



filed via e-mail

Wil Lyons, Project Planner
Permit Sonoma, County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

Re: PLP24-0005, Sonoma Developmental Center Project
Specific Plan/SB 330 Application

Dear Wil,

The Valley of the Moon Alliance (VOTMA) 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) core property and select adjacent areas (the Proposed Project).

Although the referenced application (PLP24-0005) was initially framed as an SB 330 application, we understand from the Board of Supervisor's action/decision in December 2024, that consistent with the Enabling Legislation for SDC (Government Code 14670.10.5 or EL), the proposal is intended to be processed as a revised Specific Plan. While Permit Sonoma has to this point not addressed or clarified the interplay between applicability of SB 330 procedures vis a vis those associated with consideration of a specific plan, it seems evident that at a minimum any disposition of the SDC property must be consistent and compatible with the requirements and priorities set forth in Govt Code 14670.10.5. We thus start these comments with an assessment of the proposed project as filed (and revised several times) by Applicant and its consistency with the EL.

1. The Proposed Project is Neither Consistent nor Compatible with the Enabling Legislation and Deviates Significantly from Even the Now-Revoked Prior Specific Plan.

The Enabling Legislation for SDC is compact and direct. It recognized that the SDC property contains "unique natural and historic resources" that warrant deviation from "the traditional state surplus property process." Gov Code 14670.10.5(a)(3).

It acknowledges the "acute affordable housing crisis" in California and codifies the "intent of the Legislature that priority be given to affordable housing in the

disposition of the SDC property.” EL at (a)(6).

It confirms “the exceptional open-space, natural resources, and wildlife habitat characteristics of the Sonoma Development Center” EL at (a)(7).

It confirms “the intent of the Legislature that the lands outside of the core developed campus and its related infrastructure be preserved as public parkland and open space.” EL at(a)(9).

The Applicant’s proposed project does not honor those legislative directives. It calls for demolition of most of the existing historic resources, including the Sonoma House. It packs largely and likely unaffordable housing on both sides of Sonoma Creek and serves up the bare minimum of affordable housing over the entire project that a development in any urban or suburban qualifying site would be required to provide. There is no demonstrated “priority” given to affordable housing, as is specifically intended in the EL.

There is a shocking disregard given to the “exceptional open-space, natural resources and wildlife habitat” located in and around the SDC property. The proposal submitted relocates a significantly expanded hotel with an added convention venue from the Main Administration building in the center of the campus out to the northwest corner of the SDC Core campus adjacent to and facing the wildlife corridor running west to east along the campus edge. That revision of the Specific Plan’s contemplation of a modest hotel is completely inconsistent with the EL’s declared intent that the disposition of the SDC property “shall provide for the permanent protection of the open space and natural resources as a public resource to the greatest extent feasible....”EL at (c)(3).

Finally, the EL contemplates that any change of purpose of use of the property proposed must recognize the need for “conservation of water resources to provide and enhance habitats, fish and wildlife resources, groundwater resources and recreation.” EL at (e)(5). In contrast, Applicant’s proposal for 990 housing units (excluding likely additional ADUs), a larger hotel and convention center, and substantial commercial square footage, does not acknowledge or estimate these additional resource and water set-aside requirements. Instead, the Applicant ditches the prior plan to utilize water from the Valley of the Moon Water District and instead contemplated taking control and refurbishing old water supply infrastructure located outside the core campus and utilizing riparian, appropriated surface water and possibly groundwater resources to service the substantial demands that the project would seek priority to access. Applicant has made no showing that this plan to seize those water resources would be consistent and compatible with the Legislature’s directive that “disposition of the property...shall provide for the permanent protection of...natural resources as a public resource to the greatest extent feasible.” EL at (c)(3).

2. The Proposed Project Does Not Appear Compatible with the Overriding Objectives of the Existing Safety Element of the General Plan.

The County is in the process updating the Public Safety Element of the General

Plan. The existing Public Safety Element (PS), adopted in 2014, sets out the governing objective for planning purposes as follows:

“The Public Safety Element is intended to protect the community from unreasonable risks from...flooding and fire.

The Public Safety Element establishes policies to minimize potential property damage and human injury by reducing exposure of persons and property to the above hazards and hazardous materials.

The policies in this Element are intended to avoid development that would adversely affect future residents and visitors as well as adjacent property and residents. It is also intended that an undue financial burden not be placed on the taxpayer by allowing development which may have unusually high costs for public services and disaster relief.” PS at PS-1.

The wildfire experience in the Sonoma Valley over the last eight years (2017-2024) removes any doubt that the current risk and exposure to property damage and personal injury in the SDC property area is already high. The scale of development proposed by the Applicant and its attendant increased fire ignition risk, together with the absence of any meaningful improvement in evacuation capacity, raises the risk exposure and the expected cost of any disaster relief. The objective of the Public Safety Element in relation to the Land Use Element is to “reduce the number of people and buildings exposed to risk.” PS-1

Flooding risk along the Sonoma Creek in the area of the Proposed Project remains relevant with every atmospheric river. The flat topographic profile of the banks and of that creek flowing through the flat adjacent project site suggest that greater creek setbacks are warranted rather than narrowed by variance and then densely populated by new housing in the creekside area.

The Proposed Project’s most recent demolition plan, encompassing taking down virtually all the historic buildings on the site except the Administration Building, suggests a serious hazardous materials management problem, as well as a serious air contamination exposure risk. Those hazardous materials risks are on top of other known potential hazardous material locations that were previously recommended for Phase II environmental assessments, but where those assessments were not subsequently undertaken.

Taken together, the scale and nature of development proposed by the Applicant needs a careful assessment as required under existing policies set forth in the 2014 Public Safety Element. In developing a plan for assessing Public Safety impacts and potential mitigations for fire, flooding and hazardous materials exposure Permit Sonoma should refer to and incorporate where practical the evolving policies being developed for the impending Public Safety 2025 Update.

Where such assessments raise significant factual questions about whether the Proposed Project has mitigated risk from natural hazards to an acceptable level, the County should “require the owner to provide indemnification to the County, insurance, or other security” if the owner wishes to proceed in the face of that risk uncertainty. PS at PS-2

3. Applicant's Submissions to Date have been Inadequate to Establish that the Proposed Project is Consistent with the Water Element of the Sonoma County General Plan.

The Water Resources Element (WRE) of the General Plan was an optional element adopted in 2008. It was adopted with the understanding that “the long term adequacy of groundwater and surface water is a major public concern.” As acknowledged by the WRE, “Water is an essential element of all life forms...An adequate and high quality water supply is therefore required for continued human survival, development and use of the land, and the health of the entire natural environment.” WRE at WR-1

If anything, over the last 16 years that acknowledgement has reached an even higher level of public concern. Yet, as of now, the Applicant has done little to address how specifically, and to what extent its proposed development will impact long term groundwater and surface water supplies in the Sonoma Valley. Applicant's aversion to engaging in this dialogue warrants a strong push from Permit Sonoma to extract from the Applicant hard data as to its plan for developing water supplies adequate to serve the Proposed Project over the foreseeable future, while at the same time both preserving and conserving water supplies needed to meet other water demands in the Valley.

For context, in the initial Specific Plan it appeared that the SDC Project was to be served by the Valley of the Moon Water District (VMWD). As time passed it became increasingly clear that the VMWD did not have adequate water supplies to fully serve the Project's needs. The present Proposed Project more clearly reverts to sourcing the water demand from supplies produced from the to be refurbished now-abandoned water supply facilities located outside the Proposed Project core property.

The amount and timing of water available from those sources, the ownership and access to the riparian and appropriative water rights governing that potential supply, the competing demands of the natural environmental for that supply, the nature of any groundwater rights that might be available for use, the supply demands of the Proposed Project as now expanded in size and scope, and the total costs to put that option in place and resume operations, are just a few of the issues that as of yet the Applicant has not addressed. Those considerations were not directly at issue in the initial EIR for the Specific Plan.

They are at issue now and Permit Sonoma should require that the Applicant provide that information so that it can responsibly assess the extent to which that plan and any associated mitigation required would be consistent with the objectives and policy components articulated in the WRE. As to any proposal for use of groundwater supplies, Permit Sonoma should consult with the Sonoma Valley Groundwater Sustainability Agency to obtain its view on the potential impact of ground water extraction to support the Proposed Project.

With the recent experience at the Palisades fire in Los Angeles in mind, it would be wise for Permit Sonoma to also assess the capability of the Proposed Project via water storage to provide adequate water supplies to respond to a massive fire event if such a fire were to start in or enter the Proposed Project site.

Although more likely a Circulation Element or Public Safety Element/Public Services Element issue, Permit Sonoma should also inquire about an assessment of the feasibility of a fire /mass evacuation situation and plan, and the compatibility of that with the Safety Element, given the scope and size now of the Proposed Project.

Finally, as an adjunct to the question of the existence of an adequate water supply infrastructure and the adequacy of water supply itself, there is a question presently as to the wastewater infrastructure required to collect, transport and treat the large quantity of wastewater that the Proposed Project will generate. The optional Public Facilities and Services Element (PF&SE), amended as of 2016, details Policy PF-1a through PF1o. Permit Sonoma should assess whether the Proposed Project is consistent and compatible with the various policies in PF&SE (e.g., 1b,1d,1e,1f,1g and 1h).

Conclusion

The foregoing comments are not an exhaustive assessment of the compatibility or consistency of the Proposed Project with the General Plan and its various elements, or other applicable plan, program, policy, ordinance, standard, requirement, or similar provision. Other commentors have addressed some of those, and Permit Sonoma has its own list to complete.

VOTMA notes in particular the need to consider broader preservation of historic resources given that the Applicant has now indicated that there will be a largely wholesale demolition of the site. We assume and expect that some of this ground and other issues will also be covered in the CEQA process.

VOTMA's purpose in submitting these comments is to highlight some key consistency, compliance and conformance issues. Has the size of the Proposed Project (approaching 1,000 units plus potential ADUs, larger hotel and convention venue, large commercial footage) or the revised site plan (hotel moved to the northern edge of the property facing the wildlife corridor) changed so much that new or different or increased impacts have emerged? Have the wildfire risk and problematic evacuation issues or flooding risks changed due to changes in scope, orientation and scale? Have the water supply rights, and wastewater demands and the infrastructure to produce and receive those streams changed even as the basic lack of input, cost and operational information still remains unaddressed?

VOTMA hopes that Permit Sonoma will include these considerations as it provides direction to the Applicant on compatibility and consistency of the Proposed Project with the General Plan and other relevant and applicable

plans, programs, policies and other similar provisions.

Thank you for the opportunity to provide comments.

Regards,

Roger Peters

Valley of the Moon Alliance

cc: Supervisor Rebecca Hermosillo
Tennis Wick