#### **NSMRP Master Plan**

#### Sonoma Mountain Community Comments to NSMRP Master Plan

Document sent to Karen Davis-Brown, Bert Whitaker, Steve Ehret, and all Sonoma County Supervisors on 11/18/20

#### **Comments by Major Categories to NSMRP Master Plan:**

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#### 1. General Overview

The North Sonoma Mountain Regional Park property cost \$8,450,000, funded by the taxpayers through the Sonoma County Agricultural Preservation and Open Space District in 2008. When the Open Space District transferred the property to the County of Sonoma in 2014, the District also provided funding for the County of Sonoma to complete the park planning and open trail access to the mountain summit.

In 2017 the county parks department developed a proposed plan for the North Sonoma Mountain Regional Park. And in 2020 the Park's Department decided to update, expand, and move forward with the development of the Park.

The County Park's proposed future development of the park is currently being presented as a choice of three closely similar options all of which have some features which have wide public support and other features which are widely opposed.

This letter is being sent to the members of the Sonoma County Board of Supervisors, other significantly involved institutions and organizations, local media, and the public at large. This letter has been prepared by a small ad hoc committee of local citizens. It seeks to share the results of a written survey completed by over 150 local citizens, comments from technical experts, and other research.

While most respondents are users of the park who support most of the park's proposed creation of trails and access to the summit, almost all of them have expressed the following concerns:

- Campfires, BBQs, camp stoves and backpacking stoves
- Any overnight lodging or camping
- Entry points/parking into the park
- Traffic/Roads to get to the park
- Hiking trail utilization between hikers, bikers and horse riders requiring coordination
- Trail use impact through Coopers Grove

By far the primary concern is the introduction of fire, campfires, BBQs, camp stoves and backpacking stoves in the park. Permitting fires is seen as another risk that could result in wildfires that could consume a large area of the park, Coopers Grove and expand to private properties and homes.

Fire risk includes not just residents bordering the park, but residents in Rohnert Park, Petaluma, Sonoma Valley, Sonoma Developmental Center, Glen Ellen, Bennett Valley Ridge, Bennett Valley, Penngrove, and Diamond A.

Recent concern centers on the following text message from the National Weather Service issued on October 19,2020:

National Weather Service Issues Red Flag Warning The National Weather Service has issued a Red Flag Warning which will be in effect from 8:00 PM Sunday, October 25th through 11:00 AM Monday, October 26thThe warning has been issued to due Critical to Extreme fire weather conditions due to strong winds and critically low humidity. A significant offshore wind event, likely the strongest of the year, will develop over the region on Sunday and peak Sunday night into early Monday morning. These weather conditions, in combination with very dry grass, brush and trees, will result in an increased risk of new wildfire starts and rapid wildfire spread. \* TIMING...Winds will increase late Sunday afternoon as winds mix down

from the hills then peak Sunday night into early Monday morning. \* WINDS...North to northeast 20 to 30 mph with gusts up to 50 mph. \* RELATIVE HUMIDITY...Minimum daytime humidity of 5 to 10 percent. Maximum overnight humidity generally between 15 and 25 percent. \* IMPACTS...Any fires that develop will likely spread rapidly. Outdoor burning should be avoided.

At an elevation of 2,463 feet at the summit of Sonoma Mountain on Walsh Ranch, winds could blow embers in any direction resulting in another devastation to the park and communities outside the park. In Sonoma and Napa County we have experienced this each summer and fall since 2017.

Critically important is that throughout Sonoma County we are in danger of yet another wildfire event. Since 2017 danger and damage has affected residents and county officials alike.

The group has reviewed existing road access and potential firefighting response. Under today's park configuration and road access there is considerable concern regarding plans for fire defense responses to fires in the park and its surroundings.

Our collective heightened awareness of fire vulnerability on Sonoma Mountain requires that we create new guidelines and laws and reevaluate plans designed prior to the 2017 fires. Such reconsiderations are now underway through all county and state emergency response agencies. (See Kenwood Press article, Nov. 15. 2020 "State looks at proposed changes affecting county regulations on development, rural roads and fire safety").

In short, counties need to act and commit resources to minimize and respond to potential fires.

Today North Sonoma Mountain Regional Park is vulnerable to devastating fire. The area has not experienced a wildfire for over 100 years. However, the 2017 fire reached up <a href="Pressley Road">Pressley Road</a> and the first stretch of Enterprise Road. The mountain's fuel load is extremely high. As stated, the significant area above 2,463 feet is wind-driven. Current roads and access are inadequate for proper fire response.

Now is not the time to be adding campsites, BBQs, camp stoves, backpacking stoves, and any other fire producing activities. This is true, not just at North Sonoma Mountain Park, but any county park with this much fire potential.

Sonoma County, California, "the West" needs to address minimizing fire danger before adding additional fire producing activities.

## 2. Overnight Stays vs. Day Use Only

The Project Goals, outlined on the Master Plan pdf document, page 12 of 35 identifies nine overarching goals of Preserve planning and management. We support the majority with the exception of the overarching goal to "provide the opportunity for an outdoor overnight experience within a short drive from town centers".

#### **Project Goals**

The overarching goals of Preserve planning and management are to:

- Provide a trail system that gives access to inspiring experiences for many user types with varying abilities.
- Encourage stewardship through recreation, interpretation and education.
- Provide the opportunity for an outdoor overnight experience within a short drive from town centers.
- Provide an inspiring wildland experience for recreation, respite, celebration, and community.
- Sustain and enhance a biodiverse, ecologically rich landscape.
- · Preserve large land tracts for wildlife and its movement.
- · Support native biodiversity and reduce exotic invasive species.
- Protect historic, cultural and archaeological resources.
- Preserve scenic vistas and Sonoma County landmarks.



Questions were raised in a meeting with the Regional Parks on November 12, 2020: who creates the overarching goals? Are these goals standard for every new park? When were these goals last revisited by the Regional Parks?

The response from County Parks planning staff was that project goals are set by the Regional Parks' mission and Sonoma County Agricultural Preservation and Open Space District. And that the goals of the North Sonoma Mountain Regional Park plan are based on the Conservation Easement between the County of Sonoma and Sonoma County Agricultural Preservation and Open Space District. These goals were developed between 2017 and 2020 primarily using Mount Hood's Regional Park goals as a template for NSMRP.

When a new park is proposed the goals are leveraged from the prior park planning and experiences of existing parks and edited from there. There is no standard goal or template used by the Regional Parks. Each park is uniquely planned to meet each park's unique possibilities.

Due to climate change and increase in fires in Northern California we recommend the Regional Parks and Sonoma County Agricultural Preservation and Open Space District re-examine their mission and standard overarching goals for new public spaces.

We specifically would like to see changes regarding allowing **overnight stays** and **the introduction of fire of any kind** (campfires, BBQs, camp stoves and backpacking stoves) at NSMRP. Further, previous park plans which allowed fires need to be reconsidered. What may have seemed feasible at an earlier time is no longer appropriate.

We have requested but have not as yet received access to the roughly 1,000 public comments which the Park Planning department says it has received from the public due in part to our public outreach and publicity regarding our concerns. Based on our small survey over 90% of respondents want to keep the park as a **Day Use Park only and as a nature preserve**. They also want to keep the rural nature and wildlife corridors of the mountain intact, conserve the beauty and pristine woodland and flora as the last mountain in Sonoma County with 2nd growth redwood grove and recognize the mountain as a sacred place of indigenous Native Americans.

The park's 8 of 9 stated overarching goals, (as stated above), seem contradictory. From a wildlife perspective, the land is a relatively undisturbed island in the wildland-urban interface, barely larger than a square mile (820 acres). It is not part of or adjacent to a large wilderness. Many of the proposed overnight stay activities (bunkhouses, cabins, tents) would interfere with the goal of preserving large undisturbed tracts of land for wildlife and its movement, because the park itself is the large and relatively undisturbed tract of land that **it hopes to keep undisturbed**.

All 3 NSMRP Master Plan Alternatives include overnight stays. They have different types of lodging that will be available. All 3 include two bunkhouses. One by the trailhead in a building where the ranger currently lives - he/she will migrate down the road by a quarter to a third of a mile, and the second near the summit of Sonoma Mtn, a new area which they are building out as part of this process. The use of the bunkhouse near the summit would be restricted to approved groups such as the Boy Scouts and other youth groups. They would be hiking in and out from the trail head in Jacob's Ranch, on the west edge of the park. For the groups that would be having an overnight stay near the summit, they would be allowed to bring in portable camp stoves for their cooking. Again, we find this to be a significant fire risk. Another type of overnight stay would be in a cabin that would be newly built near the trailhead in Jacobs Ranch. And a third is a section for tents that will also be near the trailhead and the new cabin. They are considering charcoal BBQ pits for the use of the registered overnight people only.

The Regional Park representative stated that no type of overnight stay would be allowed during red flag days. If one popped up, people would be kicked out and those with reservations would not be allowed in. **NONE OF WHICH HAS ACCESS TO WATER SHOULD A FIRE OCCUR.** 

We would request the County not risk people's lives, property, livestock in exchange for 6 campsites, 1 group camping, 2 bunkhouses, 4 cabins and a problem-led campfire area. As of November 17, 2020, the County of Sonoma is joining other Counties to sue PG&E in the 2019 Kincade Fire. The County of Sonoma is self-insured. We do not want the County of Sonoma to be at risk of negligence approving overnight stays and fires of any kind allowed (including campfires, bbqs, camping stoves, backpack stoves) when people's lives, property, livestock are lost.

The 2014 deed and agreement by and between the County of Sonoma and the Sonoma County Agricultural Preservation and Open Space District conveying a Conservation Easement and Assigning Development Rights provides the option to have overnight stay developed. Just because an agreement has an option included does not require you to do it. When this agreement was signed on September 12, 2014 and the issuance of the NSMRP Master Plan in 2020 is a very different climate landscape. California climate change includes deadlier and more destructive wildfires have become the new normal — and it's all related to climate.

According to the Regional Parks representative, the overnight stays are not projected to be a major revenue source for NSMRP. Instead the reason the 3 Master Plan scenarios includes overnight stays is because there is a major camping deficit in Sonoma County and the Regional Parks want to make camping accessible and affordable to the public. Below is the Regional Park's written response:

"It can provide life-changing experiences, environmental education opportunities, it allows intimate experiences with nature, provides local opportunities to train for distant locations like Yosemite (past feedback from Scouts), and provides access to night sky. If there were camping at NSM, the very few sites (most intensive alternative had six (6) walk-in tent sites) would be intimate and quiet, which is quite different than the 100+ RV/car camp sites at some of our other parks."

An example is <u>Cascini Ranch</u> costs \$80 per night for tent camping. We also talked about backpacking sites potentially for the Bay Area Ridge Trail as a pass through trail since there has been funding received from the Ridge Trail Open Space as a grant (there are already 500 miles already connected).

The funding the District received for the Ridge Trail to develop the existing parking area and trail is unrelated to the reasons why the Department is exploring the possibility of providing a diverse range of passive recreation, including overnight experiences.

About 340 miles or so of the 500+ mile Bay Area Ridge Trail has been completed to date through the 9 Bay area counties.

Because people have to hike so many miles to get to the summit, a supervised overnight possibility would allow for accessibility to a broader segment of the population, including youth and seniors."

We believe NSMRP can provide life-changing experiences, environmental education opportunities, and have intimate experiences with nature without having to spend the night. Training for distances locations like Yosemite can be done today at Mount Hood Regional Park and Spring Lake Regional Park. Both which are nearby.

There are other Regional Parks that do not include overnight stays, Helen Putnam, Taylor Mountain, Laguna, Windsor Riverfront and Shiloh Park, Sonoma Valley, and Foothill Park and people enjoy the intimate experience with nature without having to spend the night and risking lives, property, wildlife and livestock.

Keep this park as a **DAY USE PARK ONLY.** 

## 3. Outreach by Community Group

With the stress of the latest Glass Fire, the smoky days prior to the fire, pandemic, and election many of us were not aware of the Regional Park's deadline to provide feedback on the North Sonoma Mountain Regional Park. I was first alerted by a neighbor, Jennifer Beers, asking if we received a postcard from the Regional Parks.

The number of residents that have responded during our outreach has been over 150 people. 120 people have taken our community survey. This survey, created by local residents, was to triangulate what the general pulse was from individuals interested in the park's development and its impact on the surrounding areas.

We have reached out to several other organizations within Sonoma County whose headcount is not included in the 150 people.

Over 93% of survey respondents replied, "I support no bbq pits or campfires of any kind." See written comments in **Appendix A**.

### 4. Fire

Fires can be separated into 2 parts; Minimizing Risk of Ignition and Response to Fire Emergency.

#### 4a. Prevention-Minimizing Risk of Ignition

No increased risk of fire in NSMRP or any park in the county.

There is limited access for fire response and evacuation via Sonoma Mountain Road PET. The master plan's opening of the summit to hiking and camping will bring many visitors that would need to quickly depart if there is an ordered evacuation of Sonoma Mountain from fire as happened in 2018.

The plan notes summit emergency access routes by trail to Jack London trails and to the tower site. This is unrealistic. Putting hikers and campers on trails heading down the wooded and steeply sloped east side of Sonoma Mountain if there is a fire would put them in greater danger. Rapid evacuation would require trains of cars being driven up Sonoma Mountain Road PET, and this would stop fire suppression equipment from moving in until those visitors are evacuated. This would be devastating to property owners who depend on rapid delivery of fire suppression equipment on this road to save their homes.

Cal Fire did not go up Cougar Lane in the Glass Fire and Mill Creek Road in the Walbridge Fire as they needed to wait for evacuations on these roads. The same thing will happen on Sonoma Mountain Road PET as there would be a need to evacuate hikers and campers at the summit who are nowhere near their private vehicles to get out. It would use up limited fire fighter resources to protect them.

Here are compelling facts about Sonoma Mountain Road PET that make it a wholly inadequate evacuation route for more people on the Sonoma Mountain summit. A cascading series of any number of adverse events could realistically happen on this road during a fire evacuation emergency. These things would make it impossible to protect our properties when combined with delayed or no Cal Fire protection due to the need to evacuate visitors from the summit.

- 1. It is a non-compliant SRA dead end six mile long road. The first three miles have two lanes of combined width of 15 to 20 feet, very steep grades reaching 25%, no shoulders, and significant sight distance restrictions on vertical and horizontal curves. The last three miles has the same deficiencies and narrows to a one lane road at 11 feet at its widest point. It is known to have the highest accident rate per vehicle mile travelled of any road in Sonoma County. It has an extremely high rate of impaired vehicular visitors as it is a remote dead-end location, and they completely block the road when they crash.
- 2. The last three miles cross heavily forested areas overhung with old, decaying trees, many of which have sudden oak death. There has been no regular maintenance by the county road department to cut overhanging trees that fall and completely block this last three mile section. Earlier in 2020 a tree fell in this section and completely blocked the road requiring the Rancho Adobe fire department to come out and remove it. During

the night hours of 10-24-20 a large limb from an oak broke off and completely blocked the private road at the end of Sonoma Mountain Road PET that is the only roadway access to the summit.

- 3. There are 60mph+ winds blowing from a north to south direction on the North Bay Area Hills at the 1,500ft + elevation level. This increases the risk of road blockage from downed trees on the mountain. There are frequent PG&E PSPS due to high winds and low humidity on Sonoma Mountain Road PET. While these limit the risk of PG&E caused fires, they also negatively impact the ability of property owners on the mountain to maintain an adequate supply of water in their storage tanks for fire suppression. There was a PSPS on 10-25-20 that started at 3:30pm. Power was not restored until 10:30am on 10-28-20. A family of four on this last road section drew down half of its 5,000-gallon holding tank by gravity flow during this 3-1/2 day period. This was just for basic living needs, and no irrigation. There was no power to their underground well to resupply. Property owners face a diminished supply of water during forced evacuations as it is highly likely that power will be turned off.
- 4. The Rodgers Creek Fault crosses Sonoma Mountain Road PET starting at Lafferty Ranch where the road transitions to a single lane. An earthquake on this fault would likely make a significant section of this road impassable.
- 5. The road crosses geologically unstable ground. Road slides are common as seen just below Lafferty Ranch, and at the top of the road.

#### 4b. Emergency Response

Improved access for fire response and evacuation due to fire.

**The biggest concern is that a** fire will start and with wind will consume a large area surrounding Sonoma Mountain as well as other cities due to embers carried over long distances.

We are concerned not only for the residents bordering the park but residents in Rohnert Park, Petaluma, Sonoma Valley, Sonoma Developmental Center, Glen Ellen, Bennett Valley Ridge, Bennett Valley, Penngrove, and Diamond A. Prevailing winds or thermally-induced winds can blow embers on Sonoma Mountain in any direction, and result in another round of devastation to communities in the county. We have seen this year after year now since 2017 in Sonoma and Napa County.

Still fresh in our minds is the <u>Glass Fire</u> which burned 68K acres and took 3 weeks to get 100% contained. Destroying 1,555 structures (including 338 homes in Sonoma County) in the 2

counties. This mountain has not burned in over 100 years and we are worried this may be the next BIG fire area.

The 2017 Nun's fire jumped from Bennett Valley Ridge to Matanzas Creek up to Sonoma Mountain Road, The only thing that stopped Sonoma Mountain being burned were the fire engines keeping the fire from jumping Sonoma Mountain Road onto the west side of the road. The fire also burned from Pressley on the West side down to Crane Canyon Road - taking out many houses in its path.

Based on the <u>09/21/20 PD article</u> the proposed NSMRP Master Plan includes both overnight camping, bunkhouse, and cabin facilities all with bbqs as well as the possibility of open camp fires, camp stoves, and backpacking stoves. Regarding the issue of open camp fires, an article published recently in the Press Democrat was not as reassuring as the County Planner in charge of the project might have wished; careful reading leads one to conclude that open campfires ARE possible for "groups approved to stay in the bunkhouse".

This proposed NSMRP master plan is based on previous public outreach conducted by the parks department on April 27, 2017 prior to the 2017 fires. (If there were other public input since then, our community was not aware of or included in that outreach) The current updated plan expands to include new overnight camping spots and some group camping, with three, four or six campsites available. Two variations of this plan include new cabins for overnight stays.

Karen Davis-Brown, the park planner assigned to the SMRP, stated that "a four-room bunkhouse would be created under all of the plans, but access to it would be restricted to approved groups, such as a Boy Scouts troop."

She also noted that open fires would be permitted for groups at the bunkhouse and all other campers would be limited to "Just camp stoves and backpack-type stoves," she said. "But not campfires."

Such a policy raises serious questions regarding how such rules would be enforced.

Currently the plan to reduce the fire risk at NSMRP is to use the same vegetation management strategy used at other parks managed by the Parks Department. Under this strategy animal grazing and shaded fuel breaks in strategic locations are included in the master plan. One of the property owners adjacent to the park noted that the park's grazing policy is ineffective because cows used at the park only eat the grass and leave behind the invasive and very flammable weeds - thistles (several varieties), tarweed, Medusa Grass - all growing thickly in the Park. The cows only eat the easy access vegetation, not hard to reach weeds.

In short, the county proposed updated master plan consists of three expanded variations of a 2017 plan with each variation calling for different levels of recreation and amenities. There are

new trails, facilities for overnight stays, an event center, and more parking. The county's framing of the three alternatives avoids addressing a fundamental issue: Why should the park be an overnight destination? All three alternatives include bunkhouses and camping, and two alternatives include cabins. While individual campfires are not allowed, the county proposes BBQs and ranger-led group campfires, and camp stoves and backpacking stoves may also be allowed. Any overnight stays will usually involve cooking, and we all know that whatever rules park officials adopt will be very difficult to enforce.

## 5. Emergency Egress and Access

**Emergency Access to Park Summit** 

Evacuation

Road Safety within the Park

Road Safety to the park, within the park, and emergency access to park summit.

The NSMRP has only two roads providing direct entrance to the park for emergency vehicles. One is on the East side at the Park Entrance Trail road (PET) which is a dead-end road and not a public park entrance. As noted below this emergency road is not in compliance with current California Code of Regulations Department of Forestry and fire Protection Standards.

The other is the Park Entrance Road which goes from 5297 Sonoma Mountain Road along a one lane road into the parking lot of NSR. If there was a fire on Sonoma Mountain Road helicopters would likely be required to put out the flames.

The public entrance to the NSMRP is at 5297 Sonoma Mountain Road. This entrance can be accessed from four roads which lead up Sonoma Mountain. These four routes serve as escape and evacuation routes in an emergency.

- (1) from Rohnert Park via Presley Road and the junction with Sonoma Mountain Road,
- (2) from Bennett Valley via the junction with Sonoma Mountain Road and Bennett Valley Road
- (3) from Bennett Valley Road at the junction with Enterprise road which connects with Sonoma Mountain Road
- (4) from Glen Ellen via the junction with Sonoma Mountain Road and Warm Springs Road

It is important to recognize that all of these roads burned in the 2017 fires and were on fire when the residents of Sonoma Mountain were awakened by officials to evacuate Sonoma Mountain in the middle of the night.

The non-official entrance and key firefighting access to a majority of the park, including the summit/upper portion of the park is via Presley Road West side Sonoma Mountain Road out of Petaluma. Note this is a dead-end road. Hereafter referred to as Sonoma Mountain Road PET.

There are traffic and safety issues associated with all of these roads to the entrance Sonoma Mountain Road BV or GE when you are driving to get to the park and the access road itself to get to the parking lot of the park. In addition, there is a similar concern regarding evacuation and emergency access on Sonoma Mountain Road PET. The roads appear not to meet California Code of Regulations, Department of Forestry and Fire Protection Standards. The Fire Protection Standards were created to prevent catastrophes such as the Paradise Fire evacuation and emergency response failures.

This is a major concern of many residents with respect to concerns about the poorly engineered nature of Sonoma Mountain Road PET and Sonoma Mountain Road GE, 2 of the worst in the county, there will be additional wear on a road of additional traffic. Residents First Hand reports on the hazardous nature of the road, the many cave-ins and the years it takes for those to be repaired that cause virtual one-lane roads, as posted by the county (see below links of PD articles of worst roads in 2013 and 2015). There will be significant additional wear on a road due to increased parking and overnight options. Sonoma Mountain Road was not designed for heavy traffic.

State Board of Forestry and CalFire standards for roads are found in the

California Code of Regulations, Title 14, Division 1.5, Chapter 7, Subchapter 2 SRA Fire Safe Regulations.

https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid= I12A9B6F54DDC43198D801AA2BD21B8A0&originationContext=documenttoc&transitionType= Default&contextData=(sc.Default)

Sonoma Mountain Road all three portions fail to meet the minimum width requirement (14 CCR § 1273.01) in numerous places. Sonoma Mountain Road PET and Sonoma Mountain Road GE both narrow down to 11 feet at times with no shoulder and fail to meet the shoulder clearance requirement.

The intent of this Fire Safe Regulation is: "...to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicles and civilian egress..."

Sonoma Mountain Road GE and BV and the access road to the park fail to meet this critical Fire Safety Standard.

Note also that the location of the campsites appears to run parallel to the access road. It is an area with extreme dense dry brush. A fire coming from the campsite area moving West would cut off the access road in the park.

## 6. California Environmental Quality Act

CalFire maps show the Park is in a State Responsibility Areas (SRA) and is designated as a High Fire Hazard Zone.

After the 2017 and 2018 wildfires, in 2019 the State of California added section XX Wildfire to the <u>CEQA appendix G</u> which includes this checklist for projects in the State Responsibility Areas (SRA).

The following are questions posed in that Section:

WILDFIRE. If located in or near state responsibility areas or lands classified as <u>very high fire hazard</u> severity zones, would the project:

- 1. a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
- 2. b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- 3. c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- 4. d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

This project began in 2017 and has not taken into account the 2019 change(s) in the CEQA regulations. The options presented do not appear to address the CEQA requirements.

In <u>2013</u> and <u>2015</u> Sonoma Mountain Road was referred to in a survey by the Press Democrat as one of the worst roads in Sonoma County.

#### 7. Parking and Entry Points

The Regional Parks provided clarification to the NSMRP Master Plan the number of parking spaces each of the 3 alternative plans is projected to be built.

Alternative 1: 100 parking spaces

Alternative 2: 75 parking spaces

Alternative 3: 65 parking spaces

**Current parking at NSMRP is 30 parking spaces.** This includes equestrian parking. One equestrian parking is equal to 3 cars. Currently there are 3 equestrian parking spaces. The current equestrian parking is in the current parking lot and allows horse trails to circle through the parking lot to get in and out of the park.

With the proposed parking spaces doubling to tripling in size in the alternative plans will cause an elevated risk to public safety. With the increased traffic along the narrow road at the entrance, in the park, and road safety leaving the park is a risk to public safety. In addition, public safety will be at risk if an emergency evacuation or emergency vehicles are required to enter the park. There is only one lane road into the park. Lastly with increased parking spaces this goes against the protection of Conservation Values identified in <a href="Exhibit B">Exhibit B</a>, <a href="Section 2">Section 2</a>, <a href="page page 32">page 32</a> Uses Limitation and Reserved Rights North Slope Sonoma Mountain.

Exhibit B, Section 2. Protection of Conservation Values

- a. Protection of Native Plant and Animal Species
- b. Protection of Sensitive Habitat
- c. Protection of Habitat Connectivity
- d. Protection of Soil and Water
- e. Protection of Scenic Values
- f. Protection of Public Outdoor Recreation-No activity, use or improvement on the Property shall be designed or undertaken in a manner that causes or results in significant disruption to the general public's use and enjoyment of the Property for low intensity public outdoor recreation and education, except as necessary for the protection, preservation or enhancement of natural resources or for public health or safety.

#### 8. Enforcement

**Enforcement of Overnight Stays** The existing ranger who lives in a building directly adjacent to the trailhead parking, would move a quarter to a third of a mile down the road. Regional Parks told us that they have only 21 rangers to cover 58 parks covering 3 districts. The Park Ranger, on average, spends 2-3 hours per day per park. The Park Ranger is primarily responsible for safety and janitorial. Each Park Ranger is trained as a Peace Officer, EMT training, and WWII training. The Regional Parks looks for seasonal help for summer part time janitorial work.

This new/different home for the ranger that lives onsite does not have line of sight visibility to the trailhead or any of the overnight facilities (bunkhouse, cabin or tents) which will involve bbq, camp stoves, and backpacking stoves.

To provide additional support for those staying overnight, they would bring in people on a temporary basis (3-4 months at a time). These people would be "on the clock" from roughly 11-5, and would live in an RV that would be parked in the trailhead parking. While this person would live there, our understanding is that they would not have any specific obligations to be there outside of the "on the clock" hours. They would receive training and they would be responsible for keeping the overnight stayers in line, but they would not have enforcement capabilities. They would just inform the stayers of their infractions and if they did not adhere, then he/she would contact the relevant authorities. They would have limited firefighting capabilities in the form of fire extinguishers, but nothing more.

For any groups that would be staying at the bunkhouse near the summit, there is no access to water should an emergency occur, and no clear evacuation route.

Overwhelmingly, neighbors from weekly NSMRP Master Plan community meetings, object to the notion of overnight stays, campfires, BBQs, camp stoves and backpacking stoves. We think this dramatically changes the nature of the park usage and significantly increases the risk of fire for us. It is unrealistic to think that any overnight campers would stay within the confines of their campgrounds or area. Overnight stays would bring in additional nighttime noise, drinking, smoking of whatever and after hours use of the BBQs, camp stoves and backpacking stoves. Boy Scout/youth group stays at the top of the mountain are a real concern due to potential fire and the uncertain nature of the people that will be supervising these groups. Also not having a person dedicated 24/7 to supervising the people camping or other overnight stays (bunkhouse, cabin) near the trailhead is a real concern as is the level of training these people would have and the problems of providing consistency when these are short term positions.

Parking enforcement on Sonoma Mountain Road There are people that will try to save a dollar where they can and will try to park alongside Sonoma Mountain Road to avoid paying \$7.00 for day use. There are some areas on the tight and windy road that we have seen cars parked especially near Cooper's Grove. If there are cars that are parked in these turnouts, someone on the road needs to put their car in reverse and slowly drive backward to an area that will allow the other car to pass.

What if the car that is backing up in reverse is hit by a car behind them and causes an accident? Who is responsible for ticketing cars if illegally parked? The Regional Park Rangers do not have the authority to issue parking tickets and the local Sheriff's department has communicated to the residents on the Petaluma side of Sonoma Mountain Road, they do not have the resources to investigate illegally parked cars on Sonoma Mountain Road.

Jonathan Umholtz, Park Ranger Manager, indicated to call him if there is illegal parking on the perimeter of the park boundaries and they will investigate. Park Rangers will not investigate if a car is parked across the road from the park on Private Property.

We are concerned that Sonoma Mountain Road on the Petaluma and Santa Rosa side will become a hazard due to illegally parked cars that are on private property and no enforcement to keep the road clear for normal traffic, evacuations, or emergency vehicles.

#### 9. Financial Disclosures

The Regional Parks does not have public financial information for the Master Plan and the 3 proposed alternatives. The Regional Parks have a general sense of the financial patterns of the park and have a general dollar estimate of what the budget would be in the different alternatives due to the 58 parks that they manage.

Financial information will not be available to the public until the "Proposed Plan" is completed (the plan drafted after Public Review ends, 11/18/20).

According to the Regional Parks representative, the funding of this park has a timeline in order to open the summit. Per review of the Deed and Agreement by and between The County of Sonoma and the Sonoma County Agricultural Preservation and Open Space District Conveying a Conservation Easement and Assigning Development Rights effective September 12, 2014, we were not able to identify a timeline within the Deed and Agreement.

The Regional Parks need to have planners explicitly include demographic and financial information in their Master Plans and provide public access. *Just as business planners, school planners, and other public facility planners have to account for their projects.* 

## 10. Long Term County's Park Planning Process

There is a long overdue public need to review the county's park planning processes and legal requirements in the context of other regional land use planning processes underway. EIR's which only address the hypothetical impacts of a project within and immediately adjacent to that project's boundaries are misleading and unacceptable. The County of Sonoma's legal requirement of the **notification is posted at the property and sent to owners within 300 feet from the project boundary is set by Permit Sonoma**. No decisions should be made without new widespread outreach and community surveys polling residents who live within 10 miles of the park boundaries. This is not a single-family residence or routine request for a use permit.

Regional trail systems, state parks, the reuse of the Sonoma Developmental Center site, as well as utilities, traffic, and housing issues all need to be addressed as part of park and recreation planning.

We need to review the consistency of Sonoma County park planning processes with the county and state general plan land use planning laws and procedures and the stipulations of land trust conservation easements and open space district constraints on development.

# 11. Further Park Development related to fire danger in its Current State

Further Park Development and Concerns related to fire danger in its Current State (i.e., fuels reduction and hazard mitigation)

Residents on the side bordering Jacobs Ranch are very concerned with the fuel load on Jacobs Ranch. The County currently run cows there very sporadically, but they do not eat the invasive and very flammable weeds - thistles (several varieties), tarweed, Medusa Grass - all growing thickly in the Park. They also only eat the easy stuff, not in areas hard to reach. The grass and weeds are very high throughout the park except right by the parking and rangers house. We were advised by a park ranger that there was insufficient funding for fire mitigation. The old Jacobs residence has been left abandoned and was the location of many unauthorized parties in the past. Lack of maintenance has made it another fire hazard at this point.

There is also an exceptionally large population of California Bay trees in the park that are gradually forcing out the Oaks. Once again, no maintenance or fire mitigation in this area.

The park should remain as it was originally intended - Open Space Preserve, but needs to also be a responsible neighbor. The previous owners maintained their ranches - once they passed to the Open Space - Park system, all fire mitigation stopped.

**Upon reaching out to a Fire Expert by one of our residents**, the Fire Expert indicated in point of fact right now it isn't if it (Sonoma Mountain) is going to burn, but when.

The Fire Expert indicated the focus should be on planning and mitigation steps and making certain detailed hazard risk reductions are in place.

The neighbor's concerns include:

What metrics, if any, does Parks determine the fire risks for a given park?

Does Parks have a plan for fuel reduction and fire mitigation?

If Parks has a plan or metrics for fire mitigation in the past, how well has it performed?

Where is the funding for this work? How much has been budgeted and spent in prior Fiscal Years for vegetation management and fire mitigation?

## 12. Requests regarding next steps from Community

Requests regarding next steps on the master plan from residents likely to be affected by fire hazards in North Sonoma Regional Park

Residents request the following concerns created by the current park plans have the associated mitigations:

- 1. No open fire of any sort in the Park (no campfires, no bbq, no camp stoves, no backpacking stoves).
- 2. **Day use only.** No overnight camping, bunkhouse, cabins. Humans and nature cause fire. Reduce risk where it can be reduced. Reduce evacuation risk.
- 3. Increased car traffic. Minimize car, shuttles, and horse trailers across Sonoma Mountain Road to Glen Ellen.
- 4. Increased human traffic. Restrict park to DAY USE ONLY. Restrict any trails into Coopers Grove as docent led only.
- 5. Horse trailers create significant evacuation risk on the narrow unpaved access road in and out of the park. No horse trailers into the park. Horse access from Jack London State Park only.

## 13. Appendix A

## **Community Survey Comments**

8. Sonoma Mountain is also known as a mountain lion habitat and animal corridor.
This was one of the original intentions of the park. Increased traffic and people staying in a single place for extended periods of time inhibits that.
What is your recommendation to balance the wildlife corridor and increased people, bike, horse traffic in the park?
No camping or overnights in the park.

no camping

Consolidate the campground area to a small place and restrict the areas of bike and horse access

Groups and noise need to be restricted

limit parking / restrict access (e.g. 4 days a week) difficulties of any kind lower visitation

The mountain lions and other wildlife have precedent. Period.

I think the park should be day use only.

Not sure

Not in agreement with having more people in a wildlife area. Where do the wildlife go?

Keep it first and foremost a wildlife preserve

Day use only and limiting access

Day use only--no camping.

It should be left wild. No developemeny

We use the park regularly and enjoy the quiet and nature. Too much development will change what the park is now. Any development should have significant environmental impact studies first and only develop based on study results. We feel it should primarily remain a wildlife and nature corridor with light use (hiking) as it is now. Fire danger is much too high for any overnight or camping use.

undesided

Please keep the original intention of the park.

ves

No overnight stays.

would reservations be necessary

I don't think this park should be considered for camping. Day use only

For any decision where the question is potential conflict between human access/activity/whatever and the wellbeing of any and all wildlife, the decision should always be made in favor of wildlife. Human activity in the park should only be allowed to the extent that normal wildlife behavior is not impacted. If that means no increased activity in the park and to keep it as-is, so be it. This opinion motivates all my answers to these questions.

Do not allow camping

A complex question. I have already asked John Peterson who is the Executive director of ACR (Quentin Martins from Living with Lions reports to him) to weigh in. I would like to hear from a scientist on this matter.

Don't put trails near their habitat - we know where they are. Close trails when they are near. It is safest for the people as well as protecting the lions.

No action

Limit people by counting

Don't put trails near their habitat - we know where they are. Close trails when they are near. It is safest for the people as well as protecting the lions.

Park should be used for hiking and not extended stay

Get an impact statement from Quinton Martin regarding the potential effects to mountain lion habitat.

I'd prefer we keep visitation to day hikes, picnics, and a few night hikes. Camping is disruptive to animals and their habitats. Part of what makes this park special is the sense of respect and protection that currently exists. I see no reason to increase disruption. And certainly there is no justification to add fire risk—by way of camping—to this already high risk area. Beyond the homes on Sonoma Mtn Road are many densely populated communities.

This is a nature preserve not a Magic Mountain Resort. Manage as one.

Given what has been communicated as the intention of the park in the past regarding this particular issue, I am surprised at the current development proposal. I'm not against the development in total, but this particular issue has been expressed as a bright line in the past.

limit the number of hikers

eliminate any overnight camping...it will be difficult to enforce fire issues and as we have learned from lack of compliance with face masks...the public is not always respectful and fire up there would be a disaster

Camping seriously impacts this corridor and should not be allowed

very important, do not allow camping

I am not sure camping is safe for either the animals or the visitors to the park.

Unsure

Minimize or eliminate campgrounds. Few locations.

While additional trails for hiking, with some limited allowing leashed dogs to accompany hikers, overnight camping, campfires, and established group gathering sites (picnic tables, etc) should not be permitted.

Mountain lions move freely around our houses. I don't think they would care.

Prohibit/fine visitors who don't follow the rules. Maybe close the park at times if mountain lions are using the area for rearing their young (similar to beach closures for sharks. Whatever balances use of our natural areas with habitat for the lions (e.g. some areas may need to remain without trails).

Limit group hikes with only Ranger led groups

Prioritize habitat and wildlife corridor status over park usage by humans

not sure

Don't allow camping or large group reservations/gatherings. Keep parking lot small.

Limit access to and use of park by only allowing day hike/bike access w/o dogs.

Day use park only, no camping, BBQs, fires. Keep the park as originally intended and not ruin the wild animal habitat.

Don't allow camping or large group reservations/gatherings. Keep parking lot small.

No camping at all anywhere in the park. The proposed trails at Sonoma Mountain Ranch (Summit Trail, West Sonoma Mtn Trail, Mountain Top Loop, Jack Access Trail) should not be opened.

No camping at all anywhere in the park. The proposed trails at Sonoma Mountain Ranch (Summit Trail, West Sonoma Mtn Trail, Mountain Top Loop, Jack Access Trail) should not be opened.

Only hiking trails are allowed. NO CAMPING OR BUILDING DEVELOPMENT

ABSOLUTELY!!!!!!

Day use park only. No overnight camping to protect the open space preserve. Bikes are hazardous to people and animals in the park. Bikers are not interested in the beauty of the park, they just want to ride fast and this activity is not condusive to wildlife. Hikers are usually slow and quiet. Dog walking should be allowed only on the lower trails for the same reason. have wild life corridors that are off limits. I would not allow overnight camping only day use and limited by available on site parking Would not allow overnight camping and restrict human traffic to designated trails Limits the activity by humans Get "Living with Lions" Project's recommendation. I think that lion and other wildlife habitat should be a priority, so, minimum people impact as doable. Park only open during daylight hours No bikes Park only opened dawn to dusk Day use only Education, warning signs, wildlife cameras to monitor trail areas, significant fines not to be waived for people violating all rules particularly off trail hikers, bikers and riders People pay taxes, not mountian lions. Let the people enjoy their land they fund. 10. Please let us know what additional comments or other concerns you have after review of the Sonoma Mountain Regional Park Master Plan. This park should be managed for the needs of Sonoma County residents, who paid for it. It is not to be managed for out of area visitors, which seems to be the goal of park managers. We need to keep the rural nature of our mountain in tact! We need to assure we have done everything possible to avoid fires! No campgrounds. No bikes. No trails. Please let us leave some open space for wildlife, free of humans.

camp fires with so many residential districts around the park makes it a bad idea.
Anti camping. There are other parks to hike in. No fires under any circumstance!!!
No camping! There are plenty of safer campgrounds. This is a wildlife and flora preserve.
Allow dogs, day use only
Preserve the park to maintain the natural characteristics.
One of my main concerns in addition to fire issues is the increased traffic on Sonoma Mountain Rd. A narrow road on which it is difficult for two vehicles to pass one another. Road erosion took place several years ago near the Presley Rd intersection and is still not repaired.
We are opposed to any development that will affect the nature preserve/wildlife corridor that it is now, and strongly oppose overnight camping or introducing anything that may ignite wildfire (camp fire, cooking, cigarettes).
As a resident of Bennett Valley I oppose the development of overnight camping on Sonoma Mountain. Especially with fire pits of ANY KIND!
Maintain the integrity of the park and trails, do not allow over use.
In my opinion this park is not optimal for camping.
See my answer to Q8 - this is the most important consideration, wildlife first.
There must not be any fire-related activity at the park, which precludes camping.
<ol> <li>The additional road traffic. If the County sends people up here they should commit to repair the road from BOTH the SR &amp; GE side.</li> <li>What is the vegetation management plan for getting fuel off Sonoma Mountain inside the Park?</li> <li>Where does the 1st dollar goto support tourists or protect us from Wildfire?</li> <li>What is the Park doing long term to get dead trees with Sudden Oak Death off the Mountain?</li> </ol>
I haven't reviewed the Master plan, but clearing and protection from fire danger should be a top priority.
Thank you for organizing this!!
Thank you for organizing this!!
Impact of traffic on Sonoma Mountain Road. Will alcohol be allowed at the camp site and/or picnic area?

For me, the main concern is fire. I think the mountain should be shared and available for people to enjoy. I would like to understand the commitment to a fire management plan (including the possibility of controlled burns) going forward. That said, I think there has to be respect for the intent of those who donated land and their agreement with the regional parks. If this development goes against those intentions - it does not seem ethical to pursue development. After another devastating fire, we should understand that any open flame is not permitted SMR cannot handle more traffic, likely we will see speeding on flat stretches and its not the environment I wish to encourage. Trails need to be well marked and maintenance plan required, otherwise the quality of the park will diminish and along with that, safe conditions for the community. We need to minimize the impact of people on the lovely location. I suggest no campgrounds and only minimal picnicing at specific locations. The park should be kept as pristine as possible, as there are many other local venues available for camping, ranger-lead hikes, ground picnics and group hikes. Do not destroy the rare and beautiful untouched environment of Sonoma Mountain!!! The format of this survey is problematic: You can't agree/disagree with a question. That said, I would hope the park can be for people to hike in. There are other places for dogs, bikes and camping. I like alternative 1. Fires being the main concern. No burning should be permitted in the parks. Please keep fire safety as a top concern Traffic on Sonoma Mountain Rd., risk of fire in a high fire zone close to rural communities and livestock This park needs to be limited access only to maintain original intent of wildlife refuge. This land was acquired to be an Open Space Preserve to protect the rural quality of Sonoma Mountain. We are in increased fire danger areas and the topography of the park would make fighting fires very difficult. Any overnight campers would not be followed around the park to make sure they "followed rules". The very thought of having fires or BBQs on this park is terrifying. We have had serious wildfires every year since 2017, some more than one in a year. There are plenty of parks that can offer camping that are safer and more controlled in case of misbehavior of visitors (Spring Lake). This park needs to remain open only during daylight hours to protect the nocturnal animals that roam there as well as protecting Sonoma Mountain from litter, noise and FIRES.

Traffic on Sonoma Mountain Rd., risk of fire in a high fire zone close to rural communities and livestock

The Parks Department ignored our concerns about fire risks and inadequate road access to fight fires. The plans to expand the park don't align with the park's stated goal of wildlife and land protection.

The Parks Department ignored our concerns about fire risks and inadequate road access to fight fires. The plans to expand the park don't align with the park's stated goal of wildlife and land protection.

No buildings and no camping should be built / allowed

I have submitted my full comments via email to Karen Davis 9/25/20, thank you. Stephanie and Tim Harris

Leaving trash is disrespectful of the park privilege and environment. Need policy of trashless visitors.

Fire #1 priority.

This is a special and serene hiking area and that is what it should remain as it's focus.

How would regulations they are imposing in the Tahoe area of high fines, and not even a cigarette or lighter can be in the campsites be enforced

Absolutely no campfires, pits, night time campers, cigarettes or the like. Many of us who live on Sonoma Mountain have animals and evacuating them quickly enough in the face of wild fire is almost impossible. Do not put the residents and their animals in jeopardy!!

Neighbours on the west side of Sonoma Mtn. rd. #1 also known as the SMR-Petaluma, were not notified of this park proposal even though it in many cases not only boarders properties but is very close by.

Enforcing fire safety in connection with camping is essentially impossible. A wild fire from camping activities is a "when" not "if" question.

Given the fire dangers in the county, we need limits and supervision for park usage.

Preservation of wildlife and natural landscape should be first priority.

#### PLEASE DO NOT TURN OUR HOME INTO ANOTHER WINE COUNTRY THEME PARK

Given the current state of fire danger that exists for now many months of the year it would be a huge mistake to allow anything that could lead to starting a fire especially given the landscape of the area and the narrow roads

I think this is a bad idea as fire danger is very very real. I think this is a crazy idea.

The park is lovely the way it is! Adding camping and BBQ pits is an obvious fire hazard. The roads cannot accommodate increased traffic & emergency vehicles.

Sonoma Mountain Road won't support more traffic (or garbage). The mountain is in a limited water area so sewage and water usage increases should not be permitted.

We need to see the fuel load risk report data since SM has not burned in likely over 70-80 yrs

the plan does not present other posssibilities for public access which are more supportive of the intention of the conservation esament regulations

What is the process for getting approved because it seems as tho things were not done right at this park. Usually the regional parks are more thorough.

26 Traffic concern. SMRis very narrow and there are currently too many accidents presently. I live on this road and cars drive at excessive speeds right now. It is very dangerous. Any increase in traffic would only increase risk lives. Fire is our number one concerns of the area. Any activity that involves any type of fire could get out of hand. In the past three years we have had to evacuate, had our power shut off. I think we all have PTSD. Any time I smell smoke my whole body goes into shock. What are you thinking your priorities are? In this time of the world we need to pay attention to what we are doing to our environment. Please think of the bigger picture and what you would be creating. Fire and road traffic are highest concerns. Although some of the plan (e.g. expanding trails) are reasonable, the increase in park users and potential of camping put those of us who live here at risk. I live on the north face of Sonoma Mountain. I want to minimize the opportunities for fires to be sparked at any time. The settlement funds should only be used for fire related purposes such as vegetation management to reduce the chance of fires. An example would be to work with and provide funds to the State for debris removal from Annadel State Park to reduce fuel for fires that would endanger surrounding neighborhoods. Plan three seems reasonable, but without overnight camping and without fires of any sort, campfires, cigarettes, candles. There is no reason under the present circumstances to have either. We must make every attempt to keep this mountain a preserve. Fire is a real and constant danger. Much of Sonoma has been burned. Day hiking trails is needed with no smoking. No electric bikes. HORSES: We live next to Annadel Park in Bennett ridge and purchased our property to ride our horses. Once the bikes were allowed to ride ANYTRAILS it became very dangerous as many were not concerned to go by the rules of walking their bikes. After a few dangerous scares, we sold our horses. Bikes ruin trails; see Annadel trails for evidence. FIRES: i have walked Crane park for many years and observed the frisby players drinking alcohol and smoking on the trails. I notified the park of this and within the month there was a fire in Crane Park. Many people are not considerate and have no self discipline when they feel entitled. Please no overnight camping, no smoking. Sonoma Mountain is a remote park and should be respected for it's isolation. Keep it a day park. I am concerned that the ecology of the area be maintained and only low impact activity be permitted.

I live on Bennett Ridge, our house burned down in 2017. Since the area seems prone to burn we just want to make sure that we're doing things wisely. I think this is a good idea but it just needs to be managed well. The fires are very scary

Given the dramatic increase in wildfire activity and no end in sight, use of SMRP should be limited to day use

with severe fines for any breach of No Smoking, No Lighters, No Fire violations.
people must pay to park. I am a believer in user fees. Fire is of the greatest concern so I believe any type of activity that raises fire danger should be restricted from the start. That means well signed with amount of fines to be levied for violation.
Make horse riders pick up their poop for once.

