



SONOMA ECOLOGY CENTER

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Comments on the draft Environmental Impact Report for the SDC Specific Plan

Significant effort has been made to develop the SDC Specific Plan Draft EIR (DEIR) in response to community and agency input. Thank you. Still, the DEIR misses key environmental impacts. Following are comments from Sonoma Ecology Center intended to correct deficiencies in areas where we have sufficient expertise to comment.

The major problems that require correction are:

- Most Plan policies do not have Conditions of Approval to implement them. Unless Conditions of Approval enforce the Plan's intent, the EIR cannot claim that mitigating actions will occur.
- The Plan provides insufficient mitigations to claim that impacts to wildlife are insignificant. The vagueness of current policies, and lack of enforceable Conditions of Approval, mean that the sufficiency of mitigations cannot be assessed.
- The Plan provides insufficient mitigations to claim that impacts to water are insignificant. The vagueness of current policies, and lack of enforceable Conditions of Approval, mean that the sufficiency of mitigations cannot be assessed.

3.4 Biological Resources

The DEIR fails to identify foreseeable impacts to biological resources, because DEIR section 3.4 fails to include known, public, reliable data sources that post-date the *Sonoma Developmental Center Existing Conditions Report* (PCI, 2015). SEC submitted detailed info to Permit Sonoma in our April 5 2022 letter about datasets with over 14,000 geo-located, expert-confirmed observations photographically documenting over 1,000 species on the SDC property. The DEIR must include this data.

The public can view most of these observations at

<https://www.inaturalist.org/projects/sonoma-developmental-center-umbrella-project>

(some listed species locations are obscured in this public view) and <https://ebird.org/hotspot/L5410092/>. These datasets include the following protected species that occur on SDC property, with a link to an iNaturalist observation of each.

Animals

Specially Protected Mountain Lion <https://www.inaturalist.org/observations/107081516>
Vulnerable White-tailed Kite <https://www.inaturalist.org/observations/21885630>
Special Concern Vaux's Swift <https://www.inaturalist.org/observations/51438474>
Vulnerable Olive-sided Flycatcher <https://ebird.org/species/olsfly/L5410092>
Special Concern Western Pond Turtle <https://www.inaturalist.org/observations/72065647>
Special Concern California Giant Salamander <https://www.inaturalist.org/observations/36579284>
Vulnerable Foothill Yellow-legged Frog <https://www.inaturalist.org/observations/110535841>
Threatened California Red-legged Frog <https://www.inaturalist.org/observations/37283513>
Endangered California Clam-shrimp <https://www.inaturalist.org/observations/24482413>
Critically Endangered Sonoma Shoulderband Snail <https://www.inaturalist.org/observations/21959054>
Critically Endangered California Lancetooth Snail <https://www.inaturalist.org/observations/45612842>
Threatened Steelhead Trout <https://www.inaturalist.org/taxa/47516-Oncorhynchus-mykiss>
Threatened Chinook Salmon <https://www.inaturalist.org/observations/110551445>
Endangered California freshwater shrimp, <https://www.inaturalist.org/observations/39258047>
Additional protected birds reported on or over the property include Bald and Golden Eagles, Peregrine Falcon, Osprey, and American White Pelican.

Plants

Endangered (IUCN) Coast Redwood <https://www.inaturalist.org/observations/109504361>
Vulnerable Hornwort, *Anthoceros fusiformis* <https://www.inaturalist.org/observations/21766069>

Fungi

Endangered Golden-gilled Waxycap <https://www.inaturalist.org/observations/21562391>

In order to adequately identify impacts to Biological Resources:

1. Each species appearing in the [iNaturalist dataset](#) or [eBird dataset](#) needs to be added to *Table 3.4-1: Special-Status Wildlife Observed at SDC* (p. 221), and in some cases removed from *Table 3.4-2: Potential Special-Status Wildlife*, because these two datasets document actual (not potential) occurrences of these species on the property.
2. The right-most column in *Table 3.4-2: Potential Special-Status Wildlife* needs to be amended to acknowledge that the following species have been documented on parcels adjoining the SDC property.
 - a) Critically Endangered Sonoma Sunshine on Sonoma Valley Regional Park <https://www.inaturalist.org/observations/1254840>
 - b) Endangered Northern Spotted Owl on Jack London State Historic Park
 - c) Special Concern Red-bellied Newt in numerous locations <https://www.inaturalist.org/taxa/27824-Taricha-rivularis>

As one example how these datasets affect planning, Western Pond Turtles (a California species of special concern) are documented to breed in the degraded wetlands that run from the northern to the southern edges of the property east of Lake Suttonfield, including the old horse corral. These wetlands were once connected to wetlands in Sonoma Valley Regional Park where Sonoma Sunshine (*Blennosperma bakeri*) occurs. California Clam-shrimp, an Endangered crustacean that specializes in seasonal pools, occurs in unmapped seasonal ponds near the southern proposed route for a road linkage to Hwy 12.

3.9 Hydrology and Water Quality

The draft EIR fails to identify, quantify, avoid, or mitigate the impacts of re-starting diversion of water from Roulette Springs. Since closure of the water treatment facility, water from Roulette Springs has flowed into Asbury Creek and Sonoma Creek, sustaining streamflows during the recent historic drought and thus helping populations of threatened and endangered water-dependent species to survive.

Thank you for your consideration,



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