

January 21, 2021

Chair Lynda Hopkins and
Sonoma County Board of Supervisors
575 Administration Drive
Santa Rosa, CA 95401

VIA EMAIL

RE: Sonoma Developmental Center Specific Plan – Consistency with State Legislation

Dear Chair Hopkins and Board of Supervisors,

Greenbelt Alliance supports the open space elements of the SDC Specific Plan to date and consistency with state legislation. However, we are very concerned that the vision and draft plans for creating a new community at SDC/Eldridge is inconsistent with state legislation and county, regional and state policies for city-centered growth and responding to the climate crisis.

Open Space Lands – Consistent with State Legislation: Greenbelt Alliance strongly supports the protection of the natural and open space lands per state legislation and the desires of the Sonoma Valley community. We urge the county and the state to immediately delineate those lands and protect them in perpetuity by transfer to state and regional parks. This is consistent with the state legislation and would provide immediate certainty to the community and all stakeholders.ⁱ

Greenbelt Alliance, in its 2017 At Risk report, identified the 945-acres of the Sonoma Developmental Center lands as one of the most at-risk greenbelts in the Bay Area, with a critical wildlife corridor that runs through the heart of the property and Sonoma Valley. Of that 945-acres, 825 acresⁱⁱ were designated as protected community separators by the 83 percent of the voters of Sonoma County in 2016 (see attached map). This county policy prevents intensification of development on those lands and needs to be considered in the SDC Specific Plan.

Historic Campus Development – Inconsistent with State Legislation: Greenbelt Alliance is concerned that SDC Specific Plans and Vision and Guiding Principles produced by the

county planners and consultants to date are inconsistent with state legislation because they propose an entire new community with a significantly increased intensity of development than current conditions and beyond what is explicit in state legislation.

Greenbelt Alliance supports appropriate housing on the site per the state legislation as follows (emphasis added): *The agreement shall require that housing be a priority in the planning process and that any housing proposal determined to be appropriate for the property shall include affordable housing. It is further the intent of the state that priority be given to projects that include housing that is deed restricted to provide housing for individuals with developmental disabilities.*

Public services to serve the residents should be considered that aren't readily available in Glen Ellen, Kenwood, the Springs or the City of Sonoma to allow for less driving and isolation. There are four existing communities with basic services available close by to meet most basic resident needs.

Using the existing footprint to add low profile housing on SDC is probably the most consistent approach if you don't want to compromise the wildlife corridor, significantly increase environmental impacts in Sonoma Valley, and induce growth and climate impacts.

The SDC Specific Plan to date proposes an entirely new fifth community to Sonoma Valley, as these excerpts illustrate (emphasis added):

- The former Sonoma Developmental Center is reinvigorated as a vibrant and sustainable community in the heart of Sonoma Valley. [Note from GA: Since SDC was never a community, but a center for developmentally disabled, we question the use of the word reinvigorated. What is being proposed is quite different from what was here before.]
- The developed core area comprises a complementary mix of housing, commercial, and institutional uses.
- Civic uses, community gathering places, and events attract visitors from Glen Ellen, Eldridge, and the broader Sonoma region, making the center a hub of community life in Sonoma Valley.

Building a New Community in Sonoma Valley Inconsistent with City-Centered Growth and Climate Resiliency

In addition to being inconsistent with state legislation, which calls for "housing as appropriate" and not a whole new community, developing a new residential subdivision with retail, commercial, tourism, and other uses as described is that it is inconsistent with all city, county, state and regional policies and commitments to city-centered growth near jobs, transit and schools to meet climate emissions reduction goals.

The lands at SDC are rural lands without jobs, schools, transit, or services. Adding those amenities, as well as new roads, lighting, water, sewer, parks, police, etc. as described in the SDC Specific Plan will generate huge new environmental and economic impacts.

Affordable housing is needed in Sonoma Valley. It is best located in existing communities and towns to provide the most sustainable and resilient community for future generations. An *appropriate* amount of housing at SDC also makes sense, per the legislation. What that level of housing might be has never been analyzed. Instead, we see a plan for a whole new community.

Any decisions about the amount of housing at SDC must be considered in the context of Sonoma Valley and Sonoma County based on population projections and housing needs and allocations.

The SDC Specific Plan also must be considered along with the Sonoma County General Plan, the Springs Specific Plan, and the City of Sonoma General Plan, and Plan Bay Area. It should not be considered in a vacuum as a separate town or community but part of the entire Valley.

Here are some of the core issues and concerns that need to be addressed related to the intensification of development proposed in the SDC Specific Plan to date:

- A new community at SDC/Eldridge is not in the county General Plan.
- A new community at SDC/Eldridge has not been proposed in state legislation, only housing.
- There is an existing community: Glen Ellen. Glen Ellen has a market, coffee shop and services.
- The neighboring communities of the Springs, City of Sonoma and Kenwood also provide services.
- The impact of a new community in the heart of the Valley is likely to impact the other communities' environment and economy.
- Creating a new community on rural lands in the middle of open space and wildlife corridor is in direct conflict with state, regional and county goals for city-center growth.
- There is no regular or reliable transit in Sonoma Valley and won't be any time soon.
- People who live at Eldridge will drive everywhere and increase GHGs and VMTs,
- The EIR is most certainly going to find huge increases in GHGs, VMTs and significant environmental impacts.

- The environmental impacts of a new community will be significant and very difficult if impossible to mitigate.
- Lighting, noise, traffic, etc. etc. will forever compromise the only wildlife corridor between the Snow Mountain Monument and the coast. Once fragmented by development, it will lose its value to biodiversity in our Valley and county forever.
- Building a whole new community at SDC/Eldridge will be significantly growth inducing.
- Creating a new community at SDC/Eldridge is likely to accelerate the urbanization of Sonoma Valley from Glen Ellen to 8th St. East.
- If that is the county or community vision for our Valley, then it needs to be addressed in the SDC Specific Plan.
- The more I think about this, the more I think we should minimize any new development and “transfer” the proposed housing into Glen Ellen, Springs and the city of Sonoma. All are slated to provide more housing in the next decade and beyond.
- Instead save the entire property as natural and park lands, provide some land for local organic food production, and minimal structures.
- Ultimately, SDC and Sonoma Valley are not going to be a place for huge amounts of growth and housing; and no one at the state or regional or county level are planning for that. It is going mostly into the city centers.
- If the county and community want to see the Valley more developed and urbanized, it is time to consider the big picture and the likelihood of it being at all sustainable; and how much affordable housing will actually be built. How does that compare to the priceless value of the open space, wildlife corridor, etc.?
- I realize that being for open space is not popular now, but we need to look at big picture and loss of biodiversity beyond just the immediate housing crisis.

PUBLIC OUTREACH NEEDS EXPANSION

Greenbelt Alliance remains concerned that the public outreach needs to be extended and expanded to all sectors of the community and beyond Sonoma Valley to the entire county. In fact, that SDC Specific Plan is not just a local planning issue! The lands are owned by the people of the state of California. The future of the heart of Sonoma Valley is important to all who live and visit, but also to people across the Bay Area and the entire state of California.

The Public Advisory Team is not open to the public, and the members are not doing any outreach that we can tell. Certainly no one from the PAT, the consultants or the planning team have reached out directly to Greenbelt Alliance. However, we are engaged in the public process.

DIRECTION AND NEXT STEPS

Greenbelt Alliance urges the board of supervisors to direct the planning staff and consultants to:

- Provide low-profile alternatives focused on providing housing per the state legislation.
- Scale back proposed intensity of development to scale with existing communities and eliminate plans for a new community.
- Analyze housing and population projections for Sonoma Valley to determine appropriate level of housing per the state legislation.
- Analyze the growth inducing impacts of the SDC Specific Plan on Sonoma Valley.
- Analyze the combined and cumulative impacts of the SDC Specific Plan with the Springs Specific Plan, County General Plan, City of Sonoma General Plan, Groundwater Sustainability Plan, county Climate Resilience Mobility Strategy, and Plan Bay Area (PDA, PCA policies in particular).
- Analyze the impacts of COVID on the SDC Specific Plan.

Thank you for your consideration of these views.

Sincerely yours,



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ⁱ Per state legislation: The disposition of the property or property interests shall provide for the permanent protection of the open space and natural resources as a public resource to the greatest extent feasible and shall be upon terms and conditions the director deems to be in the best interests of the state.

ⁱⁱ The SDC property comprises approximately 945 acres, including the main property and Camp Via (934.08 acres and 11.42 acres respectively; APNs 054-090-001, 054-150-010, 054-150-005, and 054-150-013). CS = Community Separator

Parcel 054-090-001

512 acres – CS 498.52 [12 not in CS]

Parcel: 054-150-010

290.89 – extending CS 162.08.

054-150-005 119 acres none in CS

054-150-013 35.83 acres Existing CS

825 in CS 131 Not in CS