

Sonoma Valley Next 100
PO Box 391
Glen Ellen, CA 95442

sonomavalleynext100.org



Attn: Will Lyons

Sonoma County Permit and Resource Management Department

2550 Ventura Avenue

Santa Rosa, CA 95403

sdcc@sonomacounty.gov

September 29, 2025

Re: Scoping Comments for the Sonoma Developmental Center Campus Specific Plan and Eldridge Renewal Project EIR – Utilities and Service Systems

Information provided by your department in the Notice of Preparation document for the SDC Specific Plan and Eldridge Renewal Project EIR is very broad and lacks sufficient detail to fully understand the current condition and future requirements of the water and sewer system.

CEQA Guidelines §15082(a)(1), is clear in the need to provide “sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response”. Per the NOP, your current plan suggests that many unknowns will be resolved at some (unspecified) time into the future (e.g., The Project would repair or replace the existing water treatment plant and repair and reconstruct the off-campus and on-campus distribution system.”)

While Valley of the Moon Water District (VOMWD) has provided a conditional will-serve letter to provide water service to the Eldridge Renewal project, it has not disclosed the findings of a report it commissioned from EKI Environment and Water Consultants.

As part of the EIR, we request that the County take the EKI report under consideration as part of the EIR and make that report available to the public.

It was also understood from a conversation with VOMWD Board members, that Eldridge Renewal was considering commissioning water services distinct from VOMWD. In a subsequent conversation with Kieth Rogal at the NOP comment meeting held at Altimira School, he confirmed that Eldridge Renewal was in the process of enlisting the support of one of the large water utility companies.

As part of the EIR, we request that the County obtain specific details of Eldridge Renewal's plans to use a water utilities company to upgrade and run the water infrastructure at SDC – sharing it with the public and LAFCO. Given the magnitude of this choice – and related environmental consequences, it would be unacceptable to complete the EIR without this detail.

We believe the NOP currently lacks specificity regarding multiple facets of water and sewer infrastructure. The absence of scope, timing, cost information and, environmental impact is unacceptable and we request that the EIR examine, in detail, areas of interest and concern.

Specifically:

1. While there would appear to be significant sources of raw water, details on how it would be conveyed are scant
 - Historically at SDC, water was drawn from a variety of creeks, springs, and groundwater sources, including: Asbury and Hill Creeks providing water via piped diversion at weir structures; Roulette Springs piping water directly to the treatment plant; pumping Sonoma Creek water into Suttonfield Lake during winter months; accessing the three groundwater wells.
 - The raw water transmission system at the time of the SDC closure was dependent on 10-inch transmission line(s) and considered – at that time- to be in moderate to poor condition and in need of replacement within a 10-15year horizon.
 - As part of the EIR, the County should make clear the raw water infrastructure that will be required to meet the Project's needs, including environmental impacts on wildlife and vegetation; the capital cost to implement a viable system; and how this infrastructure would be built and maintained while most of it will exist outside of the land space being used by Eldridge Renewal.

2. The NOP makes the case that the project would utilize “a 1.8-million-gallons-per-day (MGD) water treatment plant (WTP).”
 - There is a distinct absence of information on the contemporary condition and available capacity of the WTP. Originally built in the 1930’s, it once provided up to 1.8 MGD. But as the campus population shrank and prepared for closure, output was limited to 0.2 MGD. It has lain idle since the campus closed.
 - The cost of upgrading the WTP or replacing it is likely significant. A small town, Gretna VA, recently committed to a new WTP to replace its 80year-old facility. The capital cost to replace was estimated between \$8-10m, with a projected capacity much lower than historic SDC levels. (See Exhibit A).
 - As part of the EIR, the County should make clear the current condition of the WTP, the gallons per day capacity required (in support of the project) and the likely capital cost to either upgrade or replace.
3. The current WTP sits outside of the proposed boundaries of the land that would be sold to Eldridge Renewal that forms the basis for the project. The land the WTP sits on is part of the 650 acres of SDC land that is now under the jurisdiction of California State Parks.
 - As part of the EIR, the County should make clear: how the current, or replacement, WTP would operate on land supervised by State Parks; how this would impact the project’s Specific Plan and the County’s General Plan; how this is feasible without impacting the desired environmental benefits of transferring this land to State Parks; and what approvals would be required from LAFCO to operate raw water infrastructure and a WTP on State Parks land.
4. In the NOP there is no mention of how treated water will be conveyed from “outside to inside” the campus boundaries and between the project’s proposed new buildings. Demolishing the majority of existing buildings, excavating, in parts, to a depth of 12 feet, and potentially digging deeper to install new water pipes will place additional stress on soil erosion and water quality of neighboring creeks. The new infrastructure should also provide sufficient water pressure for fire crews during wildfire emergencies.
 - As part of the EIR, the County should make it clear how treated water will be conveyed to the proposed project and between the new development. This should include the capital cost of this infrastructure, impact on soil erosion, water quality of nearby creeks and requirements to maintain desired pressure levels during times of high demand by fire services (e.g., wildfire suppression).

5. It is anticipated that the infrastructure required for raw water pumping and conveyance; upgrading the WTP; and managing treated water capability will be significant – as will the capital needed to implement it. The NOP includes no indication of the cost and capital investment needed to establish an effective and environmentally compliant water infrastructure. Currently, the VOMWD carries little to no long-term debt. Should VOMWD be charged with developing the infrastructure to support the proposed plan, it would likely issue a bond to fund the work. Under such circumstances the cost of that bond would be passed onto existing VOMWD customers in the form of increased water rates. Alternatively, should Eldridge Renewal take responsibility to implement a contemporary water system – via a utility service company, it will likely amortize costs against the cost/selling price of 790 market priced residential homes and the operating cost/rental rates of 200 rental homes.
 - As part of the EIR, the County should make it clear how the substantial cost of providing an effective and environmentally compliant water infrastructure to 990 new housing units, a 150-room hotel and commercial space will be implemented – under two Eldridge Renewal proposal alternatives: VOMWD provided, independent utility service company provided.
6. The proposed addition of a 150-room hotel is one of the least environmentally favorable elements of the Eldridge Renewal proposal. Independent studies calculate that a hotel will consume approximately 990 liters per day (comprised of rooms, kitchen, laundry, pool, irrigation. and cooling). (See – Proposal of a Water Efficiency Indicator for the Hotel Sector – Page 5, table 2). It can be assumed that this luxury property would provide each of these services. At that rate, a 150-room hotel would consume 240 gallons per room per day or 13mm gallons per year or 40 AFY. Today VOMWD supplies approx. 3,000 AFY to approx. 7,200 connections (or 0.4 AFY per connection). (See Exhibit B). At these rates, the hotel would likely become the largest non-agricultural consumer of water in the valley.
 - As part of the EIR the County should make it clear how much water the proposed 150 room hotel will consume (based on number of rooms and services provided) and a database of comparable hotels in the prime tourist areas of Napa and Sonoma Counties and prepare mitigating alternatives including “no hotel”

7. In Sonoma Valley, sewage is managed and treated at the Sonoma Valley Treatment Facility (SVTF) located on 8th Street, Sonoma. The facility is reportedly, capable of treating up to 12 million gallons per day of wastewater and storing up to 35 million gallons of untreated wastewater.
- The NOP makes no reference to the increase in wastewater the 990 homes, 150-room hotel and commercial space will generate, and the SVTF's ability to process it. During heavy rains the facility becomes overloaded as inflows increase significantly - by as much as nine times the average flow - leading to raw sewage overflows.
 - In a letter dated February 9, 2024, Kent Gylfe – a Director of Engineering at Sonoma Water, outlines the limitations of the current sewer system and indicates that the collection system may have insufficient capacity to accommodate the increase in wastewater flows. (See letter from Kent Gylfe: Sonoma Valley County Sanitation District Response to Request for Will-Serve Letter for Sanitation Service, February 9, 2024).
 - As part of the EIR, the County should calculate the estimated sewage outflow from the Eldridge Renewal proposal and understand the ability of the sewage system that runs within the Sonoma Valley and SVTF to cope with that increase. Similarly, there should be a clear understanding of the impact this increase in sewage could have during periods of heavy rainfall within the Sonoma Valley watershed, especially during the year-long demolition process that could result in toxic runoff.

Sincerely,

Sonoma Valley Next 100

PO Box 392

Glen Ellen, CA 95442