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Brian Oh, Planning Manager
Sonoma County PRMD
Santa Rosa, CA

RE: Comments on SDC Alternatives Report

Dear Brian and Planning Team,

As a member of the Planning Advisory Team (PAT), I appreciate the opportunity to review the Alternatives Report, albeit after publication. I have many concerns, comments, and questions, some of which have been expressed before but not addressed in the report.

General Comments on Alternatives and Process

1. While housing and especially affordable housing should remain a key goal of the project, none of the three alternatives are acceptable from a land use planning or environmental resource perspective due to the size, scale, and location outside of an urban growth area. This is not an “urban infill site.” I fully support the approach outlined in Sonoma Land Trust’s letter of November 18, 2021, which calls for a science-based approach rather than “let’s see how much development we can squeeze into the site.”
2. The alternatives do not reflect the themes heard over and over in multiple valley-wide workshops regarding size and scale and adequate protection of the wildlife corridor and surrounding open space. The wildlife corridor includes the campus. Animals don’t adhere to boundaries on a map. There is no alternative that reflects the many environmental constraints on the site, nor is there an alternative that strikes a balance between financial interests and environmental and community wellbeing.
3. This was not a community-driven process and providing less than a month (including the Thanksgiving holiday week) for public comment is antithetical to the stated public commitment.
4. The County should request a time extension from the State, without requesting additional funds. It is the only way that the alternatives issues can be resolved and, at the end of the day, will serve to expedite the specific plan process. With Covid, wildfires, evacuations, and power shut offs, a time extension is justified.

5. The County should take the time now to rework the alternatives. Rushing will only delay the project later during the CEQA process. We need a fourth alternative or a major modification of the lowest numbers reflected in the alternatives that strikes a real balance between environmental, community, and housing interests.
6. The alternatives are inconsistent with the County's city-centered growth policies and also inconsistent with the arguments made by the County during the RHNA appeal process.
7. The alternatives are inconsistent with Guiding Principles established for the Specific Plan:
 - (#2) Ensure that new development complements the adjacent communities of Glen Ellen and Eldridge.
 - (#3) maintains and enhances the permeability of the Sonoma Valley Wildlife Corridor for safe wildlife movement throughout the site.
 - (#4) Balance Redevelopment with Existing Land Uses. Use recognized principles of land use planning and sustainability to gauge how well proposed land uses protect public trust resources and fit the character and values of the site and surrounding area, as well as benefit local communities and residents.
 - (#7) Balance Development with Historic Resource Conservation. Preserve and adaptively reuse the Main Building and the Sonoma House complex, conserve key elements of the site's historic landscape, and strive to maintain the integrity of the historic district to the west of Arnold Drive by adaptive reuse of contributing buildings where feasible. Support a cohesive community feel and character, while allowing a diversity of architectural styles.
8. The report (and staff workshop/hearing presenters) continue to compare former SDC use to the numbers being proposed in the alternatives, as if the alternatives are consistent with the level of development and activity that occurred on the site when SDC was at peak operation. Furthermore, the Planning Team keeps saying that the building footprint will be the same as exists now. This is not intellectually honest. To compare institutionalized non-driving clients and shift staff to the impacts of thousands of proposed new residents is absurd. The misleading information provided by the planners ignores the fact that the activities that will result from these buildings are not similar in any way to previous activities onsite and that surrounding conditions have drastically changed since the campus was at its peak occupancy decades ago. It is the buildings AND number of people and their activities that result in impacts.
9. The argument that Eldridge should be able to accommodate thousands of residents and workers because it used to house and employ thousands of residents and workers is not valid. As an institution, SDC tread very lightly on the environment and adjacent community. At its most populous, most of the residents of SDC did not leave the property. They did not drive cars, they didn't go offsite to schools, doctors, restaurants, etc. Vehicle trips were primarily limited to employees who worked three shifts so that traffic was spaced out and the shifts were amenable to carpooling. Because of the limited outdoor activities and absence of constant vehicle traffic onsite, people and cars did not interfere with wildlife movement; the campus was open, peaceful, and not occupied with uses that generated a substantial amount of visitor traffic (e.g., hotel, restaurants,

etc.). Furthermore, the peak use at SDC was 40 to 50 years ago when roads were not crowded and growth had not exploded in the valley.

10. The alternatives presented are more in line with the Eldridge Enterprise concept being proposed, which outlines about 900 homes and over a million square feet of new professional/institutional space. Alternative C, in particular, appears to be an attempt to represent the Eldridge Enterprise plan, as proposed by members of Sonoma Ecology Center (SEC) and Sonoma Valley Collaborative. It is, without a doubt, NOT supported by the majority of Sonoma Valley community members, as evidenced by the overwhelming number of comments in opposition to the size and scale (e.g., over 70% rejected all three alternatives in the recent workshop). There is no basis for the large commercial area nor the large number of homes. To say that it is based on desired “public policy” is extremely misleading, especially since a large-scale use like this belongs in an urban area. The commercial space is not mandated by the State, not identified in the market study, and will certainly result in substantial growth-inducing impacts on Sonoma Valley. Plus, there is no guarantee that an innovation hub or climate change center would be the actual tenant, thus leaving the massive commercial area to any number of businesses, like an Amazon distribution center or other nonpolicy oriented hub.
11. Regardless of touting that the alternatives provide internal open spaces, introducing thousands of people onto the site will significantly disrupt these resources and will overrun the adjacent wildlife corridor and open space.
12. Nowhere in the Alternatives Report is there mention of the extensive demolition and construction activities required onsite and the associated impacts that will occur on the community over many years. The villages of Glen Ellen and Kenwood are still rebuilding homes lost four years ago in the 2017 wildfires.
13. The Planning Team continues to ignore the fact that the area south of SDC is part of Glen Ellen. It is NOT a separate community. Residents there even submitted a petition to the County but the report still calls it Eldridge. This on-going error is additional evidence of insensitivity to the surrounding community.
14. Do these alternatives reflect the excellent work by Steven Lee of the SEC on areas of the creek that need to be restored that require additional land adjacent to the creek for restoration?
15. The financial feasibility analysis needs to be reworked to be more transparent regarding its assumptions and to offer an analysis of what is possible with a larger public financing component. We are in the impossible situation of creating a plan that fits into Sonoma Valley AND is financially feasible – even though the economics are driven in large part by the dilapidated infrastructure left by the State. The site costs are simply too great and Sonoma Valley residents and resources should not have to bear the impacts of high-density development to offset these costs. The State must help fund the cleanup of the site that they have left in poor conditions to ensure that the plan is not merely driven by economic factors.
16. The density in all 3 alternatives is the source of the many impacts that will occur on the wildlife, open space, traffic, wildfire risks, infrastructure and water use, carbon emissions, and community character & quality of life. It is the largest, by far, of any development proposed in Sonoma Valley and completely out of scale. No design is capable of reducing these impacts – it’s the overall numbers.

Specific Comments on Alternatives Report

Page 3 – There is no reference to Glen Ellen being on the northwest. Glen Ellen is also adjacent to the property on the south. There is an incorrect reference to the regional park being on the south.

Figure 1.2-2 – does not show Camp Via, but text on page 3 says it's part of the specific plan. [Note: Camp Via is not further addressed in the report.]

Page 13 – “The wildfire risk that the site faces, shared by much of Sonoma County, is a key planning consideration that must be addressed through defensive design guidelines and intentional landscape management.” This statement fails to acknowledge that there needs to be adequate emergency evacuation, etc.

Figure 2.1-2 – The same symbol for “Regional Parks” is used for Jack London State Historic Park.

Figure 2-4 (should be 2.1-4?) – What is the area marked with a diagonal line? Not in key.

Page 19, Preservation of Open Space – The report claims that protection of 700 plus acres is a benefit of the Specific Plan, but it is part of the State legislation. This is misleading.

Section 2.2, Market Study, Table 2.1-1, page 18 – This information is directly from the short addendum to the market study, dated July 14, 2021 (Keyser Marston Associates), and shared with the PAT, but not peer-reviewed or made public, to my knowledge. The addendum provides information on extended market demand and states that: “A market demand projection over 20 years is subject to even greater uncertainty than a five- or 10-year projection.” It appears that this addendum was prepared for the sole purpose of justifying the large housing numbers in the three alternatives. However, the addendum does not factor in growth in other parts of the valley or county or how demand may change in the next 20 years; it just assumes a straight-line projection for 20 years, which is speculative at best as the market assessment acknowledges. Yet, the alternatives report is based on this information: page 19 of the report states that “These projections in demand were used by the planning team to inform the development of the three land use alternatives.”

Figure 3.1-1 – What is the black cross hatching in the campus area? It's not in the key.

Section 3, Alternatives – None of the alternatives provide any buffer on the southeast side adjacent to the existing neighborhood. Not only will these residents be subject to significant noise, light and glare impacts but the wildlife is completely cutoff from any movement through this area. It seems that some nominal setback can be incorporated in this area.

Section 3, Alternatives – Each alternative is represented by rows and rows of housing, with no creative clustering or other design to make new development better blend in with the site. I know we are not at the design phase now, but still the depictions are grim. Existing viewsapes to both mountain ranges cannot possibly be maintained with this massive amount of new development.

Table 4.1-1 – Delete row of historic SDC use – this is extremely misleading, as previously noted in my general comments (see general comment #8, above).

Section 4.3, Traffic Impacts – It is impossible to review the accuracy of traffic information without knowing the assumptions used in the analysis. There is no information on assumptions regarding trips per household, people per household, trips from outside SDC to commercial uses in SDC (other than employees), daily truck trip assumptions, recreational user trips, hotel guest trips, etc. Please provide this information for full transparency.

Page 61 – The following statement is not relevant and should be deleted: “Historic traffic volumes generated at the SDC campus during its 1996 employment level of 1,914 employees were also estimated.” Traffic levels from 25 years ago should not be used as any marker.

Page 62 - Peak trips per day were 3,800 – but what’s not said is that these trips were spread out over 3 shifts. Also, the baseline amounts of vehicle trips in 1996 were much lower than now. Alternatives equal 5400, 6400, 6300 but the assumptions used to prepare these numbers are not divulged.

Page 63 – The report states that traffic would increase by 40 to 70% on Arnold. That is a significant increase and even at that, it’s an underestimate.

Page 64 - “The segment of SR 12 between Boyes Boulevard and Verano Avenue, however, currently operates poorly in the LOS E range and would be expected to fall to the LOS F range with all three alternatives.” This demonstrates that not only Glen Ellen will be impacted – traffic from this high density in SDC will impact the entire valley and exacerbate already poor conditions. There is no feasible mitigation to address this impact.

Page 65 – Traffic through Glen Ellen would drop to LOS D, which is unacceptable according to County operating standards. Again, there is no feasible mitigation, indicating that a substantially reduced density impact needs to be developed.

Page 65 – “As pointed out earlier, overall traffic volumes in this segment would be comparable to those generated when SDC was operating at its peak.” Again, this is misleading and needs to be deleted. This statement does not acknowledge the increase in existing traffic volumes that has occurred since the peak over 20 years ago. This statement is an attempt to minimize the traffic impacts of the alternatives.

Furthermore, there are different peak times on Arnold Drive that need to be analyzed. One peak is during the afternoon school pick up rush, a second peak is the early evening commuter travel time.

Page 65 – “The segment between Glen Ellen and SR 12 is projected to remain at LOS C under all alternatives.” What assumptions are used to reach this conclusion? Many travelers commute on Arnold Drive through Glen Ellen, turning onto Warm Springs Rd. and continuing to Santa Rosa, as an alternative route to Highway 12.

Page 67 – The assumption that up to 20 percent of trips will be non-vehicle is unrealistic. Given the site’s location far from goods, services, schools, and doctors’ offices, a very low percentage of trips will be non-vehicular.

Connection to Highway 12 – This potential connection, as outlined in the report, appears to be infeasible as it would bisect open space and private lands.

TRANSIT–Adding benches, etc. will not help riders. The service is not frequent enough due to its location in a rural area.

Page 75 – *“A decrease in the amount of adaptive reuse buildings and new office space or the use of public financing tools to provide subsidies to the uses would improve the financial performance of the alternatives.”* Also, the text references three different public financing tools and reads: “As detailed in Tables A-7, B-7, and C-7 in the Appendix, these tools in aggregate could potentially generate over \$30 million of funding to support the redevelopment of the SDC.”

Since the density reflected in the alternatives is not consistent with the Guiding Principles and will generate significant unavoidable impacts, a different set of assumptions is needed to achieve financial feasibility. Increasing the use of public financing tools (for example, increase to \$100 million) and requiring the State to help fund site cleanup should be assumed in the calculations. This would help defray site costs and facilitate development of a reduced-size alternative.

Wildfire - This is a wildfire area and the density should reflect the limited access points for evacuation. This area was gridlock during the 2017 and 2020 fire evacuations.

Please feel free to contact me if you have any questions about my comments. I look forward to working with the County, the PAT, and the community to develop a fourth alternative, with a significant reduction in size and impacts.

Regards,

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

Vicki Hill, MPA

Environmental Land Use Planner

cc: Susan Gorin, Sonoma County Supervisor

Tennis Wick, Director, Sonoma County PRMD