SONOMA ECOLOGY CENTER
Protecting the beauty and biodiversity of Sonoma Valley

November 27, 2021

Memo: Sonoma Ecology Center Comments on the SDC Specific Plan Alternatives

Following are comments from Sonoma Ecology Center (SEC) on the SDC Specific Plan Alternatives presented to the community for comment this month. Our comments can be expanded on if further information is useful. Contact information is included in the footer of this memo.

General Comments

The Sonoma Valley community has expressed frustration at the process used to develop the three specific plan alternatives, and disappointment about their substance. We share these concerns, and do not support any of the current alternatives. We acknowledge the state code's conflicting constraints that blend protecting the site's extraordinary natural resources with providing housing and creating a plan that will attract third-party purchasers; we also understand that the pandemic and ongoing fire related community impacts have affected the planning and outreach process. Nonetheless, with over twenty months to engage stakeholders and construct a workable basis for the alternatives, there has not been adequate community engagement. A better engagement process would likely have created a better result. The current alternatives have united the same community that came together to create the opportunity for the specific plan process against these alternatives, and for several, against the process itself.

SEC feels that there can be a productive response to this concern by bringing together representative stakeholders from the community, with excellent facilitation, to seek out common interests and to find common ground. We think there is more agreement than may be evident, not just about what isn't wanted, but about what can work on the site and meet both the state's and the community's goals. If such a process is to work, there will need to be time for it to be planned, for parties to meet, and for the result to be developed by the county's planning team into a draft alternative. Our request is that both of these actions be seriously considered: a facilitated stakeholder process to build the basic consensus required for a successful alternative, and time to implement that process. Additional time would likely offset other challenges arising from a process the community feels is unacceptable, and we feel the state has significant incentive and funding to get the process right and will accept a request from our county for this extension.

The main concern raised by the Sonoma Valley community is the scale of proposed development in all three alternatives. SEC participated in a group tasked with developing a triple-bottom-line concept for the site, the Eldridge Enterprise. That group did an economic analysis for the concept at half the scale of alternatives originally presented to the planning team's PAT (public advisory team). The three draft alternatives recently presented to the public are smaller than the original, and none represent the Eldridge Enterprise concept. Moreover, after seeing how development in the alternatives was mapped onto the site, we strongly agree that all three alternatives presented represent an unacceptable level of impact to natural

resource values of the site and to the surrounding community. The Eldridge Enterprise group is revising its concept to be smaller, yet still deliver meaningful results in terms of climate action, affordable housing, and other community and environmental benefits.

The right scale for numbers of residents, employees, and other users on the site depends on the impacts they will create. We therefore support our colleagues at Sonoma Land Trust's recommendation, that a science-based, data-driven constraints analysis be done as a framework for development. The more of these data the community and planning team have, the better any emerging specific plan will be, and the more acceptable the resulting impacts will be for the environment and the community.

We feel that the opportunity presented at the site to create a world class, sustainable, multi-benefit, once-in-a-generation response to the needs and opportunities of our time, can happen on the site, and that it's worth the investment of more time and resources to strive for this result. This should be done in alignment with, and tapping into, the phenomenal resources of our community to reach this potential.

Protecting Ecological Resources

Humanity faces a global biodiversity crisis on the scale of the global climate crisis. Nearly a fourth of all known species are at risk of extinction. Over 1,060 individual species have been identified on the SDC campus, several of them rare. SDC is located at the center of a biological corridor of statewide significance, established by SEC in the 1990's. Thousands of acres of land acquisition and millions of dollars of investment have been made to expand and protect it. Water resources are likewise of regional significance, with Sonoma Creek recognized as critical coastal stream, hosting several threatened and endangered species including species found in only a few streams in the world. New development on the campus needs to consider and protect the site's extensive ecological resources, especially its significant wildlife corridor and stream corridor. The following recommendations build on this background.

- **Width of wildlife corridor**: The wildlife corridor should be expanded at its narrowest point along the north and northeast side of the campus, pulling the boundary of the developable area inward. Specifically, the campus footprint should be shrunk on the east side of Arnold as shown in Alternative C, and on the west side of Arnold southward to the edge of the current ball field. That is, remove and do not replace Bane, Thompson, the two houses between the bridges, and the road circle northwest of Wagner. The pedestrian access point in the narrowest part of the corridor (yellow asterisk on the maps in the alternatives) should be removed. Do not put trails in riparian corridors except for short distances (these are habitat areas first, recreation areas second). No new pedestrian bridges over Sonoma Creek should be built in new locations.
- **Sonoma Creek setback**: Setbacks along Sonoma Creek should be larger, at least 100 feet, to make room for a reestablished floodplain, riparian habitat, steelhead recovery, and groundwater recharge. Some areas should be wider than 100' in a few places where green infrastructure projects are planned. See Upper Sonoma Creek Restoration Vision on SEC's website.
- **Hill/Mill Creek setback**: Setbacks on Hill Creek should be widened, ideally 50' on north side, more on the south side, to protect stream function and provide for habitat linkage to Sonoma Creek from southwestern open space areas.

- **Open space within the developed area**: Built areas and paths should use Dark Sky standards. Development should face away from protected areas to reduce interactions that might impact natural systems. Landscaping should retain large healthy trees, transition to natives for at least 80% of landscaping to support local biodiversity, and use integrated pest management.
- **Wildlife and habitat quality outside developed area**: Regrade and revegetate land immediately around Jim Berkland bridge so that animals can get down to and across Sonoma Creek. This would aid wildlife passage east-west across this narrowest section of the property. Consider Infrastructure Bill funding to assist with habitat enhancement of culvert or overpass improvements on the eastern area of the corridor over Hwy 12. Fencing should be removed and only used in new projects to direct movement and reduce hazards to wildlife. Work with eastside properties to maintain permeability to uplands. The proposed road to Hwy 12 should not be paved or lighted, and should only be accessible during emergencies. Fire fuels management projects, such as the proposed buffers, should adopt and use standards that maximize biodiversity and water resources benefits.
- **Water resources protection**: Use an integrated, holistic approach to water management on the site, to steward and benefit the site's extensive water resources for the entire watershed, its people and ecosystems. Land use maps should indicate areas where future multi-benefit water projects can take place. "Multi-benefit" means projects that protect or create habitat and recreation benefits, and don't impede wildlife passage, while delivering water benefits to people. These areas, inside or outside the redeveloped area, can promote infiltration, stormwater capture, and groundwater recharge. Such projects could even include a drought-ready water treatment plant to supply treated water for north valley agriculture and other uses, and help reverse Sonoma Valley's groundwater decline. Some beneficial projects might not be possible after parks agencies own the open space areas, unless they are mapped now. Use the Sherwood maps from the WRT assessment report as a first cut.
- **Linkage with surroundings**. As much as possible, innovative design and technology should be used to integrate the developed campus with the surrounding natural environment. Sight lines should preserve and invite connections to open space. Trails should link developed areas to natural spaces, for all the benefits that occur from human connection with them, while assuring those natural areas retain their ecological function. For example, excellent paths and recreational areas should favor the southern area of the property and avoid northern areas where the wildlife corridor is narrowest. Paths should not be placed near Sonoma Creek or parallel to it.
- **Climate change contribution**. The development should be net zero energy, net zero or better emissions, as measured during operations, on an island-able, crisis-ready microgrid.

Overall Campus Design

- SEC supports re-use of existing buildings, but only to the degree that re-use can be shown to have greater or equal life-cycle environmental benefits than replacing them. Where cherished buildings are to be replaced, they should be replaced with new buildings that are of similar style, in similar locations.
- We strongly prefer the eventual campus to mirror the diversity seen in the historic buildings: a complexity of angles, materials, and ages. We strongly urge maintaining the historic campus landscape feel, with sightlines between buildings linking spaces around campus to the hills and other natural features beyond. These two factors can make a campus feel great or, if ignored, feel uncomfortable.

Housing for Current and Future Generations

We would like to see housing created that serves the needs of current and future generations, with homes for people of diverse economic and developmental capacities. Any housing plan for SDC must go beyond market-driven factors that are driving people—up to and including the middle class—out of the Sonoma Valley. Housing at SDC should be a model for reversing this trend, not exacerbating it.

- We would like to see significantly more than 25% of the site's housing to be affordable to below-AMI residents, including a mix of rental and owner-occupied units, whether via subsidy or affordable "by design." We would support 75%. Community land trusts are one tool for creating permanently affordable housing, and there are funding resources available through state and federal programs that could support it.
- The impact of housing on ecological resources and the surrounding community is more important than the number of units.
- The campus' open feeling and long sightlines can be retained by clustering multiple units into fewer buildings. We support more clustering of units than in the current alternatives, heights of two to three stories to reduce the amount of land area used, and replacing current buildings with new buildings that are of similar style, in similar locations.

VMT, Traffic, Transit, and Roads

Frequent, adaptable transit is critical for reducing traffic impacts, GHG emissions, and pollution, and to link residents to services without single vehicle dependency. We would like to see imaginative use of transit based on current technology and examples from other areas. This site should be Sonoma County's trigger to finally establish workable transit.

- Assure increased local and regional transit, innovative transit such as car sharing, regional bikeways, and other alternatives to single occupancy vehicles are required with development.
- To reduce VMT, design for onsite employers that pay living wages, and for onsite neighborhood services.
- A bike path should be linked to Sonoma County Regional Parks' Sonoma Valley Trail. Development of the site should elevate the completion of that path to high priority.
- Explore options, including funding mechanisms, developed on other campuses in similar settings.
- The Harney bridge is too narrow to accommodate passing cars. It must be widened or at minimum have its current sidewalks removed and a pedestrian bridge added alongside. If rebuilt, the bridge needs to be longer to avoid the stream corridor.

Safety

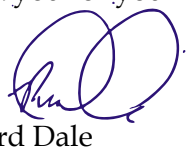
- The campus should be designed to be ready for wildfire, including clustered buildings, roads to the outside, and power lines underground. Please use "Building to Coexist with Fire: Risk Reduction Measures for New Development" at https://anrcatalog.ucanr.edu/Details.aspx?itemNo=8680.
- The campus should be designed with spaces and resources to function as a local emergency resource hub, a place that area residents can evacuate to, not just evacuate from.

- There are two vertical, actively eroding cliff banks on Sonoma Creek that should be given a wide berth by any new structures. One such area is at the southeast corner of Redwood Road; the other is near the Lux building.

Economic Uses that Support a Resilient Future

- **Economic development.** We favor an economic center, built at a scale that protects the natural resources of the site and the surrounding community, that serves current and future community residents with work that is meaningful and that provides a pathway for those who grow up here to stay. This center can and should foster a core vision or purpose for the campus that builds interest and relationships with academic, corporate, government, and philanthropic agencies. These entities can offer interns, funding, and other resources.
- **Climate center**. To tackle our planetary crisis, we propose a climate response center at SDC that researches, designs, and develops products and processes that mitigate and adapt to climate change. This kind of development can be funded by a partnership of public, private and social sectors– including the state of California, which recently pledged $15 billion to climate efforts. The center would offer higher-paying jobs plus educational opportunities from internships to vocational training.
- **Housing near jobs**. Work and housing should be co-located reduce vehicle trips and create a sense of place.
- **Meeting space**. Meeting and classroom space, with housing, could be shared by several institutions. A nonprofit hub could house local organizations–including SEC–that are involved in the site, and interpret the site's natural resources to students of all ages. This should include a nature discovery center that serves the public.
- **Education**. We support public and nonprofit education, training, and vocational facilities. These should have dorms or temporary apartments for non-residents, to reduce VMT. Training at these facilities can support a sustainable, triple bottom line future.
- **Governance**. An integrated site could be governed by a master "Trust," an array of interested citizens and experts, using clear guiding principles. This would provide an ongoing reference for future development, assuring that key principles remain throughout the development of the site and beyond. Our community began to explore the concept at the start of the SDC closure process, and experts are available who can provide input.

Thank you for your consideration.



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