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August 31, 2015

Mr. Santi Rogers, Director
California Department of Developmental Services
1600 9th Street
Sacramento, CA 95814

Dear Director Rogers and Department Staff:

As required by SB 82 (Chapter 23, Statutes of 2015), the Department of Developmental Services (DDS) must submit a closure plan for the Sonoma Developmental Center (SDC) to the Legislature by October 1, 2015. The Sonoma Land Trust (SLT) submits these recommendations as part of the public comment period for the SDC closure planning process. These comments supplement those submitted by the SDC Coalition and Transform SDC Project on August 7, 2015 in the memo entitled "Desired Elements of SDC Closure Plan."

SLT supports the following vision statement prepared by the Transform SDC Project articulating a preferred future for SDC: ***Create a public-private partnership driven by community ideas and values that showcases the site's history, maintains critical services for the developmentally disabled, provides opportunities for creative reuse of SDC's assets, and preserves the natural resources and open space of the site.***

We are deeply concerned about the well-being of the current SDC clients, their families and the Center's dedicated staff. Simply moving everyone out and closing SDC also closes the door on an extraordinary opportunity to meet multiple state and local objectives which would be achieved through a transformation of the site. Many of the health care services that could be provided on site are referenced in the January 2014 "Report on the Future of the Developmental Centers in California" issued by the California Health and Human Services Agency and DDS. SLT support the Task Force recommendations contained in this Report, and urges DDS to explore the feasibility of locating a suite of services under the umbrella of a regional Health Resource Center for northern California..

This comment letter addresses DDS's responsibility under SB 82 to provide "*a description of local issues, concerns, and recommendations regarding the proposed closure, and alternative uses of the developmental center property.*" We understand this to mean that DDS must include a clear statement of intent, a proposed strategy, and timeline for a collaborative approach to protecting the irreplaceable natural and historical legacy of SDC's lands and waters.

The SDC property is unique among the State's developmental centers because it includes approximately 750 acres of open space and natural resource lands on Sonoma Mountain and in the Sonoma Valley. The site also provides significant public benefits to the region, including water and groundwater capacity, climate change resiliency, wildlife corridor and habitat protection, scenic qualities and access to open space that supports human health. The site is bounded by state and county parks and other protected land, connected to an existing regional trail system, and identified as a critical wildlife corridor.

The permanent conservation of this property will showcase California's commitment to its goals for protecting water resources, adapting to climate change, conserving open space and biodiversity and creating more recreational opportunities. The open space and natural lands of the property have been directly beneficial to the well-being of the SDC residents and employees and the neighboring communities. Protection of the property's natural assets will directly implement multiple state plans, the California Water Action Plan, Sustainable Groundwater Management Act of 2014 (SGMA), the California Climate Adaptation Strategy, the Western Governors' Initiative on Wildlife Corridors and Crucial Habitat, and the California Wildlife Action Plan.

Recommendation

We ask that, in the "recommended alternative uses of the property" section of the closure plan, you call for a **process led by a consortium of state and local agencies to develop a plan to protect SDC lands concurrently within the closure planning timeline**. In our August 7th memo, SLT and our partners in the SDC Coalition emphasized that in order to ensure an informed process to assess and protect these resources, it is essential that the State:

1. Initiate a collaborative process with DGS, the California Natural Resources Agency, California State Parks, Sonoma County and interested stakeholders to ensure permanent protection of the critical open space lands on the SDC site.
2. Coordinate a complete biological and cultural resource assessments of the SDC property with the California Department of General Services (DGS), the Legislature and the California Natural Resources Agency, that builds on the work of the April 2014 "Sonoma Developmental Center Draft Resource Assessment" and share the data with SDC Coalition and the general public

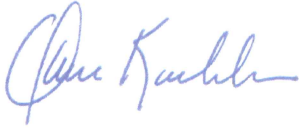
Conclusion

All of us in Sonoma have been touched by the stories of the clients who live at SDC, and the people that care for them. SLT is working every day in partnership with Sonoma County and groups like the Parent Hospital Association to make sure that this closure process works for every person who currently lives at SDC. It is also important to make sure we protect the place itself, and the myriad benefits it provides for the public good, including groundwater protection, wildlife conservation, climate change resiliency and recreation. SDC has been

held by the state to meet a public need for decades; we now have a chance to make sure it continues to serve the public good in years to come.

Thank you for considering our recommendations.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dave Koehler". The signature is fluid and cursive, with the first name "Dave" being more prominent than the last name "Koehler".

Dave Koehler
Executive Director