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Land Use and Environmental Planning

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October 22, 2024

Mr. Wil Lyons, Project Planner
Mr. Tennis Wick, Director Permit Sonoma,
County of Sonoma
2550 Ventura Avenue Santa Rosa, CA 95403

RE: Eldridge Renewal Revised Application (October 7, 2024 Submittal), SDC Major Subdivision/ Design Review, File # PLP24-0005

Dear County Staff,

I submitted comments on the initial Eldridge Renewal application in March, 2024 and the revised application in July 2024. Please see those comments. There are numerous serious issues that remain with the October 7 submittal. These issues must be resolved before the application can be deemed complete and the EIR process commenced. The revised application proposes an even larger project than initially proposed and envisioned in the Specific Plan.

Once again, the State is putting pressure on the County to quickly approve the SDC development. However, this approach failed before and will stall the process again, without consensus. So far, one multi-year lawsuit was successful because of the failure to adopt the environmentally preferred alternative and failure to address community and planning commission concerns. There is continued overwhelming public concern regarding this project. The County should not succumb to this pressure.

Here is a summary of issues.

1. **Project Size and Scale:** The recent successful lawsuit on the SDC Specific Plan EIR clearly points out that there is not sufficient mitigation or design measures to adequately reduce the impacts of such a large project. The only mitigation is to **reduce the project size**, which should be done now at the design stage.

Using the Builder's Remedy for an increased density project due to the County's failure to complete its housing element ignores public concerns to have a project that is in scale with the community. The project threatens both the critical wildlife corridor and human life in the need of a fire evacuation. The proposal ignores long standing County policies of city-centered and transit-oriented development thereby promoting the type of sprawl, traffic, and building patterns that will significantly contribute to the degradation of Sonoma County. It is the County's responsibility to downsize the project (both residential and commercial uses) to protect both the environment and public safety.

2. **Unresolved Infrastructure - Water Supply and Sewage Treatment:** Whereas the Specific Plan EIR was programmatic and necessarily less detailed, the EIR on the current proposed project will need to have specific information and analysis. Given the Builders Remedy time constraints, this information must be provided before the EIR process begins. **Of critical concern, is the water system.** The application admits that this issue has not been resolved. That alone is sufficient reason to determine the application incomplete. Without knowing the details of the proposed water supply system, the EIR analysis cannot proceed. The water source, treatment component, and transmission improvements must be clearly identified. The same applies to project sewage treatment.

The current application identifies several options for wastewater treatment. CEQA requires that a “proposed project” be identified so the applicant must state which of these options is part of the proposed project. Excerpt of project description:

“The project also has potential to develop recycled water facilities, including a Membrane BioReactor (MBR) wastewater treatment plant designed to produce disinfected tertiary recycled water, one new recycled water storage tank, and a new recycled water pump station and distribution system.”

Is this component part of the project or is it an alternative? This must be clarified.

3. **Hotel Placement and Size:** The developer continues to push a false narrative that the 150-room "boutique" hotel and event center located at the northwest edge of the property is somehow compatible with the wildlife corridor. This is a non-starter from a development standpoint for this property. The proposed placement of the 4-story hotel on a hillside will require massive vegetation removal and grading, will disrupt the pinch point of the wildlife corridor, and will create significant visual impacts in the designated scenic corridor along Arnold Drive. Furthermore, the location is immediately adjacent to a designated HIGH fire hazard zone (see Figure 2-3, Final Specific Plan). The application requests a “waiver” to exceed the 35-foot height limit. There is no justification for this request.
4. **Excessive Commercial Development:** There is no demand or basis for the large amount of non-residential development, especially in this semi-rural location. The market demand study prepared for the Specific Plan determined that the demand for non-residential uses “is limited and higher employment levels will reduce financial feasibility.” Yet, the application includes 400,000 square feet of non-residential use. Commercial use buildings throughout Sonoma Valley (including Glen Ellen) sit vacant and have been vacant for years. The massive 8th Street east development sits vacant after five years.
5. **Excessive Housing Numbers and Lack of Affordable Units:** The proposed housing far exceeds the intent of the Specific Plan and **IS NOT required by the adopted General Plan Housing Element.** Affordable housing was to be at the forefront of SDC redevelopment. There has never been an analysis to determine just how many housing units are needed to support development of the affordable housing component. The current proposal includes 20% “affordable” housing units, with the remainder at market rate. The developer trumpets that the project provides critical "missing middle" housing but does not identify estimated price range. The Planning Commission, in considering the Specific Plan, said that a meaningful approach to the housing issue was to require 28% low income and then apply an 1800 square foot limit on other housing to make sure the price

point could approach the missing middle zone. The current proposal with up to 3200 square foot units does not in fact address the need for “missing middle” housing.

6. **Wildlife Corridor:** The most important wildlife corridor in Sonoma Valley connecting the Mayacamas to Coastal ridges will essentially be closed by the current project. The campus and adjacent area represents a critical pinch point in the corridor. Building a high-density development of the scale proposed would be a huge setback in the effort to preserve the Valley’s natural ecosystem. The building density, number of people, fences, noise, mass grading, and traffic all serve to effectively block the wildlife corridor. The proposal provides no permeability for the movement of wildlife and does not incorporate key provisions adopted by the Board of Supervisors for wildlife protection. Fencing is proposed throughout the development, which will interfere with wildlife movement. The proposed removal of most trees and grading of the site will substantially interfere with wildlife movement and remove important habitat vegetation. The biological resources assessment conducted in June by the applicant’s consultant does little to address and mitigate substantial impacts associated with this mass grading and dense building footprint. The recommendations in the assessment are standard, generic provisions that will not mitigate a project of this size.
7. **Incomplete Project Description:** The project description needs to identify details to address all the demolition and remediation that will need to occur, as well as site preparation, infrastructure repairs, etc. Also, mitigation measures are lacking. In order to adequately assess the project impacts, the following information is needed in the application:
 - a. Demolition Plan – there is still NO information in the application about how demolition will take place. Where will the demolished materials be taken? How long will demolition take place? How many truck trips per day? How will emissions be handled and minimized? What measures will be taken to minimize impacts on surrounding residents and businesses during demolition and construction? It appears that the entire site, including all but 4 existing buildings will be demolished during initial site clearing. This represents a major impact on the site, wildlife corridor, surrounding land uses, and the roadway system. Yet, there is no information on it. Without this information, the EIR cannot proceed.
 - b. GHG – Demolition and construction estimates of GHG and emissions must be calculated and submitted as part of the application.
 - c. Phasing – In the identified phases, will housing be built first? The scant phasing description included in the revised application states only that both the hotel and housing will be part of Phase 1.
 - d. Wildfire Evacuation – A detailed plan for evacuation must be prepared (and analyzed in the EIR), taking into consideration the recent evacuation studies and the cumulative effects of numerous large-scale developments (e.g., CalFire Headquarters, Hanna, Springs Specific Plan) in the region. Experience and these recent studies show that inability to evacuate a fire in this proposed high-density development WUI area would be catastrophic. There is no

possible way for the thousands of residents and employees to evacuate within a reasonable time frame. The Specific Plan EIR was determined by the judge to be inadequate in this topic. Furthermore, with so much more development in high fire hazard areas, the risk of fire increases.

8. **Emergency Access:** The Specific Plan includes a roadway connection to Highway 12 for emergency access purposes only. The application (p.3-21) quotes from the DEIR that a multi-modal roadway connection to Highway 12 would be developed but the Board of Supervisors limited this road to emergency access only. The application needs to be corrected and more details about the road need to be provided – when will it be constructed and by whom?
9. **Historic Resources:** There is no consideration of historic resources protection. The important historic setting of the main brick building and other significant historic buildings will be permanently impacted. The project description must be revised to address this important issue and include mitigation measures for historic preservation. Sustainable reuse of existing buildings as an alternative needs serious consideration.
10. **Arnold Drive Impacts:** There is no discussion of how proposed development will be screened from public views. Arnold Drive is a County-designated scenic corridor because of sensitive views through the SDC campus of both Sonoma Mountain to the west and the Mayacamas to the east. These mountains provide a dramatic backdrop to the SDC campus. The application contains no provisions to adhere to this scenic corridor – 45 feet building heights are proposed for a substantial portion of Arnold Drive, with little or no setback from the road on either side, which conflicts with scenic corridor policies. Before accepting the application, this design flaw must be corrected.
11. **New Roadways:** Rather than maintaining the historic character, the proposed roadway network will create many more roads, paved surfaces, and urban character.
12. **Unjustified Waiver Request:** The applicant has requested waivers in setbacks and building heights in order to maximize the number of housing units. The waivers are unjustified.
13. **Transportation Demand Management Measures:** These measures must be identified now. Also, there is no assurance that existing poor transit will be improved.
14. **Tree Preservation:** The site plan shows preservation of a very small percentage of existing trees and vegetation, which are key elements of the SDC site, from a visual, historic, and wildlife habitat perspective. The large-scale tree removal is in conflict with wildlife corridor protection and historic setting preservation.
15. **Architecture:** There is reference to Healdsburg, Petaluma, and Sonoma, which are all urban cities. The SDC site is not in a city, nor is it even in a designated urban growth area. There is still no attempt to fit in with the surrounding community, which is a historic village.
16. **IDD housing:** As requested by IDD housing advocates, the IDD living quarters need to be next to open space areas, not clustered, and be of a substantial size to accommodate more parking.

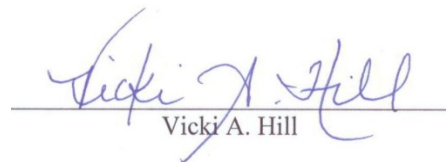
Summary

I strongly urge you to reject the Eldridge Renewal LLC application and determine that it is incomplete, based on its inadequate project description and substantial inadequate protections regarding the sensitive onsite resources, the wildlife corridor, and compatibility with the surrounding Glen Ellen community. There is insufficient information in the project description on which to base a project-level EIR, as required by CEQA. **Since the SDC EIR has been set aside by the court, the County must require a full project EIR, in which to address the many issues raised by the court case.**

The State DGS, as property owner, is endorsing a proposal that is in direct conflict with the agreement that the State and County have regarding development that balances new land uses with existing land uses and community values. There is no support for the proposed high-density residential scale and massive commercial area, which would **more than double the size of the existing semi-rural community** while providing a small amount of affordable and mid-range housing. The project must be scaled down or the approval process will likely be bogged down again.

Thank you for considering my comments during your review of the application for completeness. I hope the County will exercise sound planning judgement and not be swayed by developer and state pressures.

Regards,



Vicki A. Hill

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