



TO: Sonoma Valley Citizens Advisory Commission
North Sonoma Valley Municipal Advisory Council
Springs Municipal Advisory Council

FM: John McCaull, Land Acquisition Director, Sonoma Land Trust

DT: November 18, 2021

RE: Special Meeting: Sonoma Developmental Center Draft Alternatives

Dear Advisory Commission and Council Members:

The Sonoma Land Trust (SLT) appreciates the opportunity to provide public comment at your November 17, 2021 Special Meeting on the recently released draft alternatives for the Sonoma Developmental Center (SDC) Specific Plan. Thank you for holding this important meeting and considering our recommendations and perspective.

In order to develop an alternative that is acceptable to the community and that meets state and county legal requirements, we need to fundamentally change the assumptions and conclusions of how we derive an acceptable level of development on the SDC campus. This memo details why the proposed alternatives are legally deficient, and a set of suggestions for how to develop a new approach that will hopefully yield a better result for SDC, and for the communities of the Sonoma Valley.

1. The future uses of the Sonoma Developmental Center are governed by a state law passed in 2019. Unlike the sale or disposition of other state properties deemed “surplus”, SDC has a unique set of statutory mandates and legislative intent statements that the Specific Plan—and the planning process—must more clearly acknowledge and follow.¹
2. Because the SDC property is owned by the State of California, there is also a public trust obligation to conserve and protect the property—and especially the Sonoma Valley Wildlife Corridor—as an “ecological unit” above and beyond the specific direction provided by the 2019 legislation. Under the public trust doctrine, navigable waters, tidelands and wildlife resources of the state are held in trust for all of the people, and the state acts as the trustee to protect these resources for present and future generations.² This is acknowledged in Guiding Principle #4 in the January 2021 Vision and Guiding Principles for SDC: *“Use recognized principles of land use planning and sustainability to gauge how well proposed land uses protect public trust resources*

¹ See California Government Code Section 14670.10.5

² National Audubon Society v. Superior Court (1983) 33 Cal.3d 419; Center for Biological Diversity v. FPL Group (2008) 166 Cal.App.4th 1349

and fit the character and values of the site and surrounding area, as well as benefit local communities and residents.”

3. The goal of Guiding Principle #3 (from the January 2021 Vision and Guiding Principles) is to *“protect natural resources, foster environmental stewardship, and maintain and enhance the permeability of the Sonoma Valley Wildlife Corridor for safe wildlife movement throughout the site.”* The November 2021 SDC Alternatives Report makes various assertions about protection of SDC’s natural environment and the wildlife corridor, but there are no studies, data or analysis of the property’s environmental constraints and values, nor any information about how the County reached their conclusions that the alternatives actually support this Guiding Principle.
4. The alternatives do not meet the contractual standard established in the County’s 2019 “Request for Proposals for Consultant Services to Prepare Specific Plan & Program EIR for the Sonoma Developmental Center Site.” This document sets out the goals for the preparation of Specific Plan *“to represent the community’s vision and facilitate the site’s redevelopment. The development articulated through the Specific Plan must be compatible in scale with the surrounding community, and consistent with State, County, and community goals.”* Both the November 13th workshop and the public meeting on November 17th demonstrated overwhelming opposition to the proposed alternatives, and no consideration of how the scale of proposed development is compatible with the surrounding community.
5. There is an implication in the presentations by the County that the historic use of the SDC property at its peak in the 1960s-70’s is somehow relevant to today. It is not. The uses of the site 40-50 years ago have no bearing on the current conditions or “baseline” of the Sonoma Valley. What matters for the future is the current condition of the property and the surrounding environment, and it is disingenuous to try to justify urban levels of development based on historic uses of the SDC campus that are fundamentally different than what is being proposed in the alternatives.
6. In terms of Alternative C, there is a need to specifically identify the anchor tenant for the proposed “innovation hub” if this is going to be portrayed as economically feasible. The alternatives report explains: *“Market demand estimates were prepared for market rate housing, hospitality, commercial, and industrial uses. The potential to attract a large anchor institution is not reflected in baseline demand estimates, as institutional uses are not “market” driven.”* It appears the analysis assumed the feasibility of Alternative C without knowing whether and when the County will be able would attract an anchor tenant.
7. The draft alternatives produced by Permit Sonoma assume that the State of California must and will pass the entire \$100+ million infrastructure demolition and clean-up costs for the SDC property to an eventual buyer. Citing this cost and liability in their FAQ, the County states that without their housing and hotel numbers *“the project will no longer be financially feasible.”* This assumption of no additional responsibility, investment or support from the state is driving redevelopment proposals that have no relation to the actual environmental and site constraints and the ecological value of the property.
8. The community has called for a “4th alternative” that rejects the underlying economic assertion that high density development is the only way to make SDC “financially feasible.” The suggestion has also been made that it’s up to the local community to design and submit a new

alternative for the Dyett & Bhatia team to bring to the Board of Supervisors. SLT does not support a process to develop a “4th alternative” that perpetuates a land use planning approach that ignores the state’s comprehensive programs to protect clean air, clean water and wildlife habitat and adapt to climate change on land that they own and control.

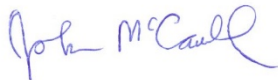
9. Instead of trying to solve the \$100 million infrastructure cost problem by trying to squeeze as many houses, hotel rooms and commercial uses as we can onto the SDC property, Sonoma Land Trust proposes a different approach based on developing a set of performance standards that will assure that the Specific Plan meets the state’s public health, climate, clean energy, wildlife conservation and natural resource protection goals while also reaching the affordable housing targets established in the 2019 statute.
10. SLT recommends that the Board of Supervisors direct Permit Sonoma to develop a new alternative for SDC that will determine the appropriate number, location and density of future housing and other development based on **performance standards** that are designed to support the 2019 governing legislation and the following state environmental mandates and goals that must be applied to the future uses of the site:
 - The AB 32 [Climate Change Scoping Plan](#) to reduce greenhouse gas (GHG) emissions by 40% below 1990 levels by 2030 and to achieve carbon neutrality by mid-century
 - In the transportation and land use planning sectors, the goal of expanding sustainable communities and improving transportation choices that result in [curbing the growth in vehicle miles traveled \(VMT\)](#) by 25% by 2030.
 - The [October 2021 Climate Adaptation Strategy](#) goals to “*strengthen protection for climate vulnerable communities and reduce urgent public health and safety risks posed by climate change*”
 - California’s [water conservation](#) and [energy conservation/efficiency](#) mandates for new communities and construction
 - The “[30x30](#)” [Initiative](#) to conserve 30 percent of California’s lands and coastal waters by 2030 including sensitive habitat areas such as the Sonoma Valley Wildlife Corridor
 - The [2015 State Wildlife Action Plan](#) that prescribes actions to conserve wildlife and vital habitat before they become more rare and more costly to protect
 - The [2016 NOAA Fisheries Coastal Multispecies Plan](#) conservation and management measures for steelhead populations in Sonoma Creek on the SDC property
11. For Sonoma Land Trust, our top priority is ensuring that the Specific Plan furthers Guiding Principle #3. Therefore, the alternative chosen as the preferred project for purposes of the Specific Plan and EIR must include and meet the following specific performance standards:
 - Provide specific setbacks from all creeks designed to protect water quality and quantity, instream and riparian habitat and wildlife connectivity
 - Provide a sufficient buffer that reduces the current footprint of the north side of the SDC campus adjacent to Sonoma Creek to allow wildlife to safely travel through the Sonoma Valley Wildlife Corridor (Corridor)
 - Provide a sufficient buffer between SDC building/improvements on the south side of campus to allow wildlife to safely travel through this portion of the Corridor to the open space areas to the east of the campus

- Ensure human activities and improvements at SDC do not impair wildlife's use of the Corridor
- Ensure roads and traffic do not create a danger to wildlife
- Ensure new development does not create new sources of light, glare or noise that would impair wildlife's use of the Corridor
- Ensure new development does not increase the risk of wildfires that would harm the natural and built environments
- Ensure runoff from new impermeable development does not result in erosion or contamination of creeks and riparian areas.

Developing these performance standards will require additional study and resources, and SLT is prepared to assist in that effort related to what the Sonoma Valley Wildlife Corridor and natural environment need to continue to function as a regional habitat linkage for the entire North Bay. We have been studying the Corridor since 2012, and we have several experts under contract (Pathways for Wildlife and Prunuske Chatham Inc.) to help us work with the state, the county and the Dyett & Bhatia consultant team to develop the performance standards mentioned above. We hope that other organizations with issue area expertise (ex. GHG and VMT reductions) can also echo this approach and suggest performance standards to achieve other statewide goals mentioned in Paragraph 10.

Thank you for considering our comments and for holding this important hearing. We will be sharing this analysis and recommendations with the Board of Supervisors with the hope that we can secure a commitment to building actual community support before this matter goes to the Board for consideration.

Sincerely,

A handwritten signature in blue ink that reads "John McCaul". The signature is written in a cursive, flowing style.

Land Acquisition Director

C.C. Sonoma County Board of Supervisors
Tennis Wick, Permit Sonoma