the Specific Plan. Per Policy HAZ-1, nighttime construction noise is only subject to the Sonoma County General Plan 2020 Table NE-2 standards “If construction activities occur ... within 0.5 miles of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors).” EIR at 347.</p> <ul style="list-style-type: none"> • Project-generated noise is a particular concern because noise has been shown to modify the behavior of species that are present at or are similar to those present at the SDC site. Noise can affect the spatial distribution of wildlife and can cause changes in predation and other critical behaviors. If project-generated noise were to alter the dispersal of wildlife through the Sonoma Valley Wildlife Corridor or otherwise substantially affect the behavior of special-status species or species of concern, those impacts would constitute significant impacts under the EIR’s chosen significance thresholds. See Biological Resources Criterion 1 (a significant impact is one that causes a “substantial adverse effect ... on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service”); see also Biological Resources Criterion 4 (a significant impact is 	<p><u>possession of a mountain lion and Sonoma County CEQA analysis of special status species typically do not include mountain lion. As the comment indicates, some populations are currently being assessed for listing, though the Sonoma County population is not one of these.</u></p>

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Sonoma Land Trust	9/26/2022	B11-31	<p>one that affects movement of wildlife through a wildlife corridor). The EIR must therefore analyze a range of noise-related impacts and other operational impacts in detail to ensure that those impacts will not constitute unmitigated significant impacts.</p> <p>B)</p> <ul style="list-style-type: none"> o Mountain lions in particular are known to be sensitive to noise. Mountain lions have been documented using the Sonoma Valley Wildlife Corridor through the SDC property. Mountain lions are also a species of concern, facing significant threats in the Bay Area and around the state. The EIR does not even acknowledge the presence of mountain lions at the SDC site, let alone analyze and mitigate impacts to mountain lions. Because mountain lions are designated as a “Specially Protected Mammal” by the California Department of Fish and Wildlife, impacts to mountain lions could constitute significant project impacts under Biological Resources Criterion 1. The EIR must study and mitigate potentially significant impacts to mountain lions. o Similar considerations apply to the project’s light impacts. The EIR must document wildlife dispersal through the SDC site and compare those data to the Project’s various development plans in order to analyze the Project’s construction and operational light impacts to biological resources. 	<p>The comment is noted. Please see MR-7 regarding impacts of the Proposed Plan on wildlife movement. See also response to comment B8-3, B8-15, B8-16, B8-19, and B11-99 for wildlife corridor policy amendments. See also MR-3; individual developments, such as the Highway 12 connector, would be subject to separate CEQA review.</p>

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			indirect, and cumulative impacts on the Project’s biological resources, including wetlands, drainages, and the Sonoma Valley Wildlife Corridor. How does the EIR propose to address and mitigate the impacts of these connectors?	
Sonoma Land Trust	9/26/2022	B11-32	Given intensity of proposed development and SDC's proximity to major regional parks, including Sonoma Valley Regional Park to the northeast and Jack London State Historic Park to the west, it is foreseeable that the Project’s biological and other impacts will extend to and impact resources in those parks. The EIR must consider the impacts of the Project on biological resources within existing parks, including but not limited to impacts to biological resources from the increased water demand that would result from the construction, occupation, and operation of more than 1,000 residential units, a hotel, and other facilities.	The comment is noted. The Draft EIR follows well laid CEQA requirements in conducting the analysis. CEQA requires (see, for example, CEQA Guidelines Section 15064), which states, “In evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment.” As an informational document, the Specific Plan EIR is required to study only reasonably foreseeable consequences. CEQA does not require an agency to assume an unlikely worst-case scenario in its environmental analysis. See Section 5.2 for an analysis on cumulative impacts on biological resources, public services and recreation, and utilities and service systems. See also MR-5 regarding the water supply analysis.
Sonoma Land Trust	9/26/2022	B11-33	A) The EIR fails as an informational document because it does not analyze the Project’s significant unmitigated environmental effects before identifying mitigation measures and analyzing their effectiveness. The County cannot condense these two steps into one or disguise mitigation actions as project features. Even if mitigation measures can be implemented as features of the Project, the EIR must evaluate the Project’s true impacts without those measures in place before it can propose, analyze, and adopt needed mitigation. The EIR here	The comment is noted. In response to segment A), see MR-1. The DEIR adequately describes baseline conditions pursuant to CEQA requirements. As noted on page 236 of the DEIR, no new field studies were conducted for the preparation of this EIR, because existing resources contained information on pertinent aspects of biological resources in the Planning Area at level of detail appropriate for a program level environmental assessment. Future project specific detailed biological surveys will be

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			<p>skips this crucial step and fails to connect the dots between the Project’s impacts and selected “mitigation.” As a result, decisionmakers and the public do not know what the Project’s unmitigated impacts would be or how the cited policies and conditions would purport to mitigate those impacts.</p> <ul style="list-style-type: none"> o The EIR fails to describe fully the environmental setting of the Project. An EIR’s description of a project’s environmental setting crucially provides the baseline physical conditions by which a Lead Agency determines whether an impact is significant. Here, the EIR fails to accurately portray the site’s underlying environmental conditions and therefore undercuts the legitimacy of the environmental impact analysis. <p>§ For example, the EIR judges impacts to biological resources primarily by estimating impacts to special-status plants and wildlife. EIR 221-251. But the EIR does not include any observational data regarding the presence or absence of these species. Id.</p> <ul style="list-style-type: none"> • The EIR relies exclusively on the California Natural Diversity Database to “identify special-status species with the potential to occur in the SDC area.” EIR at 221 (emphasis added). By definition, the species identified in the EIR may not occur in the SDC area. Likewise, as the EIR admits, the EIR’s identification of special-status species may be under-inclusive. Id. (“Lack of information in the CNDDDB and other reports ... does not imply that the species does not occur... This lack of information may reflect a lack of Project or reporting more than absence of special status species. Thus, there may be additional occurrences of special-status species within this area that have not yet been surveyed and/or mapped.”). • Surveys for sensitive plant and animal species are entirely absent. 	<p>necessary to confirm presence or absence of sensitive resources on future development sites.</p> <p>In response to segment B), see response to comments B8-2 and B8-18 regarding wetland delineation policy amendments. See also MR-3 and MR-9.</p>

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			<ul style="list-style-type: none"> • Instead, the EIR improperly defers critical studies and surveys until after project approval. • The EIR cannot identify what the impacts to specific special-status species will be or how significant those impacts will be, because the EIR cannot state with any degree of certainty whether or to what degree those species are present in the areas planned for development. <p>B)</p> <ul style="list-style-type: none"> • The EIR cannot remedy its lack of analysis by punting to “[f]uture project specific biological surveys [that] will be necessary to confirm presence or absence of sensitive resources on future development sites.” EIR at 237. The Specific Plan is incredibly detailed. It shows specifically where different types of development will be located within the Core Campus and describes in detail what each type of development will look like. E.g., EIR at 69-80. The Specific Plan breaks the Core Campus into development districts (EIR at 74) and identifies building square footage for commercial, hotel, office, public, institutional, and utility use (EIR at 80). In short, the County already knows what types of development could occur under the Specific Plan and substantially where those different types of development would occur. The EIR cannot avoid analyzing the foreseeable impacts of that development simply because more granular analysis may later be required. The EIR similarly indicates that the Project may impact wetlands and other waters. EIR at 235. However, the EIR admits that “formal wetland delineations have not been performed for the SDC and it is anticipated that additional wetlands will be mapped during future site assessments.” Id. The EIR cannot analyze or explain what the impacts to wetlands will be, how significant those impacts will be, or even if development will be possible in the areas planned for 	

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			<p>development if the EIR does not know where wetlands are located on the SDC site.</p> <ul style="list-style-type: none"> o The EIR improperly defers analysis of Project impacts until later stages of development and fails to explain how it reaches its conclusion that impacts will be less than significant. 	
Sonoma Land Trust	9/26/2022	B11-34	<p>A) The EIR’s impact methodology violates CEQA because it does not actually disclose or analyze any particular impacts. It simply states without analysis, explanation, or substantial evidence that certain unspecified impacts may occur. Decisionmakers and the public thus lack sufficient information about the nature and scope of potential impacts to evaluate those impacts for themselves.</p> <p>B) • For example, the EIR states that “[t]wo specific projects could have the potential to impact special status species and sensitive natural communities. The proposed Highway 12 connector project would follow Sonoma Creek in a southerly direction, and then proceed east adjacent to the open space area outside the SDC core area.” EIR at 241. The EIR concludes that “[w]ith implementation of Station Conditions of Approval BIO-1 through BIO-13, potential impacts would be less than significant.” Id. But at no point does the EIR disclose what potential impacts the Highway 12 connector project could have on special status species or sensitive natural communities. Decisionmakers and the public have no way of knowing whether the connector threatens habitat loss, increased mortality from vehicle</p>	<p>The comment is noted. In response to segment A), the DEIR methodology is pursuant to CEQA requirements for a programmatic EIR. See MR-3.</p> <p>In response to segment B), the 'two specific projects' noted on page 241 of the DEIR are both related to the Highway 12 connector. See also MR-7.</p>

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			<p>strikes, or something altogether different. And without knowing what the impact is, decisionmakers cannot know what it is that Conditions of Approval BIO-1 through BIO- 13 are supposed to be mitigating. Equally significant, the EIR does not disclose what the second of the “[t]wo specific projects” that threaten impacts is. Decisionmakers and the public are left to guess.</p> <ul style="list-style-type: none"> o What specifically are the anticipated impacts of the Highway 12 connector? o How will Conditions of Approval BIO-1 through BIO-13 mitigate those impacts? o What is the second specific project that could impact special status species and sensitive natural communities? o What specifically are the anticipated impacts of that second project? o How will Conditions of Approval BIO-1 through BIO-13 mitigate those impacts? 	
Sonoma Land Trust	9/26/2022	B11-35	<p>The EIR also states that “stream restoration and bridge maintenance projects are expected within aquatic features, [so] direct impacts would occur.” EIR at 252. But the EIR fails to elaborate about what those “direct impacts” might include.</p> <ul style="list-style-type: none"> o What specific impacts are anticipated from stream restoration and bridge maintenance projects? o How frequently are such projects anticipated to occur and at what locations? • The EIR states that the Project would not have a substantial adverse effect on state or federally protected wetlands in part because no new ground-disturbing activities would occur during Project operation. But the EIR does not discuss or analyze potential operational impacts to wetlands from recreation or other non-construction activities during Project operation. EIR at 254. 	<p>The comment is noted. Implementation of the Proposed Plan may result in the degradation or removal of riparian habitat identified within a given project area. Please see response to comment B9-7 regarding how the Proposed Plan reduces riparian habitat impacts. Policy 2-14 would prohibit all unleashed outdoor cats, and restrict off-leash dogs and other domestic animals to private fenced yards and designated areas to mitigate impacts to a less than significant level.</p>

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			o The Specific Plan proposes using known wetlands for recreational purposes. E.g., Specific Plan at 2-2 (“Designating an area at Suttonfield Lake for off-leash dogs and water recreation...”). What are the specific anticipated impacts from recreational uses and off-leash dog use at Suttonfield Lake?	
Sonoma Land Trust	9/26/2022	B11-36	<p>A) The EIR states that “[i]mplementation of the Proposed Plan would have a significant impact on migratory species, corridors, or nursery sites if the siting, construction, or operation of development allowed under the Proposed Plan would impede on or remove migratory corridors or nursery sites.” EIR at 255. The EIR then concludes that the Project would not impede migratory corridors or nursery sites. Id. But the EIR never defines what level of imposition rises to the level of a significant impact. Id. The EIR states that “recreational trails, in or near habitats that include wildlife corridors ... are considered to be uses consistent with open space management and are not considered substantial impacts to the wildlife corridor functionality of the site.” Id. But the EIR’s conclusory statements provide no data or analysis about the impact of recreational trails or other uses on wildlife behavior, especially if over 2000 new residents and 900 employees significantly expand public use and recreation. The EIR’s conclusions are not supported by substantial evidence.</p> <p>B) • The EIR next concludes that the “Proposed plan does not conflict with local ordinances, therefore, impacts related to conflict with local policies or ordinances would be less than significant.” EIR at 257. However, the EIR does not identify specific local policies or ordinances against which the Project was analyzed. It</p>	<p>The comment is noted. In response to segment A), see MR-3 and MR-7. See response to comment B11-25 and B8-1.</p> <p>In response to segment B), as noted on page 257, future projects under the Proposed Plan would conform with all local policies and ordinances. This includes any regulatory regional or local requirements, such as the Sonoma County Code.</p>

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			<p>simply states that the “[f]uture projects under the Proposed Plan would conform with local policies and ordinances including the Sonoma County Tree Protection Ordinance and the Sonoma County General Plan.” Id. The EIR’s so-called “analysis” fails to mention other local rules and policies that the EIR identified as applicable to the Project, including the County Heritage or Landmark Tree Ordinance or the Valley Oak Habitat Combining District (EIR at 210). Nor does the Biological Resources section discuss or analyze the Project’s consistency with Measure K, through which Sonoma County residents renewed protections for community separators and protected tens of thousands of acres of open space and agricultural land from subdivision and sprawl. EIR at 207-212. Without substantial evidence of consistency—or at least a more complete accounting of applicable policies and regulations—the EIR’s consistency determination is just a conclusory statement. See EIR at 257. Decisionmakers and the public cannot independently verify the Project’s consistency with local rules and regulations, and the EIR fails as an informational document.</p>	
Sonoma Land Trust	9/26/2022	B11-37	<p>The EIR does not explain why its selected significance criteria are relevant or appropriate.</p> <ul style="list-style-type: none"> • The EIR identifies six significance criteria for impacts to biological resources, but fails to explain why these criteria were selected. EIR at 236. The EIR neither discloses the origin of these criteria nor provides data or analysis to support their use as significance thresholds under CEQA. Due to this lack of evidence, decisionmakers and the public cannot meaningfully gauge whether the EIR’s significance criteria are adequate markers of the Project’s environmental impacts. • How did the County select its chosen significance 	<p>The comment is noted. Biological Resource significance thresholds criteria are directly from Appendix G of the CEQA Guidelines.</p>

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			<p>criteria?</p> <ul style="list-style-type: none"> • Why were other significance criteria not considered? 	
Sonoma Land Trust	9/26/2022	B11-38	<p>A)</p> <p>The EIR’s approach to mitigation presents two issues. First, the EIR evades responsibility for developing, enforcing, and monitoring mitigation measures by incorporating its chosen mitigation directly into the Specific Plan. The EIR cannot disclose the Project’s “unmitigated” impacts because, under the EIR’s approach, no impacts have gone unmitigated. Second, the purported mitigation that County incorporates in the Specific Plan punts to uncertain future actions and thus defers the analysis and development of any meaningful mitigation to a later date. By incorporating deferred mitigation into the Specific Plan, the EIR cannot meaningfully analyze what mitigation may be appropriate or how effective that mitigation may be. In so doing, the EIR denies decisionmakers and the public the opportunity to fully understand the Project’s impacts and improperly delegates the County’s legal responsibility to mitigate those impacts. The EIR relies on Specific Plan policies and Conditions of Approval to avoid, reduce, or mitigate the Project’s potentially significant impacts. The EIR must therefore treat these policies and conditions as formal mitigation measures. It must analyze fully the effectiveness of the mitigation against specific identified impacts and must include the mitigation measures in a Mitigation Monitoring and Reporting Program.</p> <ul style="list-style-type: none"> • The EIR’s conclusions as to the effectiveness of mitigating policies and conditions are not supported by analysis or substantial evidence. They are simply a means by which the EIR avoids identifying or analyzing the Project’s unmitigated impacts, as required by CEQA. This approach fails to disclose unmitigated 	<p>The comment is noted. In response to segment A), see MR-1 regarding the adequacy of a self-mitigating plan and MR-3 regarding the programmatic nature of the DEIR. See also MR-9 regarding mitigation monitoring and deferred mitigation. See also response to comment B8-1 and B10-9.</p> <p>In response to segment B), impacts from hazards and hazardous materials, fire risk, noise and vibration, and lighting are analyzed in sections 3.1, 3.8, 3.16, and 3.11 pursuant to CEQA threshold requirements.</p>

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			<p>impacts and fails to support the County’s chosen mitigation.</p> <ul style="list-style-type: none"> o For example, the EIR concludes that with the implementation of Specific Plan Policies 2-6 through 2-26 and Conditions of Approval BIO-1 through BIO-13, “the impact of future development under the Proposed Plan on species identified as candidate, sensitive, or special-status species would be less than significant.” EIR at 242. But the EIR neither identifies specific impacts that the Project will have on specific candidate, sensitive, or special-status species, nor explains how or to what degree the cited policies and conditions would reduce those impacts. EIR at 241-251. § What analysis supports the County’s conclusion that Specific Plan Policies 2-6 through 2-26 and Conditions of Approval BIO-1 through BIO-13 would reduce impacts to special-status species to less-than-significant levels? § How can the County conclude that the cited policies and conditions will reduce impacts if it has not yet identified and analyzed those specific impacts or the impacted species? § How does the County anticipate the cited policies and conditions would reduce impacts to special status species? o Similarly, the EIR asserts that “implementation of policies 2-25, 2-27, 2-29, and 2-30 would ensure impacts to riparian resources [from the proposed highway connector project] would be less than significant.” EIR at 252. But again, the EIR fails to identify what specific impacts the connector road would have or indicate how and to what degree the cited policies would mitigate those impacts. <p>B)</p> <ul style="list-style-type: none"> o The EIR further asserts that the “implementation of 	

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Sonoma Land Trust	9/26/2022	B11-39	<p>applicable policies” would render “the operational impact on riparian habitat and other sensitive activities ... less than significant.” EIR at 252. The EIR asserts that applicable policies would restrict access by humans and domestic animals to specific areas and would reduce the trampling or degradation of riparian habitat. But the EIR is silent about other potential and foreseeable impacts, such as litter, fire risk, noise, lighting, and vibration.</p> <p>A) To the extent the Specific Plan policies and Conditions of Approval cited in the EIR could mitigate for the Project’s impacts, that mitigation is impermissibly deferred.</p> <ul style="list-style-type: none"> • For example, Condition of Approval BIO-14 improperly relies on existing regulatory programs and the permitting processes of other agencies to “[a]void, minimize, or mitigate for impacts to aquatic communities.” EIR at 252. In so doing, the County delegates its legal responsibility to assess and mitigate Project impacts to “the Army Corps, RWQCB, [or] CDFW.” Condition of Approval BIO-14 defers to the issuer of any required permit(s) to design appropriate mitigation and provides no clear benchmark or performance standard(s) that that mitigation must meet. Unless the County is the permitting agency, Condition of Approval BIO-14 does not clearly provide for County oversight of this process. Such delegation of authority to analyze and mitigate environmental impacts is improper. • Similarly, Condition of Approval BIO-16 requires the Project Sponsor to develop a habitat mitigation plan subject to approval by the agency or agencies with oversight over any impacted aquatic resource. EIR at 254. That Condition defers to the habitat mitigation plan—and therefore the Project Sponsor(s) and other 	The comment is noted. In response to segment A), please see MR-1, MR-3 and MR-9. In response to segment B), see B11-25 and B11-26.

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			<p>agencies—to analyze the scope and effect of the impact to aquatic resources and to design appropriate mitigation. Here, too, the County improperly delegates its legal responsibility to future developers and regulators and fails to provide concrete performance standards for resulting mitigation. Analysis of impacts and mitigation cannot be deferred to a later date but must be performed prior to project approval. Nor may a lead agency satisfy CEQA by approving a project subject to conditions requiring the applicant to prepare future studies and mitigation measures, because in so doing the agency would be improperly delegating its legal responsibility to assess a project’s environmental impact. Instead, the lead agency itself must prepare or contract for the preparation of impact assessments that reflect the agency’s independent judgement. Where the finalization of mitigation is deferred, the EIR must explain why it cannot be finalized now and must establish performance standards for such mitigation that will ensure the impact will be reduced to a less than-significant level. How does the EIR here meet these requirements?</p> <p>B) § The EIR’s conclusions that impacts to biological resources are insignificant is unsupported by either meaningful analysis or substantial evidence.</p>	
Sonoma Land Trust	9/26/2022	B11-40	<p>Even if the EIR could mitigate impacts through Specific Plan policies and conditions of approval, the policies and conditions identified in the EIR are not sufficient to avoid potentially significant impacts.</p> <ul style="list-style-type: none"> o The EIR failed to conduct field studies or survey plants and wildlife at the SDC site. EIR at 221, 236. The EIR therefore admits that there may be special-status 	The comment is noted. See response to comment B8-1 and response to comment B11-25 and B11-26.

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			<p>plants and wildlife present on site that are not accounted for in the EIR’s list of special-status species. EIR at 221. However, the EIR concludes that “[i]mplementation of the Proposed Plan would not have a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status species” because future development will comply with standard conditions of approval that target special-status species. EIR at 241-251 (BIO-2 [special-status bats], BIO-3 [American badger], BIO-4 [nesting raptors], BIO-5 [burrowing owl], BIO-6 [northern spotted owl], BIO-7 [tricolored blackbird], BIO-8 [special status nesting birds], BIO-9 [western pond turtle], BIO-10 [foothill yellow-legged frog, red-bellied newt, and California giant salamander], BIO-11 [California red-legged frog], BIO-12 [California freshwater shrimp and listed salmonids], BIO-13 [special-status plants]. Even if these conditions of approval were sufficient to address the named special-status species, they would not address impacts to candidate, sensitive, or special-status mammals, reptiles, or amphibians that may be present in the SDC area but which may not be captured in the EIR’s list of special-status species. See EIR at 221. The County simply cannot know, and EIR cannot analyze, whether and to what degree the Project may impact as-yet unidentified</p>	

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Sonoma Land Trust	9/26/2022	B11-41	<p>special-status species until the County conducts appropriate surveys.</p> <p>The EIR’s analysis and mitigating policies and conditions focus only on construction impacts. See, e.g., Conditions of Approval BIO-1 through BIO-14. But operational impacts could be equally if not more significant.</p> <p>§ For example, significantly increased recreational uses from thousands of new residents and workers near the Wildlife Corridor or Suttonfield Lake could have potentially significant impacts to wildlife movement, wetlands, or special-status species by locating hikers and pets near critical habitat. The EIR generally assumes these impacts are less than significant because recreational uses are broadly consistent with open space management principles. But consistency with open space management principles does not necessarily mean that these uses would not negatively and significantly impact habitat or wildlife behavior. Increased visitor use along trails across SDC may alter behaviors and cause some species to avoid those areas.</p> <p>§ Increased vehicular traffic that results from the development would also likely increase human-wildlife interactions. Wildlife are already documented to traverse Highway 12. How will development under the Specific Plan contribute to and mitigate the risk of vehicular collisions? How will increased traffic change wildlife behavior in the Sonoma Valley Wildlife Corridor and throughout the SDC site? The EIR cannot presently answer these questions because it has not analyzed the operational impacts of the Project on wildlife.</p> <p>§ The surveys and related work discussed in Conditions of Approval BIO-1 through BIO-14 only apply when development is occurring. They do not continue to apply during Project operation and thus cannot mitigate</p>	<p>The comment is noted. The DEIR Impact Analysis on Biological Resources also accounts for operational activities, see section 3.4.3.4, and it was determined that these impacts are less than significant. See also MR-3 regarding the programmatic nature of the DEIR. See MR-6 regarding traffic impacts and MR-7 regarding impacts on wildlife movement.</p>

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			operational impacts that are driven simply by the presence of humans and human activity. The EIR must analyze and mitigate operational impacts in addition to construction impacts.	
Sonoma Land Trust	9/26/2022	B11-42	<p>The EIR relies on policies and conditions that are vague and unenforceable. The EIR fails to show how these vague and unenforceable policies and conditions could definitively avoid or mitigate potential significant impacts to biological resources.</p> <p>§ Specific Plan Policy 2-7: Prohibit lights within the wildlife corridor and along the creek corridor.</p> <ul style="list-style-type: none"> • This policy prohibits lights from being physically located within the wildlife corridor and along the creek corridor, but it does not clearly prohibit light intrusion into the wildlife corridor or the creek corridor from lights located outside the corridors. Without prohibiting light intrusion, the EIR cannot show that project lighting will not impact biological resources in the wildlife and creek corridors. <p>§ Specific Plan Policy 2-8: Maintain wildlife crossing structures by periodically checking for and clearing debris, vegetation overgrowth, and other blockages from culvert and bridge crossing structures; within the Core Campus, the Project Sponsor should develop and execute a maintenance program in collaboration with the owner and operator of the preserved parkland and open space.</p> <ul style="list-style-type: none"> • This policy is vague and unenforceable. It provides only that the Project Sponsor “should develop and execute a maintenance program.” There is no guarantee that a maintenance program will be developed or executed. 	<p>The comment is noted. Please see MR-1, MR-3 and MR-9. Impacts on biological resources were determined to be less than significant with compliance to federal, State, regional, and local regulations as well as proposed policies and Standard Conditions of Approval. See also Impact 3.1-4 regarding light and glare. Proposed policies 5-32, 5-39, and 5-43 would maintain a thick buffer of vegetation in order to buffer lights to protect wildlife within the preserved open space areas and implement dark-sky requirements for all public realm lighting and all new buildings on the site. With adherence to existing and proposed policies and standards, development under the Proposed Plan would not substantially increase the amount of nighttime lighting or glare in the already previously developed Core Campus or surrounding open space areas. Impacts associated with light and glare would be less than significant. See also Policy 2-1 which has been amended to state: “Ensure that land shown In Figure 2.2-1 as Preserved Open Space is dedicated or maintained as permanent public open space, and the Managed Landscape/Fire Buffer is designed and maintained for that purpose. The owner/operator of the Preserved Open Space shall prepare an open space plan, to be approved by the County to manage the rich diversity of resources on site, including habitat, vegetation, wetlands, native species, and other critical resources, balanced with recreation and wildfire protection needs. As part of the open space plan development, conduct a formal</p>

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Sonoma Land Trust	9/26/2022	B11-43	<p>Specific Plan Policy 2-10: Within the wildlife corridor, limit mowing and the removal of dead plant material to the absolute minimum required for fire safety. If possible, mowing should be conducted outside the nesting bird season, or nesting bird surveys should be constructed within 14 days of mowing.</p> <ul style="list-style-type: none"> • This policy is vague and unenforceable. It states that mowing should be conducted outside the nesting bird season and that nesting bird surveys should be “constructed” within 14 days of mowing only if possible. As an initial matter, it is not clear what it means for a nesting bird survey to be “constructed.” Surveys must be completed within an appropriate time of any mowing activity in order to adequately inform whether and how that mowing activity is conducted. Further, this policy provides no indication what entity will be responsible for determining whether nesting bird surveys are possible or whether it is possible to mow outside of the nesting season. <ul style="list-style-type: none"> o Who does the County envision will be responsible for those decisions? o What sort of oversight will the County, the Project proponent, the owner, etc. have to ensure this policy is actually complied with? o What are the impacts to nesting birds if it is not possible to avoid mowing during the nesting bird season or if it is not possible to conduct timely surveys? 	<p><u>aquatic resources delineation for habitat protection, and consider delineating a cohesive system of trails and pathways that balances recreation and wildlife conservation.”</u></p> <p>The comment is noted. Please see MR-1, MR-3 and MR-9. Impacts on biological resources were determined to be less than significant with compliance to federal, State, regional, and local regulations as well as proposed policies and Standard Conditions of Approval. <u>Development impacts to nesting birds could result in loss of suitable habitat or harm to the birds. Specifically, see Standard Conditions of Approval BIO-4 through BIO-9 regarding potential impacts to nesting birds and measures in place to reduce such impacts to a less than significant level.</u></p>

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Sonoma Land Trust	9/26/2022	B11-44	<p>A) Specific Plan Policy 2-15: Collaborate with local wildlife protection groups to create and distribute educational information and regulations for residents and employees to guide safe interactions with wildlife onsite. Materials should be accessible to all ages and abilities and could include posted signs, disclosures, fliers, or informational sessions, among other things.</p> <ul style="list-style-type: none"> • This policy is vague and unenforceable. Materials must be accessible to all ages and abilities (not should). • How will the County gauge compliance with this policy? • How will the County enforce compliance with this policy and regulations? • Until the County identifies what regulations will be implemented, how can the County know that the regulations implemented will be sufficient to mitigate impacts to wildlife? <p>B) Specific Plan Policy 2-17: Adhere to residential nighttime noise standards to the extent feasible.</p> <ul style="list-style-type: none"> • This policy is vague and unenforceable. • It is not clear to which standards this Policy refers. What are the standards with which the County envisions compliance? • Who determines whether and when it is feasible to adhere to residential nighttime noise standards? • How often does the County anticipate that it will not be feasible to adhere to residential nighttime noise standards? Under what circumstances does the County anticipate that it would not be feasible to adhere to residential nighttime noise standards? • What are the activities for which the County anticipates that it may not be feasible to adhere to residential nighttime noise standards? 	<p>The comment is noted. In response to segment A), please see MR-1, MR-3 and MR-9. Impacts on biological resources were determined to be less than significant with compliance to federal, State, regional, and local regulations as well as proposed policies and Standard Conditions of Approval.</p> <p>In response to segment B), noise standards that the Proposed Plan will comply to are defined in the County General Plan. See Standard Conditions of Approval regarding compliance with noise standards and response to B11-30.</p>

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Sonoma Land Trust	9/26/2022	B11-45	<p>Specific Plan Policy 2-21: Preserve and enhance the wetlands east of the core campus as a fire break, groundwater recharge, and habitat area.</p> <ul style="list-style-type: none"> • What additional mitigation would be required if it is not feasible to adhere to residential nighttime noise standards? Or if no further mitigation would be required, the impact would be significant and must be identified and analyzed in the EIR. What would be the impacts if the mitigation is infeasible? • This policy is vague and unenforceable. • This policy is not valid mitigation because it lacks clearly defined standards and is not specific enough to effectively implement or enforce. Who will determine whether wetlands are sufficiently “preserved” or “enhanced”? On what basis will those determinations be made? Specific Plan Policy 2-22: Leave standing or downed dead trees in place for wildlife habitat whenever they do not present a hazard for fire safety or recreational users, except within the managed landscape buffer. • This policy is vague and unenforceable. • This policy is not valid mitigation because it lacks clearly defined standards and is not specific enough to effectively implement or enforce. • Who determines whether dead trees present a hazard for fire safety or recreational users? • What constitutes a sufficient hazard that would authorize removal? • How frequently does the County anticipate that dead trees would constitute a hazard and would be removed pursuant to this policy? • What additional mitigation would be required if trees are removed? 	<p>The comment is noted. Please see MR-1, MR-3, and MR-9 regarding unenforceable policies. Impacts on biological resources were determined to be less than significant with compliance to federal, State, regional, and local regulations as well as proposed policies and Standard Conditions of Approval. See also B11-114.</p>

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Sonoma Land Trust	9/26/2022	B11-46	<p>Specific Plan Policy 2-25: Include protective buffers of at least 50 feet along Sonoma and Mill creeks, as measured from the top-of-bank and as shown on Figure 2.2-1: Open Space Framework, to protect wildlife habitat and species diversity, facilitate movement of stream flows and ground water recharge, improve water quality, and maintain the integrity and permeability of the Sonoma Valley Wildlife Corridor, and the ability of wildlife to use and disperse through the SDC site. Manage protective buffers so that they support continuous stands of healthy native plant communities.</p> <ul style="list-style-type: none"> • The EIR does not analyze or explain why a 50-foot buffer is appropriate or sufficient to reduce impacts to creeks at SDC. Merely stating that an impact will occur is insufficient; an EIR must also provide information about how adverse the adverse impact will be. Likewise, merely stating that an impact will be mitigated is insufficient; an EIR must explain how the mitigation will avoid or reduce impacts. • A 50-foot buffer is not sufficient to reduce impacts to riparian resources. The EIR states that the riparian forest along Sonoma Creek has an average width of 150 to 300 feet—three to six times the width of the proposed buffer. Why is the required buffer so significantly smaller than the riparian resources it is meant to protect? • What and where is Mill Creek? • The 2019 Land and Water Protection Proposal (which was signed off on by Regional Parks, California Department of Fish and Wildlife, and Sonoma County Ag + Open Space calls for significantly larger buffers, including a 300-foot buffer along Sonoma Creek, a 300-foot buffer along Asbury, Mill/Hill, and Butler Canyon Creeks (exception for a 100-foot buffer along Mill/Hill Creek within the core campus), and a 100-foot wetland buffer. 	<p>The comment is noted. Please see MR-1, MR-3 and MR-9. Impacts on biological resources were determined to be less than significant with compliance to federal, State, regional, and local regulations as well as proposed policies and Standard Conditions of Approval. See response to comment B10-9 regarding the appropriateness of setback requirements. Mill Creek runs along the southern border of the Core Campus.</p>

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Sonoma Land Trust	9/26/2022	B11-47	<p data-bbox="651 422 1344 454">o Why did the EIR depart from this approved proposal?</p> <p data-bbox="651 454 1344 487">o On what basis does the EIR conclude that smaller buffers will protect wildlife?</p> <p data-bbox="651 503 1344 698">Specific Plan Policy 2-26: Prohibit the use of all pesticides, rodenticides, and poisons in materials and procedures used in landscaping, construction, and site maintenance within the Planning Area. This restriction should be included in all Declarations of Covenants, Conditions and Restrictions (CC&Rs) to ensure that future homeowners are aware of the requirements (emphasis added).</p> <ul data-bbox="651 698 1344 828" style="list-style-type: none"> <li data-bbox="651 698 1344 828">• This policy is vague and unenforceable. It does not guarantee that the prohibition on pesticides, rodenticides, and poisons will be included in all CC&Rs. <p data-bbox="651 828 1344 1136">§ Specific Plan Policy 2-28: Prior to the commencement of the approval of any specific project in the Proposed Plan area, Project Sponsors shall contract a qualified biologist to conduct studies identifying the presence of special-status species and sensitive habitats at proposed development sites and ensure implementation of appropriate mitigation measures to reduce impacts to sensitive habitat or habitat function to a less than significant level.</p> <ul data-bbox="651 1136 1344 1401" style="list-style-type: none"> <li data-bbox="651 1136 1344 1401">• This policy improperly defers analysis of impacts and mitigation that must be conducted now in this EIR. Analysis of impacts cannot be deferred to a later date but must be performed prior to project approval. Conducting thorough analysis at this stage is the only way decision-makers and the public can have sufficient information about impacts and mitigation to be able to evaluate the impacts of a proposed project for 	The comment is noted. Please see MR-1, MR-3 and MR-9. Impacts on biological resources were determined to be less than significant with compliance to federal, State, regional, and local regulations as well as proposed policies and Standard Conditions of Approval.

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			<p>themselves. The needed analysis could then inform the location of various uses and development within the Sonoma Development Center and allow consideration of alternatives that minimize biological impacts. By deferring analysis of Project impacts and mitigation through implementation of the Specific Plan, the EIR fails to provide sufficient information to the public and decisionmakers and therefore fails as an informational document.</p>	
Sonoma Land Trust	9/26/2022	B11-48	<p>A) The comments presented below reference comments prepared by Neal Liddicoat, Griffin Cove Transportation Consulting, PLLC (“GCTC”) on the EIR and Specific Plan, attached below as Attachment D to Sonoma Land Trust’s September 26, 2022 letter to Brian Oh.</p> <ul style="list-style-type: none"> • The Specific Plan and its EIR include goals and objectives for this Project that include a focus on non-motorized modes of transportation within and between the Project area and local communities (e.g., Specific Plan at 3-2 and DEIR at 6. However, the proposed site maps do not demonstrate any such connections. Creating walkable and bikeable connections to Glen Ellen (including Eldridge) will be critical to encouraging nonmotorized forms of transportation. How will Project design ensure connections would be implemented to meet the Project’s stated goals with respect to sustainability and community character? • The Project requires some new road development— even if only for emergency access— and will result in substantial increases in traffic volumes. Increased traffic through the property on Arnold Drive will put tremendous pressure on wildlife. Additionally, development of new roadways (e.g., on the east side of SDC) will impair existing ecological connections across 	<p>The comment is noted. In response to segment A), see MR-9, MR-6, and MR-7.</p> <p>In response to segment B), see MR-7 and also responses to comment B8-3, B8-15, B8-16, and B8-19 for wildlife corridor policy amendments.</p>

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			<p>the Sonoma Valley Wildlife Corridor. The EIR fails to address the impact of increased traffic on wildlife.</p> <p>B)</p> <ul style="list-style-type: none"> • Wildlife movement within SDC and across the Corridor is already constrained. Currently, there are only two options for wildlife to move east-west across the core campus without having to cross the Arnold Drive roadway: along Sonoma Creek or along Hill Creek. Along the eastern edge of SDC, safe wildlife crossing of Highway 12 is limited to three culverts on Butler Creek and its tributaries. These small crossings under Highway 12 are the most critical locations for wildlife moving east-west across Highway 12 both within SDC and on nearby lands. High levels of wildlife movement have been documented at all three of the culverted crossings. The increased traffic and development of the Project will further constrain wildlifes' east-west movement opportunities, resulting in will have significant impacts on wildlife. How will Project design ensure safe wildlife crossings are retained? • The Project, including the Specific Plan policies, fail to ensure that new road construction, increased traffic volumes, and traffic speeds on SDC do not increase interference with wildlife movement and use within the property or across the larger corridor or result in increased road mortality. Development and human activities should be limited near the crossing structures. To help mitigate these impact, the Project design should: <ul style="list-style-type: none"> o limit new road, driveway, and trail construction, especially outside the core campus area o If new roads are constructed or old roads upgraded, incorporate crossing structures to accommodate wildlife o Install speed bumps and wildlife crossing signage at critical junctures 	

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-49	<p>The EIR’s transportation analysis presents a description of the Project, including a specific breakdown of housing unit types, that is inconsistent with both the EIR Project Description and with the description of the project in the Specific Plan document. GCTC at p. 2. The transportation analysis assumes a maximum of 1000 residential units, but assigns a specific breakdown of uses (i.e., 435 single family units, 345 multi-family units, and 220 senior residential units). GCTC Report at 1. Different types of housing typically result in different amounts of trip generation and VMT. Neither the Specific Plan nor the DEIR specify this particular breakdown of uses. On what basis does the EIR base the assumption of different types of residential units?</p> <ul style="list-style-type: none"> • The EIR bases its analysis of VMT on a model completed by MTC. EIR at 433. However, the EIR uses the average VMT per capita for the entire nine county Bay Area for comparison of the Project’s VMT. This comparison is inappropriate because in rural areas without established mass transit and limited alternative transportation options, the VMT is likely to be higher. The EIR analysis should have used average VMT figures for the County, or preferably, for a sub-area that includes all of the towns in the vicinity of the Project. • The EIR assumes the existing VMT is 59,654 and the proposed Project would result in a VMT of 60,285 in 2040. DEIR at 183. The EIR provides no explanation regarding how these figures were derived. Given that the SDC campus is largely unoccupied, it appears that the existing VMT figure is artificially inflated, which skews the VMT analysis. The EIR’s assumed VMT calculation suggests that the total VMT will only increase by 631. Without accounting for non-residential uses (e.g., office, commercial, etc.) the VMT for the 1,000 residential units would amount to an increase in VMT of 0.631 per 	<p>The comment is noted. The commenter states that the EIR incorrectly bases its VMT analysis on the MTC model. This statement is incorrect; the transportation VMT analysis uses the Sonoma County SCTM19 travel demand model and uses methodologies and significance thresholds that are consistent with State requirements. The MTC model was only used to establish the regional employee VMT significance threshold, which OPR guidance states is the appropriate geographic area for development in unincorporated County areas.</p> <p>Regarding housing unit assumptions in the transportation analysis, see B11-247. See also response to comments B3-15, B11-248, B11-249, and B11-250. The DEIR does conclude there are significant and unavoidable transportation impacts, see MR-6.</p>

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			<p>dwelling unit, which is not realistic. If we consider the non-residential uses, the incremental increase in project-related VMT is even lower. In addition, the air quality section of the EIR indicates that the Project-related population will increase by 2,500 people for the residential portion of the Project. The Transportation section states that “. . . residential uses in the Plan area with implementation of the Proposed Plan would on average generate 15.2 VMT per capita . . .” EIR at 445. The population increase of 2,500 multiplied by 15.2 VMT per capita would result in 38,000 VMT, which is far greater than the total increase of 631 claimed in the EIR. This calculation only considers residential uses so the actual VMT would be far greater. Therefore, the EIR’s VMT calculation as presented is simply not credible. Moreover, the EIR admits that the Specific Plan policies cannot be guaranteed to reduce significant VMT impacts so the correct conclusion regarding this impact after mitigation is that it would remain significant. EIR at 35.</p>	
Sonoma Land Trust	9/26/2022	B11-50	<p>The EIR does not provide a transportation analysis of the proposed Project without assuming the construction of the new Hwy 12 connector. Since the feasibility of this road has not been determined, what are the LOS and VMT impacts without the new connector?</p> <ul style="list-style-type: none"> • The EIR presents a flawed analysis of the Project’s consistency with applicable plans. <ul style="list-style-type: none"> o The EIR acknowledges that the Sonoma County General Plan objectives require traffic operation standards of level-of-service (“LOS”) C on roadway segments and LOS D at intersections. EIR at 443. The EIR concedes that the Project may 	<p>The comment is noted. VMT impacts are still significant without the Highway 12 connector. See the VMT analysis of the Historic Preservation Alternative on page 569. See MR-6, discussing in part Traffic Operations (LOS) and Consistency with County General Plan LOS Standards and providing the W-Trans Analysis.</p>

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			<p>exceed the established LOS standards. Id. Even though LOS is no longer used for evaluating a project's traffic impacts, when the general plan includes LOS standards, LOS does need to be considered when evaluating a project's consistency with the general plan.</p> <p>o Instead of estimating Project-related traffic and evaluating the Project's consistency with County LOS standards, the EIR concludes, absent any evidence, that the Project would be consistent with LOS targets established in the General Plan. EIR at 444. As discussed below, this conclusion appears to be erroneous. GCTC at p. 2.</p> <p>o The EIR references a traffic impact analysis prepared for the Project, but fails to include it in the EIR. GCTC at p. 2. Specifically, the EIR references the Focused Traffic Operations Analysis for the SDC Specific Plan (W-Trans, August 2022). EIR at 410, Footnote 118. The focused traffic study revealed that under future conditions with implementation of the SDC Specific Plan, two intersections are projected to operate unacceptably if no modifications to the current roadway configurations are made. GCTC at 2 and 3. The intersection at Arnold Drive/Harney Street would operate unacceptably at LOS F during the p.m. peak hour and the future new intersection on SR 12 at the new SDC Connector Road would have unacceptable LOS E operation on the stop-</p>	

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			<p>controlled connector road approach. Id. The study also revealed that at buildout of Project, the segment of SR 12 between Arnold Drive and Trinity Road and the segment of Arnold Drive between SDC and Madrone Road would continue to operate below the County’s standard at LOS D. GCTC at 3. Although these road segments are also identified as falling short of the County LOS standard without the Project, no mitigation measures were proposed to allow operation at an acceptable LOS. In any event, it is clear that these two roadway segments will fail to meet the County LOS standard upon completion of the Project, thereby violating the General Plan objectives. Id. The information necessary to address conformance with General Plan Objective CT-4.1 and CT-4.2 exists, but was not included within the DEIR, which would have allowed public review. Although the focused traffic study identifies improvements to remedy LOS deficiencies, no assurance is provided that those measures would be implemented. GCTC at 3. Why does the EIR not disclose this study or its contents? The County must make this traffic report available to the public.</p>	
Sonoma Land Trust	9/26/2022	B11-51	<p>The EIR underestimates Project trip generation.</p> <ul style="list-style-type: none"> o The EIR employs the SCTM19 travel demand forecasting model used by the Sonoma County Transportation Authority (“SCTA”) to estimate the Project’s trip generation. However, the EIR fails to disclose the 	The comment is noted. See response to comments B11-246, B11-247, B11-248, B11-249, and B11-250.

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			<p>specific trip generation factors employed in the trip generation model. As a result, it is impossible for document reviewers to understand or evaluate the accuracy of those factors or the resulting trip generation estimates. GCTC at p. 3. What specific trip generation factors were used? What is the substantial evidence to support those factors?</p> <p>o Traffic impact analyses frequently evaluate trip generation using the Institute of Transportation Engineers (“ITE”) document Trip Generation Manual. An estimate of trip generation based on the ITE Manual information (hereto referred to as the “ITE estimate”) versus the estimate documented in the EIR provides perspective on the credibility of the EIR Project’s transportation analysis. GCTC at p. 3. For purposes of comparison, the ITE estimate considers two scenarios: one uses the Project plan described in the EIR transportation section and one considers the maximum residential development scenario described in the Specific Plan document. Id. Using industry-accepted procedures and conservative assumptions, both ITE estimate results indicate a substantially higher trip generation than disclosed in the EIR. GCTC Letter, Table 1 at p. 5.</p> <p>o For the first ITE estimate using the EIR Project plan, the trip generation estimate shows 6,556 residential trips and 5,697 non-residential daily trips for a total of estimated trip generation of 12, 253. GCTC at p. 5 and</p>	

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			<p>6. This denotes a difference of approximately 114 percent more trips than the EIR estimate of 5,736. GCTC letter at p. 5 and EIR at 440. Although a small difference between model-based trip generation and ITE trip rates is expected, a difference of this magnitude brings into question the validity of the EIR's analysis. Id.</p> <ul style="list-style-type: none"> o For the second ITE estimate using the maximum residential development scenario described in the Specific Plan document, the trip generation breakdown shows 8,593 residential trips and 5,697 non-residential trips for a total of estimated trip generation of 14,290, which is an even larger difference than the EIR estimate. GCTC at p.6. o The ITE analysis presented in the GCTC letter reveals that the EIR substantially underestimates the Project's trip generation. This faulty analysis implicates the EIR's vehicle miles travelled ("VMT"). GCTC at p. 7. Trip increases described in the GCTC letter will similarly translate to roughly equivalent increases in VMT. Id. and EIR at 447. Although the EIR already concludes that VMT impacts would be significant and unavoidable, the EIR's failure to accurately estimate trips results in a failure to disclose the extent and severity of those impacts, which is impermissible under CEQA. 	

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Sonoma Land Trust	9/26/2022	B11-52	<p>The EIR substantially overestimates internal trips.</p> <ul style="list-style-type: none"> o The EIR’s transportation analysis assumes that 24.4 percent (approximately 1,398 of the Project’s total 5,736 daily trips) of Project-generated trips would never leave the project site (“internal trips”). EIR at 440 and GCTC at p. 7. However, here too, the EIR is overly optimistic and over estimates the internal trips. Even where job opportunities and other amenities exist within the Specific Plan area, residents will still commute to existing jobs and drive off site to nearby communities. There is no guarantee that people who live on site will work there. GCTC employed three different methods to estimate internal trips at the SDC site. GCTC at pps. 7 and 8. Under each of the methods, GCTC found internal trip values ranging from 6.5 to 8.8 percent, all substantially lower than the 24.4 percent value used in the EIR analysis. GCTC at p. 8. Consequently, the DEIR analysis has substantially overstated the number of internal trips and grossly underestimated the number of external trips. Id. In this way, the EIR failed to accurately assess the off-site transportation-related impacts of the Project. Id. o The EIR’s underestimate of the number of external trips, leads to similarly understated Project-related VMT, which serves as basis for determining the significance of the Project’s transportation impact. In short, the Project’s 	<p>The comment is noted. See response to comments B11-246, B11-247, B11-248, B11-249, and B11-250.</p>

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Sonoma Land Trust	9/26/2022	B11-53	<p>transportation impact has been greatly understated due to a failure to provide an accurate estimate of the volume of traffic resulting from the Project. See, GCTC Table 3 at p. 9. This failure to accurately estimate traffic impacts in turn implicates the air quality and greenhouse gas analyses, noise analysis, wildfire/emergency evacuation analysis, and biological resources assessment, among others.</p> <p>The EIR presents a flawed Project traffic assignment.</p> <ul style="list-style-type: none"> o The EIR presents a flawed analysis of projected traffic volumes for the three road segments that provide access to the Project site: Arnold Drive north of the site, Arnold Drive south of the site, and the proposed Highway 12 connector. GCTC letter at p. 9. Despite the fact that the EIR omitted some of the data related to Project existing traffic volumes, GCTC was able to derive the Project traffic assignment on each roadway segment. Id. In each scenario analyzed in the EIR, the volume of project trips assigned to regional access roads falls substantially short of the 4,338 external trips claimed in the EIR. GCTC at p. 9 and Table 4 at p. 10. In the analyses implementing the Highway 12 connector, the volume of traffic on Arnold Drive north of the site is shown to be reduced upon completion of the Project, which seems highly unlikely. Id. Although some variability in these types of analyses can sometimes occur, none of the factors that would contribute to such variability (such as the presence of alternative routes that allows for redirecting traffic to less congested routes) apply at the Project site. GCTC at p. 10. Therefore, substantial evidence fails to support the EIR’s analysis and conclusions, and the EIR fails to 	<p>The comment is noted. See response to comments B11-246, B11-247, B11-248, B11-249, and B11-250 as well as MR-6. The DEIR’s traffic analysis is neither flawed nor inaccurate. These responses describe the SCTM19 and how it was applied.</p>

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			<p>accurately account for the full volume of Project-related traffic.</p> <ul style="list-style-type: none"> • The EIR’s vehicle- miles travelled analysis is inaccurate and misleading. <ul style="list-style-type: none"> o The EIR’s VMT analysis is equally concerning and is flawed for several reasons. GCTC at 11. First, the VMT analysis assumes a 15 percent reduction in VMT based on transportation demand management (“TDM”) trip reductions. Id. However, the EIR provides no support for its assumption regarding a 15 percent trip reduction. Id. Even the EIR admits that “the ability for individual development projects to achieve a 15 percent reduction in VMT is uncertain.” EIR at 447. The GCTC analysis suggests that the VMT would be substantially greater than disclosed. GCTC at 11. Second, the employment VMT figures (also called “Home-Work VMT per Worker”) presented by the EIR are highly questionable. Id. Specifically, the planning area baseline average (7.1), the countywide baseline average (12.4), and the regional baseline average (16.9) for home-based commute VMT per worker are all higher than the EIR value assigned for home-based commute VMT. Id. The EIR’s finding that the Project’s homebased commute VMT would be 4.8 is approximately 67 percent of the corresponding value for the Planning Area, 39 percent of the Countywide value, and only 28 percent of the Bay Area Region value. Id. This unexplained discrepancy, along with the aforementioned flaws in the analysis raises serious concerns about the EIR’s credibility. GCTC at p.12. o The EIR relies on Specific Plan Policy 3-41 to reduce the Project’s VMT impact. GCTC at p.12. This policy requires all development to reduce vehicle trips by 15 percent below rates listed in the ITE Trip Generation Manual using TDM strategies. Id. and Specific Plan at 	

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			<p>p. 3-12. However, as the GCTC letter explains, this policy does not make sense given that the Project's proposed trip generation is already so low. Id. In other words, if the Project's trip generation estimate is to be believed, the Project trip rate is already substantially less than 15 percent below ITE trip rates. Therefore, unless the Project's trip generation estimate is corrected, Specific Plan Policy 3-41 is meaningless. GCTC at p.13.</p>	

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Sonoma Land Trust	9/26/2022	B11-54	<p>CEQA requires EIRs to include all feasible mitigation to reduce a significant impact to an insignificant level even where an impact is significant and unavoidable. Here, the EIR fails to identify mitigation measures that would reduce the Project’s traffic impacts. These include measures found in the California Air Pollution Control Officers Association (“CAPCOA”) report “Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, Public Draft, August 2021, found at https://www.airquality.org/ClimateChange/Documents/Handbook%20Public%20Draft_2021-Aug.pdf. Some of these measures could include, for example: MM T-7: Bus Shelter for Existing/Planned Transit Service - Bus or streetcar service provides headways of one hour or less for stops within one-quarter mile; project provides safe and convenient bicycle/pedestrian access to transit stop(s) and provides essential transit stop improvements (i.e., shelters, route information, benches, and lighting). MMT-31: Orient Project Toward Transit, Bicycle, or Pedestrian Facility MM T-38: Implement Preferential Parking Permit Program. (For electric vehicle and other alternative fuel vehicles.) MM T-39: Implement School Bus Program MM T-40: Implement a School Pool Program MM T-42: Provide Electric Shuttles MMT-47: Required Project Contributions to Transportation Infrastructure Improvement MM E-23: Use Microgrids and Energy Storage</p> <ul style="list-style-type: none"> • In sum, the EIR’s transportation analysis is flawed. Particular deficiencies were identified with respect to the volume of traffic associated with the Project, how much of that traffic will be captured internally, the assignment of that traffic to the study area roads, and the validity of the estimate of Project-related vehicle-miles traveled. GCTC at 13. These failures implicate the 	<p>The comment is noted. The commenter states that the EIR fails to identify all feasible mitigation measures related to VMT impacts, citing several VMT mitigation strategies found in the California Air Pollution Control Officers Association (CAPCOA) report “Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity,” Public Draft, August 2021. The assertion that the DEIR fails to identify feasible measures is incorrect. The County chose to address VMT mitigation through Specific Plan Policies 3-41 and 3-42, which require individual developments occurring with the Specific Plan to achieve reductions in vehicle trips and VMT through implementation of TDM strategies and establishment of a TMA to oversee areawide VMT reduction programs. Both individual developments and the TMA are expected to rely heavily on the data contained in the CAPCOA publication cited by the commenter (or more appropriately, to more recent versions of the CAPCOA report). The selection of TDM strategies will vary by individual development project and the TMA, and will likely evolve over time to maximize effectiveness, as described on DEIR pages 448-449. This approach was intentionally chosen as a VMT reduction strategy rather than attempting to speculatively predict which measures (including those identified by CAPCOA) may or may not be relevant during the span of the proposed Specific Plan. Many key VMT reduction strategies related to physical infrastructure and reducing automobile travel that are cited by the commenters have also already been incorporated as Specific Plan policies.</p>

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			<p>validity of the conclusions presented in the EIR. Id.</p> <ul style="list-style-type: none"> • The errors and omissions in the Transportation analysis implicate the EIR’s analyses of other topics, including air quality and greenhouse gas emission impacts. 	<p>Following are responses to CAPCOA measures cited by the commenter (note that the commenter appears to have mis-numbered and combined some CAPCOA measures so the following list is organized by topic).</p> <p>Measure cited by commenter:</p> <ul style="list-style-type: none"> • Bus shelters for existing/planned transit service • Provide safe and convenient bicycle/pedestrian access to transit stops • Provide essential transit stop improvements • Orient project toward transit, bicycle, or pedestrian facility • Measures would be implemented by development in the Specific Plan area • Bus service with headways of one hour or less • Subsidization of fare-free service or service expansions could be a strategy used by the TMA if funding allows • Implement preferential parking permit program • Implement school bus program • Implement a school pool program • Provide electric shuttles • Required project contributions to transportation improvements <p>Specific Plan Policy 3-23 calls for adding an additional bus stop in the campus; Policies 3-24 and 3-25 call for providing transit shelters, seating, and lighting among other amenities including real-time system updates and arrival times; Policies 3-12, 3-13, 3-15, 3-16, and 3-21 collectively call for the establishment of new pedestrian and bicycle connections including to transit along the Arnold</p>

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Drive corridor. Specific Plan Policy 3-22 calls for the County to work with Sonoma County Transit to expand transit service and extending the fare-free Route 32 shuttle to the site. The Sonoma Valley Unified School District already provides bus service to students who live beyond walking distance, though if this practice were discontinued in the future, implementing of a school bus or shuttle would remain a viable TDM strategy that the TMA could utilize. Policy 3-22 calls for extension of the Route 32 shuttle to the Specific Plan area; electrification of shuttles has no effect on transportation VMT. Policy 3-22 calls for extension of the Route 32 shuttle to the Specific Plan area; electrification of shuttles has no effect on transportation VMT. Development projects will be required by the County to contribute to improvements; the County would be responsible for completing Arnold Drive complete streets improvements and path connections (see Specific Plan section 7.6) which form a key component of VMT reduction strategies related to non-auto travel. Specific Plan Policies 3-27, 3-28, 3-29, and 3-31 require parking management strategies that will reduce VMT; preferential parking permit programs could be incorporated as a component of these strategies. In conclusion, other sections of the DEIR are not in error since the transportation analysis is accurate.

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Sonoma Land Trust	9/26/2022	B11-55	<p>The comments presented below reference comments on the EIR and Specific Plan prepared by Alexandra Syphard, Senior research ecologist specializing in wildfire science and fire ecology, Conservation Biology Institute (“Syphard Letter”), attached as Attachment E to Sonoma Land Trust’s September 26, 2022 letter to Brian Oh.</p> <ul style="list-style-type: none"> • The EIR fails to adequately analyze Project-related impacts related to evacuation during a wildfire. The EIR references an evacuation analysis prepared by Kittelson & Associates that is not included in the EIR or its Appendices and is not available anywhere on the SDC Specific Plan website. The County must make this report available to the public. <ul style="list-style-type: none"> o The EIR fails to adequately describe the baseline conditions relevant to evacuation. In past fires, Highway 12 became so congested that it took hours to drive even short distances. The evaluation of project-related wildfire evacuation impacts lacks adequate information. For example, the EIR fails to provide details related to implementation of the proposed vegetated fuel buffers, their size, how they would be managed, and how they would be maintained. o In addition, it defies logic that the evacuation of more than 2,000 cars (and potentially 3,000 or more depending on the number of housing units and number of jobs) during a wildfire would increase travel time during an evacuation by fewer than 15 seconds. The EIR fails to provide the basis for this conclusion or provide or even summarize the evacuation analysis prepared by Kittelson & Associates. In addition, the unstable project description and the flawed transportation analysis add to the uncertainty regarding the number of proposed housing units and the corresponding amount of 	<p>The comment is noted. All outputs from the evacuation analysis are included under Impact 3.16-1 of the DEIR. Also, see responses to letter C109. Specifically, see response to comment C109-5. See also MR-1, MR-3, and MR-9. See MR-4 regarding the adequacy of the wildfire evacuation analysis. The evacuation analysis includes evacuation times without the Proposed Plan to account for baseline conditions. The transportation analysis is adequate and accurate, see MR-6, and the DEIR consistently analyzes the impacts of 1,000 housing units in the Proposed Plan.</p>

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			increased traffic, which will exacerbate fire risk and the ability to safely evacuate.	
Sonoma Land Trust	9/26/2022	B11-56	<p>The EIR fails to adequately evaluate project-related wildfire risk.</p> <ul style="list-style-type: none"> o It is common knowledge that fire is an ever-present danger in Sonoma County. Decades of fire suppression, a changing climate, the epidemic of dead and dying trees, combined with a record drought equate to a recipe for disaster in the region. As County staff acknowledge, the combination of dense forests, heavy fuel loads, low humidity, potential for high winds, and the steep terrain can rapidly turn even small fires into lethal, major disasters. EIR at 500 and 501. • The environmental destruction wrought by wildfires is exacerbated by development in the Wildland-Urban Interface, which unwisely places people and structures directly in the line of fire. o Here, not only is the proposed Project located within the Wildland-Urban Interface, it is surrounded by lands designated as moderate, high, or very-high fire hazard severity zones (“FHSZ”). EIR Figure 3.16-2 Fire Constraints. o As the EIR recognizes, the site’s natural vegetation and slopes are conducive to the rapid spread of wildland fires as was the case during the Sonoma Complex fires in 2017. EIR at 502. • As the EIR acknowledges regarding wildfire ignition risk, “ the majority—95 percent— are caused by human activity.” EIR at 500. o Increased housing density, the location, and the pattern of development drives wildfire risk. Syphard et al. 2013. Isolated or remote clusters of development, such as the one proposed here, are particularly vulnerable (Syphard et al. 2016). 	The comment is noted. See responses to letter C109. Specifically, see responses to comments B3-25 and B3-27. See also MR-1, MR-3, and MR-9.

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Sonoma Land Trust	9/26/2022	B11-57	<p>o This is especially true when the housing is surrounded by high FHSZs.</p> <p>It is well established that most human-caused wildfires start near roads and housing development (Syphard and Keeley 2015 and others). Therefore, not only is the likelihood that more fires will start near the project site (that in turn increases the number of fires that could become destructive), but the increase in transportation into and out of the new development increases the likelihood of fires starting in the area. The EIR fails to address this fact.</p> <ul style="list-style-type: none"> • The EIR states that impacts related to wildfire risk will only be considered significant if “the Proposed Plan risks exacerbating those existing environmental conditions.” EIR at 506. The EIR lists several criteria for evaluating fire risk, but fails to evaluate the risk of having a substantial increase in population on-site and increased use of the open space. • The proposed increase in population on-site, particularly at the maximum level allowed, would exacerbate fire risks for three reasons: <ul style="list-style-type: none"> o increased housing density o a substantial increase in vehicles on the site and o a substantial increase in use of the undeveloped open space areas. • Increased housing density and population on site, especially at the proposed low- to medium densities, would increase opportunities for fires to ignite; and there is still ample continuous vegetation in the surrounding landscape for wildfires to spread. (Syphard et al. 2007, Syphard et al. 2019, Radeloff et al. 2018). • Research shows that the location of human ignitions tends to occur closest to roads and human infrastructure (Molina et al. 2019, Chen and Jin 2022). Increased vehicles on site would increase opportunities for fires to 	The comment is noted. See responses to letter C109. Specifically, see responses to comments C109-8, C109-15, and B3-27. See also MR-1, MR-3, and MR-9.

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			<p>ignite. Therefore, the addition of people coming into and out of the area because of the new development increases the likelihood of more fires starting on-site and in adjacent areas.</p> <ul style="list-style-type: none"> • In addition, it is reasonable to assume that with an increased population of 2,400 people, or more, there will be a significant increase in use of open space areas, which will in turn, increase wildfire ignition risk. Therefore, the Project would exacerbate wildfire risk, especially if the site can eventually house even more people. • The EIR fails to analyze any of these factors, fails to provide evidence that the Project will not exacerbate wildfire risk, and incorrectly concludes that impacts related to wildfire risk are less-than-significant. 	
Sonoma Land Trust	9/26/2022	B11-58	<p>The EIR fails to adequately analyze project-related wildfire risk exposure of people and structures due to flooding, landslides, runoff, post-fire slope instability, or drainage changes. The Specific Plan and its EIR indicate that all proposed development would be located on the flat part of site. However, some structures located near the boundaries of the Core Campus are adjacent to steep slopes (within areas preserved as open space), which are known landslide-susceptible areas, and contain vegetative wildfire fuels. EIR at 521.</p> <ul style="list-style-type: none"> • The EIR relies on Policy 2-31 to reduce risks of flooding and landslides. However, as indicated above, this policy lacks details about how fuel management would be implemented and maintained in areas susceptible to flooding and landslides. <ul style="list-style-type: none"> o This information is important because some types of vegetation are more prone to 	<p>The comment is noted. See Impact 3.16-4 on page 521 of the DEIR regarding potential secondary impacts from a wildfire. With compliance of proposed policies, implementation of the Proposed Plan would not expose people or structures to significant risks, including downslope or downstream flooding or landslides. See also MR-1, MR-3, and MR-9.</p>

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			<p>ignition than others.</p> <ul style="list-style-type: none"> o In addition, vegetation removal could result in unintended consequences, such as exacerbating slope instability especially after a wildfire. • The EIR entirely ignores potential exposure and risk to people from flooding, runoff, or drainage changes. o As explained further in the section on hydrology and water quality below, the EIR defers all analysis related to exposing people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, or inundation by seiche, tsunami, or mudflow. EIR at 299 to 301. o The EIR presents contradictory information related to the potential for flood risk. Specifically, the EIR discloses high risk of flood hazards (EIR at 286 and 287) but defers analysis and identification of feasible mitigations until after Project approval. EIR at 300. o The EIR's approach of deferring analysis and mitigation violates CEQA. 	

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Sonoma Land Trust	9/26/2022	B11-59	<p>The EIR does not adequately analyze increased fire risk to neighboring residents and wildlife</p> <ul style="list-style-type: none"> o Given the increased sources of ignition associated with new development and increased traffic, how will the Project exacerbate risk of wildfire ignitions to neighboring communities, e.g., Glen Ellen, Sonoma? o How will the Project exacerbate risks to biological resources due to increased risks of wildfires? 	<p>The comment is noted. See responses to letter C109. Specifically, see responses to comments C109-8 and B3-27. See also the cumulative impacts analysis in Section 5.2 of the DEIR. As noted on page 520, construction and maintenance of associated infrastructure to reduce wildfire risk could result in subsequent environmental impacts; the specific impacts of which are not known at this time. However, any new construction of infrastructure facilities to serve the Planning Area would be located and constructed on existing urban and built-up land within the Core Campus (Goal 2-A). Environmental impacts related to construction emissions, vehicle miles traveled (VMT), and biological resources associated with construction of the proposed new facilities and SR 12 connector are accounted for in technical modeling provided in other chapters of this EIR. Further, construction and maintenance of individual 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.</p>
Sonoma Land Trust	9/26/2022	B11-60	<p>The EIR fails to provide evidence that proposed policies and measures will reduce impacts to less than significant levels. The Project proposes vegetated fuel management buffers but fails to provide details related to buffer size, management, and maintenance.</p> <ul style="list-style-type: none"> § Why is there no fuel management buffer on the north side of the development site? § How will annual grass areas be managed to reduce ignitability of the landscape? § What criteria will be applied to determine what types of trees or shrubs will be removed and what types will 	<p>The comment is noted. See responses to letter C109. Specifically, see responses to comments C109-9 through C109-13. See response to B3-27. See also MR-1, MR-3, and MR-9.</p>

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Sonoma Land Trust	9/26/2022	B11-61	<p>be retained?</p> <p>§ What is the plan regarding maintenance of native vegetation, such as chaparral, trees, and shrubs that provide shade and humidity and may be less likely to ignite than grass?</p> <p>o Proposed Policy 2-31 states that "shrubs and chaparral should be limited within the managed landscape buffer" (emphasis added).</p> <p>§ How will this "limit" be established? Given that this is not a mandatory requirement, what impacts will occur if it is not?</p> <p>o Proposed Policy 2-34 indicates that "minimum clearance of fuels surrounding each structure will range from 4 feet to 40 feet in all directions, both horizontally and vertically" and that areas with "greater fire hazards will require greater separation between hazards." EIR at 508.</p> <p>o What areas of the campus have greater fire hazards that may require more intensive vegetation removal? What sort of shrubs and trees, and therefore wildlife habitat, would be removed under this policy? What would be the biological impacts of such removal?</p> <p>o What entity is responsible for ensuring that the fuel management buffers are properly implemented and maintained?</p> <p>o The County must provide answers to these critical questions and identify other measures for avoiding risk other than vegetation removal, such as avoiding development altogether in areas of greater fire risk.</p>	<p>The comment is noted. See responses to comment B3-27 and C109-6. See also MR-1, MR-3, and MR-9. <u>See Section 3-11 of the Specific Plan including policies that reduce reliance on single-occupant vehicles (SOV) and limit the number of SOV trips made by residents and visitors by</u></p>
			<p>Many of the policies relied upon to mitigate the significant increased risk of wildfires are inadequate because the measures are vague and unenforceable.</p> <p>o For example: SP Policy 2-42 provides for an educational campaign regarding wildfire risk to future</p>	

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			<p>residents. However, the EIR fails to specify the details of implementation. Who is ultimately responsible for ensuring that the policies are followed?</p> <ul style="list-style-type: none"> o Who will ensure that the educational campaign referred to in Policy 2-42 is updated and continued? o How long will these policies serve to help offset the increased risk that comes with the development? <ul style="list-style-type: none"> • The EIR fails to identify measures that would reduce personal vehicle use through implementation of mass transit. Having thousands of people driving vehicles on roadways on the site will increase opportunities for fire ignitions. o The EIR should consider additional mitigation. For example, the Project should include on-site shuttles for the life of the Project, providing transportation for residents to and from the Project site and Eldridge area to the towns of Sonoma, Napa, Petaluma, Rohnert Park, and Santa Rosa throughout the day and evening. <ul style="list-style-type: none"> • All policies and best management practices should be included as measures in a Mitigation Monitoring and Reporting Plan to ensure implementation and enforceability. 	<p><u>supporting alternative modes of transportation, ridesharing, and on-site services. For example, Policy 3-22 would expand transit services to the area.</u></p>
Sonoma Land Trust	9/26/2022	B11-62	<p>The comments presented below reference comments prepared by Gregory Kamman, CBEC Eco Engineering (“CBEC”) on the EIR and Specific Plan, attached below as Attachment F to Sonoma Land Trust’s September 26, 2022 letter to Brian Oh.</p> <ul style="list-style-type: none"> • The EIR Project Description and Project Plan fail to provide sufficient detail about land use changes to complete the necessary hydrologic and water quality assessments to evaluate the Project’s hydrological impacts. Due to the lack of an adequate Project Description, the EIR determinations that potential hydrologic and water quality impacts are less than significant requiring no mitigation measures is 	<p>The comment is noted. The DEIR does adequately analyze impacts to Hydrology and Water Quality pursuant to CEQA standards. See MR-1 and MR-3. See Impacts 3.9-1, 3.9-2, 3.9-3, and 3.9-5 for analysis regarding impacts on surface and groundwater quality and recharge pursuant to CEQA thresholds. See also response to comment B11-271.</p>

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			<p>unsupported.</p> <ul style="list-style-type: none"> • Redevelopment of the SDC site has the potential to impact the hydrology of interconnected groundwater, spring, and stream systems through changes in land cover, storm water management, and water use. Impacts may include changes to the quantity, quality, and timing of storm water runoff, infiltrated water available for vegetation and groundwater recharge, and the magnitude, frequency, and extent of critical low flows in streams and low water conditions in wetlands. The EIR does not adequately analyze these impacts. The EIR leaves many questions related to hydrology and water quality unanswered. For instance: <ul style="list-style-type: none"> o What is the extent of change in impervious surface footprint under this Project? The EIR states only that the Proposed Plan may increase the amount of impervious surfaces. EIR at 298. Even if final numbers will not be known until developers submit future development proposal, the Specific Plan provides the location and types of uses such that the EIR can estimate the changes to impervious surfaces at SDC. o How would the change in impervious surfaces impact the quantity and quality of discharge into Sonoma Creek or its tributaries? o How would proposed stormwater facilities change those processes? o What are the quantitative impacts on the recharge of groundwater aquifers that will result from the Project? o How will the change in extraction of raw water from streams, springs, and aquifers impact environmental quality, including species of concern at the SDC site and beyond compared to recent demand at SDC? o How will projected changes to patterns of temperature and precipitation, such prolonged periods of drought combined with more intense precipitation events affect 	

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Sonoma Land Trust	9/26/2022	B11-63	<p data-bbox="651 227 1344 292">water needs and impacts of proposed development at SDC?</p> <p data-bbox="651 422 1344 828">The EIR cannot defer the analysis and development of mitigation measures for the Project’s impacts on hydrology and water quality. The Specific Plan identifies the location, intensity, and square footage of the different land uses proposed in the Specific Plan: residential, commercial, hotel, office, public, institutional, and utility use (EIR at 80). In short, the County already knows what types of development could occur under the Specific Plan and substantially where those different types of development would occur.</p> <p data-bbox="651 828 1344 860">Yet, the EIR fails to address the following questions:</p> <ul data-bbox="651 860 1344 1401" style="list-style-type: none"> <li data-bbox="651 860 1344 1185">o How would Project design ensure there would be no substantial increase in the magnitude, frequency, duration, or extent of low-flow events or flood events on springs, streams, and wetlands located at or downstream of the SDC property that may result from changes in land cover, storm water management, and/or the volume, rate, or duration of surface run-off from the site? <li data-bbox="651 1185 1344 1401">o How would Project design ensure there would be no substantial degradation of water quality (as per state and local water quality standards), including pollutant load transported by storm water runoff from the site (e.g., sediment load, 	<p data-bbox="1344 422 2009 730">The comment is noted. The DEIR does adequately analyze impacts to Hydrology and Water Quality pursuant to CEQA standards. See MR-1, MR-3, and MR-9. Pursuant to CEQA thresholds, the Proposed Plan would have less than significant impacts to hydrology and water quality with compliance to federal, State, regional, and local regulations and implementation of proposed policies and Standard Conditions of Approval.</p>

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			<p>nutrients, metals, and hydrocarbons) that may impact the extent and quality of aquatic habitats?</p> <p>o How would Project design ensure there would be no substantial reduction of infiltration and ground-water recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table? How would Project design ensure there would be no substantial increase in water temperatures in receiving streams resulting from runoff of warm storm water from the site?</p> <p>o How would Project design ensure there would be no substantial net increase in withdrawals or diversions from area springs and streams, including Roulette Springs, Hill Creek, Asbury Creek, and Sonoma Creek, within critical low-flow periods (summer, fall, drought conditions) or as annual averages?</p> <p>o How would Project design ensure there would be maximum possible on-site reuse of treated wastewater as water supply for landscape irrigation, groundwater recharge, or other water supply needs, to minimize environmental impacts of raw water sourcing?</p>	

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Sonoma Land Trust	9/26/2022	B11-64	<p>The EIR fails to adequately analyze Project-related impacts tied to compliance with applicable regulations protecting water quality. EIR at 294.</p> <p>o Impact 3.9-1 - The EIR concludes that impacts related to implementation of the Proposed Plan would not violate any federal, state, or local water quality standards or waste discharge requirements. EIR at 29 and 294. However, the EIR fails to actually analyze how changes in site runoff and associated erosion potential will change.</p> <p>§ Performing the required analysis would require detailed hydrologic and hydraulic modeling that incorporates all changes in land use (i.e., impervious surfaces) and runoff estimates to determine where and by how much flow rates and erosion potential may impact receiving waterways. Best Management Practices and other measures could then be designed correctly to mitigate these impacts. Without this information, the EIR cannot adequately evaluate the impacts before and after mitigation.</p> <p>§ The EIR bases its conclusion, in part, on implementation of proposed Policy WQ-1. However, this policy only requires consistency with existing laws and regulations. Under CEQA, merely requiring compliance with existing laws and agency regulations does not conclusively indicate</p>	<p>The comment is noted. See MR-1, MR-3, and MR-9. Pursuant to CEQA thresholds, the Proposed Plan would have less than significant impacts to hydrology and water quality with compliance to federal, State, regional, and local regulations and implementation of proposed policies and Standard Conditions of Approval. As noted on page 292, Impact analysis of surface water hydrology considers potential changes in the physical characteristics of water bodies, impervious surfaces, and drainage patterns throughout the Planning Area as a result of construction and operation at the site. Groundwater supply and recharge are assessed by comparing existing conditions within the site area and after implementation of the Proposed Plan. Surface water and groundwater quality is analyzed by using information on existing water quality conditions. Potential sources of contaminants associated with construction are also considered. Flooding impacts are assessed using FEMA data and historical flood information to determine the existing flood zone, specifically evaluating whether the site overlaps designated 100-year floodplains and whether it was a flood risk. CEQA does not require an analysis of how existing environmental conditions will affect a project’s residents or users unless the project would exacerbate an existing environmental hazard. This analysis evaluates if construction would exacerbate existing or future flood hazards. See also response to B11-271.</p>

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			<p>that a proposed project would not have a significant and adverse impact.</p> <p>§ The EIR also relies on implementation of as yet unspecified Best Management Practices (“BMPs”). EIR at 294. The EIR provides only a laundry list of potential BMPs with no indication or commitment regarding which ones may be implemented or what performance standards they must meet. The EIR fails to address the following questions: What BMPs would be appropriate given specific site conditions? What is the expected efficacy of each measure? What residual impacts might remain after implementation of specific BMPs?</p>	
Sonoma Land Trust	9/26/2022	B11-65	<p>The EIR fails to adequately analyze Project-related impacts related groundwater recharge.</p> <p>o Impact 3.9-2 - The EIR concludes that the project will not interfere with groundwater recharge such that it may impede sustainable groundwater management of the basin and associated potential impacts are less than significant. Id. Similar to its analysis of other hydrological impacts, the EIR fails to provide any analysis of how the proposed Project development will alter groundwater recharge. Having failed to analyze the impact, the DEIR again relies</p>	<p>The comment is noted. The DEIR adequately analyzes impacts to groundwater recharge. The DEIR notes on page 296 that future development at SDC would use surface water supplies from the two reservoirs, and would not be reliant on groundwater. Furthermore, development would be limited to the Core Campus area, and redevelopment of existing structures would not significantly alter the area available for recharge of the groundwater aquifer. 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. See</p>

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			<p>on compliance with existing regulations and unspecified BMPs.</p> <ul style="list-style-type: none"> o The EIR has an obligation to describe any potential changes in recharge. Simply stating that unspecified BMPs that support groundwater recharge will be integrated into the Project is insufficient information to demonstrate that the measures will be effective to mitigate potential impacts. 	<p>also MR-3 and MR-9 and response to comment B11-271.</p>
Sonoma Land Trust	9/26/2022	B11-66	<p>The EIR fails to adequately analyze Project-related impacts related to flooding and erosion.</p> <ul style="list-style-type: none"> o The Specific Plan indicates that the site is potentially vulnerable to flooding and dam inundation from a failure of the Fern and Suttonfield dams and spillways. Specific Plan at p.2-6. The EIR explains that future flood events would pose risks to structures such as bridges and culverts and that failure of the dams would exacerbate flood risks. EIR at 286 and 287. Inundation from a dam failure at Fern Lake, could flood a large portion of the Core Campus area, as well as a large area of the Eldridge community just south of the Planning Area. Suttonfield Lake is the largest dam on the site and inundation from a failure at this lake would flood areas east of Sonoma Creek. Both failures would impact proposed residential areas. o The EIR concludes that Project development would not substantially alter the existing drainage patterns or result in substantial erosion and flooding on- or offsite or contribute runoff that would exceed the capacity of existing or planned storm drain systems. EIR at 297 and 298. Here too, these conclusions are not 	<p>The comment is noted. The DEIR adequately analyzes impacts to flooding and erosion pursuant to CEQA requirements. The Proposed Project would be required to demonstrate compliance with regulations that include NPDES permits, San Francisco Bay MRP, the Sonoma County Code, the MS4 Phase II Permit, and the Sonoma County General Plan. Proposed policies and Standard Conditions of Approval would be implemented in order to comply with such existing regulations, resulting in less than significant impacts. See also response to comments B11-64, B11-271, MR-3, and MR-9.</p>

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			<p>substantiated.</p> <p>§ The EIR fails to perform and/or present results from any hydrologic or hydraulic analyses to demonstrate to what degree the project may increase runoff rates and erosion potential from new or redeveloped plan areas. The EIR assumes that adhering to existing County regulations will reduce flooding and erosion impact; yet the DEIR fails to demonstrate that would be the case.</p> <p>§ The EIR relies on proposed policies WQ-1 and WQ-4 regarding compliance with applicable plans which, as discussed above, is not adequate to fulfill CEQA requirements. How would these plans insure impacts were reduced to an insignificant level?</p>	

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Sonoma Land Trust	9/26/2022	B11-67	<p>The EIR fails to adequately analyze Project impacts related to exposing people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, or inundation by seiche, tsunami, or mudflow. EIR at 299 to 301.</p> <ul style="list-style-type: none"> o This conclusion is contrary to the California Division of Safety of Dams (“DSOD”) conclusions about Project dam safety presented in section 3.9.2.5 (Flooding – Flooding from Dam Failure) of the EIR. EIR at 286-287. o The EIR states, “The DSOD has classified the downstream hazard of a failure at Fern Lake as high”. EIR at 286. The DEIR further states, “[T]he DSOD has classified the downstream hazard of a failure at Suttonfield Lake as extremely high.” EIR at 287. These statements alone provide evidence in the record that potential flooding impacts are potentially significant and require thorough analysis. o Despite these disclosures, the EIR impermissibly defers necessary subsurface exploration, laboratory testing, and geotechnical studies of the dam sites to determine potential for failure and need for mitigations. EIR at 300. o The EIR relies on implementation of Policies WQ-2 and WQ-3 as mitigation for the significant risks associated with locating housing and businesses in the inundation zone, stating that these policies provide for future geotechnical evaluations. Id. o WQ-2 states “Any potential hazard to life or property in the Planning Area shall be properly investigated by the appropriate licensed professional.” o WQ-3 states “All development that requires a geotechnical, hydrological, or environmental report shall utilize the recommendations of said report and be in 	<p>The comment is noted. The DEIR adequately analyzes impacts to flooding. The DEIR recognizes there are potentially significant impacts related to dam failure on page 299. Due to the potential of flooding from dam failure and because there are no records of dam construction or evaluation of the stability of the dams, a geotechnical investigation will be required as well as an emergency plan. As per Proposed Policy WQ-2 and WQ-3 a geotechnical investigation should be performed on the dam sites to evaluate the potential for failure of the embankments under both static and seismic loading conditions. Possible studies include subsurface exploration, laboratory testing, and geotechnical engineering analysis. The report should evaluate the need for improvements such as spillways, subsurface drains, reconstruction of the dam embankments, and other measures to provide long-term stability of the dam embankments. Short term mitigation measures may include lowering of the water levels in the Lakes by providing spillways at lower elevations. Long term stabilization measures would likely include reconstruction of the dam embankments and installation of subsurface drainage control measures. As per Proposed Policy WQ-5, both Fern and Suttonfield lakes are currently under the responsibility of the State. Since both reservoirs at the Planning Area are classified as at least a high hazard, an Emergency Action Plan (EAP) must be implemented in accordance with the requirements from the California Water Code Sections 6160 and 6161 and Government Code Section 8589.5. When the property is transferred a new EAP must be developed to reduce the risk of loss of human life or injury, and to minimize</p>

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			<p>compliance with regulatory agencies.” EIR at 294 [listed as standard conditions of approval].</p> <ul style="list-style-type: none"> o These proposed policies fail to mitigate potential impacts. Instead, they defer analysis and mitigation until after project approval and leave important questions unanswered. For example: On what basis is the County concluding that dam failure would not pose a significant risk to people on- and off- site? § When would the required studies be performed? § Where would the anticipated embankments and installation of subsurface drainage control measures be implemented? § What is the risk of potentially locating thousands of people on the site given the condition of the dam and the known high risk that it may fail? § How will the required Emergency Action Plan impact the proposed Project? EIR at 300. § How would potential short term mitigation measures (i.e., lowering of the water levels in the Lakes through spillways at lower elevations) impact the environment on- and off-site? Id. § How would implementation of potential long term stabilization measures (i.e., reconstruction of the dam) impact the environment on- and off-site? Id. When will appropriate evaluations be performed? o Under CEQA, studies related to hazards that have the potential to increase safety risks to life and property must be performed prior to project approval. It is critical to perform such evaluations now to determine the level of risk and to include necessary mitigations, which could include changes to the Specific Plan, major repairs or fortifications of the dams, or other mitigation measures as appropriate to avoid or minimize those risks. • The EIR concludes that Project impacts related to 	<p>property damage in the event of a potential or actual emergency. See also MR-3, MR-9, and B11-271. The Proposed Project would be required to demonstrate compliance with all applicable regulations and plans that include NPDES permits and the Sonoma Valley Sub-basin groundwater sustainability plan. Thus, the impact is less than significant.</p>

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			<p>obstructing implementation of a water quality control plan or sustainable groundwater management plan would result in less than- significant impacts, absent any analysis or evidence. EIR at 301.</p> <p>o As with all of the other hydrology impacts listed above, the EIR relies on compliance with existing policies and regulations to minimize impacts and fails to present any analysis to support its conclusion.</p>	
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			<p>presents a flawed analysis of Project-related water demands and available supply.</p> <ul style="list-style-type: none"> o The EIR asserts that the analysis of water supply and projected water demand is conservative. EIR Appendix D at pdf page 593. But this is not the case. o As an initial matter, the proposed Project water demand estimate is based on the assumption that the Project consists of 516 residential units along with nonresidential uses. EIR Appendix D Table 2 at 605. But EIR Appendix D Table 1 (at p. 602) indicates that at build-out in 2045, the Project will have constructed 1000 units plus commercial, hotel, office, public, institutional, and utility uses. And as explained above with respect to the Project Description, the number of residential units could exceed 1300. Even if allowed to build out to only 1000 residential units, the EIR underestimates water demand by 484 units or roughly half. o The EIR analysis of the availability of water supplies to meet proposed project water demands is flawed. EIR Appendix D presents the results of this analysis. Based on review of Appendix D by CBEC at 4 and 5, the analysis is faulty and fails to demonstrate there is sufficient water supply to meet the Project’s future (full buildout) water demands. § The EIR indicates that estimated Project water demands by the year 2045 will be 342 acre-feet per year (AFY). EIR Appendix D, Table 2 at p.14. The EIR indicates that the available reliable supply of water for the period 2030-2045 is 356 AFY. EIR Appendix D, Table 9 at p. 31. Given how close the reliable water supply (356 AFY) is to full buildout demands (342 AFY), there is little room for error in terms of future water supply management. § The EIR water supply estimate shows that the historic 	

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			<p>(1969-2007) water use (demands) for the SDC averaged 622 AFY and peaked at 1,143 AFY in 1986 (pg. 12, Appendix D).</p> <p>§ According to the EIR, the water use estimated for full buildout (2045) of the Project is a little more than half historic SDC water demands. How can this be given that the Project proposes 1000 residential units, a hotel, commercial, and industrial uses? See, EIR Appendix D, Table 1 at p. 13. Even with conservation measures, it appears that Project water demands would be similar to, if not greater, than the historic use.</p> <p>o Upon review and cross-checking data and information presented in the EIR, CBEC identified several questionable results that suggest the EIR water demands are significantly underestimated. EIR Appendix D, Tables 1 and 2. These findings are as follows: The EIR only provides water use estimates for the proposed hotel but considers only water used by employees. EIR Appendix D Table 2 at p.16. Water use by guests staying at the proposed 100,000 square-foot hotel is not accounted for in the annual water demand estimate. Incorporating guest water use into the demand estimate could easily result in total annual Project demands that exceed available reliable supply.</p> <p>§ CBEC identified a significant math error in the DEIR demand estimates for General Commercial, Office, Public/Industrial, and Research & Development land uses presented in EIR Appendix D, Table 2 at p.16. This is shown in Table A of CBEC's report, which merges data from Tables 1 and 2 in EIR Appendix D. When independently calculating water demands using the 2045 land use areas and Water Use Factors provided in Appendix D, the respective 2045 water demands for the General Commercial, Office, Public/Industrial, and Research & Development land</p>	

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Sonoma Land Trust	9/26/2022	B11-69	<p>uses result in values that are two orders of magnitude higher than those reported in the EIR, which results in an increased annual Project water demand of 9,846 AFY (see CBEC Letter at Table A).</p> <p>The EIR’s water supply evaluation is inconsistent with Sonoma County guidelines.</p> <ul style="list-style-type: none"> o The Permit Sonoma website provides guidelines (8-2-1 Water Supply, Use and Conservation Assessment Guidelines) for the preparation of Water Supply Assessments. The purpose of this policy is to provide guidance to applicants and their representatives on how to prepare a Water Supply, Use, and Conservation Assessment (henceforth, the “Assessment”). The Assessment may be a standalone document, or supplemental to a hydrogeologic study, Zero Net Use report, or other water supply related report. These guidelines are intended for discretionary and ministerial projects. Discretionary projects that are dependent on groundwater or surface water will typically require an Assessment with the use permit application. The Assessment will inform the environmental review process and conditions of approval. o The authority of the Assessment falls under Sonoma County General Plan, Water Resource Element Goals WR-2 and WR-4, Objective WR-4.1, WR-4.2, and WR-4.3, and Policies WR-2c, WR-2d, WR-2e, WR-4b, and WR-4f. Therefore, the EIR Water Supply Assessment (EIR at Appendix D) should adhere to County 	<p>The comment is noted. See MR-5 and response to comment B11-272. The Proposed Project would be required to demonstrate compliance with all applicable regulations that include the County Code and General Plan. Given that impacts on water supply are less than significant with implementation of proposed policies and Standard Conditions of Approval, secondary impacts would also be less than significant.</p>

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			<p>Guidelines. Appendix A to the County’s Guidelines includes water use estimates for residential, landscape, agricultural, and Commercial and Industrial uses that are greater than those factors presented in EIR Appendix D, Table 2 (see CBEC Letter Table B). Applying the Sonoma County water use estimates to Project water demand estimates results in higher residential and irrigated area water demands than presented in the EIR. Id.</p> <p>o CBEC’s analysis, which corrects the EIR’s math errors and applies the Sonoma County guidelines’ water use estimates to the EIR demand estimate tables, results in a total annual Project water demand of 10,231 AFY, a values three times higher than reported reliable supply (356 AFY). This annual total demand will be even higher when hotel guest water use is considered.</p> <p>o Based on the aforementioned skewed water supply evaluation, how will Project water demand affect water supply for wildlife and habitat? How will it affect other resources?</p>	

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Sonoma Land Trust	9/26/2022	B11-70	In 2016, Sonoma County voters passed Measure K, which renewed critical protections for community separators throughout the County. The EIR must analyze how locating new development—particularly the high-density development proposed as the upper end of the Project description—is consistent with the County’s general plan, especially if the Project requires a new road through the Glen Ellen/Agua Caliente Community Separator. This analysis must include a complete accounting of whether and how the Project would comply with Community Separator objectives and policies, which require, inter alia, that development minimize the removal of trees and mature vegetation and minimize impervious surfaces. While the EIR acknowledges that most of the SDC property is located within a local voter-approved Community Separator overlay, it fails to adequately analyze the impact of road development therein.	The comment is noted. As noted on page 320 of the DEIR, the Proposed Plan includes multiple goals and policies that would support environmental protection objectives of the General Plan. The Proposed Plan includes multiple policies that encourage sustainable development principles, such as mixed-use, compact development and pedestrian- and bicycle-friendly streets within the Planning Area. The Proposed Plan would not facilitate new development in the 750 acres of preserved open space, which is located outside of Core Campus boundaries. Thus, the Proposed Plan focuses on infill development and development of underutilized and vacant areas within the Core Campus in order to preserve scenic and biotic resources and avoid development within Community Separators.
Sonoma Land Trust	9/26/2022	B11-71	The EIR must clearly analyze the impact of the proposed Highway 12 connector not only on VMT, but also on each of the impact areas for which increased vehicle traffic threatens other impacts. For example, the construction of a new roadway has foreseeable impacts to biological resources through habitat degradation and interference with wildlife movement and connectivity. Similarly, use of a new roadway would increase wildfire risk by siting new human activity and ignition sources, such as vehicles, where none previously existed. A new road also induces growth by providing access to new areas and decreasing travel times. The EIR does not adequately analyze the full scope of foreseeable impacts	The comment is noted. The DEIR analyzes the impacts of a potential Highway 12 connection throughout its environmental analysis. See also MR-3, MR-4 regarding Highway 12 and wildfire evacuation and MR-7 discussing Highway 12 and wildlife movement . See response to comment B11-57 and C109-8 .

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			from the proposed Highway 12 connector and therefore cannot adequately mitigate those impacts.	
Sonoma Land Trust	9/26/2022	B11-72	<p>The EIR does not adequately analyze the Project's consistent with the County's general plan, especially the policies and goals designed to protect biological resources.</p> <ul style="list-style-type: none"> • The EIR fails to analyze the Project's construction impacts, claiming the analysis would be speculative without more details about the development projects. However, the County has information about the proposed land use types, and square footage, and can therefore include an analysis of anticipated construction period impacts based on that information. In addition, the EIR should have included a quantitative assessment of health risk impacts. 	The comment is noted. See Impact 3.10-2. The DEIR analyzes construction impacts throughout its environmental analysis. See also MR-3.
Sonoma Land Trust	9/26/2022	B11-73	<p>The EIR relies on the 2017 Scoping Plan rather than the current Draft 2022 Scoping Plan. The newer plan includes incorporates the State's carbon neutrality goals and consistency with Executive Order EO B-55-18) and an updated Efficiency Threshold. The updated Scoping Plan requirements should have been considered in the EIR. The EIR calls for future geotechnical study/investigation to establish appropriate mitigations. However, the EIR fails to include performance standards for the mitigation measures. Therefore, the EIR defers both analysis and mitigation for geotechnical impacts.</p>	The comment is noted. The DEIR uses the most recent information available at the time, which includes the 2017 Scoping Plan. Finalization of the Draft 2022 Scoping Plan is expected by the end of 2022. See also MR-9.

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Sonoma Land Trust	9/26/2022	B11-74	The EIR discloses that noise along the Highway 12 Connector would increase from zero to 59 decibels. EIR at Table 3.11-9 at p. 352 and 353. However, the EIR concludes that this increase would not result in a significant impact because the increase noise level does not increase by more than 3 decibels. This is clearly an error. EIR at 353.	The comment is noted. Under the noise thresholds, a significant impact would occur if project-related traffic increases the ambient noise environment of noise-sensitive locations by 3 dBA or more if the locations are subject to noise levels in excess of 60 CNEL for exterior areas. Since the connector is 59 CNEL, this would not be a significant impact.
Sonoma Land Trust	9/26/2022	B11-75	The EIR insists that, given the extensive park and recreational opportunities that will be offered within the Planning Area, development under the Proposed Plan would not increase the use of existing neighborhood and regional. EIR at 406. However, the EIR provides no evidence that the planning area parks will meet all park needs of residences.	The comment is noted. As noted on page 403, consistent with the Quimby Act (California Government Code Section 66477), the General Plan 2020 Policy PF-2g requires dedication of land or in-lieu fees as a means of funding, park facilities. Policy PF-2c requires the use of the following standards for determination of park needs: 20 acres of regional parks per 1,000 residents countywide and five acres of local and community parks per 1,000 residents in unincorporated areas. Although the Proposed Plan would result in a population increase of about 2,400, there are approximately 12 acres of parks and recreational facilities designed into the Proposed Plan. Thus, implementation of the Proposed Plan would not exceed these use standards.
Sonoma Land Trust	9/26/2022	B11-76	The EIR identifies a number of Specific Plan policies purportedly designed to reduce impacts to cultural and historic resources. But the EIR fails to explain how these policies would actually achieve that goal. o Policy 2-47: Consider adaptively reusing Sonoma House as a museum dedicated to the history of the SDC facility, collaborating with Sonoma County, the State of California, the Glen Ellen Historical Society, and other community groups for	The comment is noted. See MR-1, MR-3, and MR-9.

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			<p>design and programming of the space, if feasible.</p> <p>§ This policy is vague and unenforceable. It does not require adaptive reuse of Sonoma House or set forth standards to guide whether adaptive reuse would be feasible.</p> <p>§ Who determines whether adaptive reuse is feasible?</p> <p>§ What benchmarks must be met for adaptive reuse to be feasible in this context?</p> <p>o Policy 2-48: Provide resources and learning opportunities for residents and visitors about all phases of the history of the site. Materials should be accessible to all ages and abilities and could include posted signs, fliers, or informational sessions, among other things.</p> <p>§ This policy is vague and unenforceable. Resources and learning opportunities must be available to people of all ages and abilities. Policy 2-52: Require any unanticipated discovery of archeological or paleontological resources to be evaluated by a qualified archeologist or paleontologist.</p> <p>§ This policy is vague and unenforceable.</p> <p>§ What standards must guide the evaluation by an archeologist or paleontologist?</p> <p>§ What additional mitigation would be required if the archeologist or paleontologist were to identify resources of cultural or historic significance?</p> <ul style="list-style-type: none"> • The cultural resources analysis suffers from the same 	

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Sonoma Land Trust	9/26/2022	B11-77	<p>self-mitigating errors as the majority of the EIR. For example, the EIR concludes that “the impact of implementation of the Proposed Plan on individually significant historical resources would be less than significant with implementation of the proposed policies and actions referenced [in the EIR] and existing State regulations.” EIR at 295. The EIR must first analyze the Project’s unmitigated impacts before it can propose mitigation. Otherwise, decisionmakers and the public cannot meaningfully evaluate whether, how, and to what degree the purported mitigation would actually reduce significant impacts.</p> <p>A) The EIR states that the Project would have a significant impact to land use if development would “physically divide an established community.” EIR at 317. The EIR concludes that no division would occur because the Project includes a bike path and other features to enhance connectivity around the Project site. But the EIR ignores that the development proposed under the Specific Plan would nonetheless create a physical barrier in the Sonoma Valley and the Sonoma Valley Wildlife Corridor where none currently exists. Further, in addition to creating a physical barrier, the Project would dramatically increase human activity over present levels. Even if the Project contains elements that could increase connectivity, the population increase that results from the Project would foreseeably result in less tangible barriers, such as increased traffic. The EIR must acknowledge and fully analyze how these impacts would divide Glen Ellen, including the portions of Glen Ellen on either side of the campus, and Sonoma Valley communities more broadly.</p>	<p>The comment is noted. In response to segment A), as noted on page 318, the Proposed Plan includes features specifically aimed at enhancing connectivity within the Planning Area and improving linkages between the larger Sonoma Valley. Therefore, because the Proposed Plan would not introduce any physical barriers to the Planning Area and would generally improve connectivity for all users, including vehicles, bicyclists, and pedestrians, it would result in no impact with respect to physically dividing an existing community. See also MR-7 regarding wildlife movement.</p> <p>In response to segment B), the DEIR acknowledges that the Proposed Plan would cause a substantial change of a historic district, and this impact would be significant and unavoidable. The physical division of an established community typically refers to the construction of a linear feature, such as an interstate highway or railroad tracks, or removal</p>

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			<p>B)</p> <ul style="list-style-type: none"> • The EIR also acknowledges that “[n]ew construction has the potential to disconnect the remaining contributing resources in the Core Campus from those in Community Separator and Regional Parks lands to the east and west, consequently disrupting the feeling and character within the historic district. This would affect the cohesiveness of SSHHD’s overall integrity to the point that it would no longer be eligible for listing in the NRHP, CRHR, or as a California Historic Landmark.” EIR at 296. In other words, the Project would physically divide a historic district and thereby destroy its character as such. o How is this not a physical division of an established community that would constitute a significant land use impact? • As discussed in the above sections, the draft Specific Plan fails to include adequate performance standards to ensure that impacts from development will remain less than significant as the Project is built out. Particularly if the EIR is going to defer development of key mitigation—and it should not do so—the EIR and Specific Plan should adopt a phased-development model that establishes clear and robust performance standards that must be met before the next phase of proposed development can proceed. Build-out should begin with the most important phase(s) of development, namely the construction of affordable housing. 	<p>of a means of access, such as a local bridge, that would affect mobility within an existing community or between a community and outlying area. Thus, Impact 3.10-1 does not pertain to the historic district. See MR-9.</p>
Sonoma Land Trust	9/26/2022	B11-78	<p>The EIR fails to adequately analyze the Project’s air quality and greenhouse gas emissions.</p> <ul style="list-style-type: none"> o The EIR’s air quality analysis is based on a description of the Project that assumes construction of 1,000 residential units, 190,000 square feet of office use, 40,000 	<p>The comment is noted. The Project Description is stable. The future buildout of the Proposed Plan assumes 1,000 new total units; buildout described in the DEIR is aligned with the buildout described in the Proposed Plan. Table 3.3-7 outlines proposed policies that support the 2017 Clean Air Plan.</p>

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			<p>square feet of commercial/retail use, and 90,000 square feet of hotel, 90,000 square feet of public/institutional/utility uses. EIR at 168. As discussed above, this description is inconsistent with the other descriptions in the Specific Plan and EIR. As discussed throughout these comments, the unstable project description implicates the environmental analysis, including the analysis of impacts to air quality. The result is that by underestimating residential units, traffic, and VMT, the EIR underestimates air quality and greenhouse gas emission impacts</p> <p>o For example, the EIR claims that the Project would not conflict with BAAQMD's 2017 Clean Air Plan, based in part on a screening of the Project's estimated impacts against four criterion. EIR at 183. One of those criteria addresses whether the Project will result in an increase in projected VMT or vehicle trips that is less than or equal to projected population increase. Id. Given the significant underestimation of Project-related traffic and related VMT, as discussed above, the EIR's analysis of air quality impacts is also unreliable and its conclusion that the Project would be consistent with the Clean Air Plan is unsupported.</p>	

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Sonoma Land Trust	9/26/2022	B11-79	<p>The EIR fails to adequately analyze and mitigate the Specific Plan’s aesthetic impacts.</p> <p>o The EIR lacks support for its conclusion that development under the Specific Plan would not have a substantial adverse effect on a scenic vista (Criterion 1).</p> <p>§ EIR at 89 states that that the SDC site is within a Historic Combining District, which is designed to “protect those structures, sites and areas that are remainders of past eras, events and persons important in local, state or national history, or which provide significant examples of architectural styles of the past, or which are unique and irreplaceable assets to the county and its communities. Alterations to existing structures and construction of new structures within historic districts shall be consistent with the historic district design guidelines adopted by the board of supervisors.”</p> <p>§ EIR at 102 notes that the current County General Plan requires the County to identify and preserve roadside landscapes that have a high visual quality as they contribute to the living environment of local residents and to the County's tourism economy. Furthermore, General Plan objectives additionally aim to provide guidelines so future land uses, development, and roadway construction are compatible with the preservation of scenic values along designated scenic corridors, of which Arnold Road is one.</p> <p>§ The SDC’s historic landscape creates a unique scenic vista along the length of Arnold Road. Some Specific Plan policies identify historic buildings and contributing buildings to be retained, however the policy language is vague and unenforceable, which results in uncertainty as to whether the resources are going to be retained or whether the scenic vista is going to be lost. For instance,</p>	<p>The comment is noted. Modification to any historic resources under the Proposed Plan would be subject to all applicable regulations, including the County Code and General Plan. The DEIR adequately analyzes aesthetics impacts. Figure 3.1-1 shows the scenic landscape units and corridors located within the Planning Area. State Route (SR) 12, which comprises the eastern edge of the Planning Area, is a Caltrans-designated scenic highway. Arnold Drive, which runs through the center of the SDC property, and SR 12, at the eastern edge of the site, are Scenic Corridors that provide experiences of rural environments the General Plan seeks to preserve. Up to 200 feet on either side of these roads are subject to development restrictions and design criteria. Specifically, Section 26C-222 of the County Code states that all structures shall be subject to the setbacks of thirty percent (30%) of the depth of the lot to a maximum of two hundred feet (200’) from the centerline of the road. The Proposed Plan would adhere to all General Plan and County Code requirements. In addition, the westernmost portion of the SDC site nearest to the Sonoma Mountain is designated as a Scenic Landscape Unit and is limited to agricultural or resource land use categories. Given that construction will be clustered only in the previously developed Core Campus and that new development will keep with the overall scale and development height variation of the current SDC campus, adverse effects on the scenic vistas of SR 12 on the eastern edge of the Planning Area and the scenic landscape unit on the western edge of the Planning Area would be less than significant. Further, as described under Impact 3.1-2, adherence with existing and proposed policies</p>

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			<p>Specific Plan Policy 4-23 states “Preserve and reuse the contributing resources identified in Figure 4.3- 1, to the greatest extent feasible.” How can it be ensured that scenic resources including the Arnold Road historic landscape will be retained and maintained? Without firm and enforceable requirements, it cannot be concluded that the impacts to roadside landscapes and scenic vistas is less than significant.</p> <p>§ Furthermore, the EIR does not identify a threshold of significance to determine what loss of historic/scenic resources would be acceptable and considered less than significant. Therefore, it is impossible to determine whether the policies identified in the Specific Plan are sufficient to prevent a substantial degradation to a scenic resource, which in this case is the high-quality roadside landscape of Arnold Road.</p> <p>§ For Impact 3.1-1, EIR at 103 concludes that since “construction will be clustered only in the previously developed Core Campus and that new development will keep with the overall scale and development height variation of the current SDC campus, adverse effects on the scenic vistas of SR 12 on the eastern edge of the Planning Area and the scenic landscape unit on the western edge of the Planning Area would be less than significant.” However, the EIR fails to recognize that the existing SDC campus is considered a scenic resource due to its historic significance and roadside landscape along a scenic corridor. The substantial change to the scenic resource allowed by the lax policies to protect contributing buildings will result in a substantial adverse impact and cannot be substantiated as a less than significant impact.</p> <p>o The EIR lacks support for its conclusion that the Specific Plan would not substantially degrade the existing visual character or quality of public views</p>	<p>and standards would ensure that construction of an SR 12 connector under the Proposed Plan would minimize adverse effects on a scenic vista to a less-than-significant level. See also MR-3 and MR-9. The comment includes statements that the EIR does not provide thresholds of significance for various aesthetic impacts, however, the thresholds applied to the analyses are clearly set forth in Draft EIR Section 3.1.3.1. Development under the Proposed Plan would be required to comply with applicable regulations governing scenic corridors, including the Sonoma County Code and General Plan. With adherence to existing and proposed policies and standards, vistas along Arnold Drive would not be significantly impacted, and development of an SR 12 connector under the Proposed Plan would ensure that damage to scenic resources along SR 12 would be less than significant. Further, the Specific Plan’s Arnold Drive overlay would encourage development to maintain the feel and scale of the buildings and landscape along Arnold Drive, including with a variety of building types and scales, a continuous landscape setback, activity, and views into the SDC site. Existing goals and objectives in the Sonoma County General Plan 2020 aim to preserve and maintain views of the nighttime skies and visual character of urban, rural, and natural areas, while allowing for nighttime lighting levels appropriate to the use and location; specifically that development should maintain nighttime lighting levels at the minimum necessary to provide for security and safety of the use and users to preserve nighttime skies and the nighttime character of urban, rural, and natural areas; and ensure that nighttime lighting levels for new</p>

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			<p>of the site and its surroundings (Criterion 3). § Arnold Road is a known scenic corridor with a 200’ buffer on either side that is subject to development restrictions and design criteria (Sonoma County General Plan 2020 Figure OSRC-1). Specific Plan Policy 5-O states that “Arnold Drive, development should maintain the feel and scale of the buildings and landscape along Arnold Drive, including with a variety of building types and scales, a continuous landscape setback, activity, and views into the SDC site” (emphasis added). While this is a laudable goal, it is also an unenforceable measure with ambiguous language (“should”) and cannot be relied upon to ensure that the existing visual character will be maintained along this scenic corridor. § EIR at 106 states that “with adherence to existing and proposed policies and standards, development under the Proposed Plan would improve rather than substantially degrade the existing visual character of the site, and this impact would be less than significant.” By what metric is the visual character being measured to determine that it will improve with the proposed project? § The EIR does not identify thresholds against which the proposed degradation of the visual character and quality views of the site can be assessed to come to the conclusion that the impacts will be less than significant. Therefore, this conclusion is unfounded. o The EIR lacks support for its conclusion that the Specific Plan would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area (Criterion 4) § The EIR qualitatively discusses the light and glare impacts that will result from the operation of the project (lighting from future building fixtures, building windows, automobile headlights, parking lot lighting). What are the expected impacts from security</p>	<p>development are designed to minimize light spillage offsite or upward into the sky. General development standards that pertain to light and glare would need to conform to County-prescribed lighting regulations provided in Section 26-82-030 of the Sonoma County Code. With adherence to existing and proposed policies and standards, development under the Proposed Plan would not substantially increase the amount of nighttime lighting or glare in the already previously developed Core Campus or surrounding open space areas. Impacts associated with light and glare would be less than significant.</p>

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			<p>lighting or other sources during the construction phases of the project?</p> <p>§ The EIR references Specific Plan Policy 2-7, which prohibits lights within the wildlife corridor and along the creek corridor. To what sections and at what width of the creek corridor would this prohibition apply? For the purposes of enforcement of this requirement, what area is considered a “wildlife corridor?” The whole SDC area is designated a Habitat Connectivity Corridor – is that the area this policy is referring to?</p> <p>§ The EIR references Specific Plan policies 5-32, 5-39, and 5-43, which all refer to maintaining a thick buffer of vegetation in order to buffer lights to protect wildlife within the preserved open space areas. For each of these policies, which serve as mitigation to address light and glare impacts, what are the type and/or height of needed vegetation or depth/width of the buffers to provide suitable light and glare protection to the creek corridors? The EIR or Specific Plan should contain policies or mitigation measures requiring a photometric plan or other metric by which light impacts can be assessed and should also have a policy or mitigation measure addressing maximum light standard height and spacing.</p> <p>§ EIR at 107 concludes that “with adherence to existing and proposed policies and standards, development under the Proposed Plan would not substantially increase the amount of nighttime lighting or glare in the already previously developed Core Campus or surrounding open space areas. Impacts associated with light and glare would be less than significant.” What thresholds of significance have been used to quantify this statement? What data has been collected regarding the existing light environment and the proposed light environment to be able to draw this conclusion?</p>	

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Sonoma Land Trust	9/26/2022	B11-80	<p>A) The EIR fails to analyze a reasonable range of alternatives to the proposed Project. Though couched as “alternatives,” each of the alternatives discussed in the EIR would inexplicably implement the draft Specific Plan policies—in other words, each alternative assumes the de facto adoption of the draft Specific Plan policies even if the draft Specific Plan is not formally adopted by the County. Additionally, with the exception of the Historic Preservation Alternative, the impacts of the proposed alternatives are substantially the same. The EIR’s decision to constrain alternatives in this way is not only unsupported, but also threatens to obscure project alternatives that could actually reduce project impacts, such as alternatives with fewer residences and less commercial concentrated on a smaller development footprint. The EIR must analyze a reasonable range of alternatives, including an alternative based on the development proposal that the State ultimately chooses through its RFP process. Once the State selects a development proposal, the County will better understand the location and intensity of proposed development and will therefore be able to conduct a more thorough analysis of project impacts.</p> <ul style="list-style-type: none"> • The County should decline to certify this EIR and instead direct staff to use the Historic Preservation Alternative as the starting point for a new and revised preferred project, with a revised Specific Plan and EIR that address the flaws identified in this and the following Attachments. <ul style="list-style-type: none"> o The Historic Preservation Alternative should be revised to start with an affordable housing project of 200+/- homes (Phase 1), and to allow for future development phases consistent with whichever proposal the California Department of General Services (DGS) 	<p>The comment is noted. In response to segment A), the DEIR does analyze a reasonable range of alternatives. Section 15126.6 of the CEQA Guidelines states that: An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. See also MR-2 and MR-8.</p> <p>The purpose of alternatives is to consider alternate ways to avoid or substantially lessen any of the significant effects of the project. (CEQA Guidelines Section 15126.6 (a).) The EIR concluded that the proposed Specific Plan would only have significant unmitigable impacts in the topics of adverse impacts to a potential historic district because of physical demolition, destruction, relocation or alteration of the district or its immediate surroundings; and related to project specific and cumulative vehicle miles traveled (VMT) impacts. The Alternatives we selected in order to consider ways to reduce or avoid those impacts, while still meeting the main project objective and the intent of the state legislation.</p> <p>The comment suggests that the alternatives must include an alternative based on a development proposal that the State selects, however, the State has made no such selection, and thus there is no known proposal available to study. Further, to the extent that the State selects a development proposal that is substantially different than the Specific Plan,</p>

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			<p>selects as the winning bid pursuant to their surplus property sale process for the SDC core campus. The EIR acknowledges that the County and public have no real idea of how much development will actually occur at SDC, because we do not know which proposal DGS will select to enter into an Exclusive Negotiating Agreement for the sale of the campus. EIR at 77. Since we will know by late October who DGS has selected as the buyer, developing an alternative based on the DGS-selected proposal will give Permit Sonoma, the public, and decisionmakers an opportunity to focus on a real-world proposal that will drive “the exact amount and location of future development.” EIR at 77 (emphasis added). This approach would also resolve the problem of speculating about financial feasibility and making unfounded assumptions regarding how much and what type of housing needs to be built on the site to subsidize the affordable housing mandates.</p> <p>B)</p> <ul style="list-style-type: none"> o Importantly, the historic preservation alternative also requires significant modification to expand wildlife corridor, riparian and open space protections and setbacks. In order to further Guiding Principle #3, the revised historic preservation alternative must include and meet the following specific performance standards: <ul style="list-style-type: none"> § Provide sufficient setbacks from all creeks designed to protect water quality and quantity, instream and riparian habitat and wildlife connectivity § Provide a sufficient buffer that reduces the current footprint of the north side of the SDC campus adjacent to Sonoma Creek to allow wildlife to safely travel through the Sonoma Valley Wildlife Corridor § Ensure human activities and improvements at SDC do not impair wildlife’s use 	<p>additional CEQA review would likely be necessary before implementation of any such development proposal. <u>The State legislation informed the alternatives, and the alternatives are similar because of the need to generally meet the Project objectives. Further, see Table 4.1-1 for a summary of the alternatives and how they are different from one another.</u></p> <p><u>In response to segment B), under the Historic Preservation Alternative, the area available to wildlife for habitat and movement will be similar to what exists currently at the site and lower compared to the Proposed Plan, and the creek corridors and the wildlife corridor will also not be expanded. Conversely, the lower population could result in fewer wildlife and habitat/human conflicts. Thus, with implementation of policies outline in Section 3.4, project-level and cumulative biological resources impacts under the Historic Preservation Alternative would be similar or slightly better compared to those of the Proposed Plan, but worse, but still less than significant, for wildlife corridors.</u></p>

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Sonoma Land Trust	9/26/2022	B11-81	<p>§ Ensure roads and traffic do not create a danger to wildlife</p> <p>§ Ensure new development does not create new sources of light, glare or noise that would impair wildlife’s use of the Corridor</p> <p>§ Ensure new development does not increase the risk of wildfires that would harm the natural and built environments</p> <p>§ Ensure runoff from new impermeable development does not result in erosion or contamination of creeks and riparian areas.</p> <p>The EIR mischaracterizes and misapplies the State legislation governing the disposition and planning process for SDC.</p> <ul style="list-style-type: none"> o Government Code section 14670.10.5 (the “Legislation”) does not establish any financial objectives for the redevelopment of SDC. <p>§ The EIR repeatedly states that economic viability is a stated objective of the State Legislation governing disposition of the SDC property. E.g., EIR at 527 (stating the guiding principles “seek to further the State’s goals for the SDC site established in California Government Code Section 14670.10.5 for promoting housing, especially affordable housing and housing for those with development disabilities; preserving open space surrounding the Core Campus; and ensuring that development is economically viable.”); EIR at 532 (“State law stipulates that the SDC Specific Plan ... ensure the financial feasibility of development”); EIR at 533 (concluding an outcome would be “contrary to the economic objectives codified in State law”) (citing the Legislation). Not so. The “Legislation only directs that the County consider the economic viability of future development during the planning process: “The planning process shall facilitate the disposition of the</p>	<p>The comment is noted. See MR-2 regarding the State legislation and MR-8 regarding the financial feasibility of the Historic Preservation Alternative. See also B11-80; the Alternatives should attain most of the basic objectives of the project. Further, the focus of the Proposed Project and the Alternatives is to be financially feasible and fulfill the Project objectives and requirements under the State legislature rather than maximize profits.</p> <p>As noted in the comment, the Legislation calls for the consideration of economic feasibility of future development. Further, the agreement between the County and State for the SDC planning effort expressly calls for “...completing a report on the economic feasibility of future development...” (Paragraph 3 of Exhibit A to the County/State Agreement.) The Agreement also calls for preparation of an Economic Market Demand Report. (Paragraph 4.C. of Exhibit A to County/State Agreement.)</p>

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			<p>property by amending the general plan of the county and any appropriate zoning ordinances, completing any environmental review, and addressing the economic feasibility of future development.” Gov. Code § 14670.10.5(c)(1). It does not require that the County ensure economic viability or even prioritize economic viability. Compare id. with Gov. Code 14670.10.5(c)(3) (“shall provide for the permanent protection of the open space and natural resources as a public resource to the greatest extent feasible”) and (c)(4) (“shall require that housing be a priority in the planning process and that any housing proposal determined to be appropriate for the property shall include affordable housing”). Protection of open space and affordable housing are priorities under the Legislation; economic viability is merely a consideration.</p> <ul style="list-style-type: none"> o The only objective that requires financial feasibility is the County’s own guiding principle. § The County—not the State—requires that the Specific Plan “[e]nsure that the proposed plan is financially feasible and sustainable, as financial feasibility is essential to the long-term success of the project.” EIR at 528. The EIR proposes to ensure financial feasibility by ensuring “that the proposed plan supports funding for necessary infrastructure improvements and historic preservation while supporting the Sonoma Valley community’s needs and galvanizing regional economic growth.” Id. • The County’s goal to ensure long-term fiscal sustainability is a binary goal. A project either is feasible (i.e., capable of being completed) or it is not. A project either is sustainable or is it not. A project either pencils or it does not. Nothing directs the County to maximize economic returns or to compare the relative returns of the various alternatives. E.g., EIR at 532 	

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			<p>(criticizing the Reduced Development Alternative as “less economically viable ... than the Proposed Plan”). As discussed above, the only two Project features that must be maximized under the Legislation are open space preservation and affordable housing. See generally Gov. Code § 14670.10.5.</p> <ul style="list-style-type: none"> • The County provides a clear path towards ensuring that the Project is financially feasible and sustainable by ensuring that the Project will generate enough revenue for the developer to be able to fund the necessary infrastructure improvements the site requires. • Nothing in the County’s objectives or in the Legislation requires the Project to prioritize returns on investment or requires the EIR to analyze the comparative returns of the various project alternatives. Yet comparison of hypothetical and speculative returns on investment inexplicably forms a central pillar of the EIR’s alternatives analysis. E.g., EIR at 530 (comparing the relative economic value of the No Project Low Development Alternative against the Proposed Plan), 531 (same with respect to the No Project High Development Alternative), 532 (same with respect to the Reduced Development Alternative), 533 (same with respect to the Historic Preservation Alternative). Because alternatives must be studied to reduce environmental impacts—not to maximize economic returns—this approach is not only unjustified but contrary to CEQA. 	

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Sonoma Land Trust	9/26/2022	B11-82	<p>A) The alternatives analysis cites inconsistent assumptions to guide its analysis and justify its conclusions. Because it is unclear on which assumptions the EIR actually relies, decisionmakers and the public cannot decipher the anticipated impacts of the proposed alternatives or independently judge the EIR’s analysis.</p> <p>o For example, on page 530, the EIR concludes that the No Project: Low Development Alternative would result in a greater number of “small-lot and townhome units” because those units “generate much higher financial returns.” On page 537, the EIR removes any reference to townhomes and concludes that that same alternative would prioritize “single-family homes to maximize financial feasibility.” Then on page 541, the EIR backtracks, stating again that the No Project: Low Development Alternative “would likely have a larger proportion of small-lot single family and townhomes ... to achieve financial feasibility.” The EIR further muddies the water in its analysis of the Reduced Development Alternative, which the EIR concludes would exhibit “a preference for more large lot, single family homes to maximize financial feasibility.” EIR at 553 (emphasis added). On page 557, the EIR further specifies that these large lot residential developments would focus “more on single-family detached residential units than other typologies.” (emphasis added). Finally, in its discussion of the Historic Preservation Alternative, the EIR again states that “large lot, single-family homes” would “maximize financial feasibility.” EIR at 561; see also EIR at 566 (noting that the Historic Preservation Alternative would also prioritize “singlefamily detached residential units”) (emphasis added).</p> <p>§ Even assuming that the State’s chosen developer</p>	<p>The comment is noted. In response to segment A), case law suggests that the discussion of alternatives need not be exhaustive. CEQA Section 15126.6(f) states that the alternatives in an EIR should be governed by a “rule of reason.” If impacts are less than significant for an Alternative and the Proposed Plan, the DEIR need not define how much less significant impacts are. See MR-2 and MR-8. The planning process shall facilitate the disposition of the property by addressing the economic feasibility of future development. Thus, the financial feasibility of construction requirements and provision of affordable housing is discussed in each alternative. Rehabilitation and adaptive reuse at SDC is generally more expensive than new construction. See Alternatives Report, November 2021 (Updated), available at https://www.sdcspecificplan.com/documents. See Table A-5 for the residual value of residential development. Detached single family homes generate the greatest net value, followed by attached single family homes. Thus, the Reduced Development Alternative and Historic Preservation Alternative would need to provide both new single-family detached and small lot attached single-family units over multi-family units in order to maximize financial feasibility. Exact buildout numbers of housing typologies for each of the alternatives are not required since case law suggests that the discussion of alternatives need not be exhaustive. See also Table 4.5-1; the DEIR is comparing each alternative to the Proposed Project, rather than comparing alternative to alternative.</p>

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			<p>would prioritize maximizing financial returns when selecting housing typologies—and the EIR has given no justification to support that assumption—it is logically impossible for three different housing types to each provide higher returns on investment than the next. Either townhomes provide higher returns or large-lot detached single-family residences do. The EIR’s conclusions about which housing typologies would be employed under each alternative are therefore contradictory and unsupported by substantial evidence.</p> <ul style="list-style-type: none"> • Which housing typology or typologies would provide the highest financial returns? Why does the County believe it fair to assume that a developer would prioritize financial returns from housing when selecting housing typologies for this complex development, which includes multiple revenue streams and a mandatory obligation to prioritize affordable housing? <p>§ Further, even if these housing types provided similar returns on investment, the EIR does not explain why one alternative would maximize returns with townhomes while another would maximize returns with largelot detached single-family homes. The EIR needs to justify why those design choices are appropriate assumptions in order for the alternatives analysis to be meaningful.</p> <p>B)</p> <ul style="list-style-type: none"> o The EIR also makes inconsistent assumptions about the impacts of increased or decreased development on the amount of construction activity that the Project will generate. Because the EIR fails to apply its assumptions consistently, decisionmakers and the public cannot rely on the analysis that is based on those assumptions. <p>§ For example, the analysis of the No Project: Low Development Alternative concludes that impacts to air quality and biological resources would be reduced because less residential and non-residential development</p>	<p><u>In response to segment B), section 4.2 of the DEIR details buildout assumptions that are incorporated into the analysis of each of the alternatives. See also Table 4.1-1. Even, though there may be a reduced level of ground disturbance and construction activities in the Reduced Development Alternative, excavation, grading, and demolition would still be required for buildout under this alternative. Thus, impacts would be largely similar to the Proposed Plan. Slight variations of impacts may occur however, see Table 4.5-1.</u></p> <p><u>In response to segment C), the High Development Alternative would result in the construction of more housing units compared to the Proposed Plan, which would likely require a greater number of historic buildings to be demolished compared to the Proposed Plan. Thus, there would be greater potential impacts on historic, cultural, and tribal cultural resources. Such variations of impacts are detailed in Table 4.5-1. If impacts are less than significant for an Alternative and the Proposed Plan, the DEIR need not define how much less significant impacts are.</u></p>

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			<p>would occur. EIR at 537-538 (this alternative “would result in somewhat reduced impacts on biological resources . . . because a reduced level of ground disturbance and construction activities would occur”); see also EIR at 539 (energy and greenhouse gas impacts would be “slightly less” because “construction activity would be somewhat reduced”). But this understanding that less construction results in less grading and ground disturbance does not carry uniformly through the analysis. For example, the EIR concludes that “[s]imilar impacts on cultural resources, and tribal cultural resources would result from the No Project: Low Development Alternative compared with the Proposed Plan because excavation, grading, and demolition would likely still be required for construction.” EIR at 538. For similar reasons, the EIR concludes that this alternative would have “[s]imilar impacts on geology, soils, and seismicity . . . compared with the Proposed Plan. EIR at 540. Why would reduced construction activity reduce grading and ground-disturbance based impacts to one class of resources but not to another?</p> <p>§ Similarly, notwithstanding the EIR’s concession that construction-related impacts would be reduced under the No Project: Low Development Alternative, the EIR concludes that “[i]mpacts related to hazards and hazardous materials . . . would be similar to those of the Proposed Plan because construction would have similar risks, associated with the accidental release of hazardous materials.” EIR at 540; see also EIR at 570 (applying the same assumptions to the Reduced Development and Historical Preservation alternatives). Why would less development reduce certain construction-related impacts but not others?</p> <p>C)</p> <p>§ The EIR does not draw equivalent conclusions with</p>	

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Sonoma Land Trust	9/26/2022	B11-83	<p>respect to the No Project: High Development Alternative. In that case, the EIR notes that “[g]reater impacts on cultural resources, and tribal cultural resources would result from the No Project: High Development Alternative compared with the Proposed Plan because more development would increase excavation, grading, and demolition of existing buildings and construction requirements.” EIR at 546. Likewise, the EIR concludes that “construction activity would be increased, resulting in slightly greater construction-related and operations GHG emissions.” EIR at 547. And “[g]reater impacts on geology, soils, and seismicity would result ... compared with the Proposed Plan because excavation, grading, and demolition would still be required and increased for demolition of existing buildings and construction of new residential and non-residential units.” EIR at 548. It is logical that increased construction would result in increased construction-related impacts. But it is equally logical that decreased construction would result in decreased construction-related impacts. The EIR does not explain why it assumes the former to be true but not the latter. Its analysis is facially inconsistent and does not provide adequate information by which decisionmakers and the public could independently judge the relative merits of each of the alternatives.</p>	<p>The comment is noted. Case law suggests that the discussion of alternatives need not be exhaustive. CEQA Section 15126.6(f) states that the alternatives in an EIR should be governed by a “rule of reason.” As noted throughout the alternatives analysis, it is assumed that the alternatives would likely include similar goals and policies as the Proposed Plan in order to fulfill Project objectives. For example, page 549 of the DEIR states that development under the</p>

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			<p>implementation of the [Specific Plan] policies outlined in Section 3.3.” But the No Project Alternatives assume that the Specific Plan is not adopted. EIR at 529 (“should the County not adopt the Specific Plan ... the mostly likely course would be for the State to achieve its desired land use objectives through mechanisms other than the Proposed Plan”).</p> <ul style="list-style-type: none"> • Why would policies and conditions of approval developed in the Specific Plan to address air quality impacts of the Specific Plan exist and be implemented if the Specific Plan is not adopted? <p>§ The EIR also assumes that the No Project: Low Development Alternative would implement “policies similar to those” in the Biological Resources Analysis. EIR at 538 (“The policies outlined in Section 3.4, as well as the biological resource protection practices identifies in the Standard Conditions of Approval are assumed to be similar in the Low Development Alternative.”).</p> <ul style="list-style-type: none"> • Why would policies and conditions of approval developed in the Specific Plan to address biological impacts of the Specific Plan exist and be implemented if the Specific Plan is not adopted? <p>§ The EIR assumes the same for policies related to Cultural, Historic, and Tribal Resources. EIR at 538 (“The relevant policies and Standard Conditions of Approval identifies in Section 3.5 are assumed to be similar in the No Project Low Development Alternative.”)</p> <ul style="list-style-type: none"> • Why would policies and conditions of approval developed in the Specific Plan to address cultural, historic, and tribal cultural resource impacts of the Specific Plan exist and be implemented if the Specific Plan is not adopted? <p>§ The EIR assumes the same for policies related to</p>	<p><u>No Project Higher Development Alternative would be subject to similar policies and implementing actions promoting a vibrant mix of uses and regional connectivity outlined in Section 3.10. Since this is a programmatic EIR, individual development projects would be subject to separate CEQA review with impacts mitigated as necessary; see MR-3.</u></p>

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			<p>Geology, Soils, and Mineral Resources. EIR at 540 (“Policies and Standard Conditions of Approval identified in Section 3.7 are assumed to be similar in this Alternative.”)</p> <ul style="list-style-type: none"> • Why would policies and conditions of approval developed in the Specific Plan to address geologic impacts of the Specific Plan exist and be implemented if the Specific Plan is not adopted? <p>§ The EIR repeats these assumptions for the No Project: High Development Alternative. EIR at 546 (stating the same assumptions for policies and conditions related to air quality, biological resources, and cultural, historic, and tribal resources); EIR at 548 (stating the same for policies and conditions related to geology, soils, and mineral resources).</p> <ul style="list-style-type: none"> • Why would policies and conditions of approval developed in the Specific Plan to address impacts of the Specific Plan exist and be implemented if the Specific Plan is not adopted? <p>§ It might be reasonable to assume that certain Specific Plan policies or conditions of approval would persist or be implemented under the Reduced Development Alternative or the Historic Preservation Alternative, since those alternatives would still result in a modified specific plan being adopted. But under the No Project Alternatives, the Specific Plan is—by definition—not adopted. EIR at 529. If the Specific Plan is not adopted, logic would dictate that the Specific Plan’s policies and conditions of approval would not be implemented. The EIR needs to justify its contrary assumption why the Specific Plan’s policies and conditions would be implemented in the absence of the Proposed Plan. Without that justification, the EIR’s conclusions regarding the relative impacts of the various project</p>	

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			alternatives are unsupported by reason or substantial evidence.	
Sonoma Land Trust	9/26/2022	B11-84	<p>The EIR also fails to adequately justify the assumptions underlying the selection of the No Project Alternatives. § The No Project Alternative(s) needs to examine what would occur if the Draft Specific Plan is not approved. As the EIR acknowledges, however, determining what would happen if the Draft Specific Plan is not approved is largely speculative. See EIR at 529 (“this EIR cannot pre-judge the State’s actions”).</p> <ul style="list-style-type: none"> • The Legislature and the State Department of General Services “recognized the unique natural and historic resources of the [SDC] property and acknowledged that it was not the intent of the state to follow the traditional state surplus property process.” Gov. Code § 14670.10.5(a)(3). The State has expressed an intent to prioritize affordable housing on the site and to protect the site’s “exceptional open-space, natural resources, and wildlife habitat characteristics.” Gov. Code § 14670.10.5(a)(6), (7), and (9). And the State has provided a framework by which the County may assume planning responsibility consistent with the objectives. Gov. Code § 14670.10.5(a)(8), (c). But nothing in the State Legislation requires the planning process to include any particular elements other than affordable housing and open space preservation. See generally Gov. Code § 14670.10.5. And equally significant, the State Legislation does not mandate that the State sell the SDC property through the planning process. See Gov. Code § 14670.10.5(c)(1) (“The director may ... enter into an agreement with the county for the county to develop a specific plan for the property and to manage 	<p>The comment is noted. Case law suggests that the discussion of alternatives need not be exhaustive. CEQA Section 15126.6(f) states that the alternatives in an EIR should be governed by a “rule of reason.” It is assumed that the alternatives would likely include the similar goals and policies to the Proposed Plan. See MR-2. See also page 529 of the DEIR. While this EIR cannot pre-judge the State’s actions, the EIR tries to frame these in light of the State Legislature’s established land use objectives for the site, per Govt. Code Section 14670.10.5. The comment acknowledges the unknowns regarding what would occur if the Specific Plan is not adopted, and also recognizes that a no project alternative that assumes continuation of the status quo is not reasonable.</p> <p>The comment suggests that a viable option would be a transfer of the property to another State agency, however, there has been no indication that there is any State agency interested in utilizing the site. Government Code Section 14670.10.5 authorized DGS to enter into an agreement with the County (“Land Use Planning Agreement”) for the County to develop a specific plan for the property and manage the land use planning process, integrated with a disposition process for the property to be carried out by DGS. Thus, the State will seek to achieve Project objectives while retaining flexibility in its actions, including through “...sale, lease, exchange, or other</p>

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			<p>the land use planning process.”) (emphasis added); see also Gov. Code § 14670.10.5(e)(1) (“This section shall not apply to the transfer of the property to a state agency in accordance with Section 11011.”). The logical conclusion is that if the Specific Plan is not adopted, the Department of General Services could take a number of different paths, including allowing the County to develop a different specific plan for the site or transferring the property to a state agency in accordance with Section 11011. Yet the EIR concludes without explanation or justification that, if the Specific Plan is not adopted, the State would proceed with development of the site in substantial conformity with the rejected draft Specific Plan.</p> <ul style="list-style-type: none"> o On what basis does the EIR conclude that this outcome is more likely than any other possible outcome, such as DGS transferring the property to another state agency or DGS waiting for the County to develop an alternative specific plan? o The EIR appears to rely on its claim that the current Draft Specific Plan most fully achieves the objectives outlined in the State Legislation. See EIR at 529 (concluding that “the State [would] retain[] planning control over the campus unfettered by local regulations to achieve these land use objectives” and that as a result, “the No Project Alternative would result in a palette of uses similar to those outlined in the Proposed Plan.” But the only two objectives codified in the State Legislation are the mandate to prioritize affordable housing and the mandate to protect open space. See generally Gov. Code § 14670.10.5. So the State Legislation, standing alone, cannot justify the EIR’s conclusion that the No Project Alternative would result in the same palette of uses as the Proposed Plan, which palette is designed to achieve the County’s objectives—not the State’s. Compare Gov. 	<p><u>transfer” of the property to achieve the desired outcomes.</u></p>

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			<p>Code § 14670.10.5 with EIR at 527- 528. Without further justification, the EIR cannot demonstrate that its purported No Project Alternatives reflect what would actually occur if the Specific Plan is not adopted.</p>	
Sonoma Land Trust	9/26/2022	B11-85	<p>A) Similarly, the EIR fails to explain why the development levels in the two No Project Alternatives—which appear to be entirely arbitrary 25 percent increases and decreases in development—would be reasonably predicted to occur.</p> <ul style="list-style-type: none"> • What data support the EIR’s chosen housing and job count for the No Project: Low Development Alternative? • What analysis supports the EIR’s chosen housing and job count for the No Project: Low Development Alternative? • What assumptions support the EIR’s chosen housing and job count for the No Project: Low Development Alternative? • What data support the EIR’s chosen housing and job count for the No Project: High Development Alternative? The EIR draws conclusions about the relative merits of its proposed alternatives without actually analyzing potential impacts or supporting its conclusions with substantial evidence. These failures obscure the EIR’s reasoning and make it impossible for decisionmakers or the public to comprehend how the EIR draws its conclusions, particularly where the EIR’s conclusions appear to contradict the EIR’s own limited analysis. 	<p>The comment is noted. In response to segment A), Case law suggests that the discussion of alternatives need not be exhaustive. CEQA Section 15126.6(f) states that the alternatives in an EIR should be governed by a “rule of reason.” It is assumed that the alternatives would likely include similar goals and policies to the Proposed Plan. Thus, the probable range of development under the No Project Alternative is further fleshed out in the form of a No Project: Low Development and a No Project: High Development scenario. Given the uncertainty around the precise land use mixes in the No Project scenarios, the County’s failure to adopt the Specific Plan would result in environmental outcomes that are less certain and predictable at this stage, but potentially largely similar to those of the Proposed Plan with some variations, and are presented later in this chapter. Were the State to proceed with development under its own regulatory auspices, it would need to conduct its own environmental review as the lead agency, and thus, detailed environmental consequences of the County’s failure to adopt the Specific Plan would be more clearly known at that time.</p> <p>In response to segment B), with fewer housing sites, the No Project: Low Development Alternative</p>

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			<p>B)</p> <ul style="list-style-type: none"> o For example, the EIR concludes that No Project: Low Development Alternative would result in “lower financial feasibility” than the Proposed Plan. EIR at 537. But the EIR does not document or explain why the No Project: Low Development Alternative would be less financially feasible. To the contrary, the EIR states that the alternative’s development mix would shift, for example by prioritizing more single-family homes, “to maximize financial feasibility.” EIR at 537. § What are the specific financial drivers that influence the financial feasibility of the No Project: Low Development Alternative? § How specifically does the financial outlook of this alternative compare to that of the Proposed Project? o The EIR also states that “the No Project: Low Development Alternative would have an equivalent impact related to land use, population, and housing compared to the Proposed Plan” (EIR at 541-541), notwithstanding that the No Project: Low Development Alternative would develop “to a lesser extent and in a smaller area” (EIR at 541). § Why did the EIR conclude that impacts would be the same even though development intensity is reduced? § Why does the financial feasibility of various alternatives appear to vary so greatly but the impacts do not? <p>C)</p> <ul style="list-style-type: none"> o The EIR assumes without explanation or justification that the No Project: Low Development Alternative, the Reduced Development Alternative, and the Historic Preservation Alternative would “shift some of the planned growth in the Planning Area to other locations in the region.” EIR at 543, 559, 568. 	<p>would be less financially feasible than the Proposed Plan. See B11-80, B11-82, and MR-2 regarding the State legislation, financial feasibility, and variability of alternative impacts. If impacts are less than significant for an alternative and the Proposed Plan, the DEIR need not define how much less significant impacts are. Such variations of impacts for each alternative are detailed in Table 4.5-1.</p> <p>In response to segment C), as noted on page 376 of the DEIR, there is presently a severe shortage of housing in Sonoma County, like in much of the rest of the Bay Area. Thus, it is assumed that planned growth in other parts of the County would occur in some of these Alternative scenarios where there are fewer housing units than the Proposed Plan.</p> <p>In response to segment D), this EIR cannot pre-judge the State’s actions, the EIR tries to frame these in light of the State Legislature’s established land use objectives for the site, per Govt. Code Section 14670.10.5. These are the assumptions used in the development of the No Project alternatives. In the No Project: High Development Alternative, it is assumed that the State would pursue a greater amount of residential development to achieve greater economic viability, which is one of the project objectives outlined in the State legislation. See B11-80, B11-82, and MR-2 regarding the State legislation, financial feasibility, and variability of alternative impacts.</p>

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			<p>§ Why is the growth planned by the Draft Specific Plan assumed to be inevitable in Sonoma County?</p> <p>D)</p> <ul style="list-style-type: none"> • What analysis supports the EIR’s chosen housing and job count for the No Project: High Development Alternative? What assumptions support the EIR’s chosen housing and job count for the No Project: High Development Alternative? The EIR draws conclusions about the relative merits of its proposed alternatives without actually analyzing potential impacts or supporting its conclusions with substantial evidence. These failures obscure the EIR’s reasoning and make it impossible for decisionmakers or the public to comprehend how the EIR draws its conclusions, particularly where the EIR’s conclusions appear to contradict the EIR’s own limited analysis. <ul style="list-style-type: none"> o For example, the EIR concludes that No Project: Low Development Alternative would result in “lower financial feasibility” than the Proposed Plan. EIR at 537. But the EIR does not document or explain why the No Project: Low Development Alternative would be less financially feasible. To the contrary, the EIR states that the alternative’s development mix would shift, for example by prioritizing more single-family homes, “to maximize financial feasibility.” EIR at 537. <p>§ What are the specific financial drivers that influence the financial feasibility of the No Project: Low Development Alternative?</p> <p>§ How specifically does the financial outlook of this alternative compare to that of the Proposed Project?</p> <ul style="list-style-type: none"> o The EIR also states that “the No Project: Low Development Alternative would have an equivalent impact related to land use, population, and housing compared to the Proposed Plan” (EIR at 541-541), notwithstanding that the No Project: Low Development 	

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			<p>Alternative would develop “to a lesser extent and in a smaller area” (EIR at 541).</p> <p>§ Why did the EIR conclude that impacts would be the same even though development intensity is reduced?</p> <p>§ Why does the financial feasibility of various alternatives appear to vary so greatly but the impacts do not?</p> <p>o The EIR assumes without explanation or justification that the No Project: Low Development Alternative, the Reduced Development Alternative, and the Historic Preservation Alternative would “shift some of the planned growth in the Planning Area to other locations in the region.” EIR at 543, 559, 568.</p> <p>§ Why is the growth planned by the Draft Specific Plan assumed to be inevitable in Sonoma County?</p>	
Sonoma Land Trust	9/26/2022	B11-86	<p>A)</p> <p>The EIR concludes that the Historic Preservation Alternative “is projected to result in approximately 50 percent fewer vehicle trips than the Proposed Plan, indicating that the total VMT generated may also be roughly 50 percent lower.” EIR at 569. The EIR does not cite data or analysis to support this statement.</p> <p>§ How did the EIR reach these numbers?</p> <p>o The EIR states that the reduction in VMT under the Historic Preservation Alternative “would be substantial though would not necessarily translate to less residential VMT per capita, which is the efficiency metric for which a significant VMT impact was identified.” EIR at 569. In light of its chosen significance threshold, the EIR cannot meaningfully compare the VMT impacts of the various alternatives unless it quantifies VMT per capita for each alternative.</p> <p>§ What data or analysis would be needed to determine whether the substantial reduction in VMT under the Historic Preservation Alternative would translate to less</p>	<p>The comment is noted. In response to segment A), see MR-8 and MR-6. Transportation analysis for each of the Alternatives was conducted by W-Trans. For the Historic Preservation Alternative, the jobs to housing ratio would be approximately 0.56, which is considerably higher than the Proposed Plan’s ratio of 0.39. Based on modeling completed in 2021 for the SDC Alternatives analysis, it was noted that the alternative with the highest jobs to housing ratio (Alternative B) resulted in slightly lower home-based work (commute) VMT than the other alternatives. Based on this observation, it appears that a higher jobs-to-housing ratio in the Plan area may lead to slightly less per capita VMT generated by residents. Accordingly, it is likely that the Historic Preservation Alternative could result in a slightly lower VMT per capita than the Proposed Plan, thereby modestly reducing the significant VMT impact. This reduction in the total VMT generated by development in the Plan area</p>

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			<p>residential VMT for capita? § Under what circumstances does a change in total VMT translate or not translate to a change in VMT per capita? § The EIR states that it is uncertain whether the reduction in VMT would translate to a reduction in VMT per capita, but nevertheless goes on to conclude that the alternative’s “reductions in VMT and VMT per capita would be insufficient to avoid a significant and unavoidable VMT impact.” EIR at 539. By definition the EIR cannot determine the significance of the alternative’s VMT per capita impact if the EIR does not know that the alternative’s VMT per capita impact is. The EIR’s conclusion is therefore unsupported by analysis or substantial evidence.</p> <p>B)</p> <p>o The EIR does not provide a meaningful analysis of the impacts of each of the alternatives, using terms such as “largely comparable,” “slightly greater,” and “slightly reduced.” These terms are especially inappropriate for the Historic Preservation Alternative, which is the environmentally superior alternative. The EIR incorrectly concludes that the proposed Project’s impacts are “largely comparable” to reduced development alternatives. But the Historic Preservation Alternative would significantly reduce the magnitude of impacts on traffic, climate change, historic resources, noise, biological resources, public services and land use.</p> <p>o The EIR states that the Proposed Project would have “superior financial feasibility” than the alternatives. EIR at 571. But the EIR does not provide data or other substantial evidence to support that conclusion. All of the statements about financial feasibility in the alternatives analysis are conclusory and lack substantiating evidence or discussion. See EIR at 536-571.</p>	<p><u>would be substantial though would not necessarily translate to less residential VMT per capita, which is the efficiency metric for which a significant VMT impact was identified.</u></p> <p><u>While the Historic Preservation Alternative would potentially result in a substantially lower total VMT than the Proposed Plan, the amount of homebased VMT generated per capita would likely be similar. This is because residential VMT is expressed as home-based VMT per capita, which is an efficiency metric wherein both the numerator (home-based VMT) and denominator (population) would be expected to decrease proportionately with reduced development levels.” It is also noted that research has found residential density levels (i.e., the number of housing units per acre) to inversely affect per capita VMT, meaning that areas with a larger number of units per acre generate lower VMT per capita. Accordingly, it can be concluded that reducing the number of residential units within a defined boundary such as the Planning Area would not be expected to reduce the amount of VMT generated per resident. See MR-6 for more information.</u></p> <p><u>In response to segment B), see also B11-84. See B11-80, B11-82, and MR-2 regarding the State legislation, financial feasibility, and the variability and comparison of alternative and Proposed Plan impacts. Further, CEQA does not require economic analysis; however, see MR-8 regarding financial feasibility.</u></p>

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Sonoma Land Trust	9/26/2022	B11-87	<p>A) The EIR defines the No Project Low Development alternative by a reduction in overall housing and job numbers. It then concludes that “[t]he proportion of both income-restricted affordable housing and affordable by design housing in the Low Development Alternative is projected to be less than the Proposed Plan.” EIR at 542. But the EIR fails to provide supporting evidence for this projection. Id. § Why is the proportion of both income restricted affordable housing and affordable by design housing in the Low Development Alternative projected to be less than the Proposed Plan? o The EIR makes the same unsupported projections with respect to the Reduced Development Alternative and the Historic Preservation Alternative. EIR at 559, 568. § Why is the proportion of both income restricted affordable housing and affordable by design housing in the Reduced Development Alternative and the Historic Preservation Alternative projected to be less than the Proposed Plan? o Conversely, the EIR defines the No Project: High Development alternative by an increase in overall housing and job numbers. It then concludes that “[t]he proportion of both income-restricted affordable housing and affordable by design housing in the High Development Alternative is projected to be more than the Proposed Plan.” EIR at 550. again, the EIR fails to provide supporting evidence for this projection. Id. § Why is the proportion of both income restricted affordable housing and affordable by design housing in the High Development Alternative projected to be more than the Proposed Plan?</p> <p>B) o The EIR states that “[b]ased on prior alternatives</p>	<p>The comment is noted. In response to segment A), see B11-85, B11-82, and MR-8. Income-restricted and affordable housing units in both the Low Development and Reduced Development Alternatives are projected to be less than that of the Proposed Plan in order for the projects to be economically feasible. Under the same logic, there is projected to be more affordable housing and income-restricted units in the High Development Alternative.</p> <p>In response to segment B), the alternatives modeling mentioned refers to the November 2021 Alternatives Report which is available on the project website. See also response to B11-86.</p> <p>In response to segment C), biological resource impacts are discussed for each of the Alternatives. Discussion of the wildlife corridor is located on page 554 for the Reduced Development Alternative; impacts on wildlife movement would be slightly reduced compared to the Proposed Plan due to the expansion of the wildlife corridor. For the Historic Preservation Alternative, the creek corridors and the wildlife corridor will not be expanded which would result in greater impacts to wildlife movement compared to the Proposed Plan. For the No Project Alternatives, it would be speculative to determine how exactly development would impact the wildlife corridor since the DEIR cannot predict State actions. However, it is assumed that with a larger development footprint in the High Development Alternative, impacts would be greater with the reduction/elimination of the on-campus wildlife corridor. For the No Project: Low Development</p>

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			<p>modeling exercises completed for SDC in 2021, it is likely that the No Project: High Development Alternative would generate slightly more per capita VMT than the Proposed Project, though the difference would likely be negligible.” But the EIR fails to identify, cite to, or provide copies of the analysis and results from those “prior alternatives modeling exercises.” Without additional information, decisionmakers and the public cannot independently judge the strength of the EIR’s analysis or the veracity of its conclusions.</p> <p>C)</p> <ul style="list-style-type: none"> • The alternatives analysis fails to discuss or analyze the impacts of any of the proposed alternatives to the Sonoma Valley Wildlife Corridor. <ul style="list-style-type: none"> o The EIR’s analyses of the No Project: Low Development Alternative and the Reduced Development Alternative do not mention the wildlife corridor at all. EIR at 538 (discussing the No Project: Low Development Alternative’s impact to biological resources but failing to mention or discuss the Wildlife Corridor); EIR at 554 (same with respect to the Reduced Development Alternative). Because impacts to wildlife movement—and particularly to wildlife movement within the established Sonoma Valley Wildlife Corridor—are a major issue and threshold of significance for the Project’s impacts to biological resources, this omission prevents readers from understanding fully the relative consequences of each alternative. § How would the No Project: Low Development Alternative impact wildlife movement and connectivity through the Sonoma Valley Wildlife Corridor? § How would those impacts differ from the impacts the Project would have on wildlife movement and 	<p>Alternative, it is assumed that wildlife corridor impacts would be less than that of the Proposed Plan with less development. Such variations of impacts for each alternative are summarized in Table 4.5-1. See also MR-7 regarding impacts of the Highway 12 connector.</p>

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			<p>connectivity through the Sonoma Valley Wildlife Corridor?</p> <p>§ How would the Reduced Development Alternative impact wildlife movement and connectivity through the Sonoma Valley Wildlife Corridor?</p> <p>§ How would those impacts differ from the impacts the Project would have on wildlife movement and connectivity through the Sonoma Valley Wildlife Corridor?</p> <p>o Similarly, the EIR’s analyses of the No Project: High Development Alternative and the Historic Preservation Alternative refer only to those wildlife corridors that lie (or would lie) within the Core Campus. EIR at 546 (noting that under the No Project High Development Alternative, “the area devoted to the expanded wildlife corridor may be reduced or eliminated,” but not discussing impacts to the remainder of the Sonoma Valley Wildlife Corridor); EIR at 563 (same with respect to the Historic Preservation Alternative, noting “the creek corridors and the wildlife corridor will also not be expanded”). By failing to analyze the alternatives’ impacts to the established Sonoma Valley Wildlife Corridor and their reliance on a new road connecting to Hwy. 12 that bisects the Corridor outside the Core Campus, the EIR obscures the true impacts of those alternatives and prevents readers from accurately comparing the alternatives. The EIR cannot reliably identify an environmentally superior alternative without first comparing the full environmental effects of each proposed alternative.</p> <p>§ How would the No Project: High Development Alternative impact wildlife movement and connectivity through the Sonoma Valley Wildlife Corridor?</p> <p>§ How would those impacts differ from the impacts the Project would have on wildlife movement and</p>	

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			connectivity through the Sonoma Valley Wildlife Corridor? How would the Historic Preservation Alternative impact wildlife movement and connectivity through the Sonoma Valley Wildlife Corridor? § How would those impacts differ from the impacts the Project would have on wildlife movement and connectivity through the Sonoma Valley Wildlife Corridor?	
Sonoma Land Trust	9/26/2022	B11-88	<p>The EIR states that a cumulative impact analysis “must analyze either a list of past, present, and probably future projects or a summary of projections contained in an adopted general plan or related planning document.” EIR at 585. While the EIR claims that the “Proposed Project represents the cumulative development scenario for the reasonably foreseeable future in the Planning Area under the County’s General Plan” and “incorporates the likely effects of surrounding regional growth,” for many impacts, the EIR limits its analysis to the Plan Area rather than considering the combined effects of the Project together with the environmental impacts that are likely to occur outside the Project’s Planning Area.</p> <p>o For example, the Planning Area is constrained to the SDC site. EIR at 54 (Figure 2.1-2: Planning Area Boundaries). But the Sonoma Valley Wildlife Corridor that runs through the Planning Area extends for a significant distance to the east and west, stretching from the top of Sonoma Mountain across Sonoma Creek and the valley floor to the Mayacamas Mountains to the east. Permeability of the Sonoma Valley Wildlife Corridor is important “for the movement of wildlife at a regional scale.” EIR at 242. The cumulative impact boundary for impacts to the Wildlife Corridor must include the entire corridor and all projects capable of impacting the corridor if the true scope and magnitude of cumulative</p>	<p>The comment is noted. See MR-1, MR-3, and MR-9. Cumulative impacts are properly analyzed pursuant to CEQA. The analysis of cumulative impacts need not provide the level of detail required of the analysis of impacts from the project itself, but shall “reflect the severity of the impacts and their likelihood of occurrence.”(CEQA Guidelines Section 15130(b)). In order to assess cumulative impacts, an EIR must analyze either a list of past, present, and probable future projects or a summary of projections contained in an adopted general plan or related planning document. The Proposed Project represents the cumulative development scenario for the reasonably foreseeable future in the Planning Area under the County’s General Plan. <u>Thus, cumulative impacts analyzed in the DEIR consider regional growth in the entire county, not just the Planning Area, as anticipated under the General Plan. Additional larger-scale developments, like the Proposed Plan, are not anticipated under the County’s General Plan. Rather, small, infill development projects would occur as stated in the General Plan. The General Plan serves as a blueprint and a guide for growth in the region, thus serving as a meaningful framework for the cumulative impacts analysis. In addition, each topical section of the</u></p>

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			<p>impacts are to be understood. Specifically, analysis of cumulative impacts on the Wildlife Corridor should encompass an area extending from the Russian River in the north to the San Pablo Bay to the south, and from the Petaluma River to the west to Napa Valley to the east. This impact boundary is necessary to capture the movements of local populations of the widest-ranging species present (i.e., mountain lions), as well as movement and dispersal among regional populations, allowing for genetic exchange, and range shifts in response to climate change over time. This boundary would include a portion of the Marin Coast-Blue Ridge Critical Wildlife Linkage identified by Penrod et al. (2013),⁴ but analysis should include all land development in the region, not only within the mapped critical corridors. The EIR’s myopic focus on cumulative impacts caused by and felt within the Planning Area obscures impacts that may occur outside the Planning Area and that the Project may add to, or impacts that may occur within the Planning Area that could be cumulatively significant when impacts from projects outside the Planning Area are accounted for. The EIR must expand its cumulative impacts boundary.</p> <p>o The EIR does not apply a consistent cumulative impact boundary. While the introduction to the cumulatively impacts analysis indicates that the impact boundary is the Planning Area (EIR at 585), the EIR elsewhere extends the impact boundary (e.g., EIR at 589 (“The cumulative geographic context for cultural, historic, and tribal cultural resources is the County of Sonoma.”)).</p> <p>§ Where the EIR does use a wider impact boundary, it is not clear whether the EIR analyzes cumulative impacts based on a specific list of projects or on projected development under the General Plan. For example, at</p>	<p><u>cumulative impacts analysis identifies the boundary used for that analysis.</u></p> <p>This future scenario incorporates the likely effects of surrounding regional growth. <u>The biological cumulative geographic context for biological resources is the County of Sonoma. Development resulting from the Proposed Plan, as well as future development projects that could occur within the Planning Area or in the vicinity of the Planning Area, would be subject to the requirements of biological resource protection laws, including FESA, CESA, MBTA, and the California Fish and Game Code, as well as protection policies and provisions in the City’s 2040 General Plan and Municipal Code. With implementation of the relevant policies and implementing actions, the Proposed Plan’s contribution to cumulative biological resources impacts would be less than cumulatively considerable.</u></p> <p><u>Policy 2-28 is not piecemealing, but instead is an implementation requirement to ensure each project within the Specific Plan addresses any specific impacts associated with the design of that proposal, because specific redevelopment plans are not available at this time. See MR-3; the programmatic analysis in the DEIR is for the whole project as well as cumulative impacts. Therefore, the DEIR does not obscure impacts but shines light on any impacts associated with the future specific development proposals. See also MR-9 regarding implementation of proposed policies.</u></p>

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			<p>pages 589-590 the EIR states that “[i]f the Proposed Plan, in combination with other past, present, and reasonably foreseeable projects in Sonoma County, would result in the loss of or adverse changes to multiple historic or cultural resources a significant cumulative impact could result.” Further muddying the waters, the EIR does not specify what other projects inform its analysis. EIR at 589-590. Instead, the EIR punts to project-level environmental review and discusses only projects to be completed within the Planning Area under the Specific Plan. Id. The EIR must choose an appropriate cumulative impacts boundary for each impact, justify its choice, and analyze cumulative impacts of the Project together with other past, present and future development. See, e.g., Draft Environmental Impact Report for the Springs Specific Plan at 4.0-3 (“The cumulative setting for aesthetics is the Sonoma Valley Planning Area”), 4.0-7 (“The cumulative setting for biological resources includes the Plan area and the greater Sonoma County region.”), 4.0-9 (The cumulative setting for ... (climate change) comprises anthropogenic (i.e., human-made) GHG emissions sources across the globe.”)</p> <p>§ Use of the County’s existing general plan for the cumulative impact analysis does not provide a meaningful analysis of cumulative impacts for the SDC Project. The County adopted its general plan more than 14 years ago in 2008, and is currently updating the general plan. The general plan’s outdated cumulative impact analysis omits recent planned and approved projects and therefore does not provide a meaningful framework with which to gauge the Project’s cumulative impacts.</p> <ul style="list-style-type: none"> • Specific Plan Policy 2-28 provides that prior to the commencement of the approval of any specific project 	<p><u>The Draft EIR follows well laid CEQA requirements in conducting the analysis. CEQA requires (see, for example, CEQA Guidelines Section 15064), which states, “In evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment.” As an informational document, the Specific Plan EIR does study the reasonably foreseeable consequences of the Proposed Plan’s impacts and cumulative impacts. CEQA does not require an agency to assume an unlikely worst-case scenario in its environmental analysis. The DEIR is adequate pursuant to CEQA requirements.</u></p>

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Sonoma Land Trust	9/26/2022	B11-89	<p>in the Proposed Plan area, Project Sponsors shall contract a qualified biologist to conduct studies identifying the presence of special-status species and sensitive habitats at proposed development sites and ensure implementation of appropriate mitigation measures to reduce impacts to sensitive habitat or habitat function to a less than significant level. This policy epitomizes improper piecemealing of environmental analysis. If development under the Specific Plan is only analyzed on a project-by-project basis, the cumulative impacts of those projects will be obscured and may not be adequately mitigated. The EIR must complete all required analysis now, at the plan-level stage, in order that decisionmakers and the public can understand the full picture of what a buildout of the draft Specific Plan would entail.</p>	The comment is noted. See MR-3 and MR-9.
			<p>Much of the EIR relies on future, project-level environmental review to identify and mitigate potentially significant environmental impacts. See, e.g., EIR Chapter 3.4; see also EIR at 589-590 (finding that cumulative impacts to cultural, historic, and tribal cultural resources would not be cumulatively considerable due in significant part to future project-level environmental review). But the Specific Plan states that the County intends to avoid future project-level environmental review to the greatest possible extent. Draft Specific Plan at 7-3 (“When a public agency has prepared an EIR for a specific plan, State law provides that residential, commercial, or mixed-use projects undertaken in conformity to the specific plan are exempt from CEQA, subject to certain requirements. Pursuant to Section 15152 of the CEQA Guidelines, projects will also be eligible to “tier” from the EIR ... The County intend to rely on these provisions for exemptions and tiering to the maximum</p>	

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			<p>extent feasible.”). Furthermore, as a matter of law, residential projects consistent with a specific plan are statutorily exempt from CEQA and do not require additional environmental review. Gov’t Code § 65457.</p> <ul style="list-style-type: none"> o If the County’s goal is to evade future project-level review, how can it justify relying on future project-level review to identify and mitigate the Project’s impacts? o In light of the Draft Specific Plan’s stated goal, how will the County ensure that all necessary environmental review is completed? 	

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Sonoma Land Trust	9/26/2022	B11-90	- The Draft EIR’s analysis and discussion of potential biological impacts is limited and is insufficient to determine whether the Specific Plan’s potential impacts will be significant.	<p>The SDC Specific Plan EIR is a program EIR, presenting a comprehensive assessment of the potential impacts of the proposed SDC Specific Plan. At a programmatic level, the Specific Plan is designed to be self-mitigating and EIR includes numerous policies and measures that would ensure impacts to biological resources are avoided and minimized as development takes place. The Specific Plan would preserve the entirety of the approximately 755 acres outside the Core Campus as open space, including improved open space within the Core Campus through 30-50 acres of buffer open space (including riparian, wildlife corridor, and Arnold Drive buffers). The Specific Plan would also expand the Sonoma Valley Wildlife Corridor at the pinch point close to Suttonfield Lake by removing existing buildings in the northeastern portion of the Planning Area and providing that land for wildlife movement. Additionally, the Specific Plan includes policies designed specifically to minimize the impacts to wildlife at the interface of the built and natural environment (proposed policies 2-6 through 2-26).</p> <p>As a programmatic analysis, the DEIR does not assess project-specific impacts of potential future projects under the proposed Plan. Future projects would be required to comply with CEQA, as applicable, including preparation of more precise, project-level analyses regarding potential impacts to biological resources. Appendix A of the Specific Plan also lays out standard conditions of approvals that would apply to all projects based on Specific Plan policies and CEQA analysis, regardless of whether subsequent environmental analysis is</p>

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conducted or not. This includes Condition of Approval (COA) Policy BIO-1, which would require a biological resource assessment be prepared for any specific project in the Proposed Plan area, including identifying the presence of special-status species and sensitive habitats at proposed development sites and ensure implementation of appropriate mitigation measures to reduce impacts to sensitive habitat or habitat function to a less than significant level (DEIR page 243).

The Specific Plan approach to increase net open space, enhance existing open space areas through incorporation of proposed policies and conditions of approval, and the requirement for future projects to comply with applicable CEQA requirements supports the DEIR’s analysis that potential impacts to biological resources would be less than significant.

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Sonoma Land Trust	9/26/2022	B11-91	- The Draft EIR fails to discuss how proposed new roads, and significant increases in traffic and human activity and development density on the site, may affect wildlife movement or cause other significant impacts.	Refer to response to comment MR-7. When conducting analysis of potential environmental impacts, CEQA Guidelines Section 15064 (b)1 only require a Lead Agency to use “careful judgment...based to the extent possible on scientific and factual data.” The determination of less than significant impacts on wildlife or to wildlife movement was made based on the fact that the wildlife corridors on the site will be protected in perpetuity, are sufficiently large to support movement from one habitat to another, and will be enhanced by removal of existing development and beneficial policies referenced in response to comment B11-90.
Sonoma Land Trust	9/26/2022	B11-92	The Draft Specific Plan and Draft EIR would permit numerous uses in “Preserved Open Space” that conflict with open space preservation goals and could cause significant impacts.	Comment incorporated. Specific Plan Policy 2-1 has been amended to state: “Ensure that land shown In Figure 2.2-1 as Preserved Open Space is dedicated or maintained as permanent public open space, and the Managed Landscape/Fire Buffer is designed and maintained for that purpose. The owner/operator of the Preserved Open Space shall prepare an open space plan, to be approved by the County to manage the rich diversity of resources on site, including habitat, vegetation, wetlands, native species, and other critical resources, balanced with recreation and wildfire protection needs. As part of the open space plan development, conduct a formal aquatic resources delineation for habitat protection, and consider delineating a cohesive system of trails and pathways that balances recreation and wildlife conservation.” Incorporation of the amended policy would require future uses within open space areas to be consistent with the Specific Plan’s resource protection policies (policies 2-1 through 2-26) and would involve multiple partners to further refine

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Sonoma Land Trust	9/26/2022	B11-93	<p>These and other issues are addressed more fully in the table below. As detailed in the table, the Draft EIR’s lack of analysis of key biological impacts prevents the EIR from identifying which impacts are likely to occur or how significant they will be. Because the EIR does not adequately analyze impacts, it cannot fully develop or analyze effective mitigation measures. Further, what little de facto mitigation the EIR does propose (via Specific Plan policies and Conditions of Approval) is insufficient to reduce impacts to biological resources to less-than-significant levels. In addition to identifying analytical issues in the EIR, our comments below pose specific questions that must be answered to fill informational gaps in the EIR and facilitate complete, scientifically sound impact analysis.</p> <p>PCI also observed that the Specific Plan focuses on avoiding negative impacts on natural resources and, aside from the elimination of two buildings mentioned above, does not take advantage of this key site planning opportunity to call for positive habitat improvements or</p>	<p>open space preservation goals for “Preserved Open Space” areas.</p> <p>Please refer to response to comments B11-90 and MR-1, and responses to the specific comments below.</p>

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			restoration of impaired ecological values. In addition, the Biological Resources sections contain a number of errors and omissions in describing the basic ecological setting of the site. PCI's full comments and questions on biological resource aspects of the Draft Specific Plan and adequacy of the Draft EIR are provided below.	
Sonoma Land Trust	9/26/2022	B11-94	Is this map meant to show only known occurrences or all likely habitats? Please clarify. Multiple special-status species previously documented as occurring or likely to occur on the site are not shown. Are these excluded intentionally, and if so, why? For other species, only a portion of their known or likely distribution is shown. See PCI (2018) 1 for detailed review of potential habitat on site for these species. Species not shown, or not showing full distribution, in Figure 1.6-2, but previously documented as occurring or likely to occur are:- Freshwater shrimp – documented on Sonoma Creek and has potential to occur on Asbury and Hill Creeks.- Steelhead – documented in Hill Creek and potentially present in Asbury Creek, in addition to presence in Sonoma Creek.- Species of Special Concern documented on or adjacent to the site but not shown (see PCI 2018 for location information): o California giant salamander o Foothill yellow-legged frog o Pallid and Townsends big-eared bats o Northern western pond turtle Species of Special Concern American badger has been reported on Sonoma Mountain and also has potential to occur. Mountain lions are a “specially protected mammal in California” and of high local conservation concern; radio tracking by local researchers shows extensive use of the SDC site. Note also that northern spotted owl is federally listed as threatened but not shown as such on map.	Figure 1.6-2 is not intended to show all special status species that may occur on the site, nor is it a map of potential habitat for special status species. Such mapping would exceed the requirements of CEQA and would be atypical for assessment of wildlife and plants at both the programmatic level. However, Table 3.4-2 of the DEIR includes a detailed list of species that have been documented on the site and those that have potential to occur. This table has been updated to reflect observations provided by the Sonoma Ecology Center (letter dated April 3, 2022), to include additional observations for special status species. Additionally, spotted owl is shown on the map .

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Sonoma Land Trust	9/26/2022	B11-95	This map conflicts with known data. What is the data source? It doesn't match PCI (2018) or Sonoma Veg Map data. The large wetland on east side is labeled a "vernal pool" but this wetland is not considered a vernal pool by prior work (e.g., PCI 2018). Please adjust text or explain why the feature is considered a vernal pool, given the high conservation concern for vernal pools.	Comment incorporated. Vernal pool label has been amended to "seasonal wetland." Additionally, the DEIR notes mitigations and standard conditions of approval that require projects to conduct a biological resources assessment (Policies BIO-1, BIO-14, BIO-15, BIO-16) to identify, avoid, and mitigated potential impacts to wetlands. Wetland protection policies identified in the Specific Plan and DEIR would continue to apply and would not result in changes to potential significance of impacts or analyses contained in the DEIR.
Sonoma Land Trust	9/26/2022	B11-96	This figure also omits non-native forest on core campus though it is "existing vegetation" (i.e., relevant to the map), is mapped by the Sonoma Veg Map data, and is included in Figure 2.2-1, Open Space Framework. The non-native forest should be included on this map because these trees provide habitat values, including nesting, cover, and foraging resources for birds and potential roosting habitat for bats. The potential for impacts on birds, wildlife movement, and special-status bats should be addressed in the EIR if removal of this vegetation is proposed.	Figure 1.6-3 is not intended to show all vegetation communities that may occur on the site. Such mapping would exceed the requirements of CEQA at the programmatic level. However, Policy 2-20 has been amended to state: "Require that the project sponsor work with an arborist to develop a tree planting plan that retains existing mature healthy trees and supplements the existing tree canopy with a diverse range of native and/or low water trees that provide shade and habitat. Locate new construction and public realm improvements around existing landscaping features that are retained." Additionally, COA Policy BIO-2 would prevent potential impacts to special-status bat species and BIO-8 would avoid impacts to other special -status and non-status nesting birds.
Sonoma Land Trust	9/26/2022	B11-97	First sentence states that "the natural landscape and the site's location in the Sonoma Valley also brings fire hazards." Similar wording is used on 2-1. That statement should be omitted or clarified to explain that human infrastructure and human activity pose the most significant risks for wildfire ignition in this area (as stated on page 500), and that weather patterns of the region in combination with local topography lead to	Comment noted. Wildfire risk factors were fully taken into account in the DEIR. See response to comment B3-27.

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			high potential for the spread of wildfire throughout both natural lands and developed environments.	
Sonoma Land Trust	9/26/2022	B11-98	This figure shows “Managed Landscape/Fire Buffers” and an “Expanded Wildlife Fire Buffer.” The Managed Landscape/Fire Buffers extend into what is currently open space. How will fuel reduction practices in this zone be tailored to prevent any significant impact on wildlife movement or other habitat values? What is the proposed maximum width of this buffer? All fire buffers should be no wider than necessary to meet public safety needs in order to reduce impacts on natural resources. Potential impacts include reduced permeability for wildlife movement (due to loss of cover and foraging resources, and increased exposure to human activity), damage to sensitive plant communities (i.e., within Oregon oak woodland on the west side of campus, with potential direct removal of oaks as well as potential loss of native understory diversity, reduced oak regeneration and increased potential or weedy species establishment) and within riparian forest along Hill Creek (with potential direct removal of riparian trees as well as loss of native understory diversity, potential reduced native tree regeneration, and increases in weedy species). [See, for example, Kerns et al. (2020), Perchemlides et al. (2008), and Seavy et al. (2008).] Biological Resources significance Criteria 1 through 4 indicate that these types of impact could constitute significant impacts	<p>Refer to MR-7 and response to comment B9-15. In order to preserve open space and habitat as much as feasibly possible, Policy 2-31 has been amended as follows:</p> <p>Construct and maintain a managed landscape buffer along western and eastern edges of the Core Campus to aid in fire defense consisting of a shaded fuel break in wooded areas and grazed or mown grassland. Shrubs and chaparral should be limited within the managed landscape buffer. Management of this landscape buffer should aim to enhance biodiversity, reverse weed invasion, and protect water resources.</p>

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Sonoma Land Trust	9/26/2022	B11-99	This figure showing “Preserved Open Space” does not show the two new potential Highway 12 connector roads that could be developed within or across open space, resulting in an incomplete illustration of the nature of the proposed open space.	<p>Comment incorporated. Policy 2-55 has been added to state: “Ensure that any future roadways or pathways built in the open space do not introduce lighting that would adversely impact wildlife.” Additionally, DEIR Policy BIO-1 requires a biological resource assessment for any new project. This assessment will identify wetlands and make recommendations for mitigation of any impacts to biological resources to a less than significant level.</p> <p>Refer to response to comment MR-7. In addition, Policy 2-1 has been amended to state: “Ensure that land shown In Figure 2.2-1 as Preserved Open Space is dedicated or maintained as permanent public open space, and the Managed Landscape/Fire Buffer is designed and maintained for that purpose. The owner/operator of the Preserved Open Space shall prepare an open space plan, to be approved by the County to manage the rich diversity of resources on site, including habitat, vegetation, wetlands, native species, and other critical resources, balanced with recreation and wildfire protection needs. As part of the open space plan development, conduct a formal aquatic resources delineation for habitat protection, and consider delineating a cohesive system of trails and pathways that balances recreation and wildlife conservation.”</p>
Sonoma Land Trust	9/26/2022	B11-100	Project impacts to open space cannot be fully analyzed unless this figure shows these proposed new roads and calls out locations for any of the anticipated uses, such as intensive agriculture or utility development, noted in Table 4-3, that are not compatible with common understanding of the term “Preserved Open Space,” which	<p>Refer to response to comment B11-99 and B1-22. The DEIR does adequately analyze impacts on biological resources, including open space areas. See Table 4-3 in the Proposed Plan regarding permitted uses in the preserved open space.</p>

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			<p>is land that is primarily undeveloped and left in a natural state, such as grasslands and open rangeland, forests, and woodlands. Locations planned for utility development or intensive agriculture (e.g. indoor crop cultivation, confined farm animal operations, row crops, vineyards, etc.) should be designated as such; otherwise, project impacts to natural resources cannot be analyzed. The Plan does include a Utilities land use type; all proposed utility developments should be shown with that label. The potential impacts of the allowable uses within the “Preserved Open Space” are not analyzed in the EIR. Until the potential impacts are analyzed, it is impossible to determine whether those impacts would be significant or whether certain Specific Plan policies could avoid or mitigate those impacts.</p>	
Sonoma Land Trust	9/26/2022	B11-101	<p>Second paragraph emphasizes vegetation management as a means to reduce wildfire hazard. The prime importance of designing buildings to be fire-resistant, and of use policies that limit the likelihood of ignition, should be emphasized here along with vegetation management. Vegetation removal from the natural landscape should not be the primary approach to fire risk reduction on the site, especially given its importance to wildlife habitat and wildlife movement through the site. See comment above on page 2-4 for further discussion of potential impacts of vegetation removal on biological resources.</p>	<p>Specific Plan Policies 2-9 and 2-10 require fuels management to be minimized within wildlife corridors to limit disturbance to species. Fire resistant building design is also addressed in policy 2-38. Additionally, Policy 2-31 has been amended to add: “Construct and maintain a managed landscape buffer along western and eastern edges of the Core Campus to aid in fire defense consisting of a shaded fuel break in wooded areas and grazed or mown grassland. Shrubs and chaparral should be limited within the managed landscape buffer. Management of this landscape buffer should aim to enhance biodiversity, reverse weed invasion, and protect water resources.”</p>

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Sonoma Land Trust	9/26/2022	B11-102	To reduce impacts of trails and recreational use on biological resources, Policy 2-4 should include the decommissioning of trails that are duplicative or causing erosion or other resource damage. The current trail system includes trails that occur close together and lead to essentially the same destinations. Since each trail and its use has a cumulative impact on natural vegetation (i.e. by direct removal and often, the facilitation of invasive plant species) and on wildlife use (by the increase in human and dog presence), decommissioning duplicative or highly erosive trails will reduce the project’s recreational impacts. Some of the trails on the site are also contributing to substantial erosion, resulting in soil and vegetation loss and potential impacts to water quality downstream. The site’s trail system should be reviewed for such locations to decommission or realign as well.	Specific Plan Policy 2-1 has been amended to state: “Ensure that land shown In Figure 2.2-1 as Preserved Open Space is dedicated or maintained as permanent public open space, and the Managed Landscape/Fire Buffer is designed and maintained for that purpose. The owner/operator of the Preserved Open Space shall prepare an open space plan, to be approved by the County to manage the rich diversity of resources on site, including habitat, vegetation, wetlands, native species, and other critical resources, balanced with recreation and wildfire protection needs. As part of the open space plan development, conduct a formal aquatic resources delineation for habitat protection, and consider delineating a cohesive system of trails and pathways that balances recreation and wildlife conservation.” Amendments would ensure trails are planned cohesively, which would include potential closure of duplicative trails and improvements to degraded trails.

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Sonoma Land Trust	9/26/2022	B11-103	<p>Policy 2-5 calls for setting aside a location for water recreation for people and dogs at Suttonfield Lake. Facilitating intensive dog use of the site could have significant impacts on wildlife use of the area. Dogs can affect wildlife through direct predation, harassment, scent marking resulting in wildlife avoidance, and spread of disease. Dog presence has been found to be associated with reduced habitat use by species including mountain lion, mule deer, bobcats, and small mammals such as squirrels and rabbits (Reilly et al 2017, George and Crooks 2006, Length et al. 2008); with disease transmission to gray foxes (Riley et al. 2004); and with reduced bird presence and species richness (Banks et al 2007). The potential impacts of dog use must therefore be evaluated in the EIR. Until the potential impacts analyzed, it is impossible to determine whether those impacts would be significant or whether certain Specific Plan policies could avoid or mitigate those impacts.</p>	<p>Specific Plan Policy 2-1 has been amended to state: “Ensure that land shown In Figure 2.2-1 as Preserved Open Space is dedicated or maintained as permanent public open space, and the Managed Landscape/Fire Buffer is designed and maintained for that purpose. The owner/operator of the Preserved Open Space shall prepare an open space plan, to be approved by the County to manage the rich diversity of resources on site, including habitat, vegetation, wetlands, native species, and other critical resources, balanced with recreation and wildfire protection needs. As part of the open space plan development, conduct a formal aquatic resources delineation for habitat protection, and consider delineating a cohesive system of trails and pathways that balances recreation and wildlife conservation.” Use of open space by people and on-leash dogs is commonly accepted as a compatible use in many open space areas, which would be further addressed during development of the open space plan. As noted in the Profile & Background Report, dog walkers currently frequent unfacilitated trails on the SDC property. While some adverse effects to wildlife may result from allowing dogs and people to access these areas as presented in Reilly et al 2017, George and Crooks 2006, Length et al. 2008, Banks et al 2007, the commenter does not provide evidence that these impacts would be significant. CEQA does not require that an analysis determines that no impact will result from a project or activity.</p>

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-104	Goal 2-D seems to be mixing the goal of conservation of habitat on site with resource conservation more globally. Please clarify. For instance, how is “sustainable food production” a means to conserving habitat on the site?	Refer to response to comment MR-3 and MR-7. <u>Sustainable food production can serve to limit solid waste production on site.</u> In addition, Policy 2-1 has been amended to state: “Ensure that land own In Figure 2.2-1 as Preserved Open Space is dedicated or maintained as permanent public open space, and the Managed Landscape/Fire Buffer is designed and maintained for that purpose. The owner/operator of the Preserved Open Space shall prepare an open space plan, to be approved by the County to manage the rich diversity of resources on site, including habitat, vegetation, wetlands, native species, and other critical resources, balanced with recreation and wildfire protection needs. As part of the open space plan development, conduct a formal aquatic resources delineation for habitat protection, and consider delineating a cohesive system of trails and pathways that balances recreation and wildlife conservation.” Incorporation of the amended policy would require future uses within open space areas to be consistent with the Specific Plan’s resource protection policies (policies 2-6 through 2-26) and would involve multiple partners to further refine open space preservation goals for “Preserved Open Space” areas. 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.

Committer	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-105	Policy 2-6 – This policy should also include and address the northwest corner. Figure 2.2-1 indicates a building will be removed in this location and the wildlife buffer expanded.	Comment incorporated. Policy 2-6 has been amended to state: “Remove existing development along the north edge of the Core Campus, from area shown as Open Space in Core Area in Figure 2.2-1, and re-introduce compatible native species to expand the wildlife corridor. This includes removing existing buildings Paxton, Thompson/Bane, and Residence 126 and buildings on the northeast side of campus and ensuring that new development remains within the smaller development footprint as shown in Figure 2.2-1. Ensure that the wildlife corridor is not further restricted at its narrowest point along the north side of the campus. The project sponsor shall be responsible for demolishing buildings within the expanded wildlife corridor and establishing new planting and landscaping to support expanded wildlife movement and safety, prior to Certificate of Occupancy on any redevelopment on the eastside of Arnold Dr.”
Sonoma Land Trust	9/26/2022	B11-106	Policy 2-11 – This policy should incorporate the most recent guidance from the Dark Sky Association, which is that all outdoor lights have a color temperature of no more than 2200 Kelvins. [See A Values-Centered Approach to Nighttime Conservation - International Dark-Sky Association; darksky.org] Dark Sky Standards also provide that: <ul style="list-style-type: none"> · All lights will use the lowest light level required minimum levels recommended by widely recognized professional standards bodies. · All residential and business outdoor lighting should be actively controlled 	Comment noted. Specific Plan Policy 2-11 applies Dark Sky standards to the project design, including but not limited to measures identified in this comment.

Commenter	Date	Letter	Comment	Response
			<p>through means such as timers and motion-sensing switches to ensure that light is available when it is needed, dimmed when possible, and turned off when not needed.</p> <p>Lighting can disrupt wildlife by altering night-time cover and hunting conditions, reducing an area's value and permeability to wildlife. For instance, lighting has been found to reduce use of movement corridors for mountain lions (Beier 1995), deer and mice (Bliss-Ketchum et al. 2016), and bats (Bhardwaj et al. 2020), reducing habitat connectivity for these species. This policy should incorporate the most recent Dark Sky Association guidance and</p>	
Sonoma Land Trust	9/26/2022	B11-107	<p>Policy 2-16 – These are valuable requirements to help address impacts of fencing on wildlife movement, but to allow for passage of wildlife above and below fencing, the Specific Plan should also require that the maximum height of the upper strand be no more than 48” (42” preferred). Since Table 4-3 permits agricultural uses within the “Preserved Open Space,” this policy must make clear that these fencing standards apply throughout areas shown as Preserved Open Space in Figure 2.2-2, regardless of whether it may be also used for agricultural uses. See also comment on p. 4-14.</p>	<p>Specific Plan Policy 2-16 requires fencing within open space to be wildlife permeable to maintain wildlife corridor function. Maximum fence heights would be considered with regards to wildlife permeability.</p>
Sonoma Land Trust	9/26/2022	B11-108	<p>Policy 2-17 – The wording of this residential nighttime noise reduction policy suggests that it is optional or will not necessarily be enforced. It is therefore insufficient to reduce noise impacts on wildlife to less-</p>	<p>Refer to response to comment B11-30 and MR-3.</p>

Commenter	Date	Letter	Comment	Response
			<p>than-significant levels. Noise has been shown to impact wildlife usage of habitat, resulting, for example, in reduced foraging time and efficacy, and reduced nesting use, in birds (Burger and Gochfeld 2002, Stone 2000, Aubrey and Hunsaker 1997, Shannon et al. 2016). Potential noise impacts on wildlife must therefore be analyzed in the EIR.</p>	
Sonoma Land Trust	9/26/2022	B11-109	<p>Policy 2-19 – The planting palette for habitat restoration or general plantings within the open space areas should be entirely composed of locally native species; the County should delete “and/or low-water plant species.” The planting palette for general planting within the campus should also be composed of locally native species where feasible, but in ornamental landscape settings, other low-water-use plants would also be acceptable.</p>	<p>Specific Plan Policy 2-1 has been amended to state: “Ensure that land shown in Figure 2.2-1 as Preserved Open Space is dedicated or maintained as permanent public open space, and the Managed Landscape/Fire Buffer is designed and maintained for that purpose. The owner/operator of the Preserved Open Space shall prepare an open space plan, to be approved by the County to manage the rich diversity of resources on site, including habitat, vegetation, wetlands, native species, and other critical resources, balanced with recreation and wildfire protection needs. As part of the open space plan development, conduct a formal aquatic resources delineation for habitat protection, and consider delineating a cohesive system of trails and pathways that balances recreation and wildlife conservation.” Implementation of Specific Plan policies and incorporation of the amended policy 2-1 would ensure an appropriate planting palette for habitat restoration within open space areas.</p>
Sonoma Land Trust	9/26/2022	B11-110	<p>Policy 2-21 - To ensure the proposed enhancements do not have a significant impact on wildlife movement and sensitive wetland habitat, this policy should require that development “Ensure that enhancements protect or</p>	<p>Refer to response to comments MR-7.</p>

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-111	<p>improve wildlife habitat values.”</p> <p>Policy 2-24 – Additional bird-friendly design measures should be incorporated in order to avoid impacts to birds. Relevant additional measures include:</p> <ul style="list-style-type: none"> - Minimize the overall amount of glass on building exteriors facing water features. - Avoid transparent glass skyways, walkways, or entryways, free-standing glass walls, and transparent building corners - Utilize glass/window treatments that create a visual signal or barrier to help alert birds to presence of glass. - Avoid funneling open space to a building façade. - Strategically place landscaping to reduce reflection and views of foliage inside or through glass. - Avoid or minimize up-lighting and spotlights; and turn non-emergency lighting off (such as by automatic shutoff) at night to minimize light from buildings that is visible to birds. (See also comments on Policy 2-11 regarding lighting.) <p>See: Resource-Guide-for-Bird-safe-Building-Design.pdf (audubonportland.org)</p>	<p>Comment noted. Policy 2-24 requires the incorporation of bird-friendly design, which would include but not be limited to measures detailed in this comment.</p>

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-112	2-25 – Asbury Creek should be included as one of the streams requiring a setback of at least 50’. Because 50’ is a minimum setback that will only protect some of the processes listed, larger buffers should be retained where they currently exist, and opportunities to expand buffers to 100’ – 300’ should be considered. These larger buffers will provide greater mitigation of impacts from development and human uses on wildlife movement and water quality. For example, setbacks of 100’-300’ will be more effective as wildlife corridors, allow for greater natural regeneration of native trees, and provide greater water quality protection through sediment and nutrient filtration (see, for example, Hilty and Merenlender 2004, Castelle et al. 1994, and Lee et al. 2004).	Comment incorporated. No development is proposed along Asbury Creek. In addition, the Specific Plan includes policies that would ensure buffers and protection of riparian areas around creeks, including Asbury Creek. 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. 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.
Sonoma Land Trust	9/26/2022	B11-113	2-F – In order to reduce potential wildfire impacts to wildlife and habitat, the Specific Plan needs to include managing human activities and limiting ignition potential as one of its key strategies. Measures to limit human-caused ignition should be central to residential and recreational site regulations and agricultural use policies.	Policies 2-31 through 2-42 address design and management approaches to wildfire safety. The comment does not address the adequacy of the Draft EIR; therefore, no response is required. However, the commenter’s opinion is noted and forwarded to the Board of Supervisors for their consideration in making a determination whether to approve the project.

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-114	Policy 2-31 Fire buffers appear to encompass areas of sensitive habitat including Oregon oak woodland, valley oak woodland, and riparian forest. How will fire buffer development affect the health and quality of these sensitive vegetation types (e.g., understory diversity, natural regeneration potential, potential incursion of weeds, increased solar exposure, etc.)? How will those impacts be mitigated? These potential impacts need to be evaluated fully in the EIR to ensure they will be less than significant.	Specific Plan Policies 2-9 and 2-10 fuels management to be minimized within wildlife corridors to limit disturbance to species. Additionally, Policy 2-31 has been amended to add: “Construct and maintain a managed landscape buffer along western and eastern edges of the Core Campus to aid in fire defense consisting of a shaded fuel break in wooded areas and grazed or mown grassland. Shrubs and chaparral should be limited within the managed landscape buffer. Management of this landscape buffer should aim to enhance biodiversity, reverse weed invasion, and protect water resources.”
Sonoma Land Trust	9/26/2022	B11-115	Policy 2-32 – There seem to be some missing words in the second sentence between “Loose surface litter...shall be permitted...in order to ensure” and “the removal of trees, bushes, shrubs...”. Please clarify. Retaining some surface litter is necessary to protect soil health, prevent erosion, allow for natural regeneration of native plants, and support reptiles, amphibians, and other wildlife.	Comment is noted. No change is needed.
Sonoma Land Trust	9/26/2022	B11-116	Policy 2-34 – The Fuel Separation standard provides only minimum clearance distances. Based on this guideline, all native vegetation in this zone could potentially be removed, having a significant impact on biological resources. In order to ensure that the impact of fuel management is less than significant, the Specific Plan must identify an upper limit to the amount of clearing of native vegetation, so that as much native vegetation may be retained as possible while meeting specific fuel reduction objectives. The EIR must also evaluate the	Refer to response to comment B11-114.

Commenter	Date	Letter	Comment	Response
			impacts from the implementation of these standards to ensure they will actually be less than significant or will be mitigated to less-than-significant levels.	
Sonoma Land Trust	9/26/2022	B11-117	How will the likelihood of ignition from human causes be managed? No policies currently address this essential topic.	Refer to response to comment B11-113.
Sonoma Land Trust	9/26/2022	B11-118	The Parks and Recreation land use type description includes dog parks as one use type. Limiting dog presence on the site will be necessary to avoid impacts to wildlife permeability of the site. Policy 6-4 indicates that a dog park will be provided within Core Campus, at least 200' from any creeks or wildlife corridors. This 200' limitation will be valuable in reducing impacts to wildlife. Based on the Land Use diagram (Figure 4.1-2), the Ballfields, Central Green, and one area east of the creek are the only "Park" areas more than 200' from creeks. The Park area east of the creek appears to be within existing riparian habitat along Sonoma Creek, which would not be suitable for a dog park (or any other highly developed park type). Areas within the Ballfields zone, or elsewhere within the Residential or Flex Zones on the west side of Arnold Drive, would be most suitable for a small dog park.	Comment noted. The potential dog park would be located within the Core Campus, at least 200' from any creeks or wildlife corridors. In addition, refer to response to comment B11-104.

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-119	The table indicates that agricultural crop production and agricultural processing, as well as keeping farm animals, is permitted in both “Buffer Open Space” and “Preserved Open Space.” Keeping confined farm animals, mushroom farming, and timberland conversion are also permitted in “Preserved Open Space.” In PCI’s experience, these types of activities are often incompatible with open space preservation because they often eliminate most or all natural vegetation, often involve construction of built facilities, and frequently exclude or reduce wildlife with fencing, trapping and other measures. How does the County envision these activities occurring in a manner compatible with open space preservation? How will needs to restrict cattle or other farm animal movement, within open space areas, be aligned with maintaining wildlife permeability?	Refer to response to comment B11-104 and B11-107 regarding fencing. See amended Table 4-3 in the Specific Plan. Policy 2-1 is also amended as follows to ensure that preserved open space is properly managed and maintained: Ensure that land shown In Figure 2.2-1 as Preserved Open Space is dedicated or maintained as permanent public open space, and the Managed Landscape/Fire Buffer is designed and maintained for that purpose. The owner/operator of the Preserved Open Space shall prepare an open space plan, to be approved by the County to manage the rich diversity of resources on site, including habitat, vegetation, wetlands, native species, and other critical resources, balanced with recreation and wildfire protection needs. As part of the open space plan development, conduct a formal aquatic resources delineation for habitat protection, and consider delineating a cohesive system of trails and pathways that balances recreation and wildlife conservation.
Sonoma Land Trust	9/26/2022	B11-120	The table further indicates that an array of other intensive agricultural uses, including farm retail sales, indoor crop cultivation, wholesale nursery, and tasting rooms are all permitted in “Preserved Open Space.” These uses are not compatible with open space preservation because they entail built facilities and removal of natural vegetation. These uses should not be permitted in Preserved Open Space. How will the potential impacts of these permitted uses be evaluated in the future?	Refer to response to comment B11-104 and B11-119.

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-121	Similarly, outdoor recreation facilities and “rural sports and recreation” facilities are potentially permissible in Preserved Open Space. What types of facilities will these include? A clear explanation of this use type is needed to allow determination of potentially significant impacts to wildlife. Uses such as Frisbee golf, zip lines, and offroad vehicle use all have potential to reduce wildlife usage via habitat damage and increased human activity levels, and must be analyzed by the EIR.	Refer to response to comment B11-104 and B11-119.
Sonoma Land Trust	9/26/2022	B11-122	The table indicates that geothermal resource development, parking facilities, and public utility facilities may all also be located within Preserved Open Space. These are potentially extensive facilities that may also be incompatible with meaningful open space preservation because they entail removal of natural vegetation, construction of new buildings and other infrastructure, and a potentially heightened level of human presence and activity. They should not be permitted within Preserved Open Space unless greater detail can be provided in this Specific Plan, showing where they could be located, how extensive they are, allowing for analysis of impacts to wildlife and other biological resources in the EIR.	Refer to response to comment B11-104 and B11-119.
Sonoma Land Trust	9/26/2022	B11-123	The last paragraph indicates that sycamores will line principal axes, and other primarily deciduous canopy trees will be used on other streets. The Specific Plan should prioritize the use of native trees and other native plants for landscaping	Comment incorporated. Policy 2-20 has been amended to state: “Require that the project sponsor work with an arborist to develop a tree planting plan that retains existing mature healthy trees and supplements the existing tree canopy with a diverse range of native and/or low water trees that provide

Commenter	Date	Letter	Comment	Response
			<p>where they align with the ornamental setting, because they are well-adapted to local climate, require less water and chemical inputs to thrive, and provide habitat benefits (food resources, cover, and nesting opportunities) for the greatest variety of native animal species . Valley oaks, which form an important part of the core campus landscape already in the southwestern section, as well as coast live oak, should be incorporated where space allows to sustain oaks as a long-term element of the campus, help ameliorate historic losses of sensitive valley oak habitat, and support the many species of native birds, mammals, amphibians and invertebrates that rely on native oaks. This will also help meet Policy 5-1, establishing tree-lined avenues “.that complement the surrounding hills and open space landscape.”</p>	<p>shade and habitat. Locate new construction and public realm improvements around existing landscaping features that are retained.”</p>
Sonoma Land Trust	9/26/2022	B11-124	<p>This section should include a statement specific to lighting meeting Dark Sky standards; this is mentioned only in passing in Policy 5-13 and should be made its own policy, to ensure cross-referencing with Policy 2-7. See comments on page 2-11, above, for further discussion.</p>	<p>Refer to response to comment B11-106.</p>
Sonoma Land Trust	9/26/2022	B11-125	<p>Policy 6-4 regarding a dog park: see comment on page 4-8, above.</p>	<p>Refer to response to comment B11-118.</p>
Sonoma Land Trust	9/26/2022	B11-126	<p>The baseline appears to vary between sections in the EIR. For example, it appears the Transportation section may use 2019 as baseline and the Biology Section uses a different baseline. Without a proper baseline, impact analyses cannot be evaluated.</p>	<p>The DEIR and Specific Plan utilize best available information in development of the plan and analyses. Much of the DEIR Section 3.4 relied on biological analyses completed in 2018 (PCI 2018), which was supplemented with more recently available species occurrence information provided</p>

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-127	<p>Identifying an appropriate baseline is particularly important for impacts relating to intensity of human uses and presence on the site, since the population of SDC has declined so dramatically in recent years as SDC ceased operations and closed. What is the specific baseline condition used for each section of the EIR?</p>	<p>by the California Natural Diversity Database. The Environmental Setting sections in each topical section of the DEIR provides specific baseline information used in the impact analyses.</p>
			<p>“The section describes biological resources in the Planning Area (which includes the project area for the SDC), including habitats, wetlands, critical habitat, and special status species, as well as relevant federal, State, and local regulations and programs.” This section does not actually address potential impacts and proposed mitigation measures needed to reduce potential impacts to less-than-significant levels. In order to fully address and mitigate potential impacts on biological resources, the EIR needs to evaluate potential construction-related and operational impacts from implementation of the Specific Plan on individual species, habitats for those species across the SDC area, natural vegetation communities, movement corridors, wetland disturbance and loss, and compliance with applicable policies use.</p>	<p>Refer to response to comment B11-90. The DEIR does consider the construction and operational-related impacts on biological resources throughout the Section 3.4 Impact Analysis. See also MR-3.</p>

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-128	<p>This section does not mention the 50’ minimum setback from streams designated by the Riparian Corridor zoning for this site. Instead, smaller setbacks are described in the first paragraph. Is the 50’ minimum setback not being applied in the Plan?</p> <p>Reducing the width of riparian and creek setbacks could disrupt animal movement by reducing the width of animal dispersal corridors and disrupting movement through the loss of habitat, increased noise and light disturbance within the corridor, and from human or domestic animal intrusion. The EIR must evaluate the potential impacts on biological resources from a reduction in the riparian and creek setback widths and mitigate the impacts of whatever setbacks it employs to ensure that those impacts are less than significant.</p>	<p>The Specific Plan includes policies that would ensure buffers and protection of riparian areas around creeks, including Asbury Creek. 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. 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. Lastly, 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.</p>
Sonoma Land Trust	9/26/2022	B11-129	<p>This states that measures shall be taken to “protect and enhance valley oaks on the project site” and such measures shall include, but not be limited to, a requirement that valley oaks shall comprise a minimum of fifty percent of the required landscape trees for the development project. But the Proposed Plan contains no such requirement. The EIR states that the Proposed Plan would have a significant impact on biological resources if, among other things, “Implementation of the Proposed Plan would ... conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance” (EIR, page 257, Impact 3.4-5). In order to ensure that impacts on valley</p>	<p>Refer to response to comment MR-1. In addition, refer to response to comment B11-36, B11-123, and B11-104 for details on measures that would reduce potential impacts to a less than significant level. The Proposed Plan would be required to comply with all application regulations, including provisions outlined in Article 67 of the Sonoma County Code regarding the Valley Oak Habitat Combining District.</p>

Commenter	Date	Letter	Comment	Response
			oak habitat are less than significant, the Specific Plan must include a policy implementing the requirements of the Valley Oak Habitat Combining District. The policy must be added to ensure development does not conflict with the zoning requirements for the protection of valley oak habitat. The EIR must then analyze fully the impacts of that policy.	
Sonoma Land Trust	9/26/2022	B11-130	Here and on p. 221, PCI's work on the Existing Conditions Report is cited as PCI (2015). PCI's work and the report as a whole (prepared by WRT) was completed in 2018. The document is available here: https://transformsdc.files.wordpress.com/2020/01/2-cnaturallandrecreationalresourcesv3.pdf	Comment incorporated. References have been updated to PCI 2018.
Sonoma Land Trust	9/26/2022	B11-131	Second paragraph also indicates that habitat types described are from the California Wildlife Habitat Relationships System. That is incorrect. PCI (2018) and all mapping associated with it use the Manual of California Vegetation-based classification refined by the Sonoma Veg Map project, which provides the more detailed and more precise classification needed to identify potential impacts on sensitive habitat types as required by CEQA. Please correct here and on relevant maps	Comment incorporated.
Sonoma Land Trust	9/26/2022	B11-132	The large wetland on the east side of the habitat map is incorrectly labeled as vernal pool. This should be labeled seasonal wetland or wet meadow.	Comment incorporated. Figure 3.4-1 has been revised to identify as a seasonal wetland.

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-133	<p>The first line notes that redwood forest is not considered sensitive in Holland (1986); Holland (1986) is not considered a current reference for sensitive habitat designations and therefore does not constitute substantial evidence of sensitive habitat designations. In order to accurately determine sensitive habitat designations and analyze impacts to those habitats, the EIR must use current rankings by CDFW for sensitive alliances and provide that information for each of the plant communities listed. Note that rankings of G3 or S3 or lower are considered sensitive. Because the EIR failed to rely on up-to-date evidence, the EIR failed to acknowledge that redwood forest is considered a sensitive habitat. In fact, based on PCI (2018), CDFW-ranked sensitive alliances on the site include redwood forest, madrone forest, Oregon oak woodland, valley oak woodland, bigleaf maple forest, cottonwood forest, riparian deciduous forest, native grasslands, and wetlands. The EIR needs to include a map showing all sensitive vegetation types for use in analyzing impacts in the EIR so that decision-makers and the public can fully understand the scope and location of sensitive habitat types and the Project’s impacts on sensitive habitat types. Valley oak woodland is of particular concern since it occurs within and adjacent to the core campus, and protections will be needed to reduce impacts to less-than-significant levels.</p>	<p>Specific Plan Policy 2-20 has been amended to state: “Require that the project sponsor work with an arborist to develop a tree planting plan that retains existing mature healthy trees and supplements the existing tree canopy with a diverse range of native and/or low water trees that provide shade and habitat. Locate new construction and public realm improvements around existing landscaping features that are retained.” Incorporation of this policy would ensure appropriate protections for potentially sensitive vegetation within the Plan area. The California Natural Diversity Database (CNDDDB; CDFW 2022), an inventory of the status and locations of rare plants and animals in California maintained by CDFW, was used to identify special-status species with the potential to occur in the SDC area based on previously reported occurrences of special-status species in the region. See also COA BIO-1. Existing redwood forests are discussed on page 213 of the DEIR. Since this habitat occurs outside the Core Campus, it would not be impacted by development. See also B11-129 regarding Valley Oak woodland protections.</p>

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-134	Vernal pools are mentioned in the title and third sentence, and on map 3.4-1. Vernal pools are highly sensitive, specialized wetland types that, if present, would need to be included in the discussion of impacts in the EIR. Mitigation measures specific to vernal pools would also be required. It should be noted that no vernal pools have been identified in prior work (PCI 2018, Sonoma Veg Map). What substantial evidence does the County have with respect to the presence of vernal pools? Please clarify.	Refer to response to comment B11-95.
Sonoma Land Trust	9/26/2022	B11-135	The EIR also fails to analyze the potential impacts on the wetlands in the area from the proposed Highway 12 connector or any other proposed Plan elements. The impacts analysis needs to address the direct and indirect impacts of the development on wetlands within the Specific Plan area before the EIR can conclude that any impacts would be less than significant.	Refer to response to comment MR-1. Additionally, the DEIR notes policies and standard conditions of approval that require projects to conduct a biological resources assessment (DEIR COA Policies BIO-1, BIO-14, BIO-15, BIO-16) to identify, avoid, and mitigated potential impacts to wetlands. Wetland protection policies identified in the Specific Plan and DEIR would continue to apply and would not result in changes to potential significance of impacts or analyses contained in the DEIR. In addition, Specific Plan Policy 2-28 states: "Prior to the commencement of the approval of any specific project in the Proposed Plan area, Project Sponsors shall contract a qualified biologist to conduct studies identifying the presence of special-status species and sensitive habitats at proposed development sites and ensure implementation of appropriate mitigation measures to reduce impacts to sensitive habitat or habitat function to a less than significant level."
Sonoma Land Trust	9/26/2022	B11-136	The EIR identifies Lindera benzoin as present on the site but this species is not known	Comment incorporated. Reference has been removed.

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-137	<p data-bbox="680 240 1318 331">to occur in California. If the EIR intended to reference <i>Calycanthus occidentalis</i>, please correct.</p> <p data-bbox="680 342 1318 1143">The list includes 28 species with moderate to high potential to occur. However, the EIR fails to provide a map showing the location of the habitat necessary for the species; therefore, decision-makers and the public cannot determine what specific elements of the project may impact habitat that could support the various species listed. The EIR needs to address the potential impacts to each species on a species-by-species basis. Without a species-by-species analysis, it is impossible to determine whether and to what degree development associated with the Proposed Plan would result in potential impacts within the habitat areas presented in Table 3.4-2: Potential Special-status Wildlife. And without full analysis, it is impossible to determine what mitigation is required to reduce those impacts to less-than-significant levels. How will impacts to habitat impact the listed species and what mitigation measures are proposed to reduce the potential impact?</p>	<p data-bbox="1373 342 1990 808">Refer to response to comments B11-90 and B11-94. <u>Species habitat referenced in this comment would primarily occur outside the developed Core Campus area, so development under the Proposed Plan would have minimal impacts. In addition, Condition of Approval (COA) Policy BIO-1, would require a biological resource assessment be prepared for any specific project in the Proposed Plan area, including identifying the presence of special-status species and sensitive habitats at proposed development sites and ensure implementation of appropriate mitigation measures to reduce impacts to sensitive habitat or habitat function to a less than significant level (DEIR page 243).</u></p>

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Sonoma Land Trust	9/26/2022	B11-138	The EIR also omits data about known occurrences of special status species on the Project site. For example, the entry for northern western pond turtle does not indicate that the species has been documented to occur on the site (see PCI 2018 for detail). The EIR’s failure to survey the site for special status species or to include data regarding known occurrences prevents the EIR from fully identifying or mitigating possible impacts to special status species.	Comment incorporated. The list of documented special-status species and assessment of potential for special-status species to occur (Table 3.4-2 and Table 3.4-3) has been amended to include Sonoma Ecology Center provided observations for special status species. Some of the comment's designations of individual species do not meet the criteria to be considered "special status" under CEQA. However, these species will all benefit from the above-mentioned policies and would not be significantly adversely affected by future projects. The Specific Plan places a high priority on biodiversity preservation, preservation of wildlife corridors and protection of special-status species (Vision Statement; existing County, State and Federal policies; please refer to Specific Plan Goals 2-D, 2-E; Specific Plan Policies 2-6 through 2-30). Though the comment does identify some special-status species that were not identified as observed in the DEIR, all potential significant impacts to these species would be mitigated to a less than significant level with the implementation of existing Local, State and Federal policies and the specific and general policies in the DEIR.
Sonoma Land Trust	9/26/2022	B11-139	The EIR fails to address the mountain lion, which is designated as a “Specially Protected Mammal” by CDFW, is a species of high local conservation concern, and is known to use the SDC site extensively. Central Coast and Southern California populations are currently under review for listing under the California Endangered Species Act. Some of the same pressures threatening mountain lions in those areas – including habitat fragmentation – are highly relevant to	Refer to response to comment MR-7. In addition, the designation of mountain lion as a Specially Protected Mammal makes it subject to rules under California Fish and Game Code specific to actions that would intentionally take and/or result possession of a mountain lion. Its most notable use is a prohibition of recreational hunting for the species. Mountain lion is not listed on CDFW's special animal list and was not considered a special status species for the purposes of this evaluation because the project does not have potential to result

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			<p>the population in the SDC region as well, especially in long-range planning for increased land development. Development of the types proposed in the Draft Specific Plan may have the potential to significantly impact mountain lion habitat and movement. It is, therefore, foreseeable that the Specific Plan could have a significant impact on mountain lions under significance Criterion 1 (“Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service”) or significance Criterion 4 (“Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites”). The EIR must specifically analyze and mitigate for impacts to mountain lions to ensure any such impacts would be less than significant.</p>	<p>in intentional take or possession of a mountain lion and Sonoma County CEQA analysis of special status species typically do not include mountain lion. As the comment indicates, some populations are currently being assessed for listing, though the Sonoma County population is not one of these.</p>
Sonoma Land Trust	9/26/2022	B11-140	<p>The table identifies the potential habitat for special-status plants in the planning area, but it fails to disclose where potential impacts might overlap with areas within the Specific Plan. For example, there is no way to tell based on the EIR where the areas of potential development (including uses permitted within “Preserve Open Space” such as indoor crop cultivation and utility</p>	<p>Refer to response to comment B11-90 and B11-104.</p>

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			development) would occur in relation to the habitat for special-status plants. Nor is it possible to discern what the potential impacts to special status plants and their habitat might be, or what specific mitigation would reduce those impacts. As drafted, substantial evidence and analysis do not support the EIR's conclusion that impacts to special status plants would be less than significant.	
Sonoma Land Trust	9/26/2022	B11-141	The EIR fails to clearly evaluate sensitive plant communities other than wetlands. The scientific community considers several other habitat types that are present at SDC to be sensitive. See PCI (2018); see also comment on p. 214 and following, above. The EIR cannot justify its conclusion that impacts on sensitive habitats will be less than significant without clearly analyzing and mitigating impacts to all relevant sensitive plant communities.	Refer to response to comment B11-90 and B11-104.
Sonoma Land Trust	9/26/2022	B11-142	Riparian corridors serve as important movement routes for many species other than steelhead, including many mammals, birds, amphibians, and reptiles. Please adjust wording. Mill and Asbury Creek serve as important corridors as well. The EIR must fully identify and analyze the impacts to all wildlife corridors on the SDC site, including Mill and Asbury Creeks.	Refer to response to comments B8-5 , B10-9 , and B11-112 .
Sonoma Land Trust	9/26/2022	B11-143	This section fails to provide a map of all wildlife movement corridors showing where all proposed plan development may be located in relation to the corridors and the EIR fails to identify what, specifically, the direct and	Refer to response to comment MR-7.

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			<p>indirect impacts on wildlife use of the existing corridors might be under Impact 3.4-4 starting on page 254. What are the potential impacts from habitat loss or alteration, noise, light, human presence, dog presence, and fragmentation by roads that may impact wildlife use of the corridor and what mitigation measures are proposed to reduce the specific impacts? Without identifying, analyzing, and mitigating specific impacts to wildlife corridors, the EIR lacks substantial evidence or explanation to justify its conclusion that those impacts would be less than significant.</p>	
Sonoma Land Trust	9/26/2022	B11-144	<p>How will the proposed Class I pathway indicated on Figure 3.2-1, shown leading toward Sonoma Creek from Walnut Street, affect the wildlife corridor and sensitive riparian habitat? What measures will be in place to limit or mitigate for these impacts? Without identifying, analyzing, and mitigating specific impacts of the Class I pathway, the EIR lacks substantial evidence or explanation to justify its conclusion that those impacts would be less than significant.</p>	<p>Refer to response to comment B11-90. As stated on page 252 of the DEIR, using trails adjacent to riparian areas could result in trampling riparian habitat or sensitive natural communities. Proposed Policy 2-13 would restrict access to the wildlife corridor and creek corridor to designated pedestrian paths marked with clear signage. Proposed Policy 2-14 would prohibit all unleashed outdoor cats and restrict off-leash dogs and other domestic animals to private fenced yards and designated area. With implementation of the applicable policies, the operational impact on riparian habitat and other sensitive activities would be less than significant.</p>
Sonoma Land Trust	9/26/2022	B11-145	<p>Two options for connector roads are shown in Specific Plan Figure 3.1-1, and three types of facilities (a direct connection to Highway 12, an emergency access connection, and a pedestrian/bike connection) are all alluded to in accompanying text. In addition, Policy 3-44 calls for development of the Sonoma Valley Trail (multiuse path) parallel to Highway 12. However, the EIR does not disclose or analyze the specific impacts of</p>	<p>Refer to response to comment MR-3 and B11-90. See also MR-7 regarding impacts of the Highway 12 connector.</p>

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			each of those proposed options. What will be the direct, indirect, and cumulative impacts of all these elements on biological resources, including wetlands, drainages, Butler Canyon Creek, and wildlife movement through existing undercrossings? Without identifying, analyzing, and mitigating specific impacts of the connector road(s), the EIR lacks substantial evidence or explanation to justify its conclusion that those impacts would be less than significant.	
Sonoma Land Trust	9/26/2022	B11-146	and cumulative impacts of all these elements on biological resources, including wetlands, drainages, Butler Canyon Creek, and wildlife movement through existing undercrossings? Without identifying, analyzing, and mitigating specific impacts of the connector road(s), the EIR lacks substantial evidence or explanation to justify its conclusion that those impacts would be less than significant.	Refer to response to comment MR-3, MR-7, and B11-90. See also response to comment B11-88 regarding cumulative impacts on biological resources.
Sonoma Land Trust	9/26/2022	B11-147	The EIR's chosen thresholds of significance are not sufficiently specific to enable decision-makers or the public to understand, in practical terms, what it means for the Specific Plan to have a significant or less-than-significant impact on biological resources. Further, the EIR fails to explain how the County chose or developed its significance criteria, or to justify why these specific criteria were selected while others were omitted. The EIR cannot fulfill its role as an informational document unless it provides additional information regarding its	Consistent with CEQA, the County exercised its discretion and consistent with its standard practice, based its thresholds on the State CEQA Guidelines Appendix G environmental impact considerations.

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			significance thresholds. For example:	
Sonoma Land Trust	9/26/2022	B11-148	Criterion 1. How does the EIR define substantial adverse effect for each candidate, sensitive, or special-status species present or potentially present in the Specific Plan area? What was the process used to determine if implementation of the proposed Plan will substantially affect specific species? How does this criterion address a potential change in species diversity and abundance that could occur from the implementation of the Specific Plan? How is a potential change in the quantity and quality of native habitat used by the biological resources addressed under this criterion and what is the significance threshold to evaluate impacts of a change?	Refer to response to comments MR-3 and B11-90.
Sonoma Land Trust	9/26/2022	B11-149	Criterion 2. What does the EIR evaluation consider a substantial adverse effect on riparian habitat or other sensitive natural communities? This is not articulated, and therefore, how can impacts be determined? What are the sensitive natural communities present in the planning area and within the development area, including the Highway 12 connector?	Refer to response to comments MR-3 and B11-90.
Sonoma Land Trust	9/26/2022	B11-150	Criterion 5. How is a potential conflict with policies and ordinances evaluated in terms of protected biological resources? What would constitute a significant impact and how would the impacts be mitigated to less-than-significant levels?	Refer to response to comments MR-3 and B11-90.

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Sonoma Land Trust	9/26/2022	B11-151	Why was the analysis of impacts limited to a comparison against Figure 3.4-1 when there are additional resources presented in the EIR? Figures 3.2-1 through 3.2-4 provide significantly more information for use in the analysis of impacts in the Biological Resources section. These figures illustrate locations within the planning area that support riparian forest types, evergreen and redwood forest types, and oak woodlands at a scale far more useful for impact evaluation. Portions of 3.4-1 also to be incorrect (see comment above on p. 212).	Refer to response to comments MR-3, B11-90 and B11-133.
Sonoma Land Trust	9/26/2022	B11-152	This section states that the plans' land use designations would not directly, adversely affect areas of natural vegetation. This conclusion is inappropriate for the "Methodology and Assumptions" section. Where is the analysis of how land use designations would relate to natural vegetation? For instance, how will land use types such as managed landscape and fire buffer affect natural vegetation? How will permitted uses in "Preserved Open Space" such as crop production, keeping of confined farm animals, and wine tasting facilities (as stated in Table 4.3-1) affect natural vegetation? Without first answering these and other questions, the EIR cannot support its conclusion with analysis and substantial evidence.	Refer to response to comments MR-3, B11-90, B11-104 , and B11-133.
Sonoma Land Trust	9/26/2022	B11-153	The impacts of the proposed Plan's land use designations are the only aspect of the Plan evaluated in the Biological Resources Section. This approach is inconsistent with other sections of the EIR that evaluate potential impacts from construction of projects within the Specific Plan area. For instance, construction emissions are	Refer to response to comments MR-3 and B11-90. Construction and operational activity impacts of the Proposed Plan were analyzed under the Biological Resources Impact Analysis starting on page 235 of the DEIR pursuant to CEQA requirements. For example, on page 241 the DEIR states that construction impacts on special-status species would be less than significant with implementation of

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			<p>evaluated in the Air Quality section addressing potential construction emissions from a new road connection to Highway 12. The fact that the proposed Plan is programmatic and does not include any specific development projects does not excuse the EIR from including an evaluation of any specific potential construction/development on biological resources. The potential locations of specific development types are shown on figures included in the EIR and the Specific Plan. The draft Specific Plan is, therefore, sufficiently detailed to allow analysis of at least some of these specific impacts at the programmatic stage. The EIR needs include potential impacts from construction and use of a connector to Highway 12 so that decision-makers and the public can determine now—when the County is proposing to lock in these uses—whether these uses will have significant impacts to biological resources and how those impacts could be mitigated.</p>	<p>Station Conditions of Approval BIO-1 through BIO-13. See also MR-7 regarding construction impacts of the Highway 12 connector.</p>
Sonoma Land Trust	9/26/2022	B11-154	<p>How can the EIR make the conclusion that the proposed Highway 12 connector and the upgraded wastewater treatment plant would not adversely affect areas of natural vegetation? There is no analysis or substantial presented to support the conclusion. In addition, how can potential conditions of approval reduce impacts? Please articulate why BIO 1 through 14 are not considered mitigations. What are the potential impacts should the County not include the conditions of approval as</p>	<p>Refer to response to comments MR-1, MR-3, and B11-90.</p>

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Sonoma Land Trust	9/26/2022	B11-155	<p>proposed, and what mitigation measures would be needed to reduce impacts to less than significant-levels?</p> <p>While the methods of “intentional water and energy conservation, sustainable food productions, top-tier sustainable building practices, and aggressive waste reduction” seem like valuable strategies for general sustainability of site operations, it is not clear whether or how these methods would “promote conservation of existing habitat” on the site. Further, the EIR does not clearly evaluate the details or efficacy of any of these methods with respect to whether or how they could reduce impacts to biological resources. Please clarify and address.</p>	<p>Refer to response to comment MR-1, MR-3, and MR-9. See also Conditions of Approval BIO-1 through BIO-16 regarding measures that reduce specific impacts to biological resources in addition to proposed policies.</p>
Sonoma Land Trust	9/26/2022	B11-156	<p>The policy states that the defensible space requirements of the County Fire Department should be met but not exceeded in the wildlife corridor. What are the County standards for defensible space and what are the impacts on biological resources from implementation of the defensible space requirements? The impacts should be evaluated under Impact 3.4-4 and 3.4-2 at a minimum but may also require evaluation for potential impacts on special-status plants. What mitigation measures would be needed to reduce impacts on biological resources from implementation of defensible space requirements? What could be the impact is defensible space standards must be exceeded and what mitigation would be needed if the impacts are significant?</p>	<p>Refer to response to comment B11-101.</p>

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Sonoma Land Trust	9/26/2022	B11-157	<p>Policy 2-11. Dark skies standards need to apply to the private realm as well as public setting, and should apply all new lighting, not just for new buildings. See comments on Specific Plan p. 2-11, above. The impacts of lighting on wildlife need to be addressed in the EIR. The EIR must evaluate how wildlife species modify their behavior as a result of increased nighttime light within wildlife corridors and other habitat and how increased light may alter nocturnal ecology within the Specific Plan area. Studies indicate increased light can disrupt foraging behavior and increase the risk of predation, increase roadkill of mammals, and disrupt dispersal movements and corridor use (Rich & Longcore eds. 2006). Nighttime light may prevent wildlife from fully using habitat available to them and light can prevent mammals from moving along wildlife corridors. Nighttime light can attract animals and result in altered wildlife movement patterns; these changes can expose prey to predators and make them more vulnerable to capture, thereby reducing species abundance and diversity in the area. See comment on Specific Plan, p. 2-11, above.</p>	Refer to response to comment B11-106. In addition, refer to response to comment MR-3 and MR-7.
Sonoma Land Trust	9/26/2022	B11-158	<p>This comment provides a partial list of potential wildlife impacts from increased light; many other potential impacts may occur. The EIR must evaluate potential impacts and evaluate what level of light pollution might trigger impacts to sensitive species or species movement. How are the potential changes evaluated for the potentially</p>	Refer to response to comment B11-106. In addition, refer to response to comment MR-3 and MR-7.

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			<p>affected species? Habitat modifications must be evaluated in Biology Criteria 1 and 4 to determine how the project may affect wildlife species and how changes may affect the use of movement corridors. The analysis must identify how these potential impacts were evaluated and what mitigation measures are needed to reduce impacts to less-than-significant levels.</p>	
Sonoma Land Trust	9/26/2022	B11-159	<p>This fencing standard will be very important in reducing impacts to wildlife. Will this be required for all agricultural uses within the “Preserved Open Space” as well? Please state if so. If not, impacts on wildlife movement should be re-evaluated to ensure that fencing-related impacts will remain less than significant. Are there locations where fencing will not be allowed because potential impact on wildlife movement cannot be reduced to less-than-significant levels? These areas must be identified in the EIR as a means to reduce impacts to less-than-significant levels.</p>	Refer to response to comment MR-7 and B11-107.
Sonoma Land Trust	9/26/2022	B11-160	<p>This noise standard is vague and unenforceable. It does not include a specific commitment to lower noise levels. Requirements to meet residential noise standards, during both day and night, need to be addressed and the impacts of not meeting such standards needs to be evaluated. Biology Criterion 1 says a significant impact would occur if the Project would have a substantial adverse effect on any special-status species; therefore, the EIR must address the biological impacts resulting from noise and specifically address the impacts of non-attainment of noise standards. How will increased noise impact species that communicate acoustically such birds and</p>	Refer to response to comment MR-1 and MR-3.

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			<p>bats that use habitat at SDC? How will noise affect animal physiology and behavior, and how would those changes impact special-status species? These impacts must be addressed in Biology Criterion 1 to understand how noise may impact special-status species, what noise levels would cause the impact, and what mitigation measures would be used to reduce the impacts to less-than-significant levels. Noise impacts on potential changes in wildlife use of corridors must be addressed under Biology Criterion 4 to provide an understanding of how noise may affect movement, and what mitigation measures are proposed to reduce the potential impacts to less-than-significant levels. How will the County determine if noise impacts occur? Without this critical information, the EIR does not have sufficient evidence to conclude that impacts to special status species would be less than significant.</p>	
Sonoma Land Trust	9/26/2022	B11-161	<p>Why is Asbury Creek not included as protected with a 50' buffer? What are the potential impacts to Asbury Creek from the lack of an adequate buffer? This stream provides significant habitat values and merits protection. It needs to be protected. If it will not be included within a buffer, the EIR must analyze and mitigate impacts to Asbury Creek to ensure those impacts remain less than significant.</p>	Refer to response to comment B11-112.
Sonoma Land Trust	9/26/2022	B11-162	<p>The EIR's summary of impacts in the Biology Section does not permit the level of granular analysis that is required to fully understand the impacts of the draft Specific Plan, particularly in light of the Specific Plan's level of detail and specificity. As such, the analysis of impacts on biological resources risks is</p>	Refer to response to comment B11-92 and MR-3.

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Sonoma Land Trust	9/26/2022	B11-163	<p>missing key impacts that may not be analyzed fully in later environmental review.</p> <p>The first full sentence on this page states that “development is not proposed to occur within Preserved Open Space.” However, this conflicts with the Specific Plan (p. 4-14 and following), which permits certain uses in that zone including tasting rooms, mushroom farms, utility development, and parking. Which is correct? If the Specific Plan is correct, the EIR must analyze the biological impacts from those permitted uses and mitigate any impacts to less-than-significant levels. Similarly, the EIR fails to explain how the Conditions of Approval would mitigate the negative impact of the Highway 12 connector on wildlife movement. Nor does the EIR disclose the potential impacts of the wastewater treatment plant, or what types of mitigation would be appropriate to reduce those impacts. Without an analysis and supporting evidence, decision-makers and the public cannot independently judge the EIR’s unsupported conclusion that these impacts would be less than significant.</p>	<p>Refer to response to comment B11-104 and MR-3. See MR-7 regarding impacts of the Highway 12 connector. As stated on page 252 of the DEIR, there are two public infrastructure projects that have potential to affect special status species; upgrading the wastewater treatment plant, and constructing a connector road to Highway 12. For both projects, Conditions of Approval BIO-1 through BIO-14 would be applied. For the proposed highway connector project, implementation of polices 2-25, 2-27, 2-29 and 2-30 would ensure impacts to riparian resources would be less than significant.</p>
Sonoma Land Trust	9/26/2022	B11-164	<p>This sentence states that future development under the Proposed Plan could have a significant direct or indirect impact on any special-status species if it would result in removal or degradation of a species or potentially suitable habitat. But the EIR does not contain any performance standards by which one could judge whether removal or degradation of a species or potentially suitable habitat</p>	<p>Refer to response to comment MR-3 and B11-90.</p>

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			<p>has occurred. Please define what is meant by removal and what is meant by degradation. Does removal mean loss of one individual special-status plant or animal? Would a significant impact occur should a special-status species no longer utilize habitat following increased human/animal interactions following site development? This is only an example of how impacts may be defined and how the undefined terms of removal or degradation are problematic as used in the EIR context.</p>	
Sonoma Land Trust	9/26/2022	B11-165	<p>The EIR states that potentially significant impacts could occur if significant amounts of habitat loss occurs. But what constitutes “significant” amounts of habitat loss varies by species? What does the EIR consider to be significant habitat loss for the special-status species present and potentially present at the site? How will the County determine whether a significant amount of habitat loss has occurred for each species? Without this critical information, the EIR does not have sufficient evidence to conclude that impacts to special status species would be less than significant.</p>	Refer to response to comment B11-104 and MR-3 .
Sonoma Land Trust	9/26/2022	B11-166	<p>Why are all species lumped into a single evaluation paragraph and not discussed individually? The impacts to special-status species will vary on a species-by-species basis and need to be analyzed individually. Without species-by-species analysis, the EIR cannot disclose what the specific impacts to each species might be or determine how those impacts should be mitigated.</p>	Refer to response to comment B11-104 and MR-3 .

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Sonoma Land Trust	9/26/2022	B11-167	Where will grading, excavation, and construction activities likely occur and what species may be affected in these locations? The Specific Plan clearly identifies where development should be sited. The EIR needs to be at least as detailed as the Specific Plan in order to capture the known foreseeable impacts of the project.	Refer to response to comment B11-104, and MR-3 .
Sonoma Land Trust	9/26/2022	B11-168	What specific species could be impacted with construction of the Highway 12 connector? How can the species be impacted from this activity and what are the mitigation measures needed to reduce the potential impacts to less-than-significant levels? Once mitigation measures are identified, the EIR must address how the mitigation measures reduce the impact on a measure-by-measure basis.	Refer to response to comment B11-104 and MR-7 regarding the Highway 12 connector .
Sonoma Land Trust	9/26/2022	B11-169	How does the EIR evaluate the potential biological resource impacts of the alternatives in relation to the potential construction impacts from the proposed plan?	The comment is noted. See analysis on biological resource impacts for each of the Alternatives in Chapter 4.
Sonoma Land Trust	9/26/2022	B11-170	What specifically are the potential increased risks to special-status species from the operation of individual parts of the Proposed Plan? Individual special-status species occur in different locations around the SDC site. Some will necessarily be more affected by particular aspects of the Specific Plan depending on where the Specific Plan locates particular uses. The location of proposed uses is known based on the current draft Specific Plan. The EIR therefore needs to analyze the operational	Refer to response to comment B11-104 and MR-7 .

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Sonoma Land Trust	9/26/2022	B11-171	<p>impacts of specific proposed uses on the special-status species in their vicinity before it can draw any conclusions about the significance of those impacts.</p> <p>What are the potential impacts from increased vehicular traffic and recreational use and to which species may these impact occur? What mitigation measures are needed to reduce these impacts? Multiple studies have found that increased vehicle traffic, increased density of human uses, and increased human activity levels, including trail development and use and dog presence, can reduce or alter habitat use by key wildlife species on SDC including mountain lions and bobcats (see for example Wilmers et al. 2021, Serieys et al. 2021, Smith et al. 2019, and Nickel et al. 2020).</p>	<p>Refer to response to comment B11-104. <u>As stated on page 241 of the DEIR, in terms of potential operations and maintenance related impacts, some increased risk to special-status species may result from increased vehicular traffic, increased recreational use, and domestic pets. Policies in the Proposed Plan would serve to reduce potential impacts. Policies 2-6 through 2-26 address development-related impacts on non-status and special-status species and their habitats. These policies reduce the potential for significant impacts, especially from operational impacts after the completion of the construction of individual projects. They also restrict most development near and in the most sensitive habitat types and habitat types that support special-status plant species, including all of those referenced in Table 3.4-3. Additionally, 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. With implementation of these policies and implementation of the BIO Conditions of Approval Measures required by the County, the impact of future development under the Proposed Plan on species identified as candidate, sensitive, or special-status species would be less than significant.</u></p>

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Sonoma Land Trust	9/26/2022	B11-172	Increased visitor use along trails across SDC may alter behaviors and cause some species to avoid those areas. Mitigation measures may include visitor education and requiring all visitors stay on established trails, minimize excessive noise, and keeping dogs on leash at all times. The County must identify areas where mitigation measures may not reduce impacts to less-than-significant levels and consider other means to reduce impacts, such as prohibiting dogs in areas that cannot accommodate their presence. Identification of areas where trail densities might already impact wildlife and identifying redundant trails to eliminate must be explored and analyzed in the EIR.	Refer to response to comment B11-104.
Sonoma Land Trust	9/26/2022	B11-173	What proposed plan elements have the potential to directly impact streams and the surrounding habitats and how might this impact individual species that depend on the habitat impacted? How do the policies presented protect these resources and what are the remaining impacts following implementation of the policies? What are the mitigation measures proposed to reduce the potential impacts and how will the mitigation measure reduce the impact?	Refer to response to comment B11-104.
Sonoma Land Trust	9/26/2022	B11-174	What elements of the proposed plan might result in a significant reduction in forest extent and quality and how will these potential impacts be reduced to less-than-significant levels? How does the County define a “significant” reduction in extent and quality? Do these potential impacts vary by alternatives to the proposed plan?	Refer to response to comment B11-104.

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Sonoma Land Trust	9/26/2022	B11-175	<p>What proposed plan elements in open grasslands might impact American badger and burrowing owls? Development and increased human use in open grassland that support habitat for these species may result in the loss of nesting and foraging habitat, and direct mortality. BIO-3 identifies means to avoid American badger dens during development to avoid direct mortality; however, it does not address the impacts associated with loss of habitat. BIO-5 includes relocation measures for burrowing owl; however, the EIR does not address potential impacts from loss of habitat, such as reduced population numbers and the potential for burrowing owls to avoid use of potential nesting and foraging habitat located adjacent to developed areas. The EIR must evaluate impacts that result from human presence, such as loss of habitat and potential abandonment of nests resulting from human presence. How will the County determine if these impacts occur following development and how will the County protect the species? What are the mitigation measures needed to reduce the potential impacts on American badger and burrowing owl habitat loss?</p>	Refer to response to comment B11-104.
Sonoma Land Trust	9/26/2022	B11-176	<p>The EIR states that “Outside of the developed areas, the Proposed Plan establishes dedicated open space areas. Managed open space in these areas would preserve and, in some cases, enhance the quality of sensitive habitats such as wetlands, native grasslands and oak woodlands. Several special-status</p>	Comment noted.

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			wildlife and some plant species would be positively impacted by the preservation of these habitats. The open space would preserve the Sonoma Valley Wildlife Corridor and maintain its permeability for the movement of wildlife at a regional scale.” .	
Sonoma Land Trust	9/26/2022	B11-177	How do policies reduce impacts on special-status species? The EIR makes statements without providing supporting discussion or explaining the methods used. As a result, decision-makers and the public cannot independently evaluate the adequacy of the EIR’s analysis or the veracity of its conclusions.	Refer to response to comment MR-3.
Sonoma Land Trust	9/26/2022	B11-178	What are the impacts from development that the policies address and what impacts remain after the policies are all implemented? What mitigation measures are proposed to address impacts remaining after implementation of policies? How will the County measure the efficacy of the policies and any mitigation measures?	Refer to response to comment MR-3 and B11-90.
Sonoma Land Trust	9/26/2022	B11-179	Why are the requirements listed as conditions of approval and not as necessary mitigation measures and how does each condition of approval reduce specific impacts? The EIR effectively admits that these requirements are needed to reduce impacts to less-than-significant levels. The EIR needs to analyze the project’s unmitigated impacts and then identify impact-reducing policies as mitigation measures. It must also include those mitigation measures in a mitigation monitoring and reporting program to ensure they are effective and enforced. The approach used in the Biological Resources section failed to do this and is inexplicably inconsistent with the methodology used in other sections of the EIR.	Refer to response to comment MR-1, MR-3, MR-9, and B11-90.

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Sonoma Land Trust	9/26/2022	B11-180	Conditions of Approval policies appear to relate only to the construction phase. Where is the analysis of impacts on special-status species associated with operations? How will the effects of ongoing site use and facility operation be reduced to less than significant? Without clearly defined and enforceable mitigation, the EIR provides no assurance that the operational impacts of the Specific Plan would be reduced to less-than-significant levels.	Refer to response to comment MR-1 , MR-3 and B11-90.
Sonoma Land Trust	9/26/2022	B11-181	The EIR fails to identify potential impacts on special-status species from dog use at Suttonfield Lake. As such, the EIR cannot determine what mitigation measures are necessary to reduce those impacts to less-than-significant levels.	Refer to response to comment B11-118.
Sonoma Land Trust	9/26/2022	B11-182	The EIR fails to identify which proposed plan elements could impact special-status bats and their habitat. What happens if the survey indicates that bats inhabit a building that is scheduled for demolition? How will the bats be evacuated from the building and how will they be prevented from reoccupying the site? How will the proposed mitigation prevent impacts?	Refer to response to comment B11-96. BIO-2 in the Specific Plan requires A qualified biologist to perform preconstruction survey(s) for bat roosts to ensure there are no impacts from future implementing projects.
Sonoma Land Trust	9/26/2022	B11-183	The EIR fails to identify which proposed plan elements could impact American badger. What are the potential impacts in open grassland? How will this mitigation prevent impacts and how will the County evaluate the efficacy of the measure?	Refer to response to comment B11-104, B11-40 , and B11-94 .
Sonoma Land Trust	9/26/2022	B11-184	Is BIO-4 only needed during construction? Are there any potential impacts on nesting raptors from project operations? How will the proposed	Refer to response to comment B11-104. BIO-1 would require surveys to be conducted by a qualified biologist. Policy 2-10 would reduce

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			<p>mitigation prevent impacts and how will the County determine the efficacy of the measure? BIO 4 does not specify that pre-construction survey work needs to be completed by a qualified biologist. All construction-related wildlife surveys needs to be completed by a biologist. The measure defines an “active nest” as having eggs or nestlings present. Some interpretations of the Fish and Game Code include nest building as active nesting. The definition of “active nest” here needs to incorporate nest building.</p>	<p><u>operational impacts on nesting species to a less than significant level. While an active nest would include eggs or young, according to BIO-4, if any special-status raptor nest is determined to be present within the work area, or within 0.5 mile of the work area, consultation with the CDFW and/or USFWS shall occur and any measures recommended or required by those agencies shall be implemented. Implementation of this measure would reduce impacts to a less than significant level.</u></p>
Sonoma Land Trust	9/26/2022	B11-185	<p>The EIR fails to identify the specific potential impacts to burrowing owls. What are the potential impacts in owl habitat and what habitat do they use in the proposed plan area? How will the proposed mitigation prevent impacts? BIO 5 does not specify that pre-construction survey work needs to be completed by a qualified biologist. All construction-related wildlife surveys need to be completed by a biologist. The measure defines an “active nest” as having eggs or nestlings present. Some interpretations of the Fish and Game Code include nest building as active nesting. The definition of “active nest” here needs to incorporate nest building.</p>	<p>Refer to response to comment B11-104 <u>and B11-184.</u></p>
Sonoma Land Trust	9/26/2022	B11-186	<p>The EIR fails to identify proposed plan activities that might impact northern spotted owls. What activities might occur within riparian, evergreen and/or oak forests where owls may nest? Please explain how the</p>	<p>Refer to response to comment B11-104.</p>

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			acquisition of a permit reduces the impact on owls to less-than-significant levels.	
Sonoma Land Trust	9/26/2022	B11-187	What is the proposed work that might occur near Fern Lake and Suttonfield Lake that might impact tricolored blackbird? How will the mitigation measure prevent impacts?	Refer to response to comment B11-104.
Sonoma Land Trust	9/26/2022	B11-188	The measure defines an “active nest” as having eggs or nestlings present. Some interpretations of the Fish and Game Code include nest building as active nesting. The definition of “active nest” here needs to incorporate nest building.	Comment noted. The applied definition of active nest is standard in CEQA evaluations at the project and programmatic level, consistent with Fish and Game Code. There is no need to change the definition and no evidence is provided that such a change is warranted. See also response to comment B11-184.
Sonoma Land Trust	9/26/2022	B11-189	The EIR fails to identify which proposed plan elements could result in direct impacts to aquatic features and result in the loss of habitat or cause harm to individuals. What will those direct impacts be and how will the mitigation prevent these impacts?	Refer to response to comment B11-135.
Sonoma Land Trust	9/26/2022	B11-190	Why are the measures limited to potential work within 300 feet of a channel when USFWS mandates measures to protect California red-legged frogs across CRLF habitat, not only within 300 feet of an aquatic feature? The EIR needs to identify protection measures for CRLF habitat outside 300 feet.	COA Policy BIO-11 applies the 300 foot buffer for work that will occur outside the rainy season when California red-legged frog is unlikely to be dispersing across the landscape. During this time, most California red-legged frogs are in areas near aquatic features and so the 300-foot buffer is a protective measure for frogs that may be present around those features. With the implementation of COA Policy BIO-1 for individual projects, it may be that additional protective actions would be called for.
Sonoma Land Trust	9/26/2022	B11-191	The EIR fails to identify which proposed plan elements could result in direct impacts	Refer to response to comment B11-104 and B11-135.

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			to freshwater shrimp and salmonids and result in the loss of habitat or cause harm to individuals. How will the mitigation prevent these impacts? Why are the requirements listed not considered mitigation? What is necessary to prevent the loss of freshwater shrimp habitat and what compensatory mitigation may be necessary in the event a proposed planned element results in loss of habitat?	
Sonoma Land Trust	9/26/2022	B11-192	What process will be required if a special-status plant cannot be avoided? What specific mitigation is necessary and how will that mitigation reduce the potential impact? How will the County monitor the efficacy of the mitigation?	Refer to response to comment MR-1 and MR-3.
Sonoma Land Trust	9/26/2022	B11-193	The EIR notes development would take place in previously developed portions and concludes that will limit potential for disruption to undeveloped habitats. Where within the SDC property will riparian habitat and other sensitive natural communities be directly or indirectly impacted by implementation of the proposed plan? The EIR must support its conclusions with substantial evidence and thorough analysis.	Refer to response to comment MR-1 and MR-3.
Sonoma Land Trust	9/26/2022	B11-194	The first full sentence states that no new building development is proposed to occur within open space areas. However, this conflicts with the Specific Plan (p. 4-14 and following), which permits uses in that zone including tasting rooms, mushroom farms, utility development, and parking. Which is correct? This section must analyze	Refer to response to comment B11-104.

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Sonoma Land Trust	9/26/2022	B11-195	the specific impacts from all uses permitted under the Specific Plan. The first paragraph states that “implementation of the Proposed Plan may result in the degradation or removal of riparian habitat” and that such projects will require measures to reduce, avoid, or compensate for impacts. The EIR needs to identify these impacts as potentially significant, and must design and analyze appropriate mitigation measures. At present, the EIR does nothing to ensure that these impacts would actually be mitigated to less-than-significant levels.	Refer to response to comment MR-1, MR-3, and B10-9, and B11-112.
Sonoma Land Trust	9/26/2022	B11-196	BIO-1 though BIO-14 address special-status wildlife species. It is not clear from the EIR whether or how these policies would reduce the impact on riparian habitat or other sensitive natural communities to less-than-significant levels. The EIR needs to explain how individual species protection measures protect riparian or sensitive natural communities in general? What are the mitigations necessary for the loss of riparian habitat?	Refer to response to comment B11-104 and B11-135.
Sonoma Land Trust	9/26/2022	B11-197	How will development impact sensitive valley oak habitat? What will the impacts from the increased presence of people and pets be on wildlife in valley oak habitat? The EIR needs to discuss these impacts and analyze in sufficient detail how these impacts will be mitigated to less-than-significant levels.	Refer to response to comment B11-36 , B11-104, and B11-129.

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Sonoma Land Trust	9/26/2022	B11-198	The EIR fails to identify the specific impacts on riparian and sensitive natural communities from the two public infrastructure projects? What specifically could be impacted and which sensitive natural communities could be present in the construction area? How would BIO-1 through BIO-14, which address special-status species, reduce these impacts? What are the specific mitigations needed in the event the project results in the loss of riparian habitat or sensitive natural communities? How specifically do the policies listed reduce the impacts?	Refer to response to comment MR-1 and MR-3. In addition, the Specific Plan includes policies that would ensure buffers and protection of riparian areas around creeks, including Asbury Creek. 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.
Sonoma Land Trust	9/26/2022	B11-199	Is there new trail construction included as part of the project? If so, the potential impacts on riparian and sensitive natural vegetation must be analyzed and mitigated.	Refer to response to comment B11-104.
Sonoma Land Trust	9/26/2022	B11-200	The EIR fails to disclose the potential impact of increased vehicle trips be on individual wildlife species. This impact must be analyzed fully. At present, there is not sufficient evidence or analysis to indicate whether or how this impact would be mitigated to a less-than-significant level.	Refer to response to comment MR-1 and MR-3.
Sonoma Land Trust	9/26/2022	B11-201	BIO-14 is deferred mitigation. The EIR must expand on what might be included in an aquatic resources mitigation plan and describe how development of this plan will reduce impacts to less-than-significant levels. The EIR must provide clear performance standards that any future mitigation plan must meet.	Refer to response to comment MR-1 and MR-3.

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Sonoma Land Trust	9/26/2022	B11-202	The analysis indicates a potentially significant impact could occur if construction impacts federally protected wetlands. This analysis improperly excludes wetlands that fall under State jurisdiction without justification. Figure 3.4-1 serves as the basis for the location of known wetlands and vernal pools (but see comments on potential errors in that figure, above). What are the proposed plan elements that could potentially cause the impact and why was this analysis not provided? It further appears the Highway 12 connectors could impact a large mapped wetland (incorrectly shown as vernal pool). These potential impacts are not analyzed in the EIR. The EIR must analyze and mitigate all foreseeable potentially significant impacts, including impacts related to the Highway 12 connector(s).	Refer to response to comments B10-2, B11-95, and B11-99 .
Sonoma Land Trust	9/26/2022	B11-203	The EIR fails to identify performance standards for its de factor proposed mitigation. What are the requirements in the permits that would mitigate impacts? Why are these measures not included as mitigation(s) in the EIR? How, specifically, will these measures mitigate the impact?	Refer to response to comment MR-1 and MR-3.
Sonoma Land Trust	9/26/2022	B11-204	Operation. The first sentence states that no new building development is proposed to occur within open space areas. However, this conflicts with the Specific Plan (p. 4-14 and following), which permits uses in that zone including tasting rooms, mushroom farms, utility development, and parking. Which is correct? The EIR must analyze the specific impacts from all uses	Refer to response to comment B11-104.

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			permitted under the Specific Plan before it can determine whether those impacts will be significant.	
Sonoma Land Trust	9/26/2022	B11-205	<p>The introductory paragraph does not discuss the Sonoma Valley Wildlife Corridor.</p> <p>The paragraph also notes there will be a significant impact on migratory species, corridors, and nursery sites; however, the impact analysis does not support this statement. The EIR states that implementation of the Proposed Plan would have a significant impact on migratory species, corridors, or nursery sites if the siting, construction, or operation of develop allowed under the Proposed Plan would impede on or remove migratory corridors or nursery sites. The EIR must define what is considered impede on and what might trigger an individual species to not fully use or stop using habitat for migration. The Proposed Plan would impact species differently.</p>	Refer to response to comment MR-7.
Sonoma Land Trust	9/26/2022	B11-206	<p>The EIR must evaluate how the potential impacts on individual species resulting from development identified in the Specific Plan and addressed under Impact 3.4-1 potentially alter wildlife movement and migration patterns across the property and across the larger corridor. How would the introduction of light sources, noise, human activity, domestic animals, trails, new roadways and increased use of existing roadways directly and indirectly impact permeability of the wildlife corridor and alter use pattern? The EIR must identify mitigation measures for any significant impacts on</p>	Refer to response to comment MR-7.

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Sonoma Land Trust	9/26/2022	B11-207	<p>migratory species, use of migration corridors, or nursery sites to less-than-significant levels?</p> <p>It is an error to assume trails and use of trails would not impact wildlife movement simply because the use is consistent with open space management. Trails and trail use, especially increased use, can directly impact individual species. The EIR must analyze the specific impacts of the proposed trail and explain how those impacts will relate to wildlife movement through the SDC property. How will new trails be designed to minimize impacts to wildlife movement and prevent habitat fragmentation? What mitigation measures are needed to reduce the impacts to less-than-significant levels?</p>	Refer to response to comment B11-102.
Sonoma Land Trust	9/26/2022	B11-208	<p>The EIR does not explain why the requirements of a 401 or 404 permit or CDFW authorization would fully protect fish and wildlife resources in terms of wildlife movement and wildlife corridors. The EIR must support its conclusions with analysis and substantial evidence, and the current EIR does not do so.</p>	Refer to response to comment MR-1 and MR-3
Sonoma Land Trust	9/26/2022	B11-209	<p>The EIR fails to identify what specific policies would minimize impacts on wildlife migration or explain how implementation of each individual policy listed in the analysis would mitigate those impacts. The EIR states that the proposed plan preserves a majority of the site within the Sonoma Valley Wildlife Corridor. What is the impact caused on the portions of the migration</p>	Refer to response to comment MR-7.

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			<p>corridor that are not preserved? Will access be limited and how will access impact wildlife use? What other impacts could occur and how will these impacts be mitigated? The EIR must specifically identify impacts and analyze their potential for mitigation in order to comply with CEQA.</p>	
Sonoma Land Trust	9/26/2022	B11-210	<p>The EIR fails to analyze the potential wildlife migration issues associated with the increased daily vehicle trips for each length of roadway and for each scenario presented in Table 3.14-3: Projected Traffic Volumes in Plan Area (page 440). It appears the proposed plan would result in 13 percent more vehicular traffic than historic uses. What effect could this increase have on biological resources?</p>	Refer to response to comment MR-7.
Sonoma Land Trust	9/26/2022	B11-211	<p>The EIR fails to explain what specific impact(s) the implementation of the “dark skies” standards would address in terms of wildlife movement. The potential impact from increased light is not addressed in the wildlife impacts analysis. The EIR must analyze unmitigated impacts before defining mitigation measures. The EIR fails to analyze light impacts on wildlife movement or explain why, based on substantial evidence, it believes that dark sky standards would reduce those impacts to less than-significant levels. What are the potential impacts on biological resources from residential housing, buildings and other facilities in terms of nighttime lighting?</p>	Refer to response to comments MR-7, B11-30 , and B11-106.
Sonoma Land Trust	9/26/2022	B11-212	<p>The EIR fails to explain how these general policies apply specifically to the Sonoma</p>	Refer to response to comment MR-7.

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			Valley Wildlife Corridor and what potentially significant impacts these policies address. What proposed plan elements could encroach on the wildlife corridor and into existing open space, and what are the potential impacts on wildlife?	
Sonoma Land Trust	9/26/2022	B11-213	Operation. The addition of 1,000+ housing units and 900 jobs will substantially increase the number of recreational users. The EIR fails to quantify or analyze the effect of this increase. What is the anticipated increase in recreational use? Will this increase have a significant impact on wildlife usage? How will the impacts of this greater human and pet presence on trails be mitigated?	Refer to response to comment B11-104.
Sonoma Land Trust	9/26/2022	B11-214	Similarly, the increase in housing and jobs will increase vehicle traffic. The EIR fails to analyze the effect of this increase on wildlife corridor permeability. How will the increase in vehicle traffic generated by 1000 new homes and 900 jobs affect wildlife corridor permeability? How will these impacts be mitigated? Research has found a strong negative correlation between wildlife corridor use and traffic quantity and development intensity (see, for example, Charry and Jones 2009, and Smith 2019).	Refer to response to comment MR-7.
Sonoma Land Trust	9/26/2022	B11-215	The EIR provides no justification for limiting restrictions on nighttime noise based on feasibility. Nor does the EIR analyze or disclose how frequently adherence to residential nighttime noise standards would be infeasible or discuss what additional impacts would occur and mitigation would be required in that case. What are the	Refer to response to comment MR-7.

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			potential impacts on wildlife migration should adherence not be feasible and what are the proposed mitigation measures to reduce the impact?	
Sonoma Land Trust	9/26/2022	B11-216	The EIR fails to identify what plans were evaluated to determine the proposed plan would not conflict with any local, regional, or state habitat conservation plan. The EIR must document its analysis and support its conclusions with substantial evidence.	The comment is noted. There are no Habitat Conservation Plans (HCPs) that apply within the Planning Area. There are no Natural Community Conservation Plans at the county level that include land within the Planning Area. See the Regulatory Setting starting of page 203 for other plans and regulations that the Proposed Plan would comply with.
Sonoma Land Trust	9/26/2022	B11-217	The proposed plan would result in significant and unavoidable impacts related to transportation (Impact 3.14-2) and historic resources (Impact 3.5-2). The biological resources impact evaluation does not address potential wildlife impacts resulting from the increased traffic; therefore, the alternatives may not adequately address potentially significant and unavoidable impacts on biological resources. Traffic volume and density of development are key factors that must be addressed in evaluating impacts to wildlife movement.	Refer to response to comment MR-7.
Sonoma Land Trust	9/26/2022	B11-218	It is unclear what the no project alternative is and how the EIR evaluates it. It appears the no project alternative is development without a Specific Plan but following the County General Plan. Does the EIR evaluate a true no action alternative (no development)? If not, why not? It appears the EIR concludes that State law requires development of the site, and this is not adequately explained in the text. Discussion of a no project alternative does not provide a	The comment is noted. See MR-2. While this EIR cannot pre-judge the State's actions, the EIR tries to frame these in light of the State Legislature's established land use objectives for the site, per Govt. Code Section 14670.10.5 for the No Project Alternative.

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			complete picture without a true “no development” alternative.	
Sonoma Land Trust	9/26/2022	B11-219	The EIR does not adequately explain how the impact of increased vehicle trips on individual special status species and wildlife corridor permeability would differ between the proposed buildout and its project alternatives. Different types and magnitudes of uses in different locations would likely have different impacts on individual special-status species, since special-status species are not uniformly distributed throughout the SDC site. So it is foreseeable that a given alternative could improve impacts on one special-status species while worsening impacts on another. These distinctions and impacts must be analyzed and fleshed out in the EIR in order for decision-makers and the public to fully understand the merits of each of the alternatives presented.	Refer to response to comment MR-7. See also B11-83 and B11-87 regarding the variability of alternative impacts.
Sonoma Land Trust	9/26/2022	B11-220	The assessment for cumulative impacts on biological resources is simply a summary of the project impacts and fails to identify other projects or impacts to which the Specific Plan will add or compound impacts. What other projects in the geographical context of biological resources could have similar impacts as the proposed plan? Is there an existing cumulative impact on biological resources throughout the County and does the proposed plan have a considerable	The comment is noted. See B11-88 regarding the methodology of the cumulative impacts analysis and boundary used for the biological resources cumulative impact analysis. Development resulting from the Proposed Plan, as well as future development projects that could occur within the Planning Area or in the vicinity of the Planning Area, would be subject to the requirements of biological resource protection laws, including FESA, CESA, MBTA, and the California Fish and Game Code, as well as protection policies and

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			<p>contribution to a cumulative impact on biological resources? These questions are particularly relevant to the EIR's analysis of the Sonoma Valley Wildlife Corridor, which spans a significant east-west divide and is subjected to impacts from a broad range of projects across its geographic range. The EIR must consider the Project's cumulative impacts to the wildlife corridor in light of the corridor's full geographic range.</p>	<p>provisions in the City's 2040 General Plan and Municipal Code. With implementation of the relevant policies and implementing actions, the Proposed Plan's contribution to cumulative biological resources impacts would be less than cumulatively considerable.</p>

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Sonoma Land Trust	9/26/2022	B11-221	<p>Comment: The DIER states that the project will not interfere substantially with the movement of any wildlife species with an established native resident or migratory wildlife corridors (Figure 1; EIR at 19). This conclusion is not supported by substantial evidence and is likely incorrect. For example, there has been documented mountain lion movement through the Sonoma Development Center property (Figure 2). Two mountain lions in particular, P1 and P5, have been recorded traveling through the SDC property routinely throughout the study period and the property is part of these two mountain lions' home range (Figure 2). Mountain lions are also of particular concern when designing new development because they are uniquely threatened by human activity and encroachment into their habitat. Mountain lions are known to be sensitive to human disturbance, light, and noise (Suraci, Justin P., et al 2019, Wilmers et al. 2013). Largely as a result of increasing development pressures, local mountain lion populations in California are increasingly under threat, and some—including populations within the Bay Area—are currently under review by CA Dept. of Fish and Wildlife to be a listed species for special protection under State law (Yap, TA, JP Rose, and B Cummings. 2019). It is therefore foreseeable that the Project, which would site more than 1,000 residential units and additional commercial and recreational uses immediately adjacent to a bottleneck in the Sonoma Valley Wildlife Corridor—will impede mountain lion movement through this corridor and negatively impact the resident mountain lion population (Wilmers et al. 2013). Impeding mountain</p>	<p>The SDC Specific Plan EIR is a program EIR, presenting a comprehensive assessment of the potential impacts of the proposed SDC Specific Plan. At a programmatic level, the Specific Plan is designed to be self-mitigating and EIR include numerous policies and measures that would ensure impacts to biological resources are avoided and minimized as development takes place. This includes minimizing potential impacts to the Sonoma Valley Wildlife Corridor. The DEIR notes on page 235 that the overall site is of regional significance as a wildlife corridor.</p> <p>The Specific Plan would also expand the Sonoma Valley Wildlife Corridor at the pinch point close to Suttonfield Lake by removing existing buildings in the northeastern portion of the Planning Area and providing that land for wildlife movement. The Specific Plan would also preserve the entirety of the approximately 755 acres outside the Core Campus as open space, including improved open space within the Core Campus through 30-50 acres of buffer open space (including riparian, wildlife corridor, and Arnold Drive buffers). Additionally, the Specific Plan includes policies designed specifically to minimize the impacts to wildlife at the interface of the built and natural environment (proposed policies 2-6 through 2-26). In response to received comments on the Sonoma Valley Wildlife Corridor, Policy 2-6 has been amended to clarify: "Remove existing development along the north edge of the Core Campus, from area shown as Open Space in Core Area in Figure 2.2-1, and re-introduce compatible native species to expand the wildlife corridor. This includes removing existing buildings</p>

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			<p>lion movement would constitute significant impacts under Biological Resources significance Criteria 1 and 4. Notwithstanding this foreseeable impact, however, the EIR fails to identify or analyze the Project's impacts to mountain lions. It does not discuss how the Project's uses and associated impacts, including light and noise, would carry into the corridor and influence mountain lion behavior or other species. Nor does the EIR discuss movements of particular species, including mountain lions, through the corridor. As a result, decisionmakers and the public neither know where and how frequently mountain lions or other wildlife species occur on the SDC site or whether and to what degree the development proposed under the Specific Plan would impact their behavior. The Project's impacts to mountain lion and other species mobility could thus be significant, but decisionmakers and the public have no way to know because the EIR failed to include necessary data and studies.</p>	<p>Paxton, Thompson/Bane, and Residence 126 and buildings on the northeast side of campus and ensuring that new development remains within the smaller development footprint as shown in Figure 2.2-1. Ensure that the wildlife corridor is not further restricted at its narrowest point along the north side of the campus. The project sponsor shall be responsible for demolishing buildings within the expanded wildlife corridor and establishing new planting and landscaping to support expanded wildlife movement and safety, prior to Certificate of Occupancy on any redevelopment on the eastside of Arnold Dr." Additionally, Specific Plan Policies 2-9 and 2-10 require fuels management to be minimized within wildlife corridors to limit disturbance to species. Lastly, Policy 2-31 has been amended to add: "Construct and maintain a managed landscape buffer along western and eastern edges of the Core Campus to aid in fire defense consisting of a shaded fuel break in wooded areas and grazed or mown grassland. Shrubs and chaparral should be limited within the managed landscape buffer. Management of this landscape buffer should aim to enhance biodiversity, reverse weed invasion, and protect water resources."</p> <p>As a programmatic analysis, the DEIR does not assess project-specific impacts of potential future projects under the proposed Plan. Future projects would be required to comply with CEQA, as applicable, including preparation of more precise, project-level analyses regarding potential impacts to biological resources. Appendix A of the Specific Plan also lays out standard conditions of approvals that would apply to all projects based on Specific</p>

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				<p>Plan policies and CEQA analysis, regardless of whether subsequent environmental analysis is conducted or not. This includes Condition of Approval (COA) Policy BIO-1, which would require a biological resource assessment be prepared for any specific project in the Proposed Plan area, including identifying the presence of special-status species and sensitive habitats at proposed development sites and ensure implementation of appropriate mitigation measures to reduce impacts to sensitive habitat or habitat function to a less than significant level (DEIR page 243).</p> <p>The evidence presented in this comment related to two mountain lions and some common mesopredators do not reach the level of substantial evidence that would indicate that a significant impact determination is warranted. The Specific Plan approach to increase net open space, enhance protection of wildlife corridors through incorporation of proposed policies and conditions of approval, and the requirement for future projects to comply with applicable CEQA requirements supports the DEIR's analysis that potential impacts to mountain lions and associated wildlife corridors would be less than significant.</p>

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Sonoma Land Trust	9/26/2022	B11-222	In fact, there have been no wildlife connectivity studies conducted to document what wildlife species are traveling through or residing on the SDC property. See EIR at 236 (“No new field studies were conducted for the preparation of this EIR.”). This type of study must be conducted to be able to analyze what the project’s impacts will be to wildlife movement and resident wildlife populations, and therefore to determine whether the project’s impacts would be significant or could be mitigated. See EIR at 236 (Criterion 4, providing that impacts would be significant if the project would “[i]nterfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors”). How will the FEIR resolve this issue?	<p>As a programmatic analysis, the DEIR does not assess project-specific impacts of potential future projects under the proposed Plan. Future projects would be required to comply with CEQA, as applicable, including preparation of more precise, project-level analyses regarding potential impacts to biological resources. Appendix A of the Specific Plan also lays out standard conditions of approvals that would apply to all projects based on Specific Plan policies and CEQA analysis, regardless of whether subsequent environmental analysis is conducted or not. This includes Condition of Approval (COA) Policy BIO-1, which would require a biological resource assessment be prepared for any specific project in the Proposed Plan area, including identifying the presence of special-status species and sensitive habitats at proposed development sites and ensure implementation of appropriate mitigation measures to reduce impacts to sensitive habitat or habitat function to a less than significant level (DEIR page 243).</p> <p>In the DEIR, the determination of less than significant impacts to wildlife movement was supported by the Specific Plan’s self-mitigating approach to increase net open space, enhance existing open space areas through incorporation of proposed policies and conditions of approval, and the requirement for future projects to comply with applicable CEQA requirements.</p>

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Sonoma Land Trust	9/26/2022	B11-223	<p>The EIR also does not include any specific mitigation measures that would reduce impacts to mountain lion and other species mobility to less-than-significant levels. For example, while the EIR acknowledges that wildlife and their habitat may be sensitive to noise impacts (EIR at 337-338), and while mountain lions in particular are known to be sensitive to noise, the EIR does not include any mitigation measures that are designed to or capable of mitigating noise impacts to mountain lions to less-than-significant levels. Instead, the EIR relies on Specific Plan policies that regulate noise and vibration-based thresholds for humans and buildings. EIR at 347-349. This approach does not and cannot ensure that noise impacts to mountain lions would be sufficiently mitigated.</p> <p>Similarly, the de facto mitigation included in the Biological Resources section of the EIR fails to address mountain lions. For example, Conditions of Approval BIO 1 through BIO 14 ostensibly address construction impacts to special-status plants and wildlife. As discussed in the letter prepared by Prunuske Chatham, Inc., which comments are incorporated herein by reference, these conditions are not sufficiently detailed or enforceable to ensure that impacts would actually be reduced to less-than-significant levels. But even if they were sufficient for the species identified, Conditions of Approval BIO 1 through BIO 14 do not require mitigation specific to mountain lions or mountain lion activity. See EIR at 243-251. The EIR thus cannot conclude that the Project's impacts to mountain lion mobility would be</p>	<p>Refer to response to comment MR-1. In addition, the Specific Plan has been prepared to be fully self-mitigating, thus no mitigation measures were prepared. In lieu of mitigation measures multiple conditions of approval pertaining to biological resources (pages 243-251 of the DEIR) have been developed to help reduce impacts to species that use the wildlife corridor, including mountain lions. See also response B11-221.</p>

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			less than significant because those impacts have neither been studied nor mitigated.	
Sonoma Land Trust	9/26/2022	B11-224	<p>Comment: The SDC project will further constrain Sonoma Valley Wildlife Corridor. The landscape is already fragmented for wildlife movement. Because of the existing infrastructure and roads, the wildlife corridor within the project area already constrains the corridor, resulting in a bottleneck of the linkage. Any further development or increase in people, cars, or intensity of land use would further constrain the linkage. The proposed project could ultimately sever this critical linkage and result in isolating wildlife populations, their ability to find resources like food and water, the ability to find mates, or juveniles dispersing out of their parental home range to establish their own. How does the County propose to avoid or mitigate the foreseeable constricting effects of increased human activity on the wildlife corridor?</p>	<p>Refer to response to comment MR-3 and MR-7. In addition, Policy 2-1 has been amended to state: “Ensure that land shown In Figure 2.2-1 as Preserved Open Space is dedicated or maintained as permanent public open space, and the Managed Landscape/Fire Buffer is designed and maintained for that purpose. The owner/operator of the Preserved Open Space shall prepare an open space plan, to be approved by the County to manage the rich diversity of resources on site, including habitat, vegetation, wetlands, native species, and other critical resources, balanced with recreation and wildfire protection needs. As part of the open space plan development, conduct a formal aquatic resources delineation for habitat protection, and consider delineating a cohesive system of trails and pathways that balances recreation and wildlife conservation.” Incorporation of the amended policy would require future uses within open space areas to be consistent with the Specific Plan’s resource protection policies (policies 2-6 through 2-26) and would involve multiple partners to further refine open space preservation goals for “Preserved Open Space” areas. This assessment would refine allowable uses based on meeting multiple objectives, including function as a wildlife corridor. potential sensitive habitats and species and make recommendations for mitigation of any project-specific impacts to biological resources to a less</p>

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than significant level.

The commenter speculates that future development could further constrict the corridor but does not present substantial evidence to demonstrate increased human activity will alter wildlife movements in the context of the Specific Plan approach to increase net open space, enhance existing open space areas through incorporation of proposed policies and conditions of approval (refer to response to comment B11-221), expand the size of the existing wildlife corridor through removal of buildings, and the requirement for future projects to comply with applicable CEQA requirements.

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Sonoma Land Trust	9/26/2022	B11-225	The proposed project will further constrict the wildlife corridor by significantly increasing the amount and intensity of human activity in and immediately adjacent to the corridor. The Specific Plan proposes more than 1,000 units of residential development in addition to commercial and visitor-serving development. By contrast, in recent years, the human activity at SDC has been considerably reduced. Even before facility closure, the site only supported approximately 415 clients living there, 470,000 sf of client housing, 49,000 sf staff housing, and 643,400 sf offices, shops, etc. California Department of Developmental Services. (2012). Sonoma Developmental Center Building Use Survey. Department of Developmental Services. October 2012. The increase in activity from new construction and occupation of the SDC site would therefore represent a sizeable increase in human activity encroaching on the Wildlife Corridor. Loss of habitat, increased noise and light disturbance within the Corridor, and human or domestic animal intrusion could reduce the width of animal dispersal corridors and disrupt movement through the Wildlife Corridor.	Refer to response to comment MR-7. As stated on page 55 of the DEIR, the Proposed project would protect approximately 755 acres of land that currently exists as open space, including areas that include the narrowest part of the Sonoma Valley Wildlife Corridor. The proposed Specific Plan would restore an already developed part of the site, widening a narrow portion of the Wildlife Corridor. Please refer to response to comment B11-221 for the polices described in the DEIR that will minimize impacts to wildlife through implementation of Dark Sky standards and noise restrictions.
Sonoma Land Trust	9/26/2022	B11-226	The EIR's failure to describe the already fragmented nature of the landscape results in an incomplete picture of the environmental setting of the Project and prevents decisionmakers and the public from understanding fully the consequences of the Project's impacts. Without a complete understanding of how development will further constrict the Wildlife Corridor, the EIR cannot develop adequate mitigation to reduce the Project's constricting impacts. And without targeted and enforceable mitigation, the Wildlife Corridor would predictably see an increase in potentially	Refer to response to comment MR-7. In addition, the DEIR provides multiple maps showing the current land use, habitat distribution and proposed land use. The commenter is referred to figures 3.2.2 to 3.2.4, and Figure 3.4.1. Narrative descriptions of habitats and current land uses are found on pages 211-220 and pages 234-235.

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Sonoma Land Trust	9/26/2022	B11-227	<p data-bbox="651 227 1344 324">significant impacts from noise, light, habitat loss, and other consequences of development.</p> <p data-bbox="651 422 1344 1401">That analytical and informational gap is apparent on the face of the EIR. For example, as discussed above, the EIR admits that wildlife and their habitat may be sensitive to noise impacts. EIR at 337-338. But the EIR fails to quantify or otherwise describe how construction and operational noise might impact wildlife, including the use of the Wildlife Corridor by relevant species. The species that populate the Wildlife Corridor may respond to noise and other impacts in unique ways. For example, noise has been shown to impact wildlife usage of habitat, resulting, for example, in reduced foraging time and efficacy, and reduced nesting use, in birds (Burger and Gochfeld 2002, Stone 2000, Aubrey and Hunsaker 1997, Shannon et al. 2016). Other species may respond differently. The EIR must therefore analyze noise impacts on the Wildlife Corridor on a species-by-species basis if it is to provide a full understanding of the Project’s potentially significant impacts to wildlife and wildlife mobility. The EIR does not provide that analysis. Nor does the EIR mitigate for effects to the wildlife corridor. For example, as discussed above, noise impacts are addressed based on thresholds for human and building exposure; the EIR does not contain performance standards relevant to wildlife or explain</p>	Refer to response to comments MR-1, MR-3, and MR-7. Additionally, Specific Plan Policies 2-11 through 2-17 were prepared to generally minimize and avoid light and noise impacts to any species that move through the SDC project area.

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			why thresholds for human and building exposure are applicable to wildlife. See EIR at 347-349.	
Sonoma Land Trust	9/26/2022	B11-228	The EIR’s remaining analysis and mitigation similarly fails to ensure that the Project’s impacts on the wildlife corridor will be less than significant. For example, Conditions of Approval BIO 1 through BIO 14 require future mitigation for construction-related impacts to specific special-status species. EIR at 243-251. But none of those conditions specify what “impacts” to those special-status species might entail. EIR at 243-251. Nor do any of the conditions establish performance standards related to wildlife movement within the corridor. EIR at 243-251.	Refer to response to comments MR-1, MR-3, and MR-7. Construction and operational impacts to wildlife are described on pages 253 to 256 in the DEIR, and the finding was made that impacts would be less than significant for all significance thresholds.
Sonoma Land Trust	9/26/2022	B11-229	The fourth significance criteria chosen by the EIR requires the EIR to demonstrate that “Implementation of the Proposed Plan would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.” EIR at 254-255. But the EIR does not specify what species constitute “native resident or migratory fish and wildlife species” that could be impacted. The EIR also does not explain how much interference with species’ movement would constitute “substantial” interference or how the County would determine whether “substantial” interference has occurred. The EIR cannot treat the Wildlife Corridor or the species that use it as a monolith. Different species use the wildlife corridor in different ways. Different species are also	Please see response to comment B11-222.

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			<p>differentially impacted by various elements of human development and activity. An impact that is insignificant for one species may be extremely significant for another. Thus, before the EIR can claim that impacts to the wildlife corridor are less than significant, the EIR must first identify the species that use the corridor and identify the specific impacts of the Project that are likely to affect those species. Vague and generalized mitigation, such as the policies referenced on pages 255 to 256 of the EIR, are not sufficient to ensure that impacts to wildlife movement in the wildlife corridor will categorically be less than significant. For example:</p>	
<p>Sonoma Land Trust</p>	<p>9/26/2022</p>	<p>B11-230</p>	<p>2-12 Restrict development in the wildlife corridor and creek corridor to limited trails/paths and informational signage, and design trail networks to minimize travel through wildlife and creek corridors.</p> <p>The EIR cannot assume that limiting development in the wildlife corridor to trails and paths would not significantly impact wildlife movement. Wildlife is known to respond to human activity, even when that activity is restricted to trails. For example, mountain lions are known to avoid trails where domestic dogs are present. Since the corridor is going to be significantly impacted and restricted by the proposed developments, the only habitat left will be the creeks and rivers for wildlife to travel along. Trails should be set back from creeks and the EIR must analyze the impacts of trails and trail use on surrounding wildlife.</p> <p>Allowing limited development could have impacts on</p>	<p>Page 252 of the DEIR states that access to creek corridors will be limited to designated paths in an effort to protect (minimize impacts to) wildlife movements. Page 255 of the DEIR discloses impacts of new trails on wildlife.</p>

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			the wildlife corridor, and the EIR must analyze the significance of those impacts.	
Sonoma Land Trust	9/26/2022	B11-231	2-13 Restrict access to the wildlife corridor and creek corridor to designated pedestrian paths marked with clear signage and delineated by strategic wildlife-permeable fencing. The same principles apply here. Allowing limited access could have impacts on the wildlife corridor, and the EIR must analyze the significance of those impacts.	Page 255 of the DEIR discloses impacts of new trails on wildlife.
Sonoma Land Trust	9/26/2022	B11-232	2-14 Prohibit all unleashed outdoor cats, and restrict off-leash dogs and other domestic animals to private fenced yards and designated areas. How will this policy be enforced? Prohibiting off-leash pets is important to do but can be difficult to enforce. The EIR and Specific Plan must include an enforcement mechanism to ensure that this policy would actually reduce impacts to wildlife.	Refer to response to comment MR-1 and MR-3.
Sonoma Land Trust	9/26/2022	B11-233	2-15 Collaborate with local wildlife protection groups to create and distribute educational information and regulations for residents and employees to guide safe interactions with wildlife onsite. Materials should be accessible to all ages and abilities and could include posted signs, disclosures, fliers, or informational sessions, among other things. This policy does not clearly mitigate for any of the project's impacts and habitat loss of the wildlife corridor. What specific regulations would be developed? Until the County knows what regulations will be imposed, it cannot analyze whether those regulations would be	Please refer to response to comment MR-1 and MR-9 .

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			<p>sufficient to avoid negative interactions between people and wildlife. Further, this policy fails to specify how regulations would be enforced. Major national parks such as Yellowstone struggle with enforcement of regulations regarding interactions with wildlife despite having a full-time staff of rangers patrolling and enforcing those regulations. The EIR cannot conclude that information and regulations would reduce impacts to wildlife without providing clear standards and a mechanism for enforcement.</p>	
Sonoma Land Trust	9/26/2022	B11-234	<p>2-16 All fencing within the open space must be wildlife permeable, with at least 18 inches of clearance between the ground and the bottom of the fence, and shall not cross or bisect streams or otherwise discourage wildlife movement. For any barbed wire fences, a smooth bottom wire at least 18 inches above the ground must be used.</p> <p>The EIR and Specific Plan fail to explain how this Policy would be enforced. In my professional experience, these types of guidelines are often ignored. For example, ranchers often do not adhere to fencing guidelines because of the risk that calves or smaller farm animals might get out onto the roads, which is dangerous both for the animals and for drivers. How will the County enforce these critical fencing requirements? Further, because the Specific Plan permits agricultural uses within the “Preserved Open Space,” this policy must make clear that these fencing standards apply throughout areas shown as Preserved Open Space in Figure 2.2-2.</p>	Please refer to response to comment MR-1 and B11-107.

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Sonoma Land Trust	9/26/2022	B11-235	2-17 Adhere to residential nighttime noise standards to the extent feasible. This policy is vague and unenforceable. It states that occupants of the SDC site must adhere to residential nighttime noise standards only to the extent feasible. It does not specify who determines whether compliance is feasible or indicate how frequently compliance may not be feasible. Further, this policy does not provide for any additional mitigation that may be required if and when adhering to residential nighttime noise standards is not feasible.	Please refer to response to comment MR-1.
Sonoma Land Trust	9/26/2022	B11-236	There is simply no basis on which the EIR can conclude that this policy would reduce noise impacts to wildlife.	Please refer to response to comment MR-1 and MR-9 . See also response to comment B11-30 regarding noise impacts .
Sonoma Land Trust	9/26/2022	B11-237	Why did the DEIR fail to analyze specific impacts to the wildlife corridor?	Refer to response to comment B11-221. The degree of specificity in the analysis is consistent with the programmatic nature of the proposed Specific Plan. The Sonoma Valley Wildlife Corridor will remain undeveloped and in some areas may be expanded through removal of existing structures.
Sonoma Land Trust	9/26/2022	B11-238	Why is there no formal mitigation set up for the impacts to the wildlife corridor? Even if the mitigating policies are baked into the Specific Plan, mitigation measures need to be included in a mitigation monitoring and reporting program to ensure they are effectively followed.	Please refer to response to comment MR-1.
Sonoma Land Trust	9/26/2022	B11-239	Why was there no study developed to determine impacts to wildlife movement within the wildlife corridor?	CEQA Guidelines 15064 indicate impacts should be evaluated on the basis of scientific and factual information “to the extent possible.” There is no CEQA requirement for new studies to evaluate the significance of impacts. See also MR-3 and MR-7 .

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Sonoma Land Trust	9/26/2022	B11-240	Without a detailed analysis, how will the FEIR evaluate and set up mitigation for impacts to the wildlife corridor?	Please refer to response to comment B11-239.
Sonoma Land Trust	9/26/2022	B11-241	Comment: During a site visit, Pathways for Wildlife observed tracks and scat from multiplespecies, including deer, bobcat, coyote, and gray fox, throughout the main sections of theproposed development site. Yet the EIR does not disclose whether these species or othersare present at the site because the County has not conducted the necessary surveys todocument the site’s biological resources. A site survey is a simple and necessary tool toconfirm the presence of special-status species and other plants and wildlife at the Project site. A survey would allow the County to identify not only whether species are present on the site, but also where those species are documented to occur.	Please refer to response to comment MR-3 <u>regarding the level of detail of analysis and programmatic nature of the EIR, MR-7 regarding impacts on wildlife movement, and COA BIO-1 requiring specific project biological resource assessments prior to the commencement of the approval of any specific project in the Proposed Plan area.</u>
Sonoma Land Trust	9/26/2022	B11-242	A spatial understanding of species distribution at the SDC site is key to understanding the full scope and intensity of impacts to plants and wildlife, because the impacts of development will vary based on what types of development the Specific Plan permits at different locations around SDC. While a specific development proposal has not yet been selected by the State, the Draft Specific Plan is sufficiently detailed and development plans are sufficiently congealed to know where certain types of development would be permitted under the Specific Plan. See, e.g., Draft Specific Plan Figs. 1.6-1, 3.1-1, 3.1-2, 4.1-1, and 4.1-2. Therefore, a major roadblock standing in the way of a complete understanding of the Project’s impacts to biological resources is the EIR’s failure to collect relevant data about	Please refer to response to comment MR-3, MR-7, and COA BIO-1.

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			<p>the occurrence and distribution of species at the SDC site. Until those data are collected, the EIR cannot fully analyze the Specific Plan’s impacts to biological resources or intelligently mitigate for the effects.</p> <p>Why were simple data like these not collected and analyzed by the authors of the DEIR?</p> <p>Comments on the Notice of Preparation, including those by Sonoma Land Trust, identified the need for this type of data collection to support any analysis or mitigation in the EIR. In addition, prior comments identified the need for an in-depth wildlife linkage assessment to fully characterize the scope, use, and impacts to the Sonoma Valley Wildlife Corridor. The Sonoma Valley Wildlife Corridor broadly recognized as a critical and regional linkage. An analysis of the impacts of the proposed development needs to be conducted so that the EIR can identify linkage-level impacts and develop appropriate mitigation measures to reduce those impacts to less-than-significant levels. CDFW expects all DEIRs for projects that impact that impact documented wildlife corridors to include this analysis. The EIR must include surveys of biological resources so that it can fully analyze and mitigate impacts to less-than-significant levels.</p>	
Sonoma Land Trust	9/26/2022	B11-243	<p>Comment: Pathways for Wildlife also conducted a wildlife connectivity study along Hwy12, adjacent to the proposed development (Sonoma Valley Wildlife Corridor Road Underpass Use Report 2013-2014). We recorded multiple species’ movements under the highway on a consistent basis throughout the study period. These species included bobcat, coyote, deer, gray fox,</p>	<p>Please refer to response to comment B11-222 and B11-239. See also MR-3 and MR-7 regarding wildlife movement impacts. No new field studies were conducted for the preparation of this EIR, because existing resources contained information on pertinent aspects of biological resources in the Planning Area at level of detail appropriate for a</p>

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			<p>mountain lion, raccoon, skunk, and opossum. This study illustrated the importance of the wildlife movement with the Sonoma Valley Floor and documented that the highway is currently permeable for wildlife movement. However, no equivalent study was prepared for or included in the DEIR. There is no actual analysis of wildlife movement in the DEIR, and therefore there is no evidence on which to base the EIR's so-called "analysis" of impacts. See EIR at 254-257 (concluding that impacts to wildlife movement would be less than significant without studying or fully describing how wildlife actually moves through or around the SDC site). In order to understand how the Project will impact wildlife movement, the DEIR first needs to study and analyze how wildlife actually use the SDC property. Only after comparing actual wildlife movement against the Specific Plan's development proposal can the EIR begin to determine what the specific impacts and magnitude of impacts to wildlife movement will occur as a result of that development. A thorough study is therefore a predicate to impact analysis or mitigation. The final EIR must incorporate all relevant studies and data.</p>	<p><u>program level environmental assessment. Future project specific detailed biological surveys will be necessary to confirm presence or absence of sensitive resources on future development sites.</u></p>
Sonoma Land Trust	9/26/2022	B11-244	<p>The EIR's conclusion that the proposed project will not impact wildlife movement is completely unsupported and false as there is no data or documentation to support an assumption of that magnitude. An adequate wildlife connectivity study needs to be conducted to mitigate the project's impacts and to ensure that they are less than significant. The study proposal that Pathways for Wildlife prepared for Sonoma Land Trust, which was included in Sonoma Land Trust's</p>	<p>Please refer to response to comment B11-243.</p>

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Sonoma Land Trust	9/26/2022	B11-245	<p>comments on the Notice of Preparation and which is reproduced as Attachment 2 to this letter, is representative of the vetted and scientifically proven methodology for conducting wildlife connectivity studies to be able to analyze any types of development impacts on a wildlife corridor. This type of study is necessary to be able to determine and analyze the impacts to wildlife corridor by the proposed project (Safe Passages, Beier, P. & Loe. S. 1992, Forman, R. T. 2012).</p> <p>Finally, the DEIR is clear that important riparian corridors run through the SDC project area. Why was there no study or analysis of wildlife movement within these important riparian corridors? How will the FEIR avoid or mitigate impacts to these key riparian corridors in light of the current absence of data about wildlife movement in those corridors?</p>	Please refer to response to comment B11-243.

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Sonoma Land Trust	9/26/2022	B11-246	<p>Flawed Analysis of Plan Consistency – Impact 3.14.4.5 (DEIR p. 443) addresses the issue of potential Project-related conflicts with “a program, plan, ordinance, or policy addressing the circulation system.” Among the plans considered here is the Sonoma County General Plan 2020. The DEIR states that:</p> <p>Objectives CT-4.1 and CT-4.2 of the Sonoma County General Plan pertain to upholding vehicle level of service standards. As individual development projects occurring within the Proposed Plan complete traffic impact studies as required by the Sonoma County Department of Transportation and Public Works (DTPW), the potential exists for identification of locations where LOS [Level of Service] targets would be exceeded.</p> <p>The General Plan objectives referenced here require operation at LOS C on roadway segments (except where exceptions have been adopted) and LOS D at intersections. Attachment 1 contains an excerpt from the General Plan, including the figure illustrating where LOS exceptions have been approved.</p> <p>The DEIR (p. 444) goes on to state: . . . while traffic congestion effects of the Proposed Plan or development of individual sites within the Planning Area may not comply with the LOS targets established in Sonoma County General Plan Objectives CT-4.1 and CT-4.2, for the purposes of the Proposed Plan’s CEQA assessment this would not be considered an adverse environmental impact.</p> <p>We believe this conclusion is erroneous. In fact, we believe that the failure to conform to level of</p>	<p>The commenter states that the DEIR transportation analysis is flawed because the proposed Specific Plan would be inconsistent with the traffic level of service (LOS) objectives contained in the County’s General Plan. The commenter refers to the standalone traffic analysis contained in the Focused Traffic Operations Analysis for the SDC Specific Plan, W-Trans, July 2022, which identifies two intersections and two roadway segments where LOS objectives would be unmet if no roadway improvements were made.</p> <p>As described on DEIR page 444, automobile delay and LOS are no longer considered significant impacts on the environment per Public Resources Code §21099(b)(2). Recognizing the potential for confusion when assessing a project’s consistency with General Plan policies and objectives pertaining to LOS for CEQA purposes, the California Governor’s Office of Planning and Research (OPR) provided the following guidance, provided online at https://opr.ca.gov/ceqa/sb-743/faq.html#general-plans-with-los (accessed 10/4/2022):</p> <p><i>Even if a general plan contains an LOS standard and a project is found to exceed that standard, that conflict should not be analyzed under CEQA. CEQA is focused on planning conflicts that lead to environmental impacts. (The Highway 68 Coalition v. County of Monterey (2017) 14 Cal.App.5th 883; see, e.g., Appendix G, IX(b) [asking whether the project will “Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?”].)</i></p>

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			<p>service standards established within the County’s adopted General Plan constitutes a clear “conflict with a program, plan, ordinance, or policy addressing the circulation system.” Further, the failure to include any documentation within the DEIR regarding conformance to the General Plan LOS objectives is a significant deficiency.</p> <p>We note that a detailed traffic impact analysis has been conducted for the Project, although that document has not been included in the DEIR. Specifically, Footnote 118 (DEIR p. 410) references the Focused Traffic Operations Analysis for the SDC Specific Plan (W-Trans, August 2022 [actually July 6, 2022]). Although the traffic analysis is not part of the DEIR, we reviewed it to establish whether the Project conforms to General Plan Objectives CT-4.1 and CT-4.2. Our review revealed that the WTrans report (p. 3) states:</p> <p>Under future conditions with implementation of the SDC Specific Plan, two intersections are projected to operate unacceptably if no modifications to the current roadway configurations are made. The intersection at Arnold Drive/Harney Street would operate unacceptably at LOS F during the p.m. peak hour . . . The future new intersection on SR 12 at the new SDC Connector Road would have unacceptable LOS E operation on the stop-controlled connector road approach . . .</p> <p>Although improvements are identified that would remedy these deficiencies, no assurance is provided that those measures would be implemented.</p> <p>The focused traffic study (p. 5) also says:</p> <p>With the additional traffic generated by the buildout of the SDC Specific Plan, the segment</p>	<p><i>Auto delay, on its own, is no longer an environmental impact under CEQA. (See Pub. Resources Code, § 21099(b)(2).)</i></p> <p>The DEIR transportation analysis does not identify a significant CEQA impact associated with traffic congestion and LOS. This is consistent with CEQA requirements and does not constitute a flaw in the transportation analysis. Please also note that the Focused Traffic Operations Analysis for the SDC Specific Plan document was prepared as a standalone document separate from the DEIR because it specifically addresses a non-CEQA topic area.</p>

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			<p>of SR 12 between Arnold Drive and Trinity Road would continue to operate below the County's standard at LOS D, as would the segment of Arnold Drive between SDC and Madrone Road.</p> <p>Although these road segments are also identified as falling short of the County LOS standard without the Project, no mitigation measures were proposed to allow operation at an acceptable LOS. In any event, it is clear that these two roadway segments will fail to meet the County LOS standard upon completion of the Project, thereby violating the General Plan objectives.</p> <p>In conclusion, the information necessary to address conformance with General Plan Objective CT-4.1 and CT-4.2 exists, but was not included within the DEIR, which would have allowed public review. As described here, that information indicates that the Project fails to conform to the County's LOS standard, as two intersections and two road segments will operate at unacceptable levels of service upon completion of the Project, and no assurance was provided that these deficiencies will be remedied. Thus, a significant impact exists with respect to conflicts with the adopted General Plan.</p> <p>Finally, the focused traffic study must be incorporated into the DEIR. The provision of this new information within the DEIR provides grounds for recirculation of the document.</p>	

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Sonoma Land Trust	9/26/2022	B11-247	<p>Project Trip Generation is Underestimated – The DEIR (p. 440) states that the Project will generate 5,736 daily trips. Of that total, 1,398 of those trips (i.e., 24.4 percent of the total) will be “captured within the campus itself,” resulting in net external trip generation of 4,338 trips. We believe the DEIR has substantially underestimated the volume of traffic associated with the Project.</p> <p>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 employed were not revealed in the DEIR. Consequently, it is impossible for the reviewing public to evaluate the reasonableness of either those factors or the resulting trip generation estimates.</p> <p>Traffic impact analyses for proposed development projects commonly use information presented in the Institute of Transportation Engineers (ITE) document Trip Generation Manual (Eleventh Edition, 2021) to develop project-related trip generation estimates. Although we acknowledge that the ITE trip rates often differ from corresponding rates contained within travel demand forecasting models such as the SCTM19 model, comparison of an estimate based on the ITE information versus the estimate documented in the DEIR provides a valuable perspective on the credibility of the DEIR Project’s Two scenarios are addressed here. The first employs the Project plan as described in DEIR Section 3.14 - Transportation, and the second considers a maximum residential development scenario based on information in the Specific Plan document. DEIR Section 3.14 – Transportation Project Plan</p>	<p>The commenter asserts that the vehicular trip generation for the project was underestimated and provides an alternative means of calculating the project’s daily trip generation through application of rates published by the Institute of Transportation Engineers (ITE) in the Trip Generation Manual, 11th Edition. The trip generation characteristics of the proposed Specific Plan were extracted from the SCTM19 regional travel demand model operated and maintained by the Sonoma County Transportation Authority (SCTA). The model includes sophisticated algorithms to predict traveler behavior, and has been calibrated against real-world observations both through comparison of traffic volume projections versus observations, as well as aggregated “big data” obtained through mobile devices that provides real-world data on how residents, employees, and visitors travel within and beyond Sonoma County. As with all travel demand models, SCTM19 considers the proximity of housing, jobs, and services to one another, and accordingly does account for travel occurring within the Plan area (i.e., the component of travel that does not add traffic volumes to the roadway network beyond the immediate area).</p> <p>In the earliest steps of producing travel demand estimates, the SCTM19 model uses trip generation rates published by ITE, similar to those referenced by the commenter. The model proceeds through numerous additional steps, however, before outputting vehicular volumes. A key component of these additional steps entails the balancing of trips, wherein trip “productions” and “attractions” are matched in order to eliminate the double-counting</p>

Commenter	Date	Letter	Comment	Response
			<p>Scenario</p> <p>Table 1 provides a trip generation estimate for the Project based on the plan as described in DEIR Section 3.14 - Transportation and on commonly-accepted procedures documented in the ITE Trip Generation Manual. That estimate reflects the following parameters:</p> <ul style="list-style-type: none"> • The land use values described in DEIR Section 3.14 – Transportation, including the specific housing type breakdown, were evaluated. • The ITE Trip Generation Manual typically provides two methods to develop an estimate of project-related traffic: one using an average rate and one using a fitted curve equation. For this analysis, we have reported whichever of those two methods provides a lower value, so as to provide a conservative estimate of Project trips. The trip generation data sheets for this estimate are presented in Attachment 2. • Within each housing type, it was assumed that 25 percent of the residential units would be inclusionary income-restricted units, in order to conform to Specific Plan Policy 4-14 (Specific Plan, p. 4-25). Because these units generally produce lower volumes of traffic, this assumption again results in a conservative trip generation estimate. • Because the specific uses included within the public/institutional land use are not currently well-defined, no trip generation estimate was included for that land use category. <p>As shown in Table 1, the Project is estimated to generate 12,253 daily trips. This is obviously substantially (i.e., 114 percent) greater than the DEIR estimate of 5,736 daily trips. As we stated</p>	<p>that would otherwise occur, and to calibrate the model’s theoretical volume projections to those that are actually occurring in the field. Examples of trips that would be double-counted without balancing include an outbound commute trip generated from a residence in the morning that is also counted as an inbound morning trip to the office or employment site. Direct application of ITE trip generation rates would count these as two separate trips even though only one trip is actually being made.</p> <p>Direct application of ITE Trip Generation Manual rates constitutes standard traffic engineering practice when analyzing the effects of a proposed single-use development in a focused geographic area, as is commonly done in traffic impact studies focused on level of service. In such project-level analyses, use of a full-scale regional travel demand model such as SCTM19 is typically unwarranted except in cases of very large or complex projects. With a complex programmatic plan such as the proposed Specific Plan, however, use of a sophisticated regional model is required to fully account for the conditions occurring both within the project itself (including presence of multiple land use types) as well as conditions reflective of the project’s context within the broader area and region. The SCTM19 model is the best-available tool to produce traffic volume forecasts in this manner. The root of the commenter’s suggestion that the trip generation estimates output from the SCTM19 model should be comparable to those resulting from a straightforward application of ITE Trip Generation rates by land use is understood, since it is how project-level analyses for discreet projects are often</p>

Commenter	Date	Letter	Comment	Response
			<p>above, model-based trip generation factors often differ from the ITE trip rates. However, a difference of this magnitude is exceptional and is greater than we have ever seen. Consequently, we question the validity of the DEIR trip generation estimate. Maximum Residential Development Scenario</p> <p>As we indicated above, we have questions regarding certain aspects of the proposed development plan. One such question concerns how many residential units will be constructed. Although the DEIR transportation analysis addresses development of 1,000 residential units, the Specific Plan indicates that a greater number of units is possible. Table 4-2: Minimum and Maximum Housing Units by District (Specific Plan, p. 4-12) provides detailed information regarding how many housing units could be constructed within various subareas of the Project. That table reveals that the maximum number of housing units that could potentially be built is 1,210. Further, the notes to the table state that “[u]p to 10% deviations from the minimum and maximum by district are subject to approval by the Community Development Director.” If such a deviation from the maximum values were to be approved, the total number of residential units would increase to 1,331 (1,210 X 1.10 = 1,331).</p> <p>To assess the impacts of this maximum development scenario with respect to the volume of traffic associated with the Project we have performed a second trip generation analysis, as summarized in Table 2. The basic parameters of this analysis are similar to those described above for the Table 1 analysis. Attachment 3 contains the data sheets for the residential uses; the non-residential data sheets are unchanged from the previous analysis.</p>	<p>conducted, but is inappropriate for application to a complex programmatic Specific Plan with multiple uses since it would have a propensity to substantially overestimate actual impacts.</p> <p>The commenter also refers to language regarding the number of residential units in the Specific Plan, and estimates that the total number of residential units could be 1,331 rather than the 1,000 analyzed in the EIR, resulting in an underestimation of traffic. Section 2.5.1 of the DEIR includes a discussion on the methodology used to estimate the number of residential units. Based on this methodology, the analyses contained in the DEIR assume a total of 1,000 residential units which include market rate, inclusionary, adaptive reuse, and additional County-provided affordable housing. The transportation analysis is consistent with this estimate.</p> <p>The commenter also notes that underestimation of daily trips affects the VMT analysis, since VMT is calculated by multiplying the number of daily trips by their lengths. As described above, the trip generation estimated by the SCTM19 model is appropriate and is not an underestimation. Further the commenter’s simplified representation of VMT is correct at a broad level but does not reflect the way VMT is calculated for transportation CEQA purposes, including the use of efficiency (or “per person”) metrics as produced by the SCTM19 model. For instance, the applied VMT analysis produces “partial VMT” efficiency metrics for residential and employment uses, focusing on home-based travel and home-based commute travel, respectively, consistent with OPR guidance. These</p>

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			<p>With consideration of the larger number of residential units, the Project’s total daily trip generation increases to 14,290. This is 149 percent greater than the value claimed in the DEIR.</p> <p>Summary</p> <p>The analysis presented here indicates that the Project’s daily trip generation has been substantially underestimated. This finding relates directly to the Project’s impact with respect to vehicle-miles traveled (VMT). The DEIR acknowledges the relationship between trips and VMT at p. 447, where it says:</p> <p>. . . trip reductions should in theory translate to roughly equivalent VMT reductions.</p> <p>Thus, trip increases, as we have described, will similarly translate to roughly equivalent increases in VMT. Further, as described at DEIR p. 425, the calculation of VMT:</p> <p>. . . is based on the estimated number of vehicles [actually, vehicle-trips] multiplied by the distance traveled by each vehicle.</p> <p>If, as we have found, the number of vehicle trips is 2.14 – 2.49 times greater than the value considered in the DEIR, then the VMT values associated with the Project will also be 2.14 – 2.49 times greater than the DEIR findings.</p> <p>Although the DEIR has already concluded that the Project’s VMT impact will be significant and unavoidable, it has failed to accurately portray the magnitude of that impact. This is a serious deficiency in the DEIR, which suggests a need to reevaluate the Project’s impact and recirculate the DEIR for further public review.</p> <p>transportation analysis.</p>	<p>types of efficiency metrics require the use of a regional model such as SCTM19 to develop and are not the products of a simple multiplication of aggregated trips by trip lengths.</p> <p>It is also noted that a review of the land use inputs that were entered for the proposed Specific Plan in the SCTM19 model, as well as review of the population and employment estimates output from the model for those land uses, was conducted by both W-Trans and SCTA staff to confirm that no data entry errors occurred. This review confirmed that the land use quantities entered in the model match those described in DEIR section 3.14.4.2. With respect to population and employment, the SCTM19 model estimates that the proposed Specific Plan would result in an increase of 2,510 persons and 1,014 jobs, which are very close to the estimated values cited in the DEIR Project Description section 2.5.1.2. Note: The project description includes an estimated population of 2,400 and 940 jobs; the SCTM19 model uses somewhat different methodologies to estimate population and employment, though since the resulting estimates are within 4 to 7 percent of that stated in the project description, it is clear that the full land use inventory is being reflected in the SCTM19 results.</p>

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-248	<p>Internal Trips are Substantially Overestimated – As described above, the DEIR transportation analysis (p. 440) claims that 1,398 of the Project’s total 5,736 daily trips will occur completely within the Project site. In other words, 24.4 percent of the vehicle-trips resulting from the Project would never leave the Project site. These trips, which are typically referred to as internal trips, would have no impact on any element of the transportation system beyond the Project boundaries. Because this a substantial percentage, it seemed appropriate to test the validity of this claim.</p> <p>Various tools are available to develop estimates of internal tripmaking at mixed-use developments such as the proposed Project. Three such tools have been employed here:</p> <ul style="list-style-type: none"> • Institute of Transportation Engineers/NCHRP 684 Internal Trip Capture Estimation Tool – As described in the ITE Trip Generation Handbook (Third Edition, September 2017, p. 46), this approach is based on procedures documented in National Cooperative Highway Research Program (NCHRP) Report 684: Enhancing Trip Capture Estimation for Mixed-Use Developments. That report documents the extensive research, data collection, and analysis undertaken in developing and validating the recommended procedure. • U.S. Environmental Protection Agency (EPA) Mixed Use Trip Generation Model – As described at the EPA website (https://www.epa.gov/smartgrowth/mixed-use-trip-generationmodel), this model was developed cooperatively between EPA and ITE. Six metropolitan 	<p>The commenter states that the internal trips assumed in the analysis are overestimated, and provides alternative internal trip estimates from three off-model sources. Rather than using off-model sources such as the ITE/NCHRP 684, EPA Mixed Use Trip Generation Model, or SANDAG spreadsheet tool mentioned by the commenter to reduce the trips projected to occur by applying conventional ITE rates, the applied analysis utilizes the SCTM19 travel demand model to assess the proposed Specific Plan’s travel characteristics. As discussed above in the response related to the Plan’s trip generation, it is common for traffic impact studies for individual development projects to use standard ITE trip generation rates, which are sometimes adjusted for mixed-use projects using the referenced off-model sources. While this approach can be appropriate to assess project-level impacts in a defined area, it was determined that a more robust analytical tool, the SCTM19 travel demand model, would be appropriate to gauge the effects of the proposed programmatic Specific Plan.</p> <p>Please see the response to the above question pertaining to trip generation for additional detail on the SCTM19 model and how it was applied.</p>

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			<p>regions were evaluated in detail and the resulting model was validated against actual traffic counts at mixed-use developments across the country. This model is in use in California, Washington, and New Mexico, and according to EPA the model has been adopted as a statewide standard by the Virginia Department of Transportation.</p> <ul style="list-style-type: none"> • San Diego Association of Governments (SANDAG) Smart Growth Trip Generation Spreadsheet Tool – Similar to the EPA method, this tool employs trip generation rates specific to the San Diego region. Although the trip rates vary from the ITE rates, the internal trip capture results should be representative of a development similar to the proposed Project. The results of these analyses are summarized below. <p>ITE/NCHRP 684 Internal Trip Capture Estimation Spreadsheet Tool</p> <p>Attachment 4 contains a copy of the spreadsheet illustrating the results of this analysis procedure. Although the spreadsheet tool allows for adjustments to be made to reflect transit usage and changes to vehicle occupancy, no such modifications were made. Doing so would simply reduce the number of vehicle-trips estimated (internal, external, and total) with no effect on the resulting internal trip percentages.</p> <p>As shown in Attachment 4, the model projects an internal capture percentage of nine percent (actually 8.8 percent). The gross total of 12,256 daily trips would be reduced to 11,180, with 1,076 internal trips estimated. (Note that three of the individual daily trip totals were rounded up to ensure equal numbers of entering and exiting daily trips in the</p>	

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			<p>spreadsheet. Thus, the total trip generation in the model is 12,256 instead of the 12,253 described earlier.)</p> <p>EPA Mixed Use Trip Generation Model</p> <p>The results of this analysis are presented in Attachment 5. According to the EPA tool, the Project's 12,253 daily trips would be reduced to 11,291 external vehicle-trips (a difference of 962 trips). Those 962 internal trips include 796 vehicle-trips, 114 external walking trips, and 53 external transit trips. Considering only vehicle-trips (and ignoring external walking and transit trips), the 796 internal vehicle-trips represent an internal capture rate of 6.5 percent.</p> <p>SANDAG Smart Growth Trip Generation Spreadsheet Tool</p> <p>As described above, the SANDAG tool is very similar to the EPA tool, but with minor modifications to reflect local San Diego conditions. Nonetheless, it is believed to provide valuable perspective regarding the level of internal tripmaking at the proposed Project. The SANDAG results are provided in Attachment 6.</p> <p>The SANDAG model estimates that a total of 996 trips will be in the form of 821 internal vehicletrips, 120 external walking trips, and 55 external transit trips. The 821 internal vehicle-trips constitute 6.7 percent of the 12,253 gross total daily trips.</p> <p>Summary</p> <p>The internal trip values derived from the three models presented here range from 6.5 to 8.8 percent, and all are substantially lower than the 24.4 percent value employed in the DEIR analysis. By substantially overstating the volume of traffic to be captured within the Project site, the number of external trips was excessively reduced. Consequently,</p>	

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			<p>the DEIR analysis has failed to accurately assess the off-site impacts of the Project. Specifically, by underestimating the number of external trips, the analysis has similarly understated the Project-related VMT, which serves as basis for determining the significance of the Project's transportation impact. In short, the Project's transportation impact has been greatly understated due to a failure to provide an accurate estimate of the volume of traffic resulting from the Project.</p>	

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Sonoma Land Trust	9/26/2022	B11-249	<p>Flawed Project Traffic Assignment – DEIR Table 3.14-3: Projected Traffic Volumes in Plan Area (DEIR p. 441) presents traffic volume information for the three road segments that provide access to the site – Arnold Drive north and south of the site and the proposed Highway 12 connector. (Orchard Road connects to Jack London State Park to the west of the site, but would not be expected to carry a meaningful volume of Project traffic. That road is not included in the DEIR analysis.) Information is presented for various scenarios, both with and without the Project and with and without the Highway 12 connector. Based on this information, it is possible to derive the Project traffic assignment – that is, how many of the Project’s claimed 4,338 external daily trips are estimated to be added to each of these three road segments. Table 4 below summarizes that information. (We should note that we were unable to confirm all of the existing traffic volumes, as DEIR p. 419, which apparently includes some of that information, was missing from the document that was available for downloading from the county website.)</p> <p>In each scenario analyzed, the volume of Project traffic assigned to the regional access roads falls substantially short of the 4,338 external trips claimed to be generated by the Project. In both scenarios involving implementation of the Highway 12 connector, the volume of traffic projected on Arnold Drive between Harney and Glen Ellen is actually shown to be reduced upon completion of the Project, which seems unlikely. The volume of Project traffic and its relationship to the claimed Project trip generation is summarized as follows:</p> <ul style="list-style-type: none"> • Existing + Project (With Highway 12 Connector): 	<p>The commenter states that the traffic assignment is incorrect. In developing estimates of daily project volumes on individual roadway links, the commenter relied on information shown in DEIR Table 3.14-3 (Projected Traffic Volumes in Plan Area). As noted at the introduction of the “Transportation Data” section containing this table, the volume data is being provided in the DEIR for informational purposes but was not directly applied in the CEQA transportation analysis. Table 3.14-3 provides summaries of daily volumes, rounded to the nearest ten, on key roadway links as projected by the SCTM19 model; it includes the effects of not only project traffic, but on influences created by the proposed new roadway link to SR 12. It was not intended to provide a summary of project-only traffic volumes as used by the commenter though a coarse approximation of project trips can be extracted.</p> <p>Through reviewing the information in Table 3.14-3, W-Trans did identify four incorrectly-reported volumes that were the result of offset cell references in a summary spreadsheet. These errors did not affect the conclusions of the analysis but do affect the results of the commenter’s approach in estimating project-only volumes. The corrected daily volumes are as follows:</p> <ul style="list-style-type: none"> • Arnold Drive – Harney to Glen Ellen <ul style="list-style-type: none"> o Future plus Project volume 6,710; incorrectly reported in the DEIR as 6,310 o Future plus Project (no Hwy 12 connector) volume 7,810; incorrectly reported in the DEIR as 7,410 • Arnold Drive – Harney to Madrone

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			<p>4,070 Daily Trips (93.8% of Project trips)</p> <ul style="list-style-type: none"> • Existing + Project (No Highway 12 Connector): 3,410 Daily Trips (78.6% of Project trips) • Future + Project (With Highway 12 Connector): 3,320 Daily Trips (76.5% of Project trips) • Future + Project (No Highway 12 Connector): 2,650 Daily Trips (61.1% of Project trips) <p>The DEIR analysis apparently fails to include a substantial portion of the Project traffic. Oftentimes, this sort of oddity is described as being due to existing or “background” traffic being diverted to other routes when the Project traffic demand is added to the study area roads. This can occur in a travel demand forecasting model when the added traffic causes a particular route to become congested and have high travel times, so the model redirects traffic to other, less congested routes so as to create an equilibrium condition on the study area road network with respect to travel time.</p> <p>In this case, though, no such alternative routes are available, so this explanation would not apply. The only explanation that does seem to apply is that the analysis is defective, and that it fails to accurately account for the full volume of Project traffic. The significance of this deficiency is magnified by the fact that the DEIR analysis only includes about 38 percent of the actual volume of Project traffic (i.e., 4,338 external trips compared to the corrected values of 11,180 – 11,291 documented in Table 3).</p> <p>The transportation analysis must be revised to remedy these substantial deficiencies, and the new analysis must be recirculated for public review.</p>	<ul style="list-style-type: none"> o Future plus Project volume 10,480; incorrectly reported in the DEIR as 9,960 o Future plus Project (no Hwy 12 connector) volume 10,160; incorrectly reported in the DEIR as 9,640 <p>For the purposes of providing clarification and responding to the commenter’s question about traffic assignment, following is a breakdown of “project only” daily volumes by segment under the year 2040 buildout condition. Note that the SCTM19 model assigned 100 daily vehicle trips to a traffic analysis zone (TAZ) adjacent to the SDC site between the campus and Madrone Road that are not included in the reported segment volumes because they do not traverse the entire segment.</p> <p>Segment/Zone Daily Project Volume</p> <p>Arnold Drive – North of SDC: -20 Arnold Drive – South of SDC: 2,810 New Highway 12 Roadway Link: 1,450 TAZ 192: 100 Total: 4,340</p> <p>The rounded total project-only volume of 4,340 daily vehicles matches the external trips forecast by the SCTM19 model to be generated by the proposed Specific Plan, confirming that all trips have been effectively assigned to the roadway network.</p>

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Sonoma Land Trust	9/26/2022	B11-250	<p>Defective Vehicles-Miles Traveled Analysis – The analysis of VMT impacts (Impact 3.14-2, DEIR p. 445) indicates that the Project will have a significant and unavoidable impact, with a significant impact relative to Household VMT and less than significant impacts regarding Employment VMT and Total VMT per Service Population. A significant impact was also found with respect to induced VMT associated with the proposed connector to Highway 12 (which is described as an “east-west emergency access connection from the site”). (DEIR p. 447)</p> <p>We believe the VMT analysis is flawed, as described in the following sections.</p> <p>Transportation Demand Management Effects The VMT analysis is summarized in DEIR Table 3.14-4: Planning Area VMT Metrics. (DEIR p. 446) That table includes a section labeled “Proposed Plan with 15% TDM Reduction,” which is described as being for informational purposes and “reflect[s] a theoretical 15% reduction in VMT associated with required TDM measures.” We believe this information is misleading, as no support is provided with respect to the feasibility of actually achieving a 15 percent reduction in VMT. Further, based on this “theoretical” information the DEIR makes the questionable and conclusory statement that (DEIR p. 447): . . . it is likely that actual VMT will be less than the projections above.</p> <p>Our analysis has suggested that, to the contrary, the actual VMT will be substantially greater than those projections. In fact, only one paragraph later the DEIR contradicts itself and recognizes the questionable nature of the suggested TDM benefits (DEIR p. 447):</p>	<p>The commenter asserts that the DEIR’s informational discussion regarding the effects of Transportation Demand Management (TDM) are misleading, that the employment based VMT assessment lacks substantiation, and that the VMT reduction strategies required by Specific Plan Policy 3-14 would be ineffective.</p> <p>With respect to the discussion of TDM strategies criticized by the commenter, the results presented in DEIR Table 3.14-4 showing the proposed Specific Plan’s VMT performance metrics with a 15 percent reduction due to required TDM are presented for informational purposes and are not relied upon in making a significance determination. As described on DEIR pages 448-449, this approach was intentionally chosen in acknowledgement of the fact that the most effective forms of TDM strategies will need to be tailored to individual projects, that they will evolve over time, and that uncertainty exists as to whether 15 percent reductions can be guaranteed at every stage of development (particularly in early years when the positive synergies among housing, jobs, and services may not yet be realized). Despite this uncertainty, the proposed Specific Plan requires TDM to be implemented by all development, and requires establishment of a Transportation Management Association (TMA) to oversee and coordinate TDM strategies in an efficient manner. While the DEIR conservatively concludes that there would be a significant and unavoidable impact, the expectation remains that land uses within the proposed Specific Plan will be able to achieve the 15 percent reduction targets that are shown informationally in Table 3.14-4, particularly once</p>

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			<p>However, the ability for individual development projects to achieve a 15 percent reduction in VMT is uncertain.</p> <p>Clearly, any statement regarding the potential benefits of implementing TDM measures at the Project must be taken with a sizable grain of salt.</p> <p>Employment VMT Analysis</p> <p>As noted above, the DEIR analysis found a less than significant impact with respect to Employment VMT (also referred to as “Home-Work VMT per Worker” in the DEIR), with a finding of 4.8 homebased commute VMT per worker. (DEIR p. 445) Table 3.14-4 lists values for other pertinent geographical areas near the Project, as follows:</p> <ul style="list-style-type: none"> • Planning Area Baseline Average: 7.1 home-based commute VMT per worker, • Countywide Baseline Average: 12.4 home-based commute VMT per worker, and • Regional Baseline Average: 16.9 home-based commute VMT per worker. <p>These values raise questions regarding the validity of the DEIR’s employment VMT finding of 4.8 home-based commute VMT per worker. This value is about 67 percent of the corresponding value for the Planning Area, 39 percent of the Countywide value, and only 28 percent of the Bay Area Region value. Without further substantiation of the DEIR’s VMT analysis procedures and background parameters and inputs, it is difficult to readily accept that the Project’s VMT result would be so vastly different from the other areas referenced above. Unfortunately, the reviewing public is expected to blindly accept the output of the SCTM19 travel demand forecasting model even though, as described above, the model has obvious flaws with respect</p>	<p>sufficient development levels have been achieved to support a broad spectrum of TDM measures.</p> <p>The commenter also questions the DEIR findings related to employment based VMT, including how the proposed Specific Plan could have a projected VMT per worker that is lower than broader geographical area averages. Please see responses above regarding the applicability of using the SCTM19 travel demand model, which was used to analyze and estimate VMT. Regarding the specific VMT outputs produced by the model for employee-related VMT, which is analyzed using a home-based commute VMT per worker performance metric, the commenter is correct that the proposed Specific Plan is expected to result in a lower value per worker than the countywide and regional averages. While not entirely unexpected given the proposed uses within the Specific Plan (and associated jobs-housing balance), in 2021 W-Trans did collaborate with SCTA to investigate the employee-based results when the model was being used to test various land use alternatives, prior to initiation of work on the DEIR. Staff at SCTA examined how the model was calculating and projecting employee VMT, confirming that the model’s employment VMT projections properly aligned with related factors including calculated average trip lengths, home-based work attractions, home-based work person trips, employment estimates, origin-destination trip tables, and the land use quantities used as inputs. SCTA staff observed that the model is favoring home-based work attractions from areas near the Specific Plan and from within the Specific Plan TAZ itself; this is not unexpected given that,</p>

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			<p>to its ability to estimate Project-related traffic volumes. In short, we question whether the employment VMT value derived for the Project is credible.</p> <p>Proposed Policies Reducing VMT Impact</p> <p>In recognition of the Project’s significant and unavoidable VMT impact, the DEIR addresses ways to reduce that impact. The primary approach to achieving this goal is apparently Specific Plan Policy 3-41, which states, in part (Specific Plan p. 3-12): Require all development to reduce vehicle trips by at least 15 percent below rates listed by the Institute of Transportation Engineers Trip Generation manual using transportation demand management strategies.</p> <p>As we described above, however, the Project’s supposed trip generation, as reflected in Section 3.14 – Transportation, is already extremely low. According to the DEIR, the total daily trip generation is 5,736 trips/day. This includes trips associated with 1,000 residential dwelling units and substantial non-residential development types although, unfortunately, no trip generation breakdown is provided between the residential and non-residential land uses. For perspective, if we totally ignore the non-residential development (a frankly ridiculous notion, given that this ignores 190,000 SF of office space and 40,000 SF of commercial space), the Project’s trip generation rate would be 5.736 trips per dwelling unit (i.e., 5,736 trips / 1,000 DU = 5.736). If the non-residential land uses were included, the overall Project trip rate would be substantially lower. For comparison, the current ITE daily trip generation rates for various types of residential uses that are potentially applicable to the Project are as follows:</p>	<p>like most travel demand models, SCTM19 is a “gravity” model wherein the likelihood for trip origins and destinations to be matched decreases as the distances between origins and destinations increases. Based on these findings, it was determined that the SCTM19 model remained the appropriate and best-available tool to complete the VMT assessment prepared for the DEIR.</p> <p>The commenter opines that Specific Plan Policy 3-41 is virtually meaningless given the low trip generation estimated in the DEIR analysis. Policy 3-41 requires all development occurring within the proposed Specific Plan to reduce vehicle trips by at least 15 percent below the level that would be calculated through application of standard ITE trip generation rates. These TDM measures would be determined during the entitlement process for individual development projects, at which time they would also need to be quantified to confirm that the 15 percent reductions (below levels estimated using ITE trip generation rates) would be achieved. Thus, the traffic generation characteristics analyzed at the programmatic level in the DEIR have no bearing on this requirement, in contrast to the opinion offered by the commenter. The requirements set forth in Policy 3-41, in addition to establishment of a TMA to oversee TDM strategies for the overall campus as required in Policy 3-42, would lead to quantifiable reductions in VMT. The commenter continues by again challenging the proposed Specific Plan’s overall trip generation methodology and results applied in the DEIR; these references to the trip generation estimates contained in the DEIR are extraneous as they would play no role in the</p>

Commenter	Date	Letter	Comment	Response
			<ul style="list-style-type: none"> • Single-Family Detached Housing: 9.43 daily trips/dwelling unit, • Single-Family Attached Housing: 7.20 daily trips/dwelling unit, • Multifamily Housing (Low Rise – Not Close to Rail Transit): 6.74 daily trips/dwelling unit. <p>Therefore, it appears that, if the Project’s trip generation estimate is to be believed, the Project trip rate is already substantially less than 15 percent below the ITE trip rates. Two conclusions can be derived from this information:</p> <ul style="list-style-type: none"> • The Project’s trip generation as presented in the DEIR is not to be believed, and • Specific Plan Policy 3-14 is specious. <p>Summary</p> <p>As we have described above, the DEIR transportation analysis is significantly flawed and those flaws relate directly to the validity of the VMT analysis. To briefly summarize:</p> <ul style="list-style-type: none"> • The Project trip generation estimate substantially understates the volume of traffic that will result from the Project. • The internal trip capture rate is excessive, resulting in further reduction of the Project’s traffic volumes. • Only a portion of the Project’s trips have actually been assigned to the study area roads. • The purported benefits of implementation of TDM strategies are unlikely to be realized. • The Project’s derived Employment VMT value is highly questionable, when viewed in light of corresponding values for nearby geographical areas. • Specific Plan Policy 3-41, which is claimed as a means to reduce Project VMT, is virtually meaningless, unless the Project’s trip generation 	<p>requirements for individual developers to reduce their projects’ VMT levels. For additional information on how trip generation was otherwise assessed in the DEIR, please see the responses to prior comments provided above.</p>

Commenter	Date	Letter	Comment	Response
			<p>estimate is substantially modified to reflect reality.</p> <p>The VMT analysis must be modified to correct the deficiencies described above. Upon completion of that revised VMT analysis, the DEIR must be recirculated for further public review.</p>	

Sonoma Land Trust	9/26/2022	B11-251	I have been asked to review and comment on the Sonoma Developmental Center (SDC) Specific Plan and associated Draft Environmental Impact Report	See response to comment C109-1.
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Commenter	Date	Letter	Comment	Response
			<p>(DEIR). I write this as a research scientist who has spent more than two decades studying wildfire science and fire ecology, global change, and conservation biology. From this perspective, I appreciate the intention to balance human welfare and economic development with plans for preservation of historical and natural resources in the area. Nevertheless, my review of the plan and DEIR have led me to conclude that many issues relative to wildfire risk have been overlooked.</p> <p>The discussion of fire risk in the DEIR reflects several misconceptions concerning fire ecology, fire history, and the consequences and effectiveness of different fire mitigation strategies. The SDC property is situated within a highly fire-prone landscape, and based on evidence from the scientific literature, the Proposed Plan has high potential to significantly increase fire risk even further to new and existing structures at the SDC property as well as to the surrounding communities. A rise in human-caused ignitions due to increased population growth and expansion of human infrastructure could increase fire frequency to the point that wildfire would significantly affect public health, ecological functioning, and provision of ecological services (e.g., erosion and flood control). Unfortunately, research on recent destructive fires shows that the proposed mitigation strategies to reduce fire risk are unlikely to eliminate these significant impacts.</p> <p>Below please find an explanation for my conclusions summarized in three main points.</p>	

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-252	<p>RELIANCE UPON FIRE HAZARD SEVERITY ZONES IS INAPPROPRIATE FOR CONCLUDING THERE IS NO FIRE RISK.</p> <p>The reliance upon existing Fire Hazard Severity Zones as the basis of the findings reflects a misunderstanding of the purpose of the maps, their scale of accuracy, and their potential for uncertainty at specific locations. They are also out of date. The Cal Fire maps were not designed with the intention of indicating precisely where structures are most at risk for wildfire. Instead, the objective for these maps is for use in general planning and policy guidance. For example, defensible space practices are only enforceable within high hazard zones; homeowners are required to disclose upon sale whether the property is in a in high hazard zone; and county governments can use the zones to enforce building codes or other fire safety measures. The maps were developed in 2007 using a simple set of variables, map overlays, and general assumptions to delineate the relative degree of fire hazard across the landscape – that is, areas where fire behavior is likely to become extreme given a fire occurs. In other words, the hazard areas shown on Fire Hazard Severity Zones are delineated in very broad classes and have limited precision. Given the uncertainty and coarse scale of these maps, they are not appropriate for predicting where buildings are likely to be destroyed. This is something that Cal Fire has been transparent about (Sapsis 2018), as the appropriate use of these maps has been misinterpreted elsewhere.</p>	See response to comment C109-2.

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-253	<p>Part of the reason they are inappropriate to predict structure loss is that the location and behavior of fire is stochastic and unpredictable at any given time or location. Fire occurrence, behavior, spread, and eventual destruction of a house depends upon a large suite of random factors, such as where and when an ignition occurs; what the fire weather at the time of ignition is; what direction the wind is blowing; what the fuel and topography conditions are at the point of ignition; what kind of housing density and arrangement are in the surrounding area; whether any other fires are burning and the availability of firefighters, etc. This does not mean that the maps of fire hazard are useless. It means that they need to be interpreted with an understanding of what they can or cannot do; and that they are not completely accurate.</p> <p>This is true of fire mapping in general. For example, a map delineating probability of ignition will look completely different than a map delineating probability of a large fire (e.g., Syphard et al. 2019). Unlike the Cal Fire maps, some maps are designed with the specific objective of delineating fire risk to structures (e.g. Syphard et al. 2012), but even these maps have substantial uncertainty given the random nature of wildfire. A study comparing maps of fire risk to structures in southern California with the Cal Fire maps in the same regions found significant differences in the areas mapped as high risk, and the Cal Fire maps performed poorly compared to the other maps (Syphard et al. 2012).</p>	See response to comment C109-3.
Sonoma Land Trust	9/26/2022	B11-254	<p>Another source of uncertainty in the Cal Fire maps is the assumption that hazard is likely to be governed by the same factors in the same way across the state. Science shows that the relative weighting and direction of variables that influence the locations of fire occurrence,</p>	See response to comment C109-4.

Commenter	Date	Letter	Comment	Response
			<p>size, and risk vary from region to region (e.g., Syphard et al. 2019). Therefore, accuracy of the Cal Fire maps is likely to vary from place to place, and there is no guarantee that the maps near the SDC are accurate, even in a general sense or for their intended purpose. There are examples of recent highly destructive fires where substantial structure loss occurred in areas not mapped as high risk in the Cal Fire maps (e.g., Coffee Park in the Tubbs Fire, Malibu City in the Woolsey Fire). This should serve as an important illustration of why the maps should not be the final word in a conclusion about fire risk to structures.</p> <p>An important point is that the current maps - the ones used for the DEIR - were developed in 2007. The current landscape reflects very different environmental and housing conditions than those that were there 15 years ago. The factors used to create the 2007 the maps, such as fuel type, fire history, and housing, have all changed substantially. Cal Fire has been putting significant effort into updating their maps with new variables and assumptions, and these may be more appropriate for future decisions. However, those maps are not available yet - and maps developed in 2007 should not be trusted to assess the fire risk for a development to be constructed after 2022.</p>	
Sonoma Land Trust	9/26/2022	B11-255	<p>The Proposed Plan Is Likely To Increase Regional Fire Risk</p> <p>Although the DEIR acknowledges that the location of the proposed development is in a fire-prone part of the landscape, it does not thoroughly establish the baseline conditions that this is an area with a long history of wildfires that have already resulted in serious impacts. It was only a few years ago that structures were destroyed by wildfire at this very site and many more structures were destroyed nearby. Even without the new residents</p>	See response to comment C109-5.

Commenter	Date	Letter	Comment	Response
			<p>and visitors proposed for the site, the evacuation situation has apparently been extremely problematical in recent fires - and evacuation is often the time when people lose their lives to wildfires. These baseline conditions have not been adequately described in the DEIR despite the need to establish them before assessing the impact of the project.</p> <p>Based on data regarding repeat fires in the same locations, there is reason to believe that the area proposed for development on the SDC site is susceptible to more wildfires in the future. There is also reason to believe that the SDC development will lead to an increase in the number of wildfires in the region, not only due to the potential for climate change to exacerbate fire risk, but also because of the probable increase in human-caused ignitions. In addition, the DEIR lacks a description of how the Proposed Project will not only be impacted by fire, but also how it will impact fire in the vicinity in the future.</p>	
Sonoma Land Trust	9/26/2022	B11-256	<p>As evidenced by the almost perfect overlap of the nearby 2017 Tubbs fire with the 1964 Hanley Fire (Keeley and Syphard 2020), fires often recur in the same locations. This is because certain locations are more fire-prone than others given their topography, location within a wind corridor, climate, and vegetation.</p> <p>Research on structure loss in California has demonstrated that structures located in areas with a history of recurring fire are among those that are most likely to be destroyed by fire (Syphard et al. 2012). Although the 1964 Hanley Fire occurred in nearly the same location as the 2017 Tubbs Fire, there were only about 100 structures lost, and there were no fatalities. However, in 2017, more than 5500 structures were destroyed and 22 people lost their lives. The difference</p>	See response to comment C109-6.

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-257	<p>is the rapid growth of human population and housing in the footprint of the fire during the interim.</p> <p>The placement of new housing in fire-prone locations, like the proposed Project, not only increases the exposure of those structures to wildfire, but it also increases the likelihood of more fire occurring in the surrounding region due to human-caused ignitions. As recognized in the DEIR, humans cause more than 95% of the fire ignitions in Sonoma County, and studies repeatedly show that fire frequency is highest in low-intermediate-density development patterns, particularly when surrounded by wildland vegetation (i.e., the Wildland Urban Interface) (Syphard et al. 2007, Syphard et al. 2019, Radeloff et al. 2018). This is because, as low-medium density housing development expands (the kind proposed for this development), there is an increase in the number of people and opportunities for fires to ignite; and there is still ample continuous vegetation in the surrounding landscape for wildfires to spread. Larger numbers of people also increase the odds of fires starting during severe fire-weather conditions that lead to the most catastrophic outcomes. Recent research shows that human-caused ignitions are the top-ranking reason for area burned in Santa Ana wind-driven fires; and that human-caused fires have worse outcomes than lightning-caused fires.</p>	See response to comment C109-7.
Sonoma Land Trust	9/26/2022	B11-258	<p>Extensive research also shows that the location of human ignitions tends to occur closest to roads and human infrastructure (Syphard et al. 2008, Molina et al. 2019, Chen and Jin 2022). Therefore, the addition of people coming into and out of the region because of the new development increases the likelihood of more fires starting near the area. The lack of public transport is a concern not only in terms of greenhouse gas emissions,</p>	See response to comment C109-8.

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-259	<p>but also in terms of ignitions and increasing fire risk. Given that the most likely form of transportation to and from the development is via automobiles, many more people will be on the roadways, and thus, many more opportunities will arise for fire ignitions to occur. The increased access to open space areas also would provide more opportunities for humans to unintentionally start fires.</p> <p>In turn, the type of low-medium density development proposed in the plan is not only where fire frequency tends to be highest, but this is also where structures are most likely to be destroyed by fire (Syphard et al. 2012, 2019, Kramer et al. 2018). Also, it is not just housing location and density that drives risk exposure; it is the overall location and pattern of development (Syphard et al. 2012). Isolated or remote clusters of development are particularly vulnerable (Syphard et al. 2013). In other words, fire risk is a multi-scale issue (Syphard and Keeley 2021), and the landscape context is critical. Developments surrounded by large amounts of continuous wildland vegetation, such as is the case here, are particularly dangerous because they are exposed to potential fire on all sides. This scenario is similar to what happened in the town of Paradise in the 2018 Camp Fire. To that end, “community separation” of urban areas seems like a risky design strategy in the proposed plan - that adds edge between development and wildland. As acknowledged in the EIR, the potential for destructive wildfires is increasing in many parts of California due to climate change. Recent research also shows that proximity to the WUI is the top explanation for why fires have become destructive in the project region (Syphard et al. 2022).</p>	See response to comment C109-9.

Commenter	Date	Letter	Comment	Response
			<p>fire-safe design and landscaping can significantly enhance fire resilience, statistics from recent wildfires indicate that these actions are not guaranteed to reduce impacts to less than significant levels (Syphard and Keeley 2019, Baylis and Boomhower 2022). While having a strong and well-enforced community wildfire resilience plan is critically important for reducing fire risk to the largest extent possible, constructing a significant number of residences and businesses will add more frequent ignitions to an already highly fire-prone region. This will exacerbate fire risk in the region regardless of the mitigation policies put in place. Therefore, although the DEIR relies on policies and mitigation measures to conclude that the project would not exacerbate wildfire risk, the initiation and enforcement of these measures do not ensure that significant impacts would be sufficiently mitigated.</p>	
Sonoma Land Trust	9/26/2022	B11-260	<p>Vegetation Management</p> <p>One of the measures that the DEIR relies upon to claim no significant wildfire impacts is vegetation management to reduce fire risk. Vegetation management includes mechanical fuel breaks surrounding the development, clearance of woody shrublands or understory woody trees, defensible space, and controlled burning of vegetation. There are several common misconceptions about, and overestimations of the relative effectiveness of, these measures for reducing structure loss, especially during severe fire weather when most structures are destroyed. Fuel reduction through vegetation management is often viewed as a means of stopping or slowing the spread of fire; however, treatments typically only do this under mild weather conditions. In severe fire weather, with strong winds, vegetation treatments generally do not prevent or stop fires on their own.</p>	See response to comment C109-10.

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-261	<p>Policy 2-31 would require construction and maintenance of a managed landscape buffer along western and eastern edges of the Core Campus to aid in fire defense, consisting of a shaded fuel break in wooded areas and grazed or mown grassland. The construction of these types of fuel breaks can be helpful for protecting communities, when done strategically, by providing safe fire-fighter access. They may also slow fire spread enough to buy time for defensive activities (Syphard et al. 2011).</p> <p>Despite these benefits, the big issue with placing too much trust in fuel breaks and other forms of vegetation management is that most structures are destroyed because they are exposed to the millions of wind-borne embers that are generated during severe fire-weather. Although woody vegetation is the primary source of firebrands, wind-borne embers are known to fly kilometers ahead of a fire front, crossing vegetation treatments, and landing on or near structures. In fact, wind-borne embers often jump California's widest freeways. Therefore, although fuel breaks can facilitate safe firefighter access in some circumstances, they cannot prevent embers from flying past them. Furthermore, despite the role of fuel breaks for providing safe firefighter access, it is often unsafe for firefighters to be present during the worst fire-weather conditions. In a historical survey of fires and fuel breaks in southern California national forests, 22- 47% of fires stopped at fuel breaks when they encountered them (Syphard et al. 2011).</p>	See response to comment C109-11.
Sonoma Land Trust	9/26/2022	B11-262	<p>The creation of defensible space around structures at the parcel level, as suggested in policies 2-34 and 2-36, is a mitigating policy proposed for the DEIR, and I concur that this should be implemented to increase community resilience. Studies show that properly created defensible</p>	See response to comment C109-12.

Commenter	Date	Letter	Comment	Response
			<p>space (https://www.fire.ca.gov/programs/communications/defensible-space-prc-4291/) can significantly reduce the probability of a structure being destroyed in a fire (although there is no additional benefit to extending the distance of defensible space beyond 100 feet (Syphard et al. 2014, Miner 2014)). Nevertheless, as with other vegetation treatments, defensible space should not be considered as something that can definitively prevent structure loss. Many embers directly penetrate a structure without vegetation playing a role, and many structures with well-designed defensible space have been destroyed in recent wildfires. If embers land near the property, they may ignite new fires depending upon the flammability of the surroundings. While the recommended reduction of biomass near the property lowers flame lengths and enhances firefighter safety, the fuel moisture of the vegetation in the vicinity of structures is often more important than the amount of vegetation. Evergreen shrubs and trees are often referred to as “ember catchers” because of this – because the embers may be extinguished if they land on green vegetation. This argues for retaining some green vegetation near the structure and across the landscape.</p>	
Sonoma Land Trust	9/26/2022	B11-263	<p>Research in Australia also shows significant protective effects of irrigated land (Gibbons et al. 2018). Thus, a concern I have about the vegetation management approach described in the DEIR is the proposal to remove chaparral and other woody shrublands and to allow establishment and expansion of grass. Although fire in grass has lower flame lengths, grass is the most flammable and easily ignitable vegetation type in California (Syphard and Schwartz 2021, Syphard et al. 2022). Grass is dryer for a much longer period in the</p>	See response to comment C109-13.

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			<p>year than chaparral, and when it does ignite, it is the fastest spreading vegetation type. Most firefighters who lose their lives in fires have been killed in grass fires. Therefore, while the practice of mowing or grazing grass can enhance fire safety (if mowing does not occur during severe fire weather), removing shrublands and converting them to grass is likely to make the landscape more flammable.</p>	
Sonoma Land Trust	9/26/2022	B11-264	<p>Compliance With Fire-safe Building Codes In addition to defensible space, the DEIR relies upon class A roof retrofits and the compliance with fire-safe building codes in the construction of new buildings to mitigate fire risk. Although fire-safe building practices, such as those required in new building codes, increase the possibility that structures will survive wildfires (Syphard and Keeley 2019), they also do not guarantee prevention of structure loss. The extent to which enforcement of building codes increases the rate of structure survival in wildfires is yet unknown. For example, one study shows that building codes that enforce fire-safe construction helped to decrease rates of structure loss compared to rates of loss before the codes were enforced (Baylis and Boomhower 2021). On the other hand, an analysis of the Camp Fire, where more than 18,000 structures were destroyed, showed that homes built before and after the enforcement of building codes were destroyed at roughly equal rates (Knapp et al. 2021). Therefore, as with defensible space, many new homes with fire-resilient construction have been destroyed in recent California wildfires.</p>	See response to comment C109-14.
Sonoma Land Trust	9/26/2022	B11-265	<p>Although fire-safe building practices improve the odds of survival for new homes, these codes do not protect the existing homes at the site and in the surrounding areas. The increase in population and human activity in the region at large increases the odds for more human-</p>	See response to comment C109-15.

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			<p>caused fires to start, as people will be moving in and out of the area, engaging in more activities that could generate sparks, and spending more time recreating in flammable open-space areas. Given that humans are mobile, ignitions are numerically more likely to occur anywhere in the surrounding area that experiences an increase in human presence and activity, and this exposes more existing structures to wildfires at a landscape scale.</p> <p>In other words, because wildfires occur over large areas, with the most destructive wildfires becoming very large (Syphard et al. 2022), impacts can be expected to occur in areas much larger than the project footprint. Furthermore, new building codes will not benefit the older structures within the project footprint, some of which have significant historical and cultural value. Policy 2-38 suggests retrofits of new roofs, siding, and windows for existing structures, but this is not a complete list of needed retrofits for fire safety, and the details of this policy are vague. Would these retrofits be applied to all existing buildings, even the historical ones? They also would not apply to buildings outside of the SDC site.</p>	
Sonoma Land Trust	9/26/2022	B11-266	<p>Shelter in Place</p> <p>The DEIR relies in part on proposed Policy 2-54, which requires the Project proponent to build or designate an on-site shelter-in-place facility. DEIR at pages 510 and 511. This alternative of sheltering in place is a dangerous proposition, as evidenced by the Black Saturday Fires in Australia in 2009. In those fires, 173 people lost their lives, and more than half of those people had been sheltering in place. https://www.sciencedirect.com/science/article/abs/pii/S221242091730050X). As a result of these fires, the Australians have now shifted thinking away from their</p>	See response to comment C109-16.

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-267	<p>stay and defend policy and now have a system in which all residents are encouraged to evacuate when weather conditions meet a “catastrophic threat” level. In short, buildings are replaceable, but human lives are not. While having a shelter-in-place facility may benefit those who are simply unable to evacuate, this should be a last resort, and the SDC project should not rely on this method as mitigation for wildfire risk related impact. Finally, I question the enforceability and durability of many of the proposed policies. Who is ultimately responsible for ensuring that the policies are followed? Activities such as fire-safe education, defensible space maintenance, or maintenance of buildings require ongoing, permanent attention. Who will ensure that these activities will continue after the structures have been built? Will a permanent staff position be created to ensure ongoing compliance? In short, people will move in and move out over time, but the houses and the landscape will remain.</p> <p>Conclusion In conclusion, contrary to the assertions made in the DEIR, there is a strong likelihood that the proposed development, and its alternatives, will have significant impacts relative to wildfire. The potential for increased numbers of wildfires – and more wildfires during severe fire weather - are likely to significantly affect public health and ecological functioning. There are also likely to be increased economic costs for management and suppression, from damage/destruction to human infrastructure or agricultural lands, and from post-event hazards such as mudslides or debris flows. Sufficient homeowners insurance for wildfire, which is becoming increasingly expensive, will also be difficult to attain, particularly for the low-income residents that are supposed to be supported by this plan.</p>	See response to comment C109-17.

Commenter	Date	Letter	Comment	Response
			<p>Public health may be threatened not only from direct injury and mortality during a fire, but from smoke. The evacuation plans described in the DEIR only account for fires coming in two directions and spreading through other towns before reaching the project site. These analyses should also incorporate scenarios in which fires are spreading directly from the roads east of or from Sonoma Mountain west of the project site. In these cases, if the fire weather is severe and the fires are burning toward the project site, there would likely be less time for residents to evacuate, and this puts human lives at risk. Another potential impact to public health and safety is that, if fire frequency increases regionally due to additional opportunities for human-caused ignitions, secondary hazards may occur post-fire, such as flooding, landslides, runoff, or debris flows. Not only may these secondary events be potentially harmful during the event, but there may be subsequent impacts to water quality.</p>	
Sonoma Land Trust	9/26/2022	B11-268	<p>While my letter is aimed at explaining the wildfire-related potential and costs associated with the project, there are also ecological impacts that may result from the increased fire risk in the area. For example, there are ecological costs associated with vegetation management and construction of fuel breaks. There are also potential ecological impacts that will result from the potential for increased fire frequency in the area. Many vegetation types in the western USA are experiencing fire-driven conversion, often from native vegetation to invasive species (Guiterman et al. 2022). Therefore, the DEIR's conclusion that the project would result in no potential loss of forest is inaccurate because it fails to account for the potential effects of increased wildfire.</p> <p>While the policies to reduce fire risk at the site may work to lessen some of these impacts, the proposed</p>	See response to comment C109-18.

Commenter	Date	Letter	Comment	Response
Sonoma Land Trust	9/26/2022	B11-269	<p>policies are unlikely to offset the increase in fire risk to the property and surrounding area that results from the project. Fire hazards will nevertheless likely be significant.</p> <p>Finally, in my reading of the DEIR, I was unable to understand some of the statements. Therefore, it would be helpful to have additional clarification on the following questions: 1) Why does the plan state that the Historic Preservation Alternative leads to higher fire risk? Based on its reduced population and housing, the Historic Preservation alternative appears to be more fire-safe than the proposed project or its other alternatives. 2) On what basis does the DEIR assume that low-lying creeks and riparian areas would increase fire safety? While these areas are less flammable in general, they do not appear to be close to the proposed housing. Also, when riparian areas dry out, they can burn rapidly at high intensity. 3) On what basis does the DEIR assume that the housing in low-elevation or flat areas would not be at high risk? While it is true that topographically complex areas can often have highly erratic fire behavior, many structures are lost in low-elevation, low-relief areas (Syphard et al. 2021).</p>	See response to comment C109-19.
Sonoma Land Trust	9/26/2022	B11-270	<p>There are several local and state regulations applicable to the SDC Specific Plan that are not included in the Hydrology/Water Quality Regulatory Setting section (3.9.1 on pg. 270) of the DEIR. These include the following.</p> <p>a. Sonoma County General Plan 2020 Policy C-WR-2f, which states, “Discretionary projects in Urban Service Areas, where the density of development thus extent of impervious surface area is greater than in Rural Communities, shall be required to maintain the</p>	<p>Comment incorporated. Local and state regulations mentioned in this comment are added into the Regulatory Section of Hydrology and Water Quality. <u>Compliance with existing regulations and the Sonoma County General Plan would result in impacts that would be less than significant. This is a minor correction made to clarify and does not affect the findings of the DEIR.</u></p>

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			<p>site’s pre-development recharge of groundwater to the maximum extent practicable/feasible. Develop voluntary guidelines for development in Rural Communities that would accomplish the same purpose. (GP2020 Revised)”.</p> <p>b. Sonoma County General Plan 2020 Policy C-WR-4b, which states, “Use water effectively and reduce water demand by developing programs to: (1) Increase water conserving design and equipment in new construction, including the use of design and technologies based on green building principles; (2) Educate water users on water conserving landscaping and other conservation measures; (3) Encourage retrofitting with water conserving devices; (4) Design wastewater collection systems to minimize inflow and infiltration; and (5) Reduce impervious surfaces to minimize runoff and increase groundwater recharge. (GP2020)”.</p> <p>c. Sonoma County General Plan 2020 Policy C-WR-4f, which states, “To minimize generation of wastewater and encourage conservation of Coastal water resources, require use of water saving devices as prescribed by the local water provider in all new developments. (New)”.</p> <p>d. California statutes and regulations (e.g., California Code, Division 3. Dams and Reservoirs) related to dam safety.</p> <p>As elaborated below, the missing County policies and state regulations are directly relevant to the water supply and flood hazard assessments for the project as elaborated below.</p>	

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Sonoma Land Trust	9/26/2022	B11-271	<p>The DEIR Project Description is not detailed enough to evaluate potential impacts on hydrology and the environment. The DEIR does not contain a project plan with sufficient detail about land use change to complete the necessary hydrologic and water quality assessments to determine impacts from the project. Due to the lack of an adequate Project Description, I don't agree with the DEIR determinations that potential hydrologic and water quality impacts are less than significant and that no mitigation measures will be required for the following reasons.</p> <p>2a) Impact 3.9-1 - The DEIR states that potential impacts to federal, state, and local water quality standards are less than significant. However, the DEIR has not analyzed how changes in site runoff and associated erosion potential will change. Based on my experience, this analysis would require detailed hydrologic and hydraulic modeling that incorporates all changes in land use (esp. impervious surfaces) and runoff estimates to determine where and by how much flow rates (and erosion potential) may impact receiving waterways both on- and off-site. BMPs and other measures would then be designed correctly to mitigate these impacts. This is the primary way the DEIR can address the significance of the impact before and after mitigation.</p> <p>2b) Impact 3.9-2 - The DEIR states that the project will not interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin and associated potential impacts are less than</p>	<p><u>The comment is noted. The Project Description is stable and has been consistently referenced throughout the document regarding the Proposed Plan and project buildout numbers.</u> The commenter's main point is that there is not detailed analysis and therefore the impacts cannot be assessed. It should be pointed out that the potential impacts are discussed (3.9-1 to 3.9-4) and it is shown that development does have the potential to impact water resources. However, the impact analysis also makes specific references to county and state policies that will require specific mitigations prior to developing any of the parcels in the Specific Plan area. There are 28 County General Plan policies that are intended to minimize water resource impacts. There are also specific County design and mitigation thresholds that any development in the Specific Plan area must comply with. The impact discussions regarding the potential changes in water quality and water resources cite specific policies that address those potential impacts and are therefore built in mitigations required for any Specific Plan developments and therefore no mitigations are specifically called for other than complying with existing State and County development policies and requirements during detailed planning and project proposals.</p> <p>In regards Comment 2a. County and State have specific policies which regulate the discharge of storm water and specific requirements for detention and in some cases retention of storm water runoff. These types of features can only be effectively designed once detailed information on development footprints is known. In the case of this Specific</p>

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			<p>significant. However, the DEIR does not contain any detailed technical analysis of how the project development will alter groundwater recharge. The DEIR has an obligation to describe any potential changes in recharge. Simply stating that BMPs that support groundwater recharge will be integrated into the Project does not demonstrate that they will be sufficient to mitigate potential impacts.</p> <p>2c) Impact 3.9-3 - The DEIR states that Project development would not substantially alter the existing drainage patterns or result in substantial erosion and flooding on- or off-site or contribute runoff that would exceed the capacity of existing or planned storm drain systems. Thus, the DEIR concludes that associated impacts are less than significant. These conclusions are not substantiated as the DEIR does not present results from any hydrologic or hydraulic analyses to demonstrate to what degree the project may increase runoff rates and erosion potential from new or improved development. The assumption that adhering to County mandated BMPs will reduce flooding and erosion impact to below significant has not been demonstrated. Instead, the DEIR defers analysis and mitigations for hydrologic and water quality impacts.</p> <p>2d) Impact 3.9-4 – The DEIR states that the potential to expose people and structures to significant risk or loss, injury or death involving flooding from dam failure is less than significant. However, this is completely contrary to the</p>	<p>Plan, these detailed specific footprints are not known and therefore complying with State and County regulations will guarantee these facilities are designed so that they reduce any specific project water resource impacts to a less than significant level.</p> <p>In regards to Comment 2b. The commenter does not acknowledge the fact that the proposed development area already has nearly 74% of the core campus area consisting of impervious structures. There is no current groundwater recharge BMPs on the site. Specific Plan development will provide an opportunity to retrofit existing areas to enhance groundwater recharge above what the site contributes now.</p> <p>In regards to comment 2c. Developments within the Specific Plan area will undergo detailed hydrologic analysis to determine the size and extent of detention basins and other storm water management options. Each development will be required to calculate its runoff impact and demonstrate that it will not have an impact on existing facilities. In some cases it may be easier and more appropriate to upgrade the facilities. In either case, review by County Public Works and floodplain managers as well as building permit specialists will ensure that each proposed project complies with current building codes and development regulations regarding storm water management.</p> <p>In regards to Comment 2d. Every dam that is regulatory size and is under the California Division of Safety of Dams (DSOD) jurisdiction is required to have a dam failure inundation map. This is a map that shows the areas of flooding during a dam failure event. It does not indicate the likelihood of</p>

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			<p>California Division of Safety of Dams (DSOD) conclusions about Project dam safety presented in Section 3.9.2.5 (Flooding – Flooding from Dam Failure, pg. 286-287) of the DEIR. Page 286 of the DEIR states, “The DSOD has classified the downstream hazard of a failure at Fern Lake as high”. On page 287, the DEIR states, “The DSOD has classified the downstream hazard of a failure at Suttonfield Lake as extremely high.” These statements alone suggest this potential impact is not “less than significant”. The DEIR does present inundation maps associated with these failures but provides no further analysis on how these potential impacts will be mitigated apart from the statement (pg. 287) “Specific geotechnical investigations of the dams at Fern and Suttonfield Lakes would need to be conducted to determine their potential for failure.” However, this is a deferred analysis, which does not support the findings of “less than significant” impacts and “not applicable” mitigations.</p> <p>2e) Impact 3.9-5 - The DEIR states that implementation of the Project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Thus, the DEIR concludes that associated impacts are less than significant. However, for the same reasons presented above (items 2a. – 2c.), the DEIR does not present any technical justification for this determination and should be considered inadequate and incomplete.</p>	<p>such a failure. The dams in the Specific Plan area are old dams that were constructed prior to the oversight of the State. Deferring the studies of dam failure potential is not deferred analysis. The area of inundation is known, however, the potential for failure of these dams is unknown. The Specific plan does not intend to make any changes to the dams or their operations, therefore, there would be no increase in risk associated with these dams. Also in 2021 the DSOD determined that the condition of the dams was satisfactory and thus the risk from dam failure was acceptable to DSOD.</p> <p>In regards to Comment 2e. The commenter questions the less than significant impact determination for water resources. At this stage of the planning it is not realistic to expect technical justification for this determination. There are numerous State and County policies which clearly dictate the steps that any proposed development within the Specific Plan area must comply with in order to obtain specific project approval. These policies regulate how much, how fast, and what types of facilities are needed to protect water quality, enhance groundwater recharge and protect residents from flooding. These studies are mandated by current regulations and are not needed to show Specific Plan feasibility but to ensure that there are less than significant impacts for the identified projects in the Specific Planning area.</p>

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Sonoma Land Trust	9/26/2022	B11-272	<p>An important analysis of the SDC project is the determination if there are sufficient water supplies to meet proposed project water demands. Appendix D of the DEIR presents the results of this analysis. Based on my review of Appendix D, I've identified several mistakes and other issues that suggest the DEIR does not demonstrate there is sufficient water supply to meet future (2045 full buildout) demands. Table 2 (pg. 14) of Appendix D indicates that estimated Project annual water demands by the year 2045 will be 342 acre-feet per year (AFY). Table 9 (pg. 31) of Appendix D indicates that available annual supply that will be 100% reliable for the period 2030-2045 is 356 AFY. Comparison of available and reliable water supply (356 AFY) to full buildout demands (342 AFY) suggest there is very little margin for error in terms of future water supply management. The DEIR supply estimate is also concerning to me in that the historic (1969-2007) water use (demands) for the SDC averaged 622 AFY and peaked at 1,143 AFY in 1986 (pg. 12, Appendix D). I'm suspect that the historic SDC water use is nearly twice the volume of estimated future full buildout (2045) Project water demands, especially when the Project proposes to build an additional 1000 residential units and hotel and reoccupy and/or expand the commercial and industrial uses (see Table 1, pg. 13 of Appendix D). Even with conservation measures, I would expect that Project water demands would be similar to if not larger than historic use. The next paragraphs elucidate this opinion. In reviewing and cross-checking the data and</p>	<p>As discussed in the Water Supply Assessment (WSA), the water supply and demand estimates for the Proposed Project are both conservative estimates. For example, as mentioned in the comment, the available supply generated by the surface water rights associated with the Sonoma Developmental Center (SDC) Property used for the purposes of the supply and demand comparison represent the modeled supply that is 100% reliable for all year types. As mentioned in Section 6.2.3 of the WSA, modeling suggests that the available supplies and water rights would allow for additional diversions of approximately 280 acre feet per year (AFY) on average and as much as 808 AFY above the 100% reliable yield if the diversions were not constrained by the current storage capacity and Proposed Project demands. Thus, projected available normal year supplies would be able to accommodate up to 636 AFY in demands, which is in line with the average historical water production at the SDC site (i.e., 622 AFY). Additionally, the modeling presented in the WSA does not account for any potential operational improvements to the SDC supply infrastructure (e.g., automated Sonoma Creek intake pump controls and other supervisory control and data acquisition [SCADA] improvements), which could increase diversions. The Proposed Project's demand estimates are also intended to be conservative. For example, community landscaping water use is estimated according to the Maximum Applied Water Allowance (MAWA) per the California Model Water Efficient Landscape Ordinance (MWELO), which represented the upper limit of annual applied water for established landscaped areas. However, it</p>

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			<p>information presented in Tables 1 and 2 of Appendix D, I identified several questionable results that suggest the DEIR water demands are significantly underestimated. These findings are as follows.</p> <p>a. Table 2 (pg. 16 of Appendix D) only provides employee water use estimates for the proposed hotel. Water use by guests staying in the 100,000 square foot hotel is not accounted for in the annual water demand estimate. Incorporating guest water use into the demand estimate could easily result in total annual project demands greater than reliable supply.</p> <p>b. To better evaluate the DEIR demand estimates, I created Table A (below), which merges data from Tables 1 and 2 in DEIR Appendix D. In doing this exercise, I identified a significant math error in the DEIR demand estimates for General Commercial, Office, Public/Industrial, and Research & Development land uses presented in Table 2 of Appendix D. When independently calculating water demands using the 2045 land use areas and Water Use Factors provided in Appendix D, the respective 2045 water demands for the General Commercial, Office, Public/Industrial, and Research & Development land uses result in values that are two orders of magnitude higher than those reported, which results in an increased annual Project water demand of 9846 AFY (see Table A).</p> <p>c. The Permit Sonoma website¹ provides guidelines (8-2-1 Water Supply, Use and</p>	<p>is likely that actual plantings will be less water-intensive than the MAWA estimates. The demand estimates also do not account for the Proposed Project's potential use of recycled water, which could offset a portion of the projected potable demands.</p> <p>Lastly, the demand and supply comparisons do not account for any demand reductions that would occur due to implementation of a water shortage contingency plan (WSCP) during dry years. Valley of the Moon Water District's 2020 WSCP presents options for the District to achieve more than 50% reduction in dry year demands, if required. Any development at the SDC would be required to comply with this and future WSCPs developed and implemented by the District.</p> <p>While the historical production at the SDC site provides a useful comparison for estimated supply yields from the water supplies associated with SDC property (see Response 3-1), they are not representative of future Project demands. The land uses associated with the historical demands will be fully replaced by the those associated with the Proposed Project (i.e., the Proposed Project demands are not additive to existing demands). As discussed in WSA Section 4.4, the selected hotel water demand factor is based on a literature values included in Waste Not, Want: The Potential for Urban Water Conservation in California (Pacific Institute, 2003, https://pacinst.org/publication/waste-not-want-not/). The commercial demand factors developed in that document were derived based on the total water use for each land use type and then normalized by gallons of water per employee per day. As such,</p>

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			<p>Conservation Assessment Guidelines) for the preparation of Water Supply Assessments. The purpose of this policy is to provide guidance to applicants and their representatives on how to prepare a Water Supply, Use, and Conservation Assessment (henceforth, the “Assessment”). The Assessment may be a standalone document, or supplemental to a hydrogeologic study, Zero Net Use report, or other water supply related report. These guidelines are intended for discretionary and ministerial projects. Discretionary projects that are dependent on groundwater or surface water will typically require an Assessment with the use permit application. The Assessment will inform the environmental review process and conditions of approval. The authority of the Assessment falls under Sonoma County General Plan, Water Resource Element Goals WR-2 and WR-4, Objective WR-4.1, WR-4.2, and WR-4.3, and Policies2 WR-2c, WR-2d, WR-2e, WR-4b, and WR-4f. Therefore, the DEIR Water Supply Assessment (Appendix D) should adhere to County Guidelines. Appendix A to the County’s Guidelines has water use estimates for residential, landscape, agricultural, and Commercial and Industrial uses that are greater than those factors presented in Table 2 of Appendix D (see Table B). Applying the Sonoma County water use estimates to Project water demand estimates results in higher residential and irrigated area water demands than presented in the DEIR (see Table B below).</p>	<p>while the water demand factor is based on the number of employees, it includes all the water use associated with hotels (e.g., water used for cooling, pools, restaurants, banquet rooms, showers, toilets, faucets, etc.). No change to the factor is required to account for guest water use as it is already built into the estimate.</p> <p>The commenter has identified that the units for the commercial/industrial and research and development (R&D) water use factors are incorrectly reported in Sections 4.2 and 4.3 and Table 2 of the WSA as “AFY/100 square feet (sf)”. The correct units are actually “AFY/10,000 sf”. While the units are labeled incorrectly, the reported water use estimates in the WSA are correct and are based on the correct units. See revised Table 2 attached with changes highlighted in blue.</p> <p>The commercial/industrial factor used for General Commercial, Office, and Public/Institutional factors were derived from the average commercial sector water use per account between 2017 and 2019 (1,195 gallons per day [gpd]/account or 1.34 AFY/account) (EKI, 2020. 2020 Water Demand Analysis and Water Conservation Measure Update, prepared for Valley of the Moon Water District, December 2020) divided by the average building area of all commercial accounts (7,490 sf/account) (Average billing area for commercial accounts was calculated based on the tax records for all commercial accounts within the District’s service area) in the Valley of the Moon Water District Service Area, per the equation below:</p> $1.34 \frac{AFY}{account} \times \frac{account}{7,490 sf} = 0.000179 \frac{AFY}{sf} = 1.79 \frac{AFY}{10,000 sf}$ <p>The R&D water use factor was derived from the</p>

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			<p>In summary, correcting math errors and applying the Sonoma County guidelines water use estimates to the DEIR demand estimate tables results in a total annual Project water demand of 10,231 AFY, a values three times higher than reported reliable supply (356 AFY). This annual total demand will be even higher when hotel guest water use is considered.</p>	<p>Redwood City Engineering Standards Volume 3. Water Demand Projection Worksheet (https://www.redwoodcity.org/home/showpublisheddocument/20382/637183931771200000), which reports an R&D water use factor of 0.21 gpd/sf [Note that the water demand factor used in the WSA for R&D is likely conservative. The Genentech Campus Master Plan Public Review Draft (https://www.gene.com/assets/frontend/downloads/media/genentech_campus_plan_2019/Genentech_Campus_Plan_2019.pdf) studied 2016 water use at the Genentech campus in South San Francisco found that average annual water use equaled 180 gpd/1,000 sf (equivalent to 2.02 AFY/10,000 sf) or 14% lower than the factor used in the WSA], per the equation below:</p> $0.21 \frac{gpd}{sf} \times 0.00112 \frac{AFY}{gpd} = 0.000235 \frac{AFY}{sf} = 2.35 \frac{AFY}{10,000 sf}$ <p>While the units for the factors were incorrectly reported the water use estimates reported for estimated water use in Table 5 and other sections of the WSA are correct.</p> <p>As noted in the referenced website on the 8-2-1 Water Supply, Use and Conservation Assessment Guidelines, the purpose of this policy is to provide guidance to applicants and their representatives on how to prepare a Water Supply, Use, and Conservation Assessment (henceforth, the “Assessment”). This Assessment is triggered by a “use permit application” and is not the same as a Senate Bill (SB) 610-compliant WSA.</p> <p>The website also notes that the “water use rates may deviate from the above listed default use rates with site-specific data or published reference, and approval of the review authority.” The residential</p>

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water use factors presented in the Assessment Guidelines of 0.5 AFY per dwelling unit (446 gpd/du) is over 80% more than the single-family water use factors for Valley of the Moon Water District, which were based on average 2017-2019 residential water use within the District and serve as the basis for the Proposed Project residential water demand estimates (EKI, 2020. 2020 Water Demand Analysis and Water Conservation Measure Update, prepared for Valley of the Moon Water District, December 2020). It is not realistic to assume that water use for the Proposed Project’s new homes, all of which would be constructed according to current CalGreen building code standards, would be significantly higher than the District’s existing low density residential use. The Assessment Guidelines residential water use factors also do not account for reduced water use associated with higher density residential units, as are planned for the project. Additionally, consistent with the Making Water Conservation a California Way of Life legislation, on September 29, 2022, the Department of Water Resources (DWR) submitted the recommendations on guidelines and methodologies that urban water suppliers will be required to use to calculate their annual urban water use objective (referred to as “Objective”) to the State Water Board for approval. Compliance with the Objective will be calculated as the sum of an urban water supplier’s: (1) residential indoor water use standard, (2) residential outdoor water use standard, (3) large commercial, industrial, and institutional (CII) landscape outdoor water use standard, (4) water loss standard, (5) bonus, and (6) variance.

Further, on September 28, 2022, Governor Gavin

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Newsom signed Senate Bill (SB) 1157. This bill reduces the previously adopted residential indoor water use standard of 55 gallons per capita per day (GPCD) by 2025 and 50 GPCD by 2030 to a new standard of 47 GPCD by 2025 and 42 GPCD by 2030.

With the water demand factors included in the Assessment Guidelines, the Proposed Project would not be able to achieve the developed and pending water use Objectives and thus the Assessment Guideline factors are no longer applicable and should not be considered a reasonable basis for the demand projections included in this WSA.

