



September 25, 2025

RE: Scoping comments on Sonoma Developmental Center (SDC) Notice of Preparation (NOP)

Dear Mr. Lyons, Planning Staff, and Board of Supervisors,

Sonoma Community Advocates for a Liveable Environment (SCALE) hereby submit these comments on the scope of the upcoming EIR on the proposed SDC redevelopment project and Specific Plan. These comments are in response to the SDC Specific Plan EIR Notice of Preparation (NOP) dated August 29, 2025. Thank you for carefully considering these comments and sharing them with the planning team and decision makers.

SCALE is composed of multiple Sonoma County organizations, including Eldridge for All, Glen Ellen Historical Society, Sonoma Mountain Preservation, and Valley of the Moon Alliance. Together, we are very concerned about the proposed size of the project outlined in the NOP and the absence of identified alternatives that would reduce/minimize impacts.

Our most serious concerns are related to public health and safety, including wildfire evacuation and wildfire risk, the impacts of which can only be reduced by downsizing the project to a reasonable scope. **There is no other feasible, effective mitigation.** To that end, this letter outlines a feasible alternative that should be fully evaluated in the forthcoming EIR. Additional comments regarding EIR scope are provided as well. Also, please note that we support the comments submitted by the Sonoma Land Trust, particularly in regard to wildlife corridor protection and biological resources mitigation measures.

1. A Fire-Safe, Balanced Alternative – The Provide, Protect, and Preserve Alternative

The Sonoma Valley community, science experts, professional land use planners, and public agencies have commented over and over again that a more reasonable and scaled-down alternative must be considered for the SDC site. A reduced-size alternative is the only way to mitigate the many significant impacts of the proposed high intensity project. Design guidelines and other measures will not mitigate the public health and safety impacts to levels that are less than significant. The specific purpose of CEQA is to analyze alternatives that reduce impacts of the proposed project. Furthermore, the market study conducted during the previous specific plan process did not identify a high demand for non-residential development. **Finally, the proposed project does not represent a “housing first” plan, and we firmly believe that housing should be constructed before any hotel or commercial uses on the property.**

Summary of the Provide, Protect, and Preserve Alternative

Analysis of a reasonably scaled, economically feasible alternative for the Sonoma Developmental Center (SDC) campus is essential to reduce wildfire risks and provide for a sound and defensible environmental process under the California Environmental Quality Act (CEQA). This alternative must:

- **Provide:** Prioritize housing and maximize affordable units;
- **Protect:** Reduce significant public health and safety impacts, including reducing wildfire evacuation and ignition risks; and
- **Preserve:** Maintain natural, historical, and prehistoric cultural resources.

Additionally, this alternative must meet the requirements of the SDC Specific Plan's enabling legislation (Gov. Code Section 14670.10.5), contain project components that can be equitably compared to the proposed project, satisfy public official commitments that redevelopment will be "community driven," and provide Sonoma County's Board of Supervisors with a thoroughly analyzed option to help it properly exercise its land use authority.

The Provide, Protect, Preserve Alternative presented here was developed in response to public health and safety concerns, environmental site constraints, non-compliance with CEQA (as identified by the Sonoma County Superior Court in the SCALE decision), and broad community input. It represents a balanced and environmentally superior approach to redevelopment of the site.

Existing Site Context

Similar to the proposed project outlined in the Notice of Preparation, the Project Area for the Provide, Protect, Preserve Alternative consists of buildings and structures that are part of the former SDC, which closed in 2018. The boundaries of the core campus align with the Sonoma State Home Historic District (SSHHD), which is eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a California Historic Landmark. All of the buildings on the site were constructed before 1959, which qualifies them for historic status under the "50-year" guideline. The iconic red-brick Main Building, which is listed in the National Register of Historic Places, and the Sonoma House (Residence 140) are key to the site's historical context.

The Central Green, including the pollarded sycamores that frame iconic views of the historic Main Building and Sonoma Mountain to the west and the Mayacamas Mountains to the east, is an integral element of the site. The north-south axis along Arnold Drive, a designated scenic corridor, is another integral element. The historic ballfields, along with the Sonoma Valley Wildlife Corridor to the north, provide culturally and biologically important touchstones for the site.

Key Alternative Components

Key project components of the Provide, Protect, Preserve Alternative, as shown in Figure A, include:

- **A residential village:** A total of 470 homes (including density bonuses and accessory dwelling units [ADUs]), accommodating about 1,160 new residents, will be distributed throughout the site and in a variety of configurations appropriate to the needs of a broad socioeconomic mix of families, elders,

veterans, individuals with developmental disabilities, and essential workers in the Sonoma Valley. The proposed density reflects:

- the consensus arrived at by the community through many meetings held as part of the Specific Plan debate in past years;
- the site's "carrying capacity," as supported by the water and sewer trunk mains and treatment systems now in place in the Sonoma Valley;
- the public health and safety constraints of the wildfire evacuation network and danger posed by increased ignition risks related to project density;
- the lack of viable public transit in the valley;
- the sensitivity and limitations of the constricted Sonoma Valley Wildlife Corridor; and
- the limited demand for large-scale residential and commercial uses in a semi-rural location like the north Sonoma Valley.

Housing would be built first on the site, and would comprise a combination of new construction and the adaptive reuse of selected existing buildings. New uses would include a mix of attached and detached residential homes, cottages, apartments, townhouses, and co-housing. Residential accommodations for up to 25 individuals with developmental disabilities would be provided in 5 homes, integrated into the residential layout of the site, and designed to meet the specific needs for this type of residential care.

- **Viability:** This alternative would be accomplished without major demolition on the SDC site and would provide a percentage of affordable homes that exceeds both the County's mandatory requirements and the percentage included in the proposed project. Redevelopment would be accomplished, in part, through adaptive reuse of qualifying buildings employing innovative modern construction techniques (e.g., second skin construction, encapsulation, etc.), which would provide carbon sequestration benefits and minimize greenhouse gas emissions. State and Federal affordable housing subsidies and tax credits available to developers for reuse of existing structures, etc., would provide an important funding source.

The smaller scale of this alternative would result in reduced costs and would be compatible with the carrying capacity of the existing utility infrastructure that serves the Sonoma Valley. A combined solar and battery-charged microgrid would further enhance project affordability.

The overall redevelopment design would protect and extend the existing onsite permeability and, significantly, it would avoid the serious disruption and expense resulting from the extensive demolition needed for the much larger proposed Eldridge Renewal project.

- **Protection of the historic character of the site:** Planning for this alternative would give serious consideration to the preservation and restoration of individual homes flanking the west side of Arnold Drive, and to the adaptive reuse of the buildings (Stoneman, Poppe, Cromwell, and Butler) flanking the east side of Arnold Drive, all of which establish the historic character of the entrance to the SDC campus. Private owners would be given the opportunity to restore the residences on the

west side according to historic standards, with limited expansion allowed within a designated building envelope of each parcel.

- **A cultural, business, and educational center for Sonoma Valley:** A mix of commercial and community space totaling approximately 100,000 square feet (much of it existing, some new as infill) would be developed as a cultural, business, and educational hub on the west side of the campus, focused on the Central Green. The historic Main Building and its environs would be redeveloped as a gathering place offering public services, cafes, and outdoor terraces. Open space to the north and south of the Main Building would be preserved as a park enhancing the west side of the Central Green.

A mixed-use area south of the Central Green would be developed as new construction and would encompass a walkable neighborhood, with a network of alleys and small plazas providing access to live-work spaces, with shops, cafes, and other commercial enterprises on the ground level and a variety of housing and lodging opportunities.

- **Visitor services:** A small visitor center and museum would be located in the historic Sonoma House, creating a gateway to Sonoma Mountain and providing access to existing trail systems, Orchard Road, the Eldridge Cemetery, Jack London State Historic Park, and more (see Figure C). Parking would be provided on-site. A small lodging facility would be sited near the south perimeter of the campus, avoiding the profound negative environmental impacts that would result from the proposed project's large hotel and conference facility on the edge of the Sonoma Valley Wildlife Corridor to the north.
- **Park and recreational amenities:** A mix of public parks, active recreational areas, and open space areas proportionate to the level of development reflected in this alternative would be distributed throughout the site.
- **Public infrastructure:** The smaller scale of this alternative would maximize use of existing utility infrastructure to the extent feasible, and reduce the scope and cost of new infrastructure needed. A combined solar and battery-charged microgrid would further enhance project sustainability. Existing out-of-date underground utilities on the site would be capped off and remain in place, thereby avoiding the costs of both demolition and total replacement.
- **Emergency access to Highway 12:** If included in the proposed project and other alternatives considered in the EIR, an emergency access connection to Highway 12 from the east side of the campus could be included to facilitate wildfire evacuation and other emergency response activities. This would provide for a fair comparison among alternatives, in terms of evacuation and traffic issues. However, the reduced scale of this Alternative, together with the dispersed nature of the housing proposed, reduces the need for such a measure. Alignment and construction of an emergency connection, if necessary, would be carefully coordinated with California State Parks and with adjacent landowners to ensure compatibility with open space considerations, protect private property, and ensure compatibility with open space considerations and the adjacent Sonoma Valley Wildlife Corridor.

- **Fire Station:** If required, a designated location for a new on-site fire station and evacuation command center would be coordinated with the local fire and evacuation agencies.
- **Cemetery:** Protection and preservation of the existing cemetery and its memorial and other resources would be part of the plan.

Preservation of Natural and Historic Site Assets

The Provide, Protect, Preserve Alternative preserves the “historic buildings in a park” character of the SDC campus. It would also provide public gathering and recreational spaces for local residents and the entire Sonoma Valley, all without substantial growth-inducing impacts. In contrast to the proposed project, the scaled-down alternative would significantly reduce demolition impacts and costs. Where buildings would need to be removed due to their deteriorating condition, deconstruction would include recycling and reuse of key components and construction would be phased to reduce impacts.

Redevelopment under this alternative would occur in existing buildings and/or as infill construction on selected previously developed campus footprints. The majority of the existing street systems would remain in their present configurations. A network of walking and cycling trails throughout the new development would create a walkable community and connect to the off-site trail system linking to businesses and services in Glen Ellen.

In this alternative, the well-established natural systems and runoff patterns between Sonoma Mountain and Sonoma Creek and its riparian corridor would be retained, as would corridors across the site presently and historically used by animals migrating between Sonoma Mountain and the Mayacamas Mountains using the Sonoma Valley Wildlife Corridor. Creek setbacks would be the same as, or larger than, those in the proposed Eldridge Renewal project.

Confining redevelopment to existing buildings and/or building/infill footprints also minimizes the potential for the inevitable wildfire to become a potentially deadly urban fire. The existing site’s permeability reduces the risk that fire would jump from structure to structure, which is an important consideration given the site lies within the wildland-urban interface (WUI) and adjacent to designated high wildfire hazard zones.

Ensuring Assumptions for Alternatives Are Equal

The Historic Preservation Alternative in the previous EIR, which forms a foundation for parts of the Provide, Protect, Preserve Alternative, was determined to be environmentally superior but was unjustifiably dismissed as being not economically feasible, though no feasibility analysis was provided. Further, the alternative was crafted to look disadvantageous in some environmental issue areas when compared to the proposed project. Even with these flaws, the Historic Preservation Alternative was determined to be environmentally superior.

Flaws in previous project assumptions/components for a reduced-size alternative that must be corrected in the new EIR to provide an objective, unbiased analysis of the Provide, Protect, Preserve Alternative include the following:

- **Emergency route:** The Historic Preservation Alternative did not include an emergency road connection between the campus site and Highway 12, when the proposed Specific Plan did allow for such a road. This led to the conclusion that transportation-related and wildfire evacuation impacts were greater for the Historic Preservation Alternative, even though it accommodated a lower population and would have generated less vehicle traffic.
- **Creek setbacks:** The previously proposed project included widening some creek corridors, but this mitigating component was arbitrarily excluded from the Historic Preservation Alternative, making it look worse in terms of impacts on biological resources.
- **Lot size:** The assumption that a smaller alternative would necessarily have larger lots was unfounded.
- **Total reuse vs. a mixture of reuse and new construction:** The Historic Preservation Alternative included almost total reuse of existing buildings. A more practical approach, as set forth in the Provide, Protect, Preserve Alternative, would reuse buildings that are structurally sound, more fireproof due to their reinforced concrete walls, and confine new construction within existing building footprints. The previous EIR failed to consider the immense savings in demolition and associated greenhouse gas (GHG) emissions associated with reuse, and failed to acknowledge that a viable alternative could include a mixture of reuse and new construction.
- **Disproportionate commercial uses:** The Historic Preservation Alternative included a disproportionate number of commercial uses without any evidence of a demand for such uses, resulting in an imbalance between jobs and housing that would increase commuting impacts.

All of those assumptions were faulty and a disservice to the Board of Supervisors in reaching an environmental sound and defensible position. The Provide, Protect, Preserve Alternative analysis should address these shortcomings, as well as the flaws identified by the Court in the SCALE ruling.

Conclusion Regarding Requested Alternative Analysis

To date, a viable, smaller scale, safer redevelopment alternative for the former SDC campus has not been thoroughly and fairly evaluated by the County. To put it in context, the Provide, Protect, Preserve Alternative would still be the largest development to occur in Sonoma Valley (and one of the largest ever in the unincorporated County) and would triple the size of Glen Ellen. This balanced, scaled-back alternative represents the ideal option to satisfy the alternative analysis evaluation required under CEQA, provide meaningful mitigation of the significant environmental impacts and public health and safety risks associated with the proposed project, and meet the needs of all stakeholders, including the existing community and future residents of the Sonoma Valley.

Figure A

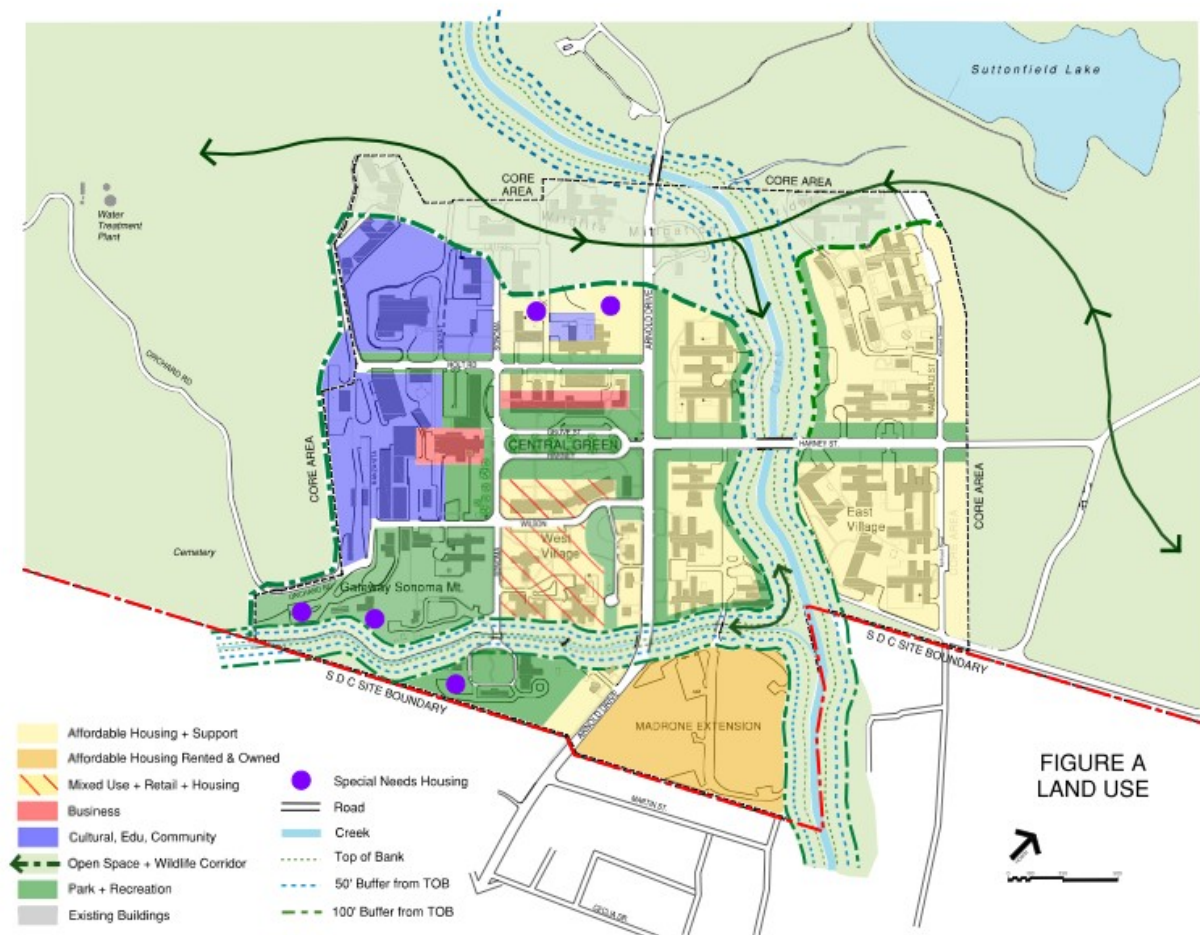


Figure B

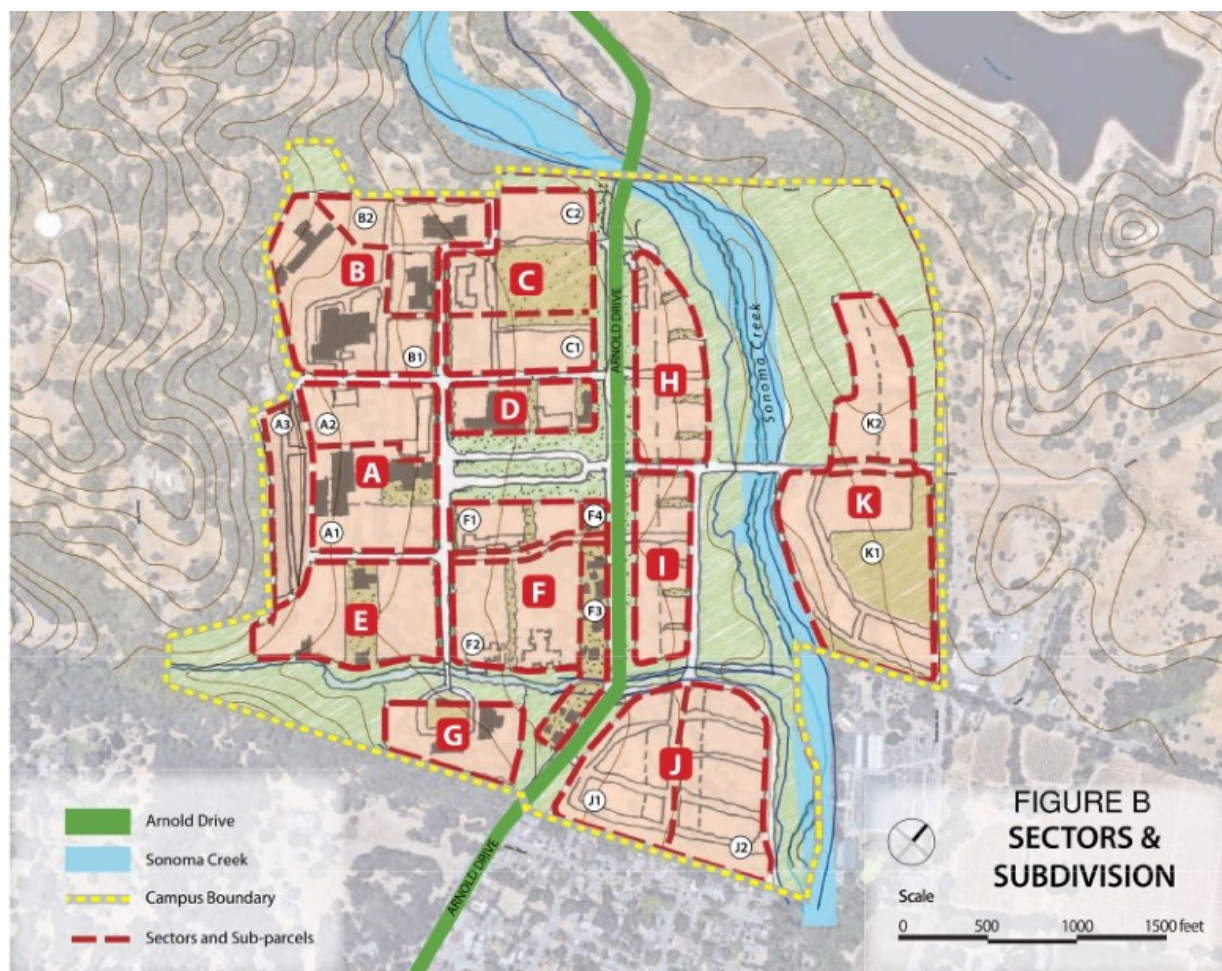
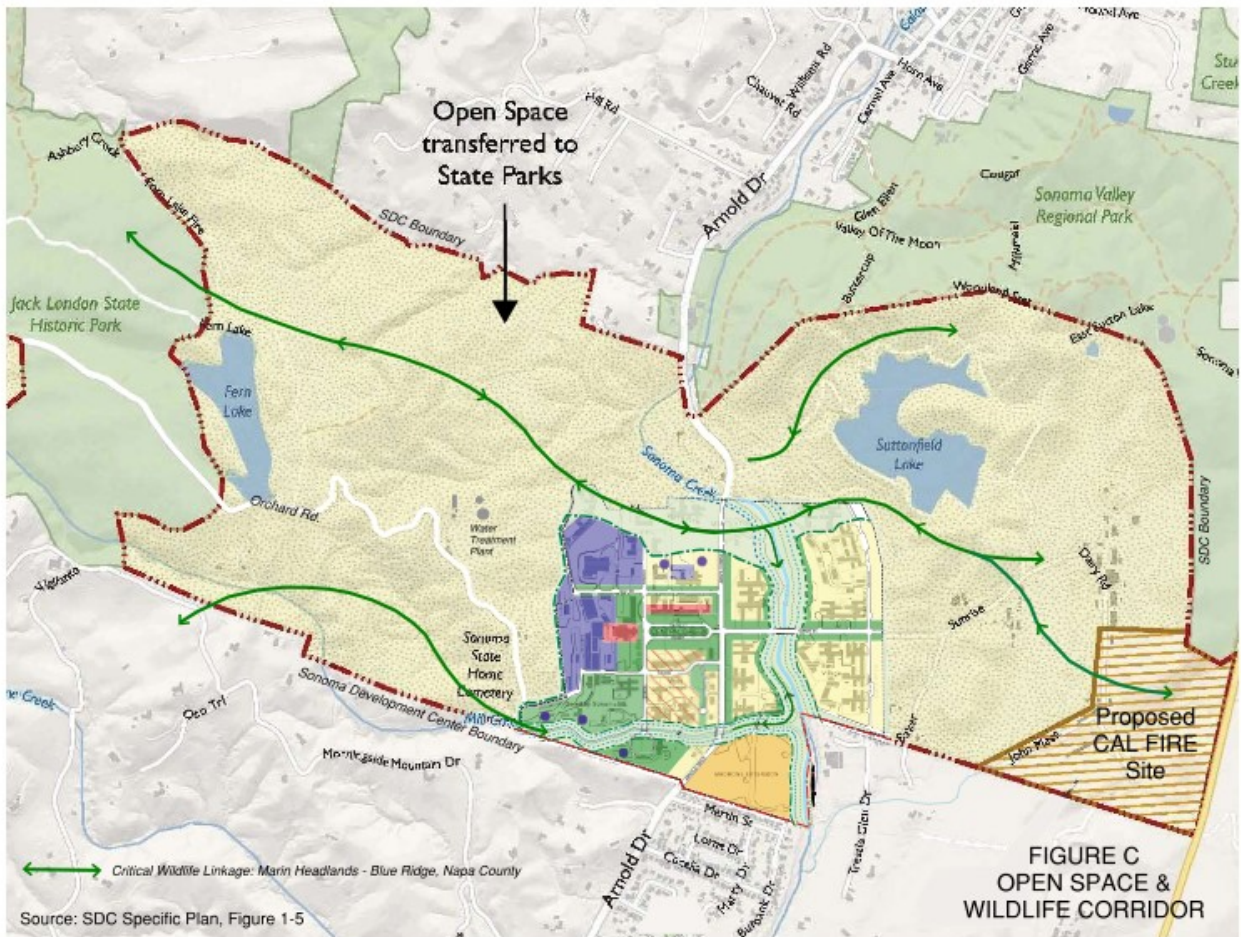


Figure C



2. Evacuation/Emergency Response impacts

A site-specific and cumulative assessment of the proposed project's impacts on the ability of both onsite and Sonoma Valley populations to evacuate safely is needed. Evacuation traffic loads should be calculated and information from the recent real-life evacuation bottlenecks that occurred in 2017 and 2020 should be utilized. It took hours for Oakmont, Kenwood, and Glen Ellen residents and workers to evacuate during the wildfire events. With the introduction of 4000 to 5000 people on the site, evacuation and emergency response in this high-risk area will be substantially impacted. Results of the recent KLD evacuation study must be considered. That study was conducted by an independent reputable firm that has prepared dozens of similar studies for cities and counties.

3. Project Feasibility

The EIR must assess the feasibility of the proposed project. Given the extensive mitigation that will be required to address a full range of significant impacts and public safety risks, it is questionable whether the project is economically and environmentally feasible.

4. Demolition/Construction Impacts

The proposed massive clearing, remediating, and grading of the site all at once, rather than during different stages of the development, must be studied in detail. Unlike the previous EIR, this EIR is project-specific. This proposal needs to be fully evaluated in terms of impacts on traffic and roadways, wildlife and open space resources, hazardous materials emissions, materials transportation, and disturbances to surrounding land uses (noise, emissions, glare), etc.

5. Thresholds of Significance

The Night Sky standards should be used as significance criteria for visual/lighting impact assessment. Specific thresholds for the wildlife corridor should be developed based on its importance and sensitivity.

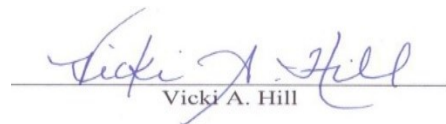
6. Open Space Impacts

The boundary of the proposed Specific Plan redevelopment area should be clearly delineated for the proposed project and alternatives. Facilities proposed outside of the campus area must be identified and analyzed. Also, impacts of the proposed project on the adjacent open space resources must be assessed. Who will manage the 47 acres of “buffer” space around the proposed development area and what are the impacts of maintaining this cleared buffer? What are the impacts of the proposed project on this buffer area? What uses will be allowed in the buffer zone?

7. No Project Alternative

Under the No Project alternative, it cannot be assumed that the state will take control of the site and that the county will have no land use authority (as was improperly assumed in the previous Specific Plan EIR). If the state proceeds with sale of the property, any private developer would be subject to county land use controls.

Regards,



Vicki A. Hill

Vicki A. Hill, Land Use Planner

SCALE Steering Committee Chair

On behalf of SCALE Steering Committee:

- Alice Horowitz, Eldridge for All
- Angela Morgan, Glen Ellen Historical Society
- Roger Peters, Valley of the Moon Alliance
- Kathy Pons, Valley of the Moon Alliance
- Tracy Salcedo, Sonoma Mountain Preservation

Cc: Rebecca Hermosillo, Sonoma County Supervisor
Scott Orr, Permit Sonoma Interim Director