



SONOMA ECOLOGY CENTER

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Brian Oh, Comprehensive Planning Manager
Permit Sonoma, County of Sonoma
2550 Ventura Avenue, Santa Rosa, CA 95403
Brian.Oh@sonoma-county.org
(707) 565-1931

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Comments on the draft SDC Specific Plan

Significant effort has been made to develop the SDC Specific Plan in response to community and agency issues of concern. While laudable, there are several topics related to areas of our expertise, and in others cases globally, where the plan misses key opportunities, some critical, to address these concerns. Following are comments from Sonoma Ecology Center to support Sonoma County's efforts to develop an exceptional plan for this exceptional site.

Appendix A: Conditions of Approval

Most of the policies in the draft Specific Plan have no Conditions of Approval to implement them. This needs to be corrected. Unless Conditions of Approval enforce the Plan's intent, the EIR cannot claim that mitigating actions will occur.

Because many policies are vague or unenforceable—using words like “promote,” “encourage,” “if feasible”—such words must be removed from the Conditions of Approval, or else the Conditions cannot be considered mitigation commitments.

Conditions of Approval in the draft Plan do not provide any means to control impacts after the construction period; that is, during the decades of operation and occupancy. This needs to be corrected by adding Conditions of Approval that describe enforceable, objective standards that will apply after construction.

Similarly, many policies designed to protect ecological resources must be carried through to the actions of future residents and occupants of the property, and therefore should be required to be included in CC&Rs, as exemplified in a single policy of the draft Plan, Policy 2-26. A list of objective, enforceable items to be included in future CC&Rs (Dark Skies, pet policies, fence specifications, native and drought-tolerant landscaping, no pesticides in landscaping, etc) should be provided in the COM section of the Conditions of Approval.

Protections of wetlands are insufficient in the draft Plan. In order to implement Goal 6E, wetlands must be fully documented before any construction occurs. Therefore, add to BIO-1 after the first sentence “Identifying sensitive habitats includes a jurisdictional wetland delineation and designation of wetlands in Sonoma County zoning code.”

BIO Conditions of Approval require two types of corrections before the Plan can claim to mitigate environmental impacts. First, additional species need to be added to the BIO Conditions of Approval, so that the Conditions cover all known occurring species, as detailed in the datasets described in our April 5, 2022 letter and reiterated in our September 26, 2022 comment on the DEIR. Second, Conditions of Approval need to mitigate impacts after construction, during occupation and use of the site. These Conditions will need to codify ongoing mitigations described in the Plan and its policies, within any areas known now or in the future to harbor protected species, such as prohibiting dogs, prohibiting ground-disturbance land management techniques such as tilling, prohibiting entry of heavy equipment such as trucks, masticators, or tractors, etc.

The effectiveness of mitigating provisions and policies cannot be assessed unless the Plan and the Conditions of Approval mandate a permanent monitoring program, beginning before demolition or construction begins, to detect and regularly report wildlife use patterns, abundance of protected and indicator species, streamflow, and water levels in major wetlands. Therefore, please add such a program in both the Plan (Chapters 2, 6, and potentially others) and the Conditions of Approval.

Revise MOB-2 so that it implements Goals 2D and 2E, as follows: “Construction of the Highway 12 connector ~~should shall~~ avoid damage to biological, scenic and open space resources such as protected biological species, protected habitats such as wetlands, trees, rock outcroppings, and historic buildings ~~to the greatest extent feasible~~.” 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 Endangered 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.

2.1 Open Space Management Framework

Goal 2-B and Table 4.3 suggest there is agriculture planned in Preserved Open Space (i.e. outside the agrihood), but such agricultural uses are not shown on any maps or limited in acreage or location by any text. Please fix this, particularly in light of known sensitive species and habitats in many areas of the Preserved Open Space; otherwise the Plan cannot claim to implement Guiding Principle 3 to Integrate Development with Open Space Conservation.

2.2 Biological Resources and Wildlife Corridors

- A. Figure 4.1-2 and other Plan maps are only partially consistent with Goal 2E and Policy 2-6 to “expand the wildlife corridor.” The low/medium residential area north of the ballfields (the location of the Bane/Thompson building) is a key border with the narrowest part of the corridor, including high-value riparian habitat and access to year-round water in Sonoma Creek. To fulfill Goal 2E and Policy 2-6, this area should not be built on, and if it remains as a development area, it should have a 100’ setback from Sonoma Creek or preserve all existing native trees, whichever width is greater. Also, to reduce corridor disturbance in this pinchpoint area, structures between the two Arnold Drive bridges should be removed and not replaced.
- B. Policy 2-8 is not enforceable as written and needs to be changed to, for example, “...the Project Sponsor will develop and execute a maintenance program...”
- C. Policy 2-10, as written, can not achieve its intent if its language remains vague and unenforceable. To fix this, remove “If possible”.
- D. Policy 2-12 restricts development to limited trails and signage, and minimizes development of trails within wildlife and creek corridors. However, this policy’s lack of specificity may impact wildlife and other biotic resources. Expand the policy such that: paths and recreational areas shall not be placed on the northern edge of the core campus where the wildlife corridor is narrowest.
- E. Policy 2-16, as written, does not fulfill Goal 2E. To fix this, clarify that the policy applies to “open space” both inside the core campus and outside it, with the exceptions of 1) fenced back yards of residences and 2) fences meant to direct movement of and reduce hazards to wildlife.
- F. Policies 2-25 and 2-27 (riparian corridor protections) do not fulfill Goal 2-D.
 - a. To avoid confusion, please use language consistent with Sonoma County policy and zoning by changing “protective buffers” to “riparian corridors”.
 - b. The 50’ riparian corridor protections mapped by Permit Sonoma (see [map](#)) in SDC, and copied in Policies 2-25 and 2-27, are anomalous and should be made consistent with the logic of riparian corridor widths everywhere else in Sonoma Valley; that is, where Sonoma Creek adjoins low-density land uses or open space, the corridor width is 100’.
 - c. Riparian corridor setbacks need to be larger where green infrastructure projects are planned to reduce flooding and enhance terrestrial and aquatic wildlife habitat. Please see the [Upper Sonoma Creek Restoration Vision](#). Where there are vertically eroding banks, these projects will pull the top of bank back, to create banks that can slow storm flows and stabilize the creek corridor. Riparian corridors in the Plan should be established from these new top-of-bank locations, which could be 50 or 100 feet or more back from the existing, vertical bank top, rather than using a generic setback width based on today’s conditions.
 - d. Please either include Asbury Creek alongside Sonoma and Hill Creeks in Policies 2-25 and 2-27, or justify its exclusion.
- G. Policy 2-26 and Policy 6-17, which both prohibit use of pesticides in landscaping, need a Condition of Approval to implement them, that applies during operation, not just construction.

- H. Policy 2-28, as written, will not achieve Goal 2D. To fix this, change to "... conduct studies identifying the presence of special-status species and sensitive habitats at proposed development sites, including wetland delineation, ..."
- I. Goal 2E, to enhance and expand the wildlife corridor, cannot be implemented unless wildlife permeability extends past the current SDC boundaries. Therefore, add a policy that future owner(s) of the Preserved Open Space shall positively participate with any surrounding property owners, CalTrans, and Sonoma County TPW to improve wildlife habitat and permeability across property boundaries, up to and including the eventual construction and maintenance of a wildlife overpass or underpass across Hwy 12.

3. Mobility and Access

Policy 3-16 “Create a multi-use creek trail running parallel to Sonoma Creek that connects to a greater Glen Ellen-Eldridge community bikeway.” conflicts with Policy 2-25 to protect wildlife and other functions of riparian areas. To correct this, change Policy 3-16 to locate most of the north-south trail outside the riparian corridor setback. Trails should not occur in riparian corridors except for short distances (these are habitat areas first, recreation areas second). Add a policy that there shall be no new pedestrian bridges over Sonoma Creek unless built high above the riparian zone such that wildlife are not affected.

SCTA has conducted studies showing that a large fraction of passenger vehicle trips in Sonoma Valley are to drop off and pick up school children. In order to fulfill Goal 3-F and Policy 3-41, add a policy to provide free bus service to and from local primary and secondary schools.

4. Land Use

If Goal 2E is to “Maintain and enhance the size and permeability of the Sonoma Valley Wildlife Corridor”, then a map of the corridor’s current size (Figure 1.6-2) is insufficient to guide land use. That map must be augmented by a map of the future, larger corridor, otherwise it is not possible to know where Policies 2-6 to 2-10, 2-12, and 2-13 “within the wildlife corridor” apply.

If Goal 2E is to be achieved, special protections are needed for the narrowest, most vulnerable portion of the wildlife corridor, beyond the protections of other areas of Preserved Open Space. To accomplish this, add a new land use designation, potentially called “Corridor Pinchpoint,” where no uses (in the sense of “use” in Table 4-3) are permitted. The Corridor Pinchpoint is the area bounded on the south by the ballfields, on the west by a line extending north from Manzanita, on the north by the Planning Area boundary, and on the east by a line extending north from Railroad. Change instances of “the wildlife corridor” in all Policies to “the Corridor Pinchpoint.”

Table 4-3, Permitted Uses, must remove or condition land uses that are in conflict with the Plan’s Guiding Principles, Goals, and/or the stated intent of the individual land use classifications:

- Remove Timberland conversion and Tasting Rooms as permitted or conditionally permitted uses from the Agriculture and Resource Based Land Use category of the table in the Preserved Open

Space column. Change all other uses in the Agriculture and Resource Based Land Use category of the table from “Permitted” to “Conditional Use Permit” in the Preserved Open Space column.

- Change all permitted uses in the Transportation, Energy, Public Facilities Land Use category of the table from “Permitted” to “Conditional Use Permit” in the Preserved Open Space and Buffer Open Space columns.

The stated purpose of Preserved Open Space (p. 4-10) is not carried through to any policies or Conditions of Approval. To remedy this, add enforceable policies in chapter 4.4, including a policy to the effect that “Within Preserved Open Space, multi-benefit water resources projects shall be an acceptable use of land, where such projects protect or create habitat and recreation benefits, deliver water benefits to people and nature, and do not impede wildlife permeability.

6. Public Facilities, Services, and Infrastructure

In order to implement Goal 6-E, safeguarding SDC’s water supply for human and ecosystem needs, these provisions need to be added to policies in Chapter 2, potentially in Chapter 6, and in the Conditions of Approval:

- Lake Suttonfield, Fern Lake, Eldridge Marsh, and all mapped wetlands shall have development setbacks of 100’ or greater. This setback is consistent with Sonoma County’s policies (see table of wetland setbacks [here](#)).
- Connectivity between water features (lakes, creeks, vernal pools, intermittent streams) shall be enhanced and maintained. Connectivity means the presence of vegetated native plant cover, absence of roads, ditches, and other barriers to water or animal movement, and absence of human presence.
- Water-related features, including swales, intermittent drainages, and seasonal waterways shall not be undergrounded, but instead shall be daylighted and enhanced as visual amenities and wildlife habitat.
- Eldridge Marsh (permanent and seasonal wetlands on the east side) shall be restored hydrologically and biologically, in part by blocking ditches that currently drain the area.

Policies affecting Roulette Springs fail to fulfill Goals 2D and Policy 2-21. As documented in the *Sonoma Developmental Center Existing Conditions Report* (PCI, 2015), this area is unique among wetlands in the region for its provision of a large, perennial, reliable source of water for people and nature. In order to fulfill Goals 2D and Policy 2-21, the policies and Conditions of Approval need to commit to proactively restoring and protecting Roulette Springs, instead of merely avoiding further damage to it and diversions from it, in order to maximize ecological benefit to wetland habitats and listed species.

- Add “and Roulette Springs” to Policy 2-21.
- Strengthen Policy 6-30 to proactively restore and protect Roulette Springs, instead of merely avoiding further damage to it, in order to maximize ecological benefit to wetland habitats and listed species.

Chapter 7.6 Funding and Financing Mechanisms

This section provides no actual funding/financing plan, just a description of many possible options. Please correct this omission by inserting a table showing the list of planned funding and financing options mechanisms, and how much funding or financing each would contribute to the total cost of implementing the Specific Plan, preferably presented in the phases of section 7.3.

Thank you for your consideration,

A handwritten signature in blue ink, appearing to read "Richard Dale".

Richard Dale
Executive Director
(707) 888-1656
richard@sonomaecologycenter.org