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Land Use and Environmental Planning

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DELIVERED VIA EMAIL

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 (SDC) Major Subdivision and Design Review Application
Consistency Analysis, SB 330 Preliminary Application File No: PRE23-0008, File No: PLP24-0005

Dear Tennis and Wil:

This letter provides comments regarding the above-referenced project's consistency with adopted plans, policies, and provisions. Your March 6, 2025 completeness letter to the project applicant states that the County will soon 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." This letter provides a partial list of the project's inconsistencies with the adopted County General Plan Land Use Element and Open Space and Conservation Element. The County should review additional relevant policies in the General Plan Safety Element, Noise Element, Public Facilities and Services Element, Circulation Element and Water Resources Element.

There are also inconsistencies with the SDC enabling legislation that must be considered, as well as conflicts with the original Specific Plan that was in place at the time of filing the preliminary application. I urge you to include these and all other inconsistencies in your forthcoming assessment.

General Plan Land Use Element (December 3, 2024)

The Land Use Element defines land use designations and establishes land use policies. The proposed project conflicts with numerous provisions due to its semi-rural location, without necessary infrastructure and public facilities.

Relevant Provisions:

According to the Land Use Element, “Residential densities are based upon availability of urban services and infrastructure, land use compatibility, environmental suitability, projected growth, neighborhood character, and other factors. Amendments to add this designation must meet all of the following: (1) Lands shall be within a designated Urban Service Area, (2) Adequate water, sewer, public safety, park, school services and other necessary infrastructure shall be available or planned to be available, (3) Lands shall have convenient access to designated arterial or collector roads, (4) Lands shall not be subject to unacceptable risks such as flooding, geologic, noise, or other hazards, (5) For high or medium density residential use, lands shall have convenient access to commercial uses and community services, and (6) Any applicable Land Use Policies of the Planning Area.”

Comment:

The proposed project has not clearly identified an adequate water supply, nor does it have convenient access to commercial uses and community services since it is in the middle of a semi-rural area. The two-lane roadway is not sufficient to handle the large number of vehicle trips that will be generated and there is extremely limited public transit. Furthermore, the site is subject to significant fire risks and evacuation limitations.

Relevant Sonoma Valley Land Use Policy:

Policy LU-20i: Use the "Limited Commercial" and "Limited Commercial - Traffic Sensitive" categories for commercial lands in communities with urban services, including Boyes Hot Springs/El Verano/Agua Caliente, Glen Ellen, and Kenwood. Require that new uses meet the following criteria: (1) The size, scale, and intensity of the use is consistent and compatible with the character of the local community, (2) Capacities of public services are adequate to accommodate the use and maintain an acceptable level of service, (3) Design and siting are compatible with the scenic qualities and local area development guidelines of the local area, and (4) Siting of structures is compatible with planned infrastructure improvements such as roadway widening and under grounding of public utilities.

Comment:

The commercial components of the proposed project do not meet these criteria, particularly #1, 2 and 3.

Relevant Glen Ellen Policy:

Policy LU-20gg: Land use for the Glen Ellen area, including residential densities, shall correspond with the General Plan Land Use Element for Sonoma Valley. New development in Glen Ellen shall be evaluated in the context of the following: (1) the relationship between growth and traffic congestion, (2) the boundaries and extent of Urban Service Areas, (3) the amount and location of recreation and visitor-serving commercial uses, (4) the need to upgrade existing structures and public infrastructure, and (5) the compatibility of rural development with protection of agriculture, scenic landscapes, and resources.

Comment:

The proposed project is clearly not consistent with this provision.

General Plan Open Space and Conservation Element (August 9, 2016)

- **Community Separators – Comment:** Although the project site is not in the Community Separator, it is immediately adjacent to separator lands that will be impacted by the urban development of the site, which is not adjacent to any city or other urban area. Please review relevant policies regarding protection of community separators.
- **Scenic Landscape Units** –As noted in the Open Space and Conservation Element, the Sonoma Mountains “... are highly valuable scenic lands, clearly defining the eastern edge of the Santa Rosa Plain between Petaluma and Sonoma. They provide an important backdrop to the urban plains and Sonoma Valley.” Equally important are the mountains on the east side of Sonoma Valley, which “provide a backdrop to the valley and agricultural areas bordering the valley. These areas define the boundaries of the urban and rural communities and are very sensitive because of their small size and the unobstructed view of them from roads and adjoining urban areas.”

Relevant Policies:

GOAL OSRC-2: Retain the largely open, scenic character of important Scenic Landscape Units.

Objective OSRC-2.1: Retain a rural, scenic character in Scenic Landscape Units with very low intensities of development. Avoid their inclusion within spheres of influence for public service providers.

Objective OSRC-2.2: Protect the ridges and crests of prominent hills in Scenic Landscape Units from the silhouetting of structures against the skyline.

Objective OSRC-2.3: Protect hills and ridges in Scenic Landscape Units from cuts and fills.

Policy OSRC-2a: Avoid amendments to increase residential density in Scenic Landscape Units in excess of one unit per ten acres.

Policy OSRC-2b: Avoid commercial or industrial uses in Scenic Landscape Units other than those that are permitted by the agricultural or resource land use categories.

Policy OSRC-2c: Apply the Scenic Resources combining district consistent with this element to all lands located within Scenic Landscape Units.

Comment:

The project is in direct conflict with policies calling for protection of scenic views of both Sonoma Mountain and the Mayacamas (east side mountains). There are high quality existing scenic views along Arnold Drive, which is a designated scenic corridor. The project will result in massive three and four-story buildings on both sides of Arnold Drive, obliterating all existing scenic views. The hotel, in particular, would be built on a highly visible hill, with substantial cuts and fills. It and the other buildings would block views of both the Sonoma Mountains and the Mayacamas mountains to the east.

Relevant Policies:

Policy OSRC-2d: Unless there are existing design guidelines that have been adopted for the affected area, require that new structures within Scenic Landscape Units meet the following criteria: (1) Site and design structures to take maximum advantage of existing topography and vegetation in order to substantially screen them from view from public roads. (2) Minimize cuts and fills on hills and ridges. **(3) Minimize the removal of trees and other**

mature vegetation. Avoid removal of specimen trees, tree groupings, and windbreaks. (4)

Where existing topography and vegetation would not screen structures from view from public roads, install landscaping consisting of native vegetation in natural groupings that fits with the character of the area in order to substantially screen structures from view.

Screening with native, fire retardant plants may be required. (5) Design structures to use building materials and color schemes that blend with the natural landscape and vegetation.

(6) On hills and ridges, avoid structures that project above the silhouette of the hill or ridge against the sky as viewed from public roads and substantially screen driveways from view where practical. (7) To the extent feasible, cluster structures on each parcel within existing built areas and near existing natural features such as tree groupings.

Policy OSRC-2e: Use the following standards in addition to those of Policy OSRC-2d for subdivisions in Scenic Landscape Units: (1) Establish building envelopes for structures and **consider use of height limitations if necessary to further mitigate visual impacts.** (2) Use clustering to reduce visual impact where consistent with the Land Use Element.

(3) Locate building sites and roadways to preserve significant existing tree stands and significant oak trees.

Policy OSRC-2h: For development on parcels located both within Scenic Landscape Units and adjacent to Scenic Corridors, apply the more restrictive siting and setback policies to preserve visual quality.

Comment:

The huge amount of tree removal proposed by the applicant would be substantially inconsistent with policies to protect existing trees. Buildings (e.g., hotel) on slopes would further obstruct views and would create silhouettes against the sky.

- ***Scenic Corridors-***

Relevant Policy:

Policy OSRC-3c: Establish a rural Scenic Corridor setback of 30 percent of the depth of the lot to a maximum of 200 feet from the centerline of the road unless a different setback is provided in the Land Use Policies for the Planning Areas. Prohibit development within the setback [with exceptions, none of which are applicable to proposed project uses].

Comment:

Arnold Drive is a designated Scenic Corridor. Proposed development within SDC along Arnold Drive does not comply with this provision.

- ***Urban Design- Relevant Policies:***

Objective OSRC-5.2: Establish community character as a primary criterion for review of projects in Urban Service Areas.

Policy OSRC-5b: Use the following general urban design principles until Urban Design Guidelines specific to each Urban Service Area are adopted. (1) Promotion of pedestrian and/or bicycle use. **(2) Compatibility with adjacent development. (3) Incorporation of important historical and natural resources. (4) Complementary parking out of view of the streetscape.** (5) Opportunities for social interaction with other community members. (6) Promotion of visible access to buildings and use areas. (7) Appropriate lighting levels.*

Comment:

The project completely ignores community character in its design, building placement, and density. The existing surrounding historic community is semi-rural in character. The proposed project is high-density urban with no attempt to fit in with the surrounding land use character or preserve/incorporate important historic and natural resources.

- ***Biotic Resources*** – The General Plan Open Space and Resource Conservation Element includes many policies to protect native flora and fauna.

Relevant Policies:

GOAL OSRC-7: Protect and enhance the County's natural habitats and diverse plant and animal communities.

Objective OSRC-7.1: Identify and protect native vegetation and wildlife, particularly occurrences of special status species, wetlands, sensitive natural communities, woodlands, and areas of essential habitat connectivity.

Objective OSRC-7.5: Maintain connectivity between natural habitat areas.

Objective OSRC-7.6: Establish standards and programs to protect native trees and plant communities.

Objective OSRC-7.7: Support use of native plant species and removal of invasive exotic species.

Policy OSRC-7d: In all areas outside Urban Service Areas, encourage property owners to utilize wildlife friendly fencing and to minimize the use of outdoor lighting that could disrupt native wildlife movement activity.

Policy OSRC-7h: In coordination with resource agencies, landowners and affected public, conduct a comprehensive study of the cumulative impacts of habitat fragmentation and connectivity loss and the effects of exclusionary fencing on wildlife movement. If warranted, identify essential habitat connectivity corridors and develop recommendations for policies to protect essential habitat corridors and linkages and to restore and improve opportunities for native plant and animal dispersal.

Policy OSRC-7o: Encourage the use of native plant species in landscaping. For discretionary projects, require the use of native or compatible non-native species for landscaping where consistent with fire safety. Prohibit the use of invasive exotic species.

Comment:

The proposed project will significantly disrupt the existing critical wildlife corridor by placing structures within and immediately adjacent to wildlife movement areas and by introducing large numbers of people, vehicles, noise, and lighting. The project will remove special status species and habitats, as a result of complete site clearance. The density and design of the development, as well as fencing, will effectively block wildlife movement. The entire campus is currently used by wildlife to connect to adjacent habitat areas. Furthermore, the proposed long-term demolition and construction activities will create significant impacts on wildlife habitat and movement.

- **Historic Resources-** Among other things, the General Plan notes that “Heritage and landmark trees enhance the quality of the environment and have historical significance.” There are also multiple policies protecting historic buildings.

Relevant General Plan Policies:

GOAL OSRC-19: Protect and preserve significant archaeological and historical sites that represent the ethnic, cultural, and economic groups that have lived and worked in Sonoma County, including Native American populations. Preserve unique or historically significant heritage or landmark trees.

Objective OSRC-19.1: Encourage the preservation and conservation of historic structures by promoting their rehabilitation or adaptation to new uses.

Objective OSRC-19.2: Encourage preservation of historic building or cemeteries by maintaining a Landmarks Commission to review projects that may affect historic structures or other cultural resources.

Objective OSRC-19.3: Encourage protection and preservation of archaeological and cultural resources by reviewing all development projects in archaeologically sensitive areas.

Objective OSRC-19.4: Identify and preserve heritage and landmark trees.

Objective OSRC-19.5: Encourage the identification, preservation, and protection of Native American cultural resources, sacred sites, places, features, and objects, including historic or prehistoric ruins, burial grounds, cemeteries, and ceremonial sites. Ensure appropriate treatment of Native American and other human remains discovered during a project.

Policy OSRC-19d: Include a list of historic structures proposed for designation as County landmarks in Specific or Area Plans or Local Area Development Guidelines and refer the list to the Landmarks Commission for their recommendations.

Policy OSRC-19e: Refer applications that involve the removal, destruction or alteration of a structure or cemetery identified in a historic building survey to the Landmarks Commission for mitigation. Measures may include reuse, relocation, or photo documentation.

Policy OSRC-19f: Use the Heritage or Landmark Tree Ordinance and the design review process to protect trees.

Policy OSRC-19k: Refer applications for discretionary permits to the Northwest Information Center to determine if the project site might contain archaeological or historical resources. If a site is likely to have these resources, require a field survey and preparation of an archaeological report containing the results of the survey and include mitigation measures if needed.

Policy OSRC-19l: If a project site is determined to contain Native American cultural resources, such as sacred sites, places, features, or objects, including historic or prehistoric ruins, burial grounds, cemeteries, and ceremonial sites, notify and offer to consult with the tribe or tribes that have been identified as having cultural ties and affiliation with that geographic area.*

Policy OSRC-19m: Develop procedures for consulting with appropriate Native American tribes during the General Plan adoption and amendment process.*

Policy OSRC-19n: Develop procedures for complying with the provisions of State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, if applicable, in the event of the discovery of a burial or suspected human bone. Develop procedures for consultation

with the Most Likely Descendant as identified by the California Native American Heritage Commission, in the event that the remains are determined to be Native American.

Comment:

The proposed project includes clearance of almost the entire SDC campus, including vegetation. This involves massive removal of historic buildings and trees, including heritage trees that contribute to the historic setting of historic structures and the designated historic district on the SDC campus. Removal of almost all historic features is in direct conflict with the above goals, policies, and objectives.

Thank you for considering the comments in this letter. I hope the County's review of project consistency is comprehensive and factors in the many goals and policies of the General Plan that are aligned with good land use planning.

Regards,

Vicki A. Hill, MPA