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March 25, 2022

Brian Oh
Comprehensive Planning Manager, Permit Sonoma
County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

Via email to: Brian.Oh@sonoma-county.org

Re: Notice of Preparation for the Sonoma Development Center Specific Plan
Environmental Impact Report (EIR)

Dear Mr. Oh:

River Otter Ecology Project, based in Marin County, CA, engages the public in supporting conservation and restoration by linking river otter recovery to the health of our watersheds through research, education, and community science. River otters, although not a protected species, are sentinel apex predators that use every part of watersheds, from headwaters to ocean. Their presence and success are important indicators of ecosystem function and environmental health.

Over the past ten years we have documented and researched the return of North American river otters to parts of the Bay Area from which they were extirpated decades ago through trapping and habitat degradation. The recovery and return of these sentinel apex aquatic predators is a conservation success story, and their presence and success are important indicators of ecosystem function and environmental health.

Through our Otter Spotter community science program¹, we have collected nearly 5,000 reports of river otter sightings in the Bay Area and beyond. Besides engaging the public in watershed conservation, these sightings help us begin to understand river otter presence and success in a regional context. As shown in the attached Figure 1, river otter presence and movement may be associated with the stream network that flows south from Santa Rosa Creek to San Pablo Bay. These streams, prioritized for their conservation value², intersect the identified Bay Area Critical Habitat Linkage network precisely at Sonoma Development Center and Sonoma Valley Wildlife Corridor.

Thus, the regional significance of the project area requires that the EIR analyze a large enough area to determine the cumulative landscape-scale impacts of proposed development on the permeability and ecosystem function of the Sonoma Valley Wildlife Corridor.

In addition, to ensure the preservation of the Sonoma Development Center's ecological resources, as required by California Government Code § 14670.10.5, the EIR must accurately describe the resources and wildlife use of the project area at a fine scale. The EIR should include sufficient data and studies to comprehensively identify negative impacts and feasible mitigations.

Finally, the EIR must identify appropriate buffers between development and sensitive habitat in order to protect the ecological value and function of the entire project area and the Sonoma Valley Wildlife Corridor.

Thank you for your thoughtful attention to our comments.

Respectfully,

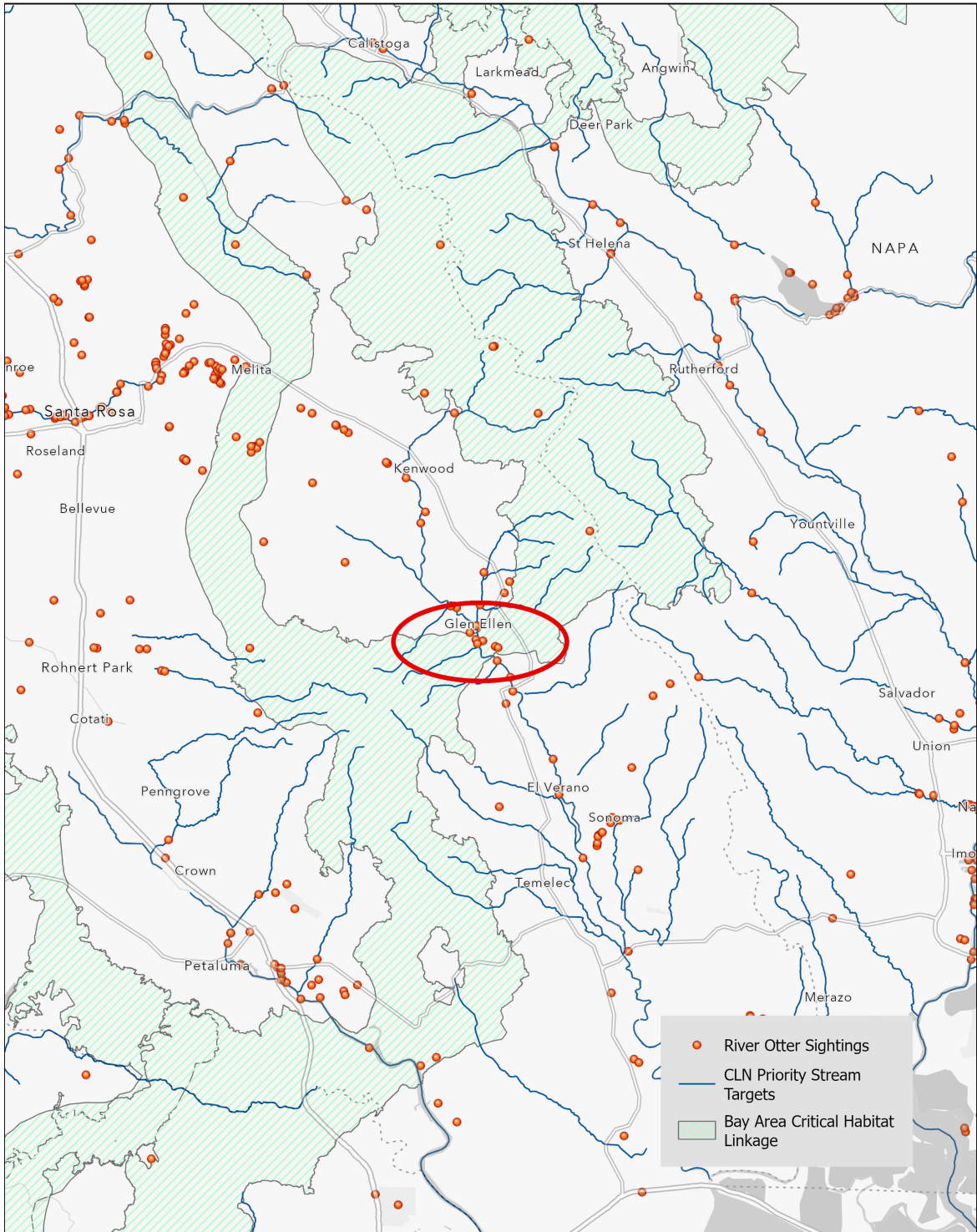
A handwritten signature in cursive script that reads "Megan Isadore".

Megan Isadore
Executive Director

¹ [Supporting Conservation - One Otter Sighting at a Time](#)

² The Conservation Lands Network 2.0 Report, Berkeley, CA. Available at <https://www.bayarealands.org/>

Figure 1. Map of River Otter Sightings, Priority Streams, and Bay Area Critical Habitat Linkages. Location of Sonoma Development Center and Sonoma Valley Wildlife Corridor are circled in red.



Source: CLN 2.0; River Otter Ecology Project