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Sent: Monday, September 29, 2025 at 10:20:31 AM PDT
Subject: SDC Specific Plan & PLP24-0005 EIR NOP Scoping Comments

I am submitting these comments on the referenced proceedings after listening to the Scoping Meeting last Thursday. I support the comments submitted by SCALE and VOTMA, among others, and those submitted by the Sonoma Land Trust.

1. The Specific Plan Scope-of-Work and Project Description in Incomplete and Inadequate: Permit Sonoma is designated as the sponsor of the Specific Plan (SP) in the NOP. But the Specific Plan as outlined in the NOP (which is distinct and different from the Eldridge Renewal Project) is vague, incomplete, and does not contain critical elements to be a complete specific plan independent of any pending other application. The project description for the SP does not identify the number and nature of the housing contemplated by the SP and does not explain why the Hotel location adopted in the 2022 SP was discarded. It appears that Sonoma County, in deference to the Eldridge Renewal (ER) project application, is implicitly accepting that the hotel concept adopted in the 2022 SP should be modified significantly and relocated adjacent to what the NOP acknowledges is a "critical " wildlife corridor. For Scoping purposes *for the Specific Plan*, the revised SP, as outlined in the NOP must be revised to articulate the details of the development plan element set forth in the enabling legislation.

The revised contract with the Department of General Services (Contract 19-30324 A2, as revised July 2025) contemplates that a Specific Plan that satisfies the enabling legislation objectives will be adopted as a contract obligation. Any implementing applications consistent with the specific plan to be adopted may be processes as well, but Sonoma County still must develop a specific plan. That is what the County did in 2022, and that is what it is obligated to do now.

Neither the Board of Supervisors nor Permit Sonoma has indicated why it has abandoned the Specific Plan it had previously approved, or why the development framework adopted in 2022 is not longer appropriate.

The SP does not restate the elements of the SP that was adopted by the Board of Supervisors in late 2022. Nor, astonishingly, does it explain whether and why Permit Sonoma proposes and is supportive of a base project that 1) expands the size (number of rooms), 2) expands the use (adding a parking facility and a

conference/convention center) and 3) moves the location of the proposed hotel adopted in the 2022 SP to the edge of the wildlife corridor.

It would make more sense if the proposed SP project utilized the same framework as previously approved, and shows the SP the Eldridge Renewal project as an alternative to that. Alternatively, the adopted 2022 SP should be included as an alternative to the ER project. Either way, the SP should have more detail than that currently reflected in the NOP.

2. The ER project description lacks necessary detail required to develop an adequate project level EIR: The ER Ab330 application is a project application that requires a detailed EIR. Essential details regarding design and use of the hotel and conference facility are not included in the project description. Will there be a restaurant attached to the hotel and if so, what is the capacity and operating schedule? How large is the event space? What limits, if any, will there be as to its use (weddings, concerts or other music events)? What is the predominant window orientation for the hotel (restaurant) and conference structure, and what is the lighting and noise exposure from the facility to the adjacent wildlife corridor?

3. The County should commission a level of service study to assess the dual impacts of the CalFire and SP proposals on traffic at the Madrone/Highway 12/Arnold Drive intersections and surrounding areas.

The specific plan represents a significant land use policy that will have a lasting impact on the Sonoma Valley. The recently announced CalFire Headquarters proposed development on the southeast portion of the SDC designated open space land is likely to accentuate traffic congestion in that area resulting from the SDC SP. Although LOS analysis is no longer required by law and cannot be used as an adverse environmental impact, nonetheless, an LOS study is not prohibited and would be helpful to get an accurate assessment of the combined impacts of the two proposals for policy planning purposes.

4. The SP programmatic EIR and ER project level EIR should analyze the potential adverse impacts of allowing the residential units developed under those frameworks to be utilized as vacation rentals. Vacation rental properties present noise and traffic impacts, increased waste and resource consumption, increased impacts on local services, and cumulative impacts when densely aggregated. The EIR Scope should include appropriate analysis of the potential adverse impacts resulting from authorization to own and operate units developed under the SP and/

or EV project as vacation rentals. The adverse community impacts of such authorization warrant very restrictive authorization, if not complete prohibition, of vacation rentals of residential units within the redeveloped campus.

The SP and EIR should also consider the urban decay potential of corporatization of the planned housing units. The social and economic impacts of rental market corporatization of single family residential housing present credible EIR issues where urban decay is a recognized result. Allowing broad scale corporate ownership of the housing inventory at SDC would trigger that consideration.

Thank you for the opportunity to comment on this important land use proposal..

Roger Peters