



April 23, 2025

Mr. Wil Lyons, Project Planner  
Mr. Tennis Wick, Director  
Permit Sonoma, County of Sonoma  
2550 Ventura Avenue  
Santa Rosa, CA 95403

Re: Sonoma Development Center Major Subdivision and Design Review Application

SB 330 Preliminary Application File No: PRE23-0008  
File No: PLP24-0005  
Address: 15000 Arnold Drive, Eldridge, CA 95431  
APNs: 054-090-001, 054-150-005, 054-150-010

Dear Tennis and Wil:

Sonoma Land Trust ("SLT") respectfully provides these comments in response to your March 6, 2025 completeness determination for Eldridge Renewal, LLC's ("Applicant") proposal to develop the Sonoma Developmental Center ("SDC") property (File No. PLP24-0005). SLT will provide additional comments as Permit Sonoma continues to consider the application.

Your March 6 letter states that the County will provide the Applicant with a written determination explaining how the proposed project is *"inconsistent, not in compliance, or not in conformity with [any] applicable plan, program, policy, ordinance, standard, requirement, or other similar provision as specified in Gov. Code § 65589.5, subdivision j."* What makes this determination complicated is the history of planning at SDC which includes the General Plan 2020, a Specific Plan, and statutory directives from 2019 legislation.

The site is designated in the General Plan as Public/Quasi-Public and zoned PF-Public Facility. Neither of these designations support the type or scale of development proposed for SDC by the Applicant. The County adopted the SDC Specific Plan in 2022, but in October 2024 the Sonoma County Superior Court judged that act invalid. "Based on violations of CEQA," the Court ordered Sonoma County "to void its certification of the SDC EIR and to set aside all of its SDC Approvals." (Judgment Granting Peremptory Writ of Mandamus, *Sonoma County Advocates for a Liveable*

*Environment v. County of Sonoma*, Sonoma County Superior Court Case No. SCV-272539, filed Oct. 18, 2024.)

SLT understands that the County intends to comply with the California Environmental Quality Act (“CEQA”) and re-adopt a Specific Plan for SDC. (See Eldridge Renewal Project Description, Feb. 4, 2025.) However, the public has received no information about how or when the County intends to modify the SDC Specific Plan in conjunction with the Applicant’s project-level proposal. This creates substantial uncertainty as to which plans, programs, policies, etc. may be “*applicable*” to the Applicant’s project.

Government Code section 65589.5(j)(2)(B) states that if the County “fails to provide the required documentation” demonstrating inconsistency with any plan, program, etc., “the housing development project shall be deemed consistent, compliant, and in conformity”, regardless of whether this is accurate. It is imperative that the County provide a full accounting of all potentially applicable plans, programs, policies, ordinances, standards, requirements, and other similar provisions to preserve its ability to enforce the SDC Guiding Principles and mitigate impacts from the proposed project.

This letter provides a non-exclusive list of the project’s inconsistencies with the 2022 SDC Specific Plan and with the site’s General Plan zoning. SLT respectfully urges you to include these and all other inconsistencies in your forthcoming assessment.

### **2020 General Plan**

When the County began the specific planning process for the SDC property, the site was designated as “Public / Quasi-Public” under the General Plan. Completed in 2010, the Sonoma County General Plan 2020 designated an area around Glen Ellen that includes much of the SDC property as a “Habitat Connectivity Corridor” (See Open Space Map, Biotic Resource Areas, Figure OSRC-2).

***Open Space and Resource Conservation Element Policy 3.1 Habitat Connectivity Corridors:*** *Maintaining and improving opportunities for habitat connectivity throughout the County is essential for protecting biodiversity and sustaining native plant and animal populations. Linkages and corridors are needed to allow movement across the landscape and to connect wetlands and other important habitat areas to undeveloped lands and permanent open space. Important linkages and corridors include lands south of Glen Ellen connecting Sonoma Mountain and the Mayacamas Range and lands connecting the Laguna de Santa Rosa to agricultural areas south of Highway 116. It should be noted that riparian corridors also provide habitat connectivity and are addressed in the next section.*

***Land Use and Element Policy LU-20ff:*** *Consider future public uses of the Sonoma Developmental Center and Skaggs Island properties as a priority if they are declared surplus and offered for sale to local agencies, particularly park, recreation, and open space uses and affordable housing.*

***General Plan Land Use Element Section 2.5: Permitted Uses.*** *Uses include schools, places of religious worship, parks, libraries, governmental administration centers, fire stations, cemeteries, airports, hospitals, sewage treatment plants, waste disposal sites, etc. The Land Use Map may show the specific type of public use. In these cases, other public uses shall not be allowed.*

The overwhelming majority of uses proposed by the Applicant, including the hotel use and commercial uses, are not permitted on property designated as “Public / Quasi-Public” and are inconsistent with the goals and policies designed to protect Biotic Resources and Habitat Connectivity Corridors. The County needs to identify any other potential inconsistencies with the General Plan, which may be numerous given that the Applicant’s proposal is inconsistent with the applicable land use designation. In particular, the County must assess the proposal for consistency with the Open Space and Resource Conservation Element, the Land Use Element, the Public Safety Element, the Public Facilities and Services Element, and the Noise Element.

- **Original Zoning**

When the County began the specific planning process for the SDC property in 2020, the site was zoned PF-Public Facility. The County also applied several zoning overlays, including the F2 Floodplain Combining Overlay, the B7 Combining District, the HD Historic Combining District, the VOH Valley Oak Habitat Combining District, the RC50 Riparian Corridor Combining Zone, the SR Scenic Resources Combining District, and the LG/MTN Taylor/Sonoma/Mayacamas Mountains local guidelines overlay. The County pursued the Specific Plan in substantial part because the type of mixed-use development proposed by the Applicant is not permitted in this zoning.

***Sonoma County Code §§ 26-14-020.5, 26-14-030***

Hotel uses are prohibited in the PF zone. Residential uses are also prohibited, except for “caretaker dwellings” which are a conditional use. Retail and restaurant uses are similarly prohibited.

***Sonoma County Code §§ 26-14-040, 26-64-010, 26-67-080***

The PF zone has a minimum lot size of 6,000 square feet. The maximum building height in the PF zone is 35ft. A violation of the base zone maximum building height and minimum lot area is also a violation of the SR combining district development standards and the VOH Combining District permitted uses.

***Sonoma County Code § 26-28-150***

Hotel uses are allowed only in the K zone or industrial zones and are subject to size limitations in each zone. If the Specific Plan is not in effect, the Applicant proposes to build a hotel in the PF zone.

### ***Sonoma County Code § 26-78-010 and General Plan Policy LU-6c***

“The B7 combining district signifies that the lot has been frozen in order to restrict further subdivision of large remaining parcels left after approval of a clustered subdivision as provided in general plan Policy LU-6c.” (Sonoma County Code § 26-78-010.) General Plan Policy LU-6c reads: “Past subdivisions using a clustered design have exhausted General Plan density and left a large remaining lot. In these cases, restrictive zoning was used and shall continue to be used to show that there is no subdivision potential for the remaining lot.” The Applicant proposes to subdivide the SDC property.

### ***Sonoma County Code §§ 26-65-030, 26-65-040***

The Riparian Combining Zone details allowed uses, restrictions, activities, and permit requirements. Although fire fuel management is allowed, there are restrictions especially for new development: “Fire fuel management [is allowed] in compliance with county fire safe standards, provided .... vegetation removal is limited to the *minimum* required for fire safety purposes. New development located within one hundred feet (100') of any riparian corridor shall be allowed with a zoning permit only where there are no feasible alternative development locations that do not require vegetation removal for fire protection and fire resistive construction materials are used to avoid or minimize the need for vegetation removal in the riparian corridor. ”

The County should clarify how this requirement will be satisfied. At a minimum, the Project should include the information required for an “Exception” as outlined in 25-65-030 : “An exception to this prohibition (on vegetation removal in a streamside conservation area) may be approved with a use permit a conservation plan is adopted that provides for the appropriate protection of the biotic resources, water quality, floodplain management, bank stability, groundwater recharge, and other applicable riparian functions. Off-site mitigation will be considered only where on-site mitigation is infeasible or would provide superior ecological benefits, as determined by the director.”

### **2022 SDC Specific Plan**

The Applicant admits that the proposed project is inconsistent with the 2022 SDC Specific Plan. In their Submittal dated Feb. 4, 2025, they state “*Our team designed the proposed project to be largely consistent with the 2022 SDCSP.*” Though imperfect, that plan was carefully designed to provide much-needed affordable housing while protecting Sonoma County’s ecological and recreational resources—and especially the Sonoma Valley Wildlife Corridor—for future generations. The Applicant’s deviations from the Specific Plan threaten key resources that the County has a duty to protect.

- **Hotel**

Perhaps most egregious, the Applicant continues to propose a 150-room hotel and conference center in the northwest corner of the Core Campus. This hilltop location is a critical part of the Sonoma Valley Wildlife Corridor (“Wildlife Corridor”) and threatens to expose wildlife to potentially significant impacts. This location also appears to encroach into a “High” fire severity zone. (*Compare SDC Specific Plan, Fig. 2-3: Fire Constraints showing “High” fire severity zone abutting the Specific Plan boundary with Applicant’s Site Plans at 5-7 showing hotel construction nearly to the edge of the DGS Core Boundary*). At 45 feet tall, the proposed hotel would exceed the 35-foot height limit the County established for the northwest corner. (SDC Specific Plan, Fig. 5-9: Maximum Heights.)

The proposed hotel is inconsistent with the following Specific Plan goals and policies:

***Goal 2-E Wildlife Corridor: Maintain and enhance the size and permeability of the Sonoma Valley Wildlife Corridor (as shown in Figure 1-5) by ensuring a compact development footprint at the SDC site and by minimizing impacts to wildlife movement and safety from human activity and development at the campus.***

The proposed plan violates this Goal because it locates a large hotel and conference facility adjacent to the Wildlife Corridor. This location would likely expose the Wildlife Corridor to increased light and noise, especially at later hours than if the Applicant maintained this area consistent with the Specific Plan’s “Maker Space” designation. (See, e.g., SDC Specific Plan Fig. 4-2: Land Use designating the northwest corner for live/work lofts with “Medium/Flex Density Residential” zoning.)

***SDC Specific Plan Table 4.4: Permitted Uses***

***Hospitality Overlay Zone: The Hospitality designation allows for a “boutique” hotel of up to 120 keys to be located in and near the historic Main Building. The Main Building is envisioned as the anchor and focal point of the Central Green, and must be at least partially open to the public with a mix of lobby space and publicly-accessible retail, food, and other support uses. Additional hotel wings and parking facilities should be built within the remaining overlay area. The maximum FAR will be as per the underlying district regulations.***

Hotels are permitted only in the “Hotel Overlay” Zone and are a conditional use in Flex Zone and the Employment Center Zone. Hotels are a prohibited use in the “Medium/Flex Density Residential” zone applicable to the northwest corner of the Core Campus. The proposed hotel and parking facilities are not “in and near” the Main Building and exceeds the authorized maximum key count by 25%.

***Goal 5-G Maker Place: Maker Place is envisioned as a thriving district of employment uses including offices, research and development spaces, institutional uses with a research focus, and live-work artist studios anchored***

*by a mix of historic buildings and new higher intensity working spaces, that maintains historic views and easy pedestrian access to the amenities of the Historic Core.*

Locating the hotel in the northwest corner is explicitly inconsistent with the SDC Specific Plan's goals for the Maker Place. The Applicant does not propose any of the appropriate or consistent uses identified in the SDC Specific Plan.

***Policy 5-32: Orient building activity and entrances away from the wildlife corridor at the north of the district and ensure that thick vegetation and compliance with dark-sky requirements buffer wildlife from exposure to human activities.***

The proposed hilltop hotel is oriented with a roundabout and pathway directly adjacent to the Wildlife Corridor. The primary entrance for hotel "Building A" is oriented northwest, facing the Wildlife Corridor. (Application at 7.4.4-9.) And the Applicant proposes to include a rooftop terrace and pool on the hotel parking structure overlooking the Wildlife Corridor.

- **Fire Buffer**

**SDC Specific Plan Fig. 2-2, *Preserved Open Space and Buffer Open Space***

The SDC Specific Plan distinguished between "Preserved Open Space" for "for public use and benefit, including habitat, active and passive recreation and minor park amenities, ecological services, water resources, and limited agricultural use," and "Buffer Open Space . . . intended as a defensible fire buffer area." (SDC Specific Plan at 4-9; *see also* SDC Specific Plan, Fig. 2-2.) Applicant's proposal significantly expands the "Buffer Open Space" into the Wildlife Corridor by creating a 300-foot managed fire buffer along the entire perimeter of the core campus. (Applicant's Site Plans at 5-4, 5-9.) At the point nearest SDC's northern boundary, this managed buffer consumes nearly half of the open space available to wildlife.

***Policy 2-22: Leave standing or downed dead trees in place for wildlife habitat whenever they do not present a hazard for fire safety or recreational users, except within the managed landscape buffer.***

The Applicant proposes to treat the entire 300-foot fire buffer as "landscaped open space." (Eldridge Renewal Project Description, Feb. 4, 2025). Excessive landscaping would conflict with the Specific Plan's mandate to minimize vegetation removal except inside the significantly smaller Buffer Open Space. The impacts of expanded fuel management activities would be particularly impactful to wildlife moving through the Sonoma Valley Wildlife Corridor, given the sensitive habitat types found within the buffer area. (See SLT Comments on the Draft EIR, Sept. 26, 2022, Exh. B where we stated "*Potential impacts include reduced permeability for wildlife movement*

*due to loss of cover and foraging resources, and increased exposure to human activity and damage to sensitive plant communities.”)*

- **Walnut Court**

***Goal 5-J Walnut Court:*** *Walnut Court is envisioned as a site for a small Institutional campus in an idyllic setting on the SDC site, adjacent to Mill Creek and surrounding the existing grove of redwood trees, and providing a space for offices, short term residential occupancy and other uses associated with and Institutional campus.*

The Applicant has proposed a neighborhood of courtyard homes at Walnut Court. (Application at 7.4.7-1.)

***Policy 5-40: Maintain the existing grove of redwood trees within Sonoma Circle.***

The Applicant has proposed to destroy the existing grove of redwood trees within Sonoma Circle. (Compare SDC Specific Plan, Fig. 2-2 with Application at 7.4.7-1.)

- **Core Open Space**

The SDC Specific Plan designates substantial open space within the Core Campus, including the historic Ball Fields and the triangular park east of Redwood Street. (SDC Specific Plan, Fig. 2-1: Open Space Framework.) The Applicant proposes to build in some of that designated open space.

***Policy 2-1: Ensure that land shown in Figure 2-1 as Preserved Parkland and Open Space is dedicated or maintained as permanent public open space, and the Managed Landscape/Fire Buffer is designed and maintained for that purpose. The owner/operator of the Preserved Parkland and Open Space shall prepare an open space plan, to be approved by the County to manage the rich diversity of resources on site, including habitat, vegetation, wetlands, native species, and other critical resources, balanced with recreation and wildfire protection needs. As part of the open space plan development, conduct a formal aquatic resources delineation for habitat protection, and consider delineating a cohesive system of trails and pathways that balances recreation and wildlife conservation. All future Preserved Parkland and Open Space planning shall include necessary protections of utilities such as the existing water treatment facilities.***

The Applicant proposes to destroy the Ball Fields and the triangular park east of Redwood Street, both of which are designated as Parks in SDC Specific Plan Fig. 2-1.

***Policy 5-27: Maintain views of the Main Building and the Baseball Fields from Arnold Drive.***

The Applicant proposes to destroy the Ball Fields.

***Goal 5-F Core North Residential:*** *The Core North Residential district is envisioned as a neighborhood centered on the historic Baseball Fields that provides a transition and connection between the Historic Core and the expanded wildlife corridor to the north.*

The Applicant proposes to destroy the Ball Fields.

- **Housing Affordability**

***Policy 4-17:*** *At least 50 percent of the market rate housing should be designed as “missing middle housing,” intended for sale or rental to individuals or families making between 121 and 160 percent of Sonoma County’s Area Median Income (AMI).*

The Applicant states that “approximately 75% of all market-rate dwelling units designed to a scale consistent with the needs of the ‘missing middle,’” but does not explain how the applicant defines the “missing middle” or commit to the affordability criteria of SDC Specific Plan Policy 4-17.

- **Historic Preservation**

***Policy 4-25:*** *Preserve and reuse all the contributing buildings and structures that surround the Central Green, as listed below, unless otherwise determined through the approved historic preservation plan.*

- a. Main Building*
- b. Chamberlain Hospital*
- c. Palm Court*
- d. Pines*
- e. Entrance Gate*

Of these structures, the Applicant proposes only to preserve and reuse the Main Building.

- **Fire Safety**

***Policy 2-54:*** *Ensure that the project sponsor proactively plans for emergency wildfire safety by:*

- a. Developing an Emergency Preparedness and Evacuation Plan that complies with Sonoma County evacuation plans and servicing fire*



*department procedures and identifies emergency access routes and procedures;*

*b. Building or designating an on-site shelter-in-place facility, to be open to both SDC residents and the general public, prior to construction of the 200th housing unit, with specifications for the facility to be included as part of the Emergency Preparedness and Evacuation Plan;*

The Draft Sonoma Development Center Emergency Preparedness and Evacuation Plan prepared for the Applicant in June 2024 does not include specifications for an on-site shelter-in-place facility.

### **Additional Considerations**

As the County proceeds with environmental review under CEQA, it must fully study and mitigate the project's inconsistencies with applicable plans and standards. For example, the Applicant's proposal does not adequately describe construction impacts on the riparian buffers or riparian areas, and it is difficult to determine those impacts from the maps provided. The tentative map shows multiple new stormwater outfalls into creeks, demolition and construction limits within the 100-foot riparian buffer on Sonoma Creek, and development along Mill Creek that is within the 50-foot riparian buffer, but that information is not contained on the same map. The Applicant should explicitly address how stormwater discharges will not violate water quality standards and identify the location and count of outfalls into Sonoma and Mill Creeks.

The application materials also do not adequately address the relationship between Core Campus development and the remainder of the SDC property. The SDC Specific Plan Section 1.1 states:

*The Planning Area, shown in Figure 1-2, includes all of the SDC property, encompassing an area of 945 acres (about 1.5 square miles), with former agricultural land, oak woodlands, native grasslands, wetlands, forests, large riparian woodlands along Sonoma Creek and other tributaries, a major wildlife corridor, a cemetery, and two reservoirs surrounding the historical 180-acre built area, referred to in this Plan as the "Core Campus."*

Since the Specific Plan includes "all" of the SDC property, any revised Plan proposed by the County in conjunction with the Applicants development proposal must include the entire property and not just the Core Campus in the Planning Area. A prime example of the need for a comprehensive approach is the Applicant's draft water and wastewater feasibility study. This includes facilities and land outside the Core Campus that must be brought up to functional standards. This will result in impacts of the project on lands and waters beyond the 180 acres described in tentative maps, biological analysis, and related documents.

The June 10, 2024 biological analysis is likewise restricted in scope to the Core Campus and refers only to potential impacts of construction versus operation of the

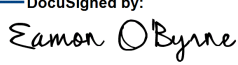
Project. Yet the application acknowledges that the project would have impacts within the entire SDC planning area, including repair of the Roulette Springs diversion; replacement of the Roulette Springs pipeline to the water treatment plan; drawdown and use of Fern Lake and Suttonfield Lake; vegetation management in the 300-foot wildfire buffer, which includes riparian areas and sensitive habitats; and construction of the proposed emergency access road to Highway 12.

Further, the biological analysis wrongly asserts that “[n]o special-status animal records have ever been mapped on or adjacent to the site,” even though the site includes Sonoma Creek and water resources such as Fern Lake and Suttonfield Lake which host documented populations of species protected under state and federal designations. The County’s CEQA analysis must fully account for impacts to special status and other species throughout the entire SDC property, and collect missing information on species with likely habitat in the SDC property, including northwest pond turtles proposed as “threatened” under the Endangered Species Act, California Endangered Species Act-candidate mountain lions, California freshwater shrimp, foothill yellow legged frog, California red-legged frog, steelhead, and chinook.

Only with a complete and accurate analysis can the County determine necessary mitigation and the project’s ongoing compliance (or non-compliance) with applicable plans and standards.

### Conclusion

Thank you for considering the comments and recommendations in this letter. We recognize the substantial investments the County has made to ensure that the SDC property is developed responsibly and for the maximum benefit to the people and wildlife who depend on it. We hope these comments will help align the County’s consideration of the Applicant’s project with General Plan, the SDC Guiding Principles and the goals of the community.

Sincerely,  
DocuSigned by:  
  
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Eamon O'Byrne  
Executive Director