



JACK LONDON
PARK
PARTNERS



June 16, 2025

Re: Upcoming Notice of Preparation for the Eldridge Renewal Project at the Sonoma Developmental Center

Greetings,

Around June 20, 2025, Sonoma County will release a Notice of Preparation (NOP) regarding a proposed development project ("Project") at the former Sonoma Developmental Center (SDC). The county plans to release a draft Environmental Impact Report (EIR) in November 2025.

We are reaching out because we have identified specific direct and indirect impacts that the proposed Project may have on resources under your agency's jurisdiction.

We also have significant concerns that the proposed EIR will not examine reasonably foreseeable impacts. For example, the County has proposed to limit the EIR analysis to the core of the SDC campus, despite the fact that the Project proposes significant activities on additional SDC lands now owned by State Parks.

Your agency's input is critical to ensuring that this Project minimizes and mitigates adverse impacts and adheres to the law, including critical policies promoting biodiversity and climate resilience. Your agency's participation in this Project will be especially impactful because the applicant has proposed this Project as a "Builder's Remedy" project under the Housing Accountability Act. If the Project proceeds under the Builder's Remedy, the County cannot deny approval or apply conditions that make the Project infeasible as long as the Project maintains a certain percentage of low-income housing. Your agency's input could be key to crafting mitigating conditions that are impactful and that the County can actually enforce.

We have attached the following information to this letter:

- A high level summary of likely and potential Project impacts, highlighting issues that concern your agency.
- Links to Project documents, in case you want to learn more before the NOP is released.
- Photos, to give context to the potential impacts we list.

After reviewing these materials, we hope that your team will have time to respond to the Notice of Preparation, insisting that the EIR analysis, project alternatives, permit requirements, and mitigation measures are environmentally sound, legally sufficient, and supportive of outcomes that promote biodiversity and climate resilience.

We recognize that housing and especially affordable housing are needed, but not at the expense of ecosystem and community resiliency. There are many alternatives and design improvements that could make this Project more sustainable.

The extensive history and complexity of this Project increases the burden on reviewing agencies. To help ease that burden, we are offering our support in a few ways:

- 1) Maps and data: We have mosaiced, georeferenced, and digitized elements of Project's tentative maps (top of bank, limit of grading, limit of demolition, parcel outlines, location of existing and proposed utilities, location of fire buffer, etc), and can provide these files and georeferenced maps upon request.
- 2) Reports: We are compiling a tentative impact report, based on Project application documents filed with the County. By the week of June 23rd, we will have more detailed summaries and maps of potential impacts in each topic area we provide below.
- 3) Meetings - we would be pleased to meet with you at any point during the EIR process, to help answer any questions or to explain our maps/reports as you prepare a response on behalf of your agency.

Sonoma Land Trust is working in partnership with Sonoma Ecology Center, Audubon Canyon Ranch, and Jack London Park Partners. Each of our organizations have significant concerns and questions over this Project's potential impacts to resources that we have been working for decades to steward and protect.

We will be reaching out with a subsequent letter after the NOP is released, with a more detailed assessment of topic areas we list in Exhibit B.

If you or colleagues have any questions at all about the Project, our involvement, or our analyses, please reach out.

For the land,



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Sonoma Valley Stewardship Program Manager
Sonoma Land Trust
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Attached:

Exhibit 1: Links and Resources

Exhibit 2: High-level summary of potential impacts

Exhibit 3: Photos

Exhibit 1: Links and Resources

History of the SDC:

<https://permitsonoma.org/regulationsandlongrangeplans/longrangeplans/sonomadevelopmentalcenter/sitehistory>

CEQA documents from 2022 EIR:

<https://ceqanet.opr.ca.gov/Project/2022020222>

News article - Judge invalidates 2022 EIR and Specific Plan:

<https://www.pressdemocrat.com/article/news/sonoma-developmental-center-judge-overtums/>

Most recent proposed Project documents (Feb. 2025) - Developer application to Sonoma County: <https://share.sonoma-county.org/link/7NXJldFZm-A/>

Look for: [Draft project description](#), difficult to understand [tentative map](#). (links open pdf downloads)

May 2025 County of Sonoma - Consistency review : [11-10-24 DRH23-0002 Resubmission Completeness.Review.Letter.docx](#)

Look for: County position on Builder's Remedy impact on CEQA. (Pg 2-3, Consistency Analysis)

May 2025 Scope of Work for Consultant to run EIR process:

<https://sonoma-county.legistar.com/LegislationDetail.aspx?ID=7358976&GUID=B632B538-514C-4153-B764-C1466A8CF606>

Look for: "Exclude the 750 acres of open space that have been transferred to State Parks", Pg 2, *Scope Assumptions Bullet 3*. The Project proposes multiple direct activities on this land (surface water diversion/development, 300-foot-wide community wildfire buffer, potential water treatment plant)

Sonoma Area Fire Evacuation Study, by KLM Associates, sponsored by Valley of the Moon Alliance. <https://votma.org/evac-study>

Look for: Figure C-3 and C-4 (pg. 165) showing a graph of modeled increase in evacuation times as result of this Project.

Exhibit 2: High Level Summary of Potential Project Impacts

Our top concerns with the proposed project include the following. In a subsequent letter, we will share more detailed maps, figures, and topics we feel the EIR needs to address.

1. Removal of **11.4** acres of oak woodland and riparian forest to build a relatively small number of single-family homes (3% of proposed). The project proposes 15 “hillside” homes on the west edge of campus, 12 “courtyard” homes on the South edge of campus, and 3 “large detached” homes along Sonoma creek that would require significant grading and removal of intact oak forest and/or riparian forest. One site on Sonoma Creek shows placement of fill into areas of bed and bank along Sonoma Creek. Grading and development associated with these homes would result in the removal of **7.3 acres of Valley oak forest, 1.9 acres of Oregon oak forest, and 0.2 acres of riparian forest**. A proposed hotel would remove an additional 0.4 acres of Oregon oak woodland, and 1.6 acres of other forested area on campus. Proposed grading overlaps sensitive habitat communities including Valley Oak and Oregon Oak woodland.

These forest removals are not accounted for in draft project documents (arborists report, biological impacts analysis, draft project description) filed with the County. [CDFW](#).

2. Degradation of **56** acres of woodland, grassland, and riparian habitats, many of which are listed as “sensitive natural communities”. The degradation is reasonably expected as a result of development. It will occur through a combination of **1)** vegetation clearing in the proposed “community” fire buffer located on State Park lands (51 acres total, 23 acres sensitive natural community), **2)** about 6 acres where intact native vegetation will be located within residential lots and subject to defensible space requirements. [CDFW](#)
3. Impacts to habitats and species on former SDC lands transferred to State Parks, as a result of the re-development of a water system. The project proposes to re-develop a public water supply using surface water rights located largely on former SDC lands transferred to State Parks in 2024, using water from 2 reservoirs, 4 creeks and 1 perennial spring complex. Currently, points of water diversion and pipelines are in partial disrepair.

Planning documents indicate that the County has proposed to restrict EIR analysis to the 180 acre core campus, when the proposed water system lies mostly on former SDC lands now owned by State Parks. We strongly feel that a sufficient environmental analysis needs to consider the potential direct and indirect consequences of re-developing the water system, of which there are many. One example: the two primary reservoirs (Fern Lake and Lake Suttonfield) both have known populations of northwestern pond turtles, proposed threatened by USFWS. Full drawdown of these reservoirs during periods of drought would eliminate occupied habitat for pond turtles.

Similarly, diversion of Roulette Springs could eliminate habitat for the foothill yellow legged frogs known to occur downstream in Asbury Creek. Asbury Creek has reverted from an intermittent to a perennial stream course since the Roulette Springs diversion has fallen into disrepair.

The [Water and Wastewater Feasibility Study](#) indicates high reliance on Roulette Springs showing Roulette would provide 50% of total annual water supply in consecutive drought years. The Project has multiple options to reduce reliance on a single spring, such as increasing storage capacity, lowering elevation of diversion, connecting to the Sonoma Aqueduct, or building a greywater treatment plant.

In our next letter, we will report these more fully: acres of sensitive natural communities directly disturbed by water system construction, linear miles of Asbury Creek potentially dewatered during summer, instances where water development might impact protected species. [CDFW, SWRCB Drinking Water, USFWS, State Parks](#).

4. Insufficient protections for wildlife connectivity and riparian function, by increasing but not restoring riparian buffers. We support a plan that increases existing riparian buffers. The Project proposes increasing setbacks to 50' or 100' from top-of-bank, by demolishing existing infrastructure that currently extends up to and past the top-of-bank with many buildings, streets, lawns, and parking places set to be removed. Overall, the Project proposes to remove approximately **11.6 acres** of formerly developed space. This creates a huge opportunity to improve important ecosystem functions that riparian areas provide for both people and nature - stormwater filtration; habitat for species who need cover, food, water, and nesting opportunities to thrive; shade, and cool water.

However, the Project has no plan to restore the expanded riparian setbacks. Without a plan for restoration, there are reasonably predictable outcomes: **1)** After demolition and construction end, these acres will convert to non-native herbaceous vegetation. **2)** Then, they will be mowed annually for fire danger, because of their proximity to backyard fences. **3)** After mowing, people will understandably utilize these areas for informal recreation – accessing Sonoma Creek to stay cool, walking dogs (on or off leash), and generally increasing disturbance to wildlife. Sonoma Creek and Mill Creek are critical to wildlife connectivity in and around the Project area.

The lack of a plan to restore or manage this area of abandoned development is a missed opportunity. The most important ecosystem services performed by riparian areas are performed by native, perennial vegetation – trees, shrubs, grasses and forbs. These are unlikely to establish naturally without restoration and stewardship measures. Secondly, this would be the ideal location to place stormwater infrastructure that was sized to meet the demands of high-intensity rainfall, providing a variety of ecosystem services to creek and riparian health. We feel that if a Lake and Streambed Alteration Agreement is deemed necessary for the project, permit conditions could require restoration and management of proposed riparian buffers. [CDFW](#).

5. Direct disturbance of stream channels through demolition of existing infrastructure, grading during construction, connecting to and repairing water and sewer pipelines

during construction, installation of new stormwater outfalls, and anticipated repair of water infrastructure and points of diversion prior to the project horizon date.

An examination of Project maps and documents found:

- About 10 locations where existing water/sewer pipelines or walkways (proposed for removal) cross Mill Creek or Sonoma Creek
- About 0.6 linear miles where the top-of-bank and demolition limits are congruent, including demolition within 10 horizontal feet of a steep actively eroding creek bank.
- 5 new stormwater outfalls
- Needed repairs to the Sonoma Creek point of diversion, and siphon under Sonoma Creek.

CDFW, USFWS, San Francisco Bay RWQCB, NOAA/NMFS, Army Corps of Engineers.

6. Degradation of water quality in Sonoma Creek as a result of an insufficient stormwater plan to filter pollutants, reduce peak flows, or prevent erosion. Sonoma Creek is a 303d-listed impaired water body and is only 8 miles upstream from wetlands and waters in San Pablo Bay. The project proposes to use curb-and-gutter stormwater catchment, but project documents do not demonstrate they are sufficiently sized to accommodate high intensity precipitation events that are becoming more typical as the climate warms. Furthermore, there are **43** existing stormwater outfalls on the core Project area. The Project proposes to re-utilize **9** outfalls, and install **5** new outfalls. By reducing the total number of outfalls from **43** to **14** and re-directing that water into existing outfalls that are already experiencing erosion, the project is reasonably likely to increase erosion issues, and destabilize bed-and-bank where new outfalls will be constructed. The Project is also likely to increase the concentration of 6PPD-quinone, from vehicle tires, in Sonoma Creek and its tributaries; this chemical is toxic to salmonids and other aquatic species.

CDFW, San Francisco Bay RWQCB, USFWS, NOAA/NMFS, Army Corps of Engineers.

7. Impacts to known habitat or potential habitat for a number of protected species.
- a. *Northwestern pond turtles* (proposed for federal listing; known from the reservoirs on site), as a result of water system operation, increased development in upland habitats, increased human and pet presence, and increased traffic;
 - b. *California red-legged frogs* (federally listed as threatened, CA Species of Special Concern; potential habitat in reservoirs/creeks), as a result of water system operation
 - c. *Foothill yellow-legged frogs* (CA Species of Special Concern; known from Sonoma Creek and Asbury Creek with potential habitat elsewhere), as a result of water system operation
 - d. *California giant salamander* (CA Species of Special Concern; known from Asbury Creek and Fern Lake, and east of SDC in Butler Canyon Creek, with potential habitat elsewhere), as a result of water system operation and road development

- e. *Red-bellied newt* (CA Species of Special Concern; potential habitat in the creeks and Roulette Springs), as a result of water system operation
- f. *Steelhead* (federally listed as threatened), California freshwater shrimp (federally and State listed as endangered) and fall-run Chinook; all known from the SDC stretch of Sonoma Creek, where beds and banks will be disturbed and stormwater will be released; and water quality impacts from increased 6PPD-quinone concentrations
- g. *Mountain lions* (a specially protected mammal in California, under the CA Wildlife Protection Act of 1990; documented to use the site extensively), as a result of increased development, defensible space clearing, human and dog presence, lighting, and traffic, reducing habitat utilization and movement opportunities.
- h. This is in addition to unknown use of built and natural vegetation by sensitive bat species.

Appropriate surveys for many species have not been conducted, despite years of opportunity by the developer to address concerns raised in the first EIR process, and attempts by our organizations to obtain permission to conduct these surveys. [CDFW](#), [USFWS](#), [NOAA/NMFS](#).

- 8. Operational impacts on birds, other wildlife, and their habitats as a result of 1000 housing units, 150 hotel rooms, commercial businesses, 3000 residents and their dogs, cats, cars, kids, outdoor lighting, night-time activities, pesticides and herbicides, fertilizers, invasive species, and increased human presence in and around natural areas. As proposed, this project will have negative impacts on migratory birds, other common and special-status wildlife species, native vegetation, and water quality. [CDFW](#).
- 9. Direct and indirect impacts to wildlife connectivity as a result of Project development
Although the Project portrays the “wildlife corridor” as being constrained to a single geography - a regional “critical linkage” (Bay Area Missing Linkages Project) , nearly the entire campus supports wildlife movement. Furthermore, the effects of the proposed development would extend well beyond the construction footprint. The levels of increased traffic, lighting, fencing, pets, recreational trail use and other human activities associated with the project will impact wildlife movement both on-site and across Sonoma Valley. Although the project makes some concessions to protect wildlife passage (reducing development on the north edge of campus, increasing riparian buffers), the proposed concessions are insufficient, especially without a plan to restore creek corridors and avoid the necessity of defensible space clearing in intact habitats. We have developed “cost for movement” models for five focal species that highlight the critical importance of the area for wildlife connectivity, a finding that is confirmed by data from wildlife collars on mountain lions collected between 2016-2024. [CDFW](#).
- 10. Cumulative impacts on wildlife connectivity due to proposed development on other former SDC lands adjacent to the project, namely the construction of a new road connecting to Highway 12 (crossing Butler Canyon Creek, documented to be a movement route for western pond turtle and other wildlife, as well as other smaller drainages and a large wetland), a proposed CalFire regional headquarters (also in the

location of Butler Canyon Creek), and recreation development on former SDC open space lands now owned by State Parks. [CDFW](#).

11. Impacts on natural resources located on State Parks land through increases in on- and off-trail recreational use, fire buffer management, and water system development and maintenance. The Project proposes to directly and indirectly impact lands owned by State Parks, but the EIR may not include these lands in impact assessments. [CDFW](#), [State Parks](#).
12. Impacts to local communities, and the environment, by not including sufficient pedestrian, bike, and bus connections, to reduce the total miles driven.
13. No plan for management and maintenance of “common space” areas. Although the Project proposes many areas of common use areas (parks, natural areas, fire buffers), there is no plan for what entity will be responsible for managing these areas or how this work will be funded. Without an entity to manage open space areas, who has sufficient funding, expertise, and leverages existing local resources, there could be many additional project impacts on human safety and the environment. Irresponsible application of defensible space can release carbon, degrade habitat, or transition vegetation towards a more flammable condition. Project maps also label some riparian areas as “Park / Open Space”, leading to other questions about proposed management.
14. Concerns over fire risk that cannot be mitigated by vegetation clearing or the addition of a new road to Highway 12. Although the project proposes steps to mitigate fire risk by maintaining a fire buffer and using ignition-resistant materials and designs, the Project proposes to achieve that benefit by manipulating intact native vegetation in the community fire buffer (“This buffer will be managed as landscaped open space in accordance with regional fire resiliency best practices” according to the draft Project Description), as well as “backyard” vegetation management within 100’ of homes. According to Project maps, the 30’ and 100’ defensible space zone around infrastructure extends into the riparian buffer, and includes riparian vegetation. At best, community-level and home-level vegetation clearing might mitigate the risk of *property* loss during a major wildfire event, but these practices cannot mitigate risks to human life. The primary risk to human life during a major wildfire in this area is the amount of time it takes to evacuate Sonoma Valley, due to bottlenecks on Highway 12, as detailed in a recent [independent fire evacuation study](#). This same study estimated that developing the SDC would increase evacuation times by 35 minutes (for 90% evacuation when only the SDC area is under evacuation order), a 19% increase as a result of the Project.

Because no amount of vegetation clearing or defensible space work can mitigate evacuation timing, we would argue that this project should take every available step to avoid the need to manage fuels in the first place, by setting back development from natural vegetation.

Exhibit 3 Figures and Photos.



Figure 1.
Oregon Oak forest to be removed by grading for the construction of 15 courtyard homes.



Figure 2. Forest areas to be removed by grading for a proposed hotel.

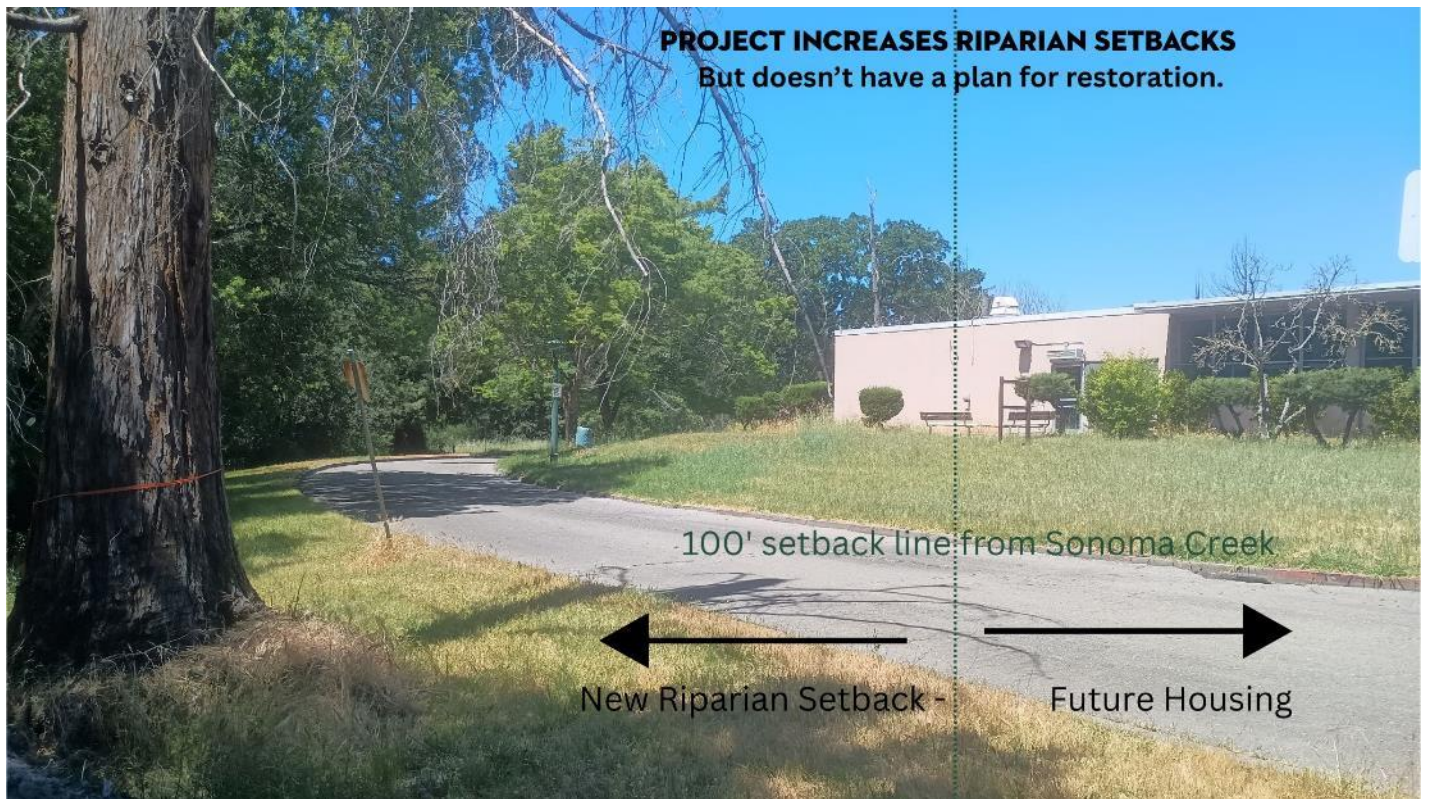


Figure 3a and 3b. The Project proposes to expand the existing riparian corridor, by demolishing or abandoning 11.6 acres of existing roads, buildings, and lawns. The Project does not propose any restoration or management of the expanded riparian setback.





Figure 4. Current condition of the main collection box at Roulette Springs, located on former SDC land now owned by State Parks. Infrastructure is more than leaking; it is non-functional. Water is spilling onto the forest floor. The spring complex creates in-situ wetlands and provides the base flow for Asbury Creek during summer months. The spring is also a critical component of the Project's proposed water supply, providing a large fraction of total water supply, especially during summer months and multi-year drought periods. We feel the EIR must analyze potential impacts of water system development.



Figure 5. Current (inoperable) condition of the Sonoma Creek point of diversion. Utilizing this water source would require in-creek work.



Figure 6. Pipes crossing Mill Creek at the existing bridge, one of many such crossings. Although the Project proposes to abandon existing lines and re-construct a new grid of water/sewer pipes, the

Project does not specify whether it will leave these lines in place or remove them as part of demolition.



Figure 7. Example of existing infrastructure (slated for demolition) that is congruent with the top-of-bank of Mill Creek.

Figure 8.



6/16/2025

Proposed Roads and Alleys

Future Private Parcel

Proposed Demolition Limit - Tentative Map

Proposed Riparian Setback - Tentative Map

Grading Limit - Tentative Map

Top of Bank - Tentative Map

Existing Sewer Lines

Existing Water Lines

2018 Countywide High Resolution Orthophotos

Red: Red

Green: Green

Blue: Blue

World Imagery

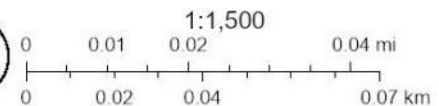
Low Resolution 15m Imagery

High Resolution 60cm Imagery

High Resolution 30cm Imagery

Citations

30cm Resolution Metadata



Maxar, Microsoft, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, County of

Example map, showing layers digitized from Project Tentative maps: Top of bank, limits of demolition and grading, existing utilities, etc.