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15 March 2024

Keith Rogal, Rogal and Associates,
Eldridge Renewal, LLC
3255 West March Lane, Suite 400
Stockton, CA 95219
keith@rogal.net

Matt Skelton
The Grupe Company
mskelton@grupe.com

RE: Notice of Project Status
SB 330 Preliminary Application File No: PRE23-0008
File No: PLP24-0005
Address: 15000 Arnold Drive, Eldridge, CA 95431
APNs: 054-090-001, 054-150-005, 054-150-010

Dear Mr. Rogal and Mr. Skelton,

This letter provides the County of Sonoma's determination that the above referenced planning project involving a major subdivision and design review applications for a mixed-use housing development, received February 16, 2024, is **incomplete**. To process the application to completion, please review the completeness and advisory items outlined in this letter and provide revised or supplemental application material as needed. Please note that the completeness review does not include a comprehensive review for consistency with standards and requirements, which will be conducted following the receipt and determination of a complete application.

The application is for a mixed-use housing development across three parcels on the Sonoma Development Center campus consisting of the following:

- 1) **1,667,450 square feet of residential space** across 930 residential units. The residential program includes 49 courtyard homes, 293 detached homes, 56 duplex units, 84 triplex units, 189 townhome units, 174 apartment units, 74 mixed-use apartment units, 6 cohousing units and 5 independent living residences. Of the total units, 124 apartment units are proposed as affordable to lower income households including 93 units for households with incomes earning at-or-below 50% Area Median Income (AMI), with monthly rent limited to no more than 30% of the 50% Sonoma County's AMI, and 31 units for households with incomes earning at-or below

60% AMI for Sonoma County, with monthly rent restricted to no more than 30% of the 60% Sonoma County's AMI;

2) **400,000 square feet of non-residential** commercial, institutional, and retail spaces including but not limited to a 150-guest room hotel and conference space, and community facilities; and

The project includes adaptive reuse of several structures onsite and rehabilitation, replacement, and new infrastructure. Multiple parks and greenways are proposed with access to surrounding open space. Approximately 2,750 parking spaces will be distributed throughout the site.

Please feel free to consult Permit Sonoma staff as you work to address each comment and/or recommendation. An open dialogue is welcomed throughout the review process and is not predicated on the prior submittal of *all* information requested.

Please see attached for Permit Sonoma's initial completeness review. In addition, Permit Sonoma has added advisory feedback regarding the design, circulation, and area compatibility of the project in an effort to better align the proposal with the Sonoma Developmental Specific Plan, neighborhood sentiment, and the existing context of the Sonoma Valley and its housing needs.

If you have any questions, please contact Wil Lyons at 707-565-7388 or email at Wil.Lyons@sonoma-county.org

Sincerely,

Wil Lyons
Project Planner

Cc: Tennis Wick, Director
Scott Orr, Assistant Director
Emi Theriault, Deputy Director of Planning
Ross Markey, Comprehensive Planning Manager
Cecily Condon, Project Review Manager
Katrina Braehmer, Supervising Planner

Enclosures: Completeness Items
Referral Agency Comments and Invoices (under separate attachment)
Advisory Comments
County of Sonoma Letter to State Department of Housing & Community Development
(under separate attachment)

COMPLETENESS ITEMS

The items outlined below identify revisions or additional materials that must be submitted to bring the application to completeness based on the following published application requirements:

[PJR-128](#) Housing Development Application Requirements

[PJR-078](#) Major Subdivision Application Requirements

[Sonoma Development Center Specific Plan](#)

1. PROPOSAL STATEMENT AND SUPPLEMENTAL INFORMATION.

a. Architectural Style, Design, Materials, Finishes, and Colors (PJR-128 and SDC Specific Plan).

- i. **Agrihood Plan.** Please provide sections through Agrihood blocks showing housing typologies and how they interface with agricultural cultivation areas, riparian corridors, and the street. Please elaborate on the proposed agrihood development, including the general schemes for the development. Address consistency with SDC Specific Plan Policies 5-47 through 5-50 and the maintenance and promotion thereof including identification of local agricultural community partners per Policy 2-2.

b. Existing and Proposed Structures and Land Uses (PJR-128).

- i. Please add a tabulation of all residential buildings, identifying their location, square footage, number of floors, and type of use, similar to Figure 3-d provided for the non-residential buildings. Please include a calculation of the total residential and non-residential building area in square feet, including residential garages. Building area is as defined by the California Building Standards Code (Title 24 of the California Code of Regulations).
- ii. PJR-128 requires identification of the location and square footage of all outdoor use areas. For multifamily projects, a landscaped, usable open recreational and leisure area, totaling at least two hundred (200) square feet for each dwelling unit, shall be provided except that for projects limited to seniors, at least one hundred fifty (150) square feet of landscaped, usable open area shall be provided for each dwelling unit (Zoning Code Section 26-08-050(I)). In the proposal statement, please provide a calculation of open/recreational space for the multifamily rental development and identify these areas on the preliminary architectural plans and site plan(s).
- iii. The proposal should elaborate on the development's plan for the PEC/Main Building and intensifying and further activating the core. This should include: Proposed or potential uses in the 'Innovation Zone' and a proposed public realm plan in the Core that highlights how the public will interact with the site considering items such as access to commercial areas, parks, open space access, the Central Green, PEC access, transparency and visibility in public areas, public circulation, and an approach to bring the hospitality into the Core.

c. **Circulation, Bicycle and Pedestrian Access, and Transit (PJR-128 and SDC Specific Plan).**

Please describe the project's compliance with the following requirements and add relevant information and details to the project plans:

- i. SDC Specific Plan Policy 3-5 requires that a bicycle and pedestrian path connection be made to Highway 12 and that the fire evacuation road be integrated with a fully separated permeable surface bike route.
- ii. Policies 3-15 and 3-16 require that a community bikeway be established connecting Eldridge to Glen Ellen.
- iii. Policy 3-23 requires the addition of a second bus stop on Arnold Drive, north of the current location.
- iv. Policy 3-41 requires all development to reduce vehicle trips through transportation demand management strategies.
- v. Policy 3-42 requires the establishment of a Transportation Management Association for the entire campus.
- vi. Policy 3-44 requires development of a multiuse path (the Sonoma Valley Trail) along Highway 12 connecting Santa Rosa and Sonoma in the immediate vicinity.
- vii. Policies 5-9, 5-11, 5-12, 5-13, 5-14, and 5-15 provides details regarding streetscape design including street and sidewalk width, pedestrian amenities, general circulation, and access but no significant details are provided in the proposal.

- d. **Water Supply and Sewage Disposal (PJR-128).** The project statement, and accompanying plans, lack detail on the existing and proposed water and wastewater sources, treatment, and distribution systems at the site to serve new development. The proposal statement does not discuss necessary changes in district boundaries and services necessary to accommodate the project. A constraints analysis of water and wastewater systems at the site must be provided relative to any plans for repairing and/or replacing these systems. Please see the requested information from Sonoma Water, the State Department of Water Resources, and the Sonoma Local Agency Formation Commission (LAFCO), enclosed, and incorporate details into the project proposal statement and relevant plan sheets. Please also discuss project compliance with Specific Plan Policies 6-8 through 6-15 that address water and wastewater systems.

- e. **Water and Energy Efficiency (PJR-128 and SDC Specific Plan).** The County is committed to greenhouse gas (GHG) reduction and water conservation in new development to contribute to adopted GHG reduction goals. In the project proposal, please elaborate on the project's compliance with the Specific Plan policies:
 - i. SDC Specific Plan Policy 6-19 requires each building be connected to Microgrids, innovative power generation, and management. Policies 6-8 through 6-15 require responsible, innovative water stewardship. The project application should identify all measures taken to reduce energy demand, support on-site renewable power generation, and water stewardship beyond best management practices (BMP). Though the project statement includes commitment to these goals, no tangible plans are provided. Areas of opportunity addressed by the SDC Specific Plan include the site's access to geothermal, rooftop solar, water reservoir battery, and on-site water recycling. Compliance with Policies 6-26 through 6-30 should be demonstrated.
 - ii. PJR-128 requires an estimate of the annual water demand for the use and a Water Conservation Plan including all reasonably feasible measures to reduce water and energy demand to the maximum extent feasible and enhance water resource recovery to maintain sustainable water supplies. Measures that must be evaluated include: installation of low-flow fixtures, best available conservation technologies for all water uses, rainwater and storm water collection systems, and graywater reuse. Please provide details in compliance with these requirements.
- f. **Power.** The proposal statement should demonstrate the capacity and infrastructural capability of Pacific Gas and Electric (PG&E) to meet demand of the proposed project.
- g. **Wetlands and Riparian Corridors (PJR-128).** Describe the type of work, if any, to be conducted in riparian corridors including infrastructural and restoration work. If any land disturbance will occur within applicable streamside conservation areas (i.e. riparian corridor setbacks), please show this in the preliminary grading and stormwater plans and project site plan(s). Please review and address comments from the Permit Sonoma Natural Resources Section, enclosed.
- h. **Biological and Natural Resources (SDC Specific Plan).** SDC Specific Plan Policies 2-6 through 2-30 regard protection, restoration, and long-term stewardship of the site's many natural resources including riparian corridors, wildlife corridors, and open spaces. In the project proposal, please elaborate on the project's compliance with the Specific Plan policies:
 - i. **Wildlife Corridor.**

1. SDC Specific Plan Policy 2-6 calls for less intensive development along the northern edge of the core property. See Advisory section below for further feedback.
 2. Policy 2-8 calls for a maintenance program in collaboration with the owner and operator of the surrounding parklands and open space. Provide details demonstrating work towards this effort.
- ii. **People/Wildlife Interface.**
1. SDC Specific Plan Policy 2-15 calls for collaboration with local wildlife protection groups for an educational program regarding the site's abundant wildlife. Provide details demonstrating work towards this effort.
 2. Policy 2-16 requires wildlife permeable fencing within the designated open space. Please provide details and incorporate into project plans.
- iii. **Biological Resources and Habitat.**
1. SDC Area Specific Plan Policy 2-18 requires collaboration with local groups to remove invasive species. Please provide plans and documentation towards this effort.
 2. Policy 2-19 requires native plant selection palette. Policy 2-35 requires all new landscaping to be fire resilient. Discuss in the proposal and provide more detailed planting plans.
 3. Policy 2-21 requires wetland preservation enhancement in the areas east of the core campus while Policy 2-23 requires that the development will not contribute to or result in net loss of wetland area or wetland functional and habitat value. Please demonstrate compliance with these policies.
- iv. **Biological Resource Assessments.** SDC Specific Plan Policy 2-28 requires that "Prior to the commencement of the approval of any specific project in the Proposed Plan area, Project Sponsors shall contract a qualified biologist to conduct studies identifying the presence of special-status species and sensitive habitats at proposed development sites and ensure implementation of appropriate mitigation measures to reduce impacts to sensitive habitat or habitat function to a less than significant level." Please provide relevant biological resource studies or evidence that these are underway to continue the review process.
- i. **Hazards (PJR-128 and SDC Specific Plan), including Wildfire and Evacuation.** It is stated in the project statement that the project would abide by SDC Specific Plan Policy 2-54, which requires the project sponsor to proactively plan for emergency wildfire safety by:

- i. Developing an emergency preparedness and evacuation plan;
- ii. Building or designating an on-site shelter-in-place facility;
- iii. Ensuring that every parcel within the Core Campus has two routes for ingress and egress during an emergency; and
- iv. Posting signage for designated evacuation routes throughout the site and along Arnold Drive.

Please provide wildfire protection plans including buffers and details to the project submittal. Additionally, please clarify whose responsibility the construction and maintenance of the new Highway 12 connector evacuation road will be and how it will integrate into the larger project's road network.

2. HOUSING PROPOSAL (PJR-128 and SDC Specific Plan).

- a. **Proposed Units.** Update Figure 4-d with the following information:
 - i. The tenure of all units (e.g. rental or for-sale); and
 - ii. The proposed affordability level for all units.
 - b. **Existing Units.** Update Figure 4-d with the following information:
 - i. Date of vacancy for all units identified as currently vacant; and
 - ii. Unit type, number of bedrooms, and tenure of each unit.
 - c. **Inclusionary Proposal.**
 - i. **Affordability Levels.** SDC Specific Plan Policy 4-17 requires that at least 50 percent of market rate housing should be designed as Missing Middle Housing "intended for sale or rental to individuals or families making between 121 and 160 percent of Sonoma County's Area Median Income (AMI) by including: small lot sizes; smaller, efficient dwelling sizes; a mix of duplex, triplex, fourplex, townhomes, and cottage clusters; a range of studio through three- or four-bedroom units; and simple but high-quality materials in construction and finishes." Please update Figure 4-a to identify the proposed affordability levels for all units. Please see Advisory section below for ways to better align the proposal with this policy.
 - d. **Housing Proposal Site Plan.** PJR-128 requires a description of how the project will comply with Article 89 and shall include an accompanying site plan. The site plan provided should identify the location of the affordable housing units.
3. **SITE PLANS (PJR-128).** Site plans must provide a comprehensive understanding of the existing and proposed conditions on the project site in accordance with [PJR-129](#). The required information may be represented across multiple plan sheets. The project application generally lacks sufficient detail on the infrastructure improvements necessary to redevelop the site. Among other missing requirements in PJR-129, please address the following:

- a. **Plan Boundary Discrepancies.** Please address any discrepancies between the Specific Plan boundary and other boundaries shown on provided maps, including the “DGS Core Boundary.” If this has been imposed by the California Department of General Services, please add clarification to the project statement.
 - b. **Building Locations.** SDC Specific Plan Policy 5-24 states “Buildings should engage the public realm, with building entrances, public spaces of buildings such as lobbies, and windows facing the public realm, with any parking or loading areas in the back. Where buildings face multiple streets, both the primary and secondary facades should provide engagement with the public realm through windows, secondary entrances, and improvements to the public realm.” Please see Advisory section below for ways to better align the proposal with this policy.
 - c. **Connection to Surrounding Open Space.** SDC Specific Plan Policy 2-3 requires improvements to pedestrian and bicycle access to the open space surrounding the core campus. Policy 2-4 requires realignment and trail upgrades while Policy 2-5 requires consideration of connection to Suttonfield Lake. Please add detail to the site plan to verify compliance with connections to the open and recreational spaces surrounding the Core and show how these influence circulation around the site.
 - d. **Preliminary Sewer and Water Infrastructure Plan.** Please prepare and submit a preliminary sewer and water supply plan providing additional information on proposed on-site and off-site sewer and water supply improvements.
 - e. **Fire Access.** Detailed civil plans were not provided indicating fire safe road access, inside turning radius, etc. in compliance with fire safe standards. Please review attached Fire Prevention comments for more information.
 - f. **Community Center.** Policy 6-7 stipulates allocation of space for a local non-profit or other operator to build and operate a gym and community center for the wider Sonoma Valley. Please show this on plans.
- 4. MAJOR SUBDIVISION TENTATIVE MAP (PJR-078 and SDC Specific Plan).** Permit Sonoma Form PJR-078, the County’s Subdivision Ordinance (Sonoma County Code Chapter 25), and the State Subdivision Map Act (SMA) require submittal of a tentative map. PJR-078 requires the tentative map to provide the following information:
- A site location map indicating the location of the proposed subdivision in relation to the surrounding area or region.
 - The tract name, if any, date, north point, scale, and sufficient description to define the location and boundaries of the proposed tract.
 - Names and addresses of applicant, property owner of record, and engineer or surveyor.

- Location, names and present width of adjacent or abutting roads, streets, highways and ways, and their status as public or private roads.
 - The locations, names, widths and approximate gradient of all roads, streets, highways, and ways in or adjacent to the proposed subdivision or to be offered for dedication.
 - The location and width of all proposed or existing easements for drainage, sewerage, public utilities and roads.
 - Sufficient contours to determine the general slope of the land and the high and low points thereof.
 - The approximate dimensions of all lots and radii of all curves.
 - Total acreage of site (gross and net), total number of lots, minimum lot size, average lot size, and lot numbers.
 - The location and identification of all existing structures on the property, including distances to existing and proposed property lines.
- a. The tentative map does not depict proposed parcels associated with the ownership units or those specified for rental, mixed-use, and commercial areas. Please prepare a draft tentative map that includes *all* proposed lots for the project.
 - b. The tentative map must show *all* road easement widths in compliance with Sonoma County Chapter 25 (Subdivision Ordinance), the Subdivision Map Act, and State Board of Forestry's regulations for subdivisions within State Responsibility Areas.
 - c. The tentative map must show all emergency vehicle access easements with a road surface (i.e. not on grass, turf, gravel, etc.).
 - d. The tentative map should provide a sheet with all proposed subdivision roads, parcel lines, emergency vehicle access easements, and public utility easements. Sections should be provided for all subdivision roads showing all cuts, fills, side drainage, and sidewalks as applicable.
 - e. The tentative map must show the locations, names, widths and approximate gradient of all roads, streets, highways, and ways in or adjacent to the proposed subdivision or to be offered for dedication.
 - f. The tentative map must show the location and width of all proposed or existing easements for drainage, sewage, public utilities and roads.
 - g. SDC Specific Plan Policy 4-8 requires a total of 5 residential parcels comprising at least 1.25 total acres of land for individuals with developmental disabilities within at least three of the five specified districts. Please identify these on the tentative map submission.

5. PRELIMINARY GRADING AND DRAINAGE PLAN (PJR-128 and SDC Specific Plan).

- a. **Contours.** The grading plan must indicate existing contours shown with light or dashed lines and proposed contours shown with darker solid lines across the building site and the limits of grading.

b. Details.

- i. The amount of proposed excavation, any off-haul, and fill in cubic yards and the location of proposed deposition and borrow sites for each major element of the project must be indicated.
 - ii. SDC Specific Plan Policy 6-16 requires minimization of impervious surfaces and incorporation of prioritization of permeable surfaces. Please demonstrate compliance in plans and calculations.
 - iii. Policy 6-18 requires incorporation of site design measures and Low Impact Development (LID) features such as bioretention facilities in accordance with the Bay Area Stormwater Management Agencies Association (BASMAA) Manual or otherwise required by the Grading and Stormwater Division of Permit Sonoma. The bioretention facilities should have a surface area of at least 4 percent of the tributary impervious area. Please provide plans consistent with this policy.
- c. **Low Impact Development.** SDC Specific Plan Policy 6-17 requires that the project maintain high water quality in lakes and streams. The proposal lacks detail regarding flow into local watersheds and riparian corridors. The project should explicitly address how stormwater discharged to receiving waters will not violate water quality standards. Please see attached comments from the Permit Sonoma Natural Resources Section.

6. PRELIMINARY ARCHITECTURAL PLANS AND RENDERINGS (PJR-128 and SDC Specific Plan).

- a. Please revise architectural drawings to clearly demonstrate the architectural styles of the typologies identified in the proposal. The housing diagrams are difficult to respond to due to the lack of scale and detail, and overly simplistic rendering style. Please resubmit plans with the following information for each proposed housing type:
 - i. Lot dimensions.
 - ii. Typical entries, living areas, and rear access.
 - iii. Delineation between unit and overall building footprint.
 - iv. Parking structures, if proposed.
 - v. Architectural elevations that articulate how the chosen building form is derived from the character and history of the existing site's buildings.
 - vi. When adjoining protected open space, show the limits of disturbance, transition or restored landscape and native landscape.
 - vii. Separate site plan and sections showing proposed building heights from grade as they are deployed across the site.

- viii. A non-residential square footage tabulation identifying differences, if any, between proposed buildout and those enumerated in the Specific Plan.
 - ix. A tabulation comparing the project details with SDC Specific Plan Table 4-1: Specific Plan Land Use Density and Intensity Standards (FAR), Table 4-2: Minimum and Maximum Housing Units by District, and Table 4-3: Projected Specific Plan Build Out
 - x. Material and Colors.
 - 1. Provide a materials and colors palette for each housing type.
 - 2. SDC Specific Plan Policy 5-59 requires a mix of high-quality, long-lasting materials for all new buildings, and use of reclaimed and salvaged materials from demolished SDC buildings wherever feasible. Please provide information regarding plans for reuse of existing material at the site.
 - xi. Policy 2-36 requires a five-foot buffer of defensible space around all buildings. Please delineate this buffer on the plans.
 - xii. Depiction and dimensions of all outdoor use areas, fences, driveways, patios, utilities, and parking areas.
- b. **Site and Corridor Section Studies.** Provide key illustrative cross sections to show scale, proposed public realm relationships, mobility options and building mass. Key sections should include:
- i. *Arnold Drive.* Section of Arnold drive and proposed strategies to incorporate road into the development as a key green space/ mobility corridor vs barrier between east and west sides of the campus.
 - ii. *Density Gradient.* Complete section from Arnold Drive through Sonoma creek to eastern edge of Agrihood to provide more clarity and understanding of open space, agricultural production, street, parking and building relationships to one another, and relative scale of positive and negative spaces.
 - iii. *Frontages Along Sonoma Creek.* Enlargement and to scale cross section of proposed development fronting Sonoma Creek. It is unclear from the plan if the proposed residential products are to front on the creek, or how the public to semi-private transition will be handled. Provide to scale lot prototype section showing front of home, proposed door yard, fencing, public walk and relationship to setback line.

- iv. *Central Green*. Building face to building face, with ground floor activation strategies more clearly articulated.
- v. *Sonoma Circle Drive*. Illustrate intended building/ street and public realm relationships in southern and northern neighborhoods.
- vi. Please provide sections through blocks (curb cut to curb cut) of the various housing typologies to demonstrate:
 - 1. Building Access
 - 2. Pedestrian, Bicycle, and Vehicle Circulation
 - 3. Neighborhood Scale
 - 4. Landscaping improvements

7. PRELIMINARY LANDSCAPE PLANS (PJR-128 and SDC Specific Plan).

- a. Preliminary landscape plans must demonstrate compliance with the County's water-efficient landscape ordinance, [Article 7D3](#), including water usage calculations demonstrating compliance with the Maximum Applied Water Allowance (MAWA).
- b. [SDC Specific Plan Policies 5-17 through 5-22](#) include specific landscaping, park, and open space amenities. Please provide details demonstrating compliance with these policies.
- c. [Policies 2-31 through 2-36](#) concern safe wildfire landscaping including buffers, maintenance, and irrigation. Please provide details demonstrating compliance with these policies.
- d. [Policy 4-20](#) requires preservation of trees and landscapes that contribute to SDC's unique character. Provide diagrams of those being preserved, removed, and rationale as to why.
- e. [Policies 5-15a, b, c, f and Policies 5-40, 5-45](#) provide road and pedestrian access requirements on specific streets and neighborhoods, including landscaping considerations and tree preservation. Please demonstrate compliance.

8. LIGHTING PLAN (PJR-128 and SDC Specific Plan).

- a. Lighting plans should show wildlife and riparian corridor boundaries to evaluate consistency with [SDC Specific Plan Policy 2-7](#).
- b. [Policy 2-11](#) dictates that all outdoor lighting in the public realm and for all new buildings shall be "dark sky" compliant; fixtures should be fully shielded, down-cast lights, and have a color temperature of no more than 3,000 Kelvin. Please demonstrate dark sky compatibility of all light fixtures.
 - i. Lighting for outdoor recreational facilities is prohibited after 11pm.

- c. Policy 5-5 requires restoration and re-use of existing “acorn” lights where appropriate. Please demonstrate this in the lighting plan noting details for fixture restoration.

9. PARKING PLAN (PJR-128 and SDC Specific Plan).

- a. Include a calculation table that identifies the number of required parking spaces and the number of spaces provided based on all proposed uses.
- b. Please demonstrate compliance with the following SDC Specific Plan Policies regarding parking:
 - i. 3-28 and 3-29: Confirm that minimum parking requirements do not exceed average peak parking demand rates and demonstrate that proposed parking serves multiple uses and destinations to minimize parking impacts, maximizing efficient use of space on site.
 - ii. 3-31: Demonstrate application of “unbundled parking” principles.
 - iii. 3-32: Demonstrate work towards exploration of feasibility of partnering with a carshare company or creating an SDC-specific carshare program.
 - iv. 3-33: Demonstrate incorporation and prioritization of back-in diagonal spaces and provide rationale where not incorporated.
 - v. 3-36: Demonstrate allowance for flexible use of parking spaces, curb space, and loading areas as appropriate for restaurants, cafes, and other businesses to enhance the pedestrian realm. See advisory section for further details.
- c. **Bicycle Parking.** Parking calculations and plans should include bicycle parking as stipulated in Zoning Code Article 86, including provisions for non-residential projects with fifty or more employees to provide secured, covered bicycle parking and shower facilities. Furthermore, Policy 3-16 requires bicycle parking. Please show bicycle parking and facilities details to the project plans.

10. TREE PROTECTION PLAN (PJR-128). The Tree Protection Plan should specify which arboreal value chart is to be used to determine mitigation amounts. All site plans and improvement plans shall also depict the protected perimeter of protected trees to remain. The application should identify the mitigations for valley oak removal using the mitigation tables in the Valley Oak Habitat Ordinance. The site plans for tree removal should depict where the combining district overlaps with valley oaks proposed for removal.

11. SEWAGE DISPOSAL AND WATER SUPPLY (PJR-078). The application must demonstrate there will be adequate water supply and sewage disposal to serve the project. If the project will connect to an existing sewer or water district, evidence that the provider is willing and capable of service to the project will be required.

12. SIGNAGE REQUIREMENTS (PJR-128 and SDC Specific Plan).

- a. Signage is an integral component of Design Review for all parts of the project. Please provide conceptual plans of proposed signage including colors, materials, dimensions, and a key map. Please tabulate the project signage based on the signage categories and associated standards contained in [Section 26-84-030](#) to demonstrate consistency with standards.
- b. [SDC Specific Plan Policy 5-10](#) requests consideration of including multiple languages including Spanish, English, and Native Languages as well as braille and large high-visibility text on site signage. Please discuss this in the sign plans.

13. TRIBAL CULTURAL RESOURCES (SDC Specific Plan).

- a. [SDC Specific Plan Policy 2-52](#) requires that a “Cultural Resources Management Plan (CRMP), in consultation with Graton Rancheria and other local tribes culturally and geographically associated with the Planning Area, to identify and manage cultural and tribal cultural resources.” Please provide a CRMP that includes, but is not limited to, the following: a Cultural Resources Management Plan, a cultural resource survey, and a treatment testing plan.”
- b. [Policy 4-27](#) requires the preparation of interpretive signage, art, or other exhibition onsite to educate residents and visitors about the history of the site, including pre-history, Native American history and the history of the Sonoma State Home. Signage should be available in English and Spanish and Native American tribal language as appropriate. Please provide details on how this will be accomplished in the proposal identifying measures that honor the site’s Native American history.

14. HISTORIC PRESERVATION PLAN AND CULTURAL RESOURCES (SDC Specific Plan).

- a. **SDC Specific Plan Policy 4-21.** As part of its planning application submittal and prior to any modifications or removal of historically contributing buildings/features, require that the project sponsor prepare a historic preservation plan, based on desired development and suitability of buildings for adaptive reuse, with the overarching objective of preserving a set of buildings that reflect the diversity of building types and the continuum of life at the former SDC.
 - i. **SDC History.** [SDC Specific Plan Policy 2-47](#) requests consideration for the reuse of the Sonoma House as a museum while [Policy 2-48](#) states that effort must be made by the developer to ensure the stories of those who lived and worked at SDC over its long history are told. Sonoma House is identified in [Policy 2-47](#) for this purpose. [Policy 4-27](#) requires the preparation of interpretive signage, art, or other exhibition onsite to educate residents and visitors about the history of the site, including pre-history, Native American history and the history of the Sonoma State Home. Signage should be available in English and Spanish and Native American tribal language as appropriate.

1. Please provide details on how this will be accomplished in the proposal identifying measures that honor the history of the site as a center for the developmentally disabled, civil rights for the disabled, and how these themes are incorporated into the overall buildout of the site.
 2. Permit Sonoma recommends an additional plan showing historic and contributing resources maintained, and identifying key features that connect the site history to the proposed site plan along with a plan demonstrating historic and contributing resources removed, including streets, along with specific plans for reuse.
- ii. **Programming.** SDC Specific Plan Policies 2-49 and 2-50 require programming for the arts, history, and inclusionary attractions to the site. Please provide demonstration of progress towards this effort.
- iii. **Reuse and Preservation.**
1. SDC Specific Plan Policy 4-21 requires that the historic preservation plan preserve and reuse buildings of diverse architectural styles. Most buildings identified for preservation are of a single, warehouse style. Policy 4-23 encourages preservation of Wagner, Dunbar, Wright and Hatch. Policy 4-25 encourages reuse of Chamberlain Hospital, Palm Court, Pines, and the Entrance Gate. If these are not to be preserved, please demonstrate reasoning for their removal.
 2. SDC Specific Plan Policy 4-24 requires preserving 8 of the 10 contributing buildings fronting Sonoma Avenue unless otherwise determined by an approved historic preservation plan. Please demonstrate compliance or reasoning for their removal.
 3. SDC Specific Plan Policy 4-26 requires that houses along Arnold Drive in the core campus be reused or reconstructed as necessary. It also requires a historic preservation architect be hired by the developer to perform a conditions assessment and reconstruction plan. Please demonstrate compliance and confirm status of historic preservation architect.
 4. SDC Specific Plan Policy 4-28 requires that contributing buildings as defined in Appendix A are documented prior to substantial alteration or demolition. Please add these details to Historic Preservation Plan or demonstration of work towards this effort.
 5. SDC Specific Plan Policy 4-29 requires that if contributing historic structures that are demolished within the Planning Area, require that

materials be made available as salvage as described in Appendix A, in order to facilitate the reuse of materials and historic detailing, and to reduce demolition waste. Please add these details to Historic Preservation Plan.

- iv. **Harney Street Bridge.** SDC Specific Plan Policy 2-54 calls for conservation of the Harney Street Bridge. The bridge itself is narrow and is likely insufficient for evacuation and daily traffic loads as a result of this build out. Please specify any treatment or plans intended for this issue.

REFERRAL AGENCY REVIEW

The following is a summary of preliminary comments or requests for information from referral agencies. An overview of the comments is below. Full comments and conditions are under separate attachment.

- **Lytton Rancheria.** A Phase I archaeological study was requested. Permit Sonoma has provided the study prepared for the Specific Plan. Additional studies may be required.
- **Permit Sonoma Grading and Stormwater.** The required review fee must be paid. Please see the enclosed invoice and submit payment online. The Grading and Stormwater Section will review the Preliminary Stormwater Control Plan and provide comments.
- **Permit Sonoma Building Division.** Draft conditions of approval have been issued and are attached herein. A fee for review has been charged and is on the enclosed invoice.
- **Permit Sonoma Survey.** Draft conditions of approval have been issued and are attached herein.
- **Permit Sonoma Natural Resources.** Comments are provided related to riparian corridor incursions, wildfire resiliency, tree and oak woodland protection, water supply and stormwater management infrastructure, and more. The following are specifically requested:
 - a. A discussion of why the minimum riparian corridor setbacks suffice (Specific Plan Policy 2-25). If the project involves encroachment into the minimum riparian corridor setbacks, a streamside conservation plan is required. Please address this in the project proposal statement and in the Biological Resources Assessment (see below and under the Completeness Items section).
 - b. A Biological Resources Assessment (Specific Plan Policy 2-28)
 - c. Additional information in the Tree Protection Plan to evaluate consistency with the County Tree Protection Ordinance and Valley Oak Habitat Combining District.
 - d. A Water Supply, Use, and Conservation Assessment
- **Sonoma County Fire Prevention.** Detailed civil plans were not provided indicating one-way or two-way public roads, inside turning radius, etc. The project must comply with Fire Safe Standards – Division B. Projects having more than 50 dwelling units shall have two separate and approved fire apparatus access roads (CFC Sec. D106.1). Plans should be revised to comply with applicable standards as detailed in the enclosed comments from Fire Prevention.
- **Sonoma Public Infrastructure (SPI).** The Department is analyzing the traffic studies prepared for the SDC Specific Plan EIR against the development proposal. Further information, or study, may be required.

- **California Department of Transportation (CalTrans).** Permit Sonoma has provided CalTrans traffic studies prepared for the SDC Specific Plan EIR. Further information, or study, may be required.
- **State Water Resources Control Board Division of Drinking Water.** The proposal must clarify if the project will establish or operate a new Public Water System or receive drinking water from an existing, permitted Public Water System (e.g. Valley of the Moon Water District).
 - a. If the project will establish a new Public Water System, the developer must submit a Preliminary Technical Report and Permit Application Packet to the State.
 - b. If the project will connect to an existing Public Water System, the Valley of the Moon Water District must apply for a permit amendment to add the SDC facilities to their inventory.
- **Sonoma Water / Sonoma Valley County Sanitation District.** The proposal statement and plans lack sufficient detail for a complete understanding of the existing and proposed water and wastewater systems. The application needs detailed plans, a constraints analysis and discussion of off-site capacity impacts, and clarification on operations, jurisdiction changes, and more. Please see full comment letter enclosed and incorporate the required detail in the proposal statement and relevant plan sheets.
- **Sonoma Local Agency Formation Commission (LAFCO). Utility Services and Service Annexation.** It is unclear what uses of municipal agency-provided services (water and sewage disposal) will be needed to serve the proposed development. Should the proposed site be required to be annexed to the Sonoma Valley County Sanitation District to receive sewage disposal service, a sphere of influence amendment must be sought from LAFCO, followed by an application for annexation. The site is eligible for potential annexation to the Valley of the Moon Water District and to the extent that the proposed development relies on municipal water service from that agency, an annexation of all or a portion of the site to the water District must be sought. Please clarify the proposed services plan in the proposal statement and applicable plan sheets.
- **Sonoma County Department of Health Services, Environmental Health.** General comments and conditions are provided related to drinking water, retail food facilities, sales of alcohol beverages, and public pool operations.

ADVISORY COMMENTS

The following advisory comments are not items that determine the completeness of the application. Advisory comments highlight relevant policy issues, suggested revisions, guidance on environmental analysis, and next steps. Comments provided in the following section are purely advisory; they do not guarantee approval or denial of the application.

REQUIRED ENTITLEMENTS

Once Permit Sonoma has determined the application is complete for processing, additional entitlements, such as a Specific Plan Amendment, may be required based on the project's consistency with local and state regulations.

CONSISTENCY WITH APPLICABLE PLANS, POLICIES, AND STANDARDS

Permit Sonoma will provide a determination of any inconsistency, nonconformity, or non-compliance with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision within 60 days of the date the application is determined to be complete.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

In accordance with CEQA Guidelines Section 15060, Permit Sonoma will begin environmental review of the project after determining that the application is complete for processing.

Appendix A of the Specific Plan lists the standard conditions of approval that apply to all future development within the Planning Area. Conditions are applicable at different stages of the planning and development process. The following lists the conditions that must be completed as part of environmental review for the project:

- UTIL-1 through UTIL-4
- WQ-5
- GEO-1
- BIO-1
- LU-1

Additional technical analyses may be required to evaluate the environmental impacts of the project under CEQA, as will be determined once the application is deemed complete. The project's consistency with the SDC Specific Plan and the assumptions studied within the SDC Specific Plan Environmental Impact Report will affect the necessary level of environmental review for the project.

PUBLIC OUTREACH

Permit Sonoma highly recommends conducting outreach with the local community to listen and respond to public concerns regarding the project early and throughout the life of the project.

DESIGN COMMENTS

Permit Sonoma provides the following preliminary feedback regarding project design elements, site circulation, and area compatibility of the project in an effort to better align the proposal with the SDC

Specific Plan, neighborhood sentiment, and the context of the Sonoma Valley and its housing needs. This is not an exhaustive list of applicable standards or requirements.

1. **Benefits of the Proposal.** Overall, Permit Sonoma commends the application for the following:
 - **Clear, Organizing Center.** Preservation of the Central Green, and intensified development brought closer to its edges will strengthen the contrast of built and green space and make the symbolic “heart” of the Village more discernable.
 - **Housing Diversity.** The plan seeks to offer a variety of product types within the totality of the Village. There is a good range of product typologies and net densities.
 - **Density Gradient.** The organization of product typologies creates a legible and appropriate density gradient from the eastern agri-hood to higher density core.
 - **Creek Frontage Strategy.** As illustrated, the plan provides the potential for a unique lifestyle with homes fronting on Sonoma Creek – encouraging access to the frontage while ensuring that the creek areas are visible and monitored.
 - **Multiple Parks and Open Spaces.** The plan proposes many parks throughout the development of the site, including dog parks. Dog parks encourage responsible socialization, vector containment, and healthy activity of pets, elevating the overall wellbeing of both pets and their owners throughout the surrounding area while decreasing likelihood of aggression and destructive behavior.
2. **Recommendations for Improvement.**
 - b. **Land Use Policy.**
 - i. **Locations.** Several items, including the Hospitality, Live/Work, and Ballfields are out of alignment with the Land Uses as designated in the SDC Specific Plan. SDC Specific Plan Policy 2-6 calls for less intensive development along the northern edge of the core property. Permit Sonoma strongly disagrees with the hotel placement as proposed. Its removal from the Core area of the site prevents a strong sense of public activity in the area while adding intensity along a sensitive wildlife corridor.
 - ii. **Hotel.** SDC Specific Plan Policy 4-10 requires that the hotel or hospitality use include community serving components such as food services, recreational facilities, or performance spaces. The Land Use element of the Specific Plan allows 120 rooms in the hotel, however the project proposes 150. Please reduce total rooms and demonstrate compliance with this.
 - c. **Residential Program.**
 - i. SDC Specific Plan Policies 4-6 and 4-7 require that each block and neighborhood consist of a diverse range of housing typologies to create mixed product street

patterns and diverse lifestyles. The current proposal reflects blocks of single unit typologies.

- ii. SDC Specific Plan Policy 4-16 requires inclusionary housing be collocated with market rate housing rather than clustered and isolated. Plans should be revised to integrate inclusionary housing to meet this policy.
- iii. Permit Sonoma requests an explanation of the proposed housing choices in comparison to any development market analysis for the site to best help the department review the proposal collaboratively.

d. Site Planning and Design.

- i. **Minimize Reliance on Private Yards.** The design should recognize and rely on the fact that the site is surrounded by over 700 acres of open recreational space. This aspect is a primary impetus for people wanting to live at the site. As such, minimizing reliance on private yards is not only feasible but a necessity. Doing so increases opportunities for Missing Middle housing types, permeability throughout the development, tree preservation, and green space connectivity.
- ii. **Minimize Reliance on Single Family Detached Dwellings and Increase Missing Middle Housing Typologies.** The unit makeup does not reflect the greater housing needs of the Sonoma Valley. Greater diversity in housing types is necessary to increase equitable housing access. Greater inclusion of townhomes, duplexes, triplexes, and courtyard/cottage housing styles better addresses the housing crisis and situates the proposal in greater alignment with State and County goals. While the overall proposed range of products is diverse – they are still largely single family detached, missing a range of more interesting types that can reflect the character and forms of the historic campus, while also generating fine grained, mixed tenure/ mixed income housing that is the overall intent of the Specific Plan. Better mixing proposed products within blocks would provide several benefits including:
 - 1. Increased overall density per neighborhood.
 - 2. Ability to create complete neighborhoods in phases.
 - 3. Adaptive market feasibility for products over time to most desired products.
 - 4. Two noticeable product types that would help round out the portfolio and add net density and market appeal to a different demographics are Bungalow or Cottage Courts and smaller Multiplexes. Explore the introduction of a multiplex (mansion unit) product that is smaller than Type G, but affords more net density than Type F.

- iii. **Intensify the Core.** The use of the PEC and its immediate context should be greatly intensified. Consider moving hospitality into the PEC to intensify the use of the PEC to help accomplish this. Hospitality functions, when fully integrated into the core, will create both the ‘body heat’ needed to attain a vibrant mixed-use village and provide the means to better support marginal retail and local serving commercial and institutional uses. Furthermore, SDC Specific Plan Policies 5-32 and 5-33 for the maker spaces require orientation of building activity away from the Wildlife Corridor and favors a sense of community that the extra body heat at the core would bring. Policy 5-26 envisions the life and dynamism that diverse retail, restaurants, and hospitality would bring. Inclusion of balcony and rooftop assets in higher density areas would work to further bring life to this critical central area of SDC. Expanding transit to enable equitable access around the site itself, beyond the minimum connections to Sonoma County Transit Authority connections, would further activate the site.
- iv. **Present a realistic strategy for a vital community core.** The open space framing of PEC makes it an ‘object in the park’, lacking engaged urbanism to generate a thriving, vital heart to the Village. This disconnect, coupled with the low number of total activated rooftops for the project means the Specific plan’s Guiding Principle #1 “Promote a vibrant mixed-use village,” is unlikely to be attained. The proposed use of PEC as a Food Hall is too small to be practical or feasible in such an isolated building. Circulation and cultural event access between the central green, adjacent commercial areas, and the PEC should *encourage* spillover and work together to amplify activity there.
- v. **Refine density gradient.** The organization of product typologies creates a legible density gradient from the eastern Agrihood to higher density core. A more detailed review evidences a monotonous product mix at the block level that could be much more interesting with a stronger intermixing of product types as one moves across the site, with multiple benefits to the sponsor and the plan (see above).
- vi. **Create mixed product neighborhoods.** While the overall proposed range of products is diverse – they are still largely single family detached and isolated, missing a range of more interesting types that can reflect the character and forms of the historic campus, while also generating finer grained, mixed tenure/mixed income housing that is the overall intent of the Specific Plan.
- vii. **Activate the site with architectural features such as balconies and accessible rooftops.** In addition to allowing residents further access to the profound settings surrounding SDC, these features work to add a sense of place and vibrancy to any neighborhood. SDC Specific Plan Policies 5-25 through 5-27 enforce these goals and would add substantial vibrancy to the area.

- viii. **Establish a strategy for complete, phased neighborhoods.** The proposed homogeneity of each neighborhood, largely driven by a single product/ single builder development strategy, will result in architecturally monotonous streetscapes and many sections of the Village being under construction for extended periods of time. The goal of the plan is to create fully intermixed product offerings resulting in complete neighborhoods with builders working in tandem to complete a single neighborhood or phase before moving on to other portions of the site.
- ix. **Reflect the History and Unique Opportunities of SDC.** The site plan reflects a 'greenfield' approach to development, removing much of the experience of history, form, and pattern that the campus precedent established. Permit Sonoma appreciates the increased attempts to adaptively reuse signature buildings but also recommends greater maintenance of the prior campus' irregular block/ street pattern. The current proposal results in a development that is devoid of any historical references. There is additional opportunity for new buildings to reflect the architectural character of the buildings on site, this would be amplified if these typologies are reflected in the areas of the site where they originally deployed, adding to the feel of diverse, organically developed neighborhoods.
- x. **Use the Ballfields to balance greater, adjoining residential density.** Noting the requirement by the Specific Plan to preserve and the significant opportunity presented by the Ballfields as an active open space and visual green space, place core density at the ballfield perimeter to balance both population and building intensity with designated, active open space. This could be further activated by balcony and rooftop assets overlooking the ballfields as specified in [SDC Specific Plan Policy 5-29](#) which states "Orient balconies, stoops, decks, and porches to look out over the Baseball Fields as feasible."
- xi. **Use existing architecture to inform chosen styles in the location where they are to be deployed.** SDC has a variety of architectural styles that can inform the design of proposed structures. These styles were used at different parts of the site at different times in its history. Paying homage to these styles can help reinforce the unique sense of place that SDC offers while preventing architectural monotony of a "green field" build. This can be further enhanced by deploying the styles in specific areas where they were originally located on the site.
- xii. **Present a clear and legible open space framework.** The new submittal has improved upon initially fragmented open space features that are conserved or maintained, and several new open space elements are added into the fabric. However, the framework to connect these elements should be greatly enhanced

to create a sum greater than individual pieces, especially on the North South axis. Recognizing the dedication of extensive open space around the Village perimeter, the plan lacks a clear strategy for how the developed internal open space network intends to connect with the external conservation areas for recreation, health and wellness, and ecosystem services. Creating a clear connection through paths, landscape features, and access would provide more fruitful ground for deploying open space interventions. Additionally, Permit Sonoma recommends separating a multi-use path along Arnold Drive to provide an additional buffer and visual separation between the new development and the Scenic Corridor while creating new connectivity to SDC and better activating the space. This could be further amplified by adding connections between this and the proposed multiuse path along Sonoma Circle. Organize all open space features into a clear set of open space typologies that define size, uses and lifestyle intent. Steps and submittals to illustrate the overall framework of the selected typologies and the connective corridors and elements between them would include:

1. Scaled sections for each of the connecting elements, from building face to building face.
 2. Typical sections along key elements of the network should include streets, mews, pathways or corridors, creek trails.
 3. Create a comprehensive network of open space features, links, corridors, and places all organized and connected with a hierarchy of pedestrian, bicycle, vehicular, green space and green infrastructure fabric. These should connect both the larger open space network as well as proposed parks and open spaces within the core development.
- xiii. **Creek Frontage.** The original submittal provided potential for a unique Product and lifestyle options with homes fronting on Sonoma Creek – democratizing the frontage while putting “eyes on the creek.” The updated submission appears to have reverted to units that back onto the creek which is inconsistent with Specific Plan goals and best practice.
- xiv. **Leverage site assets more intentionally.** Intentionally work to create terminated vistas to inform street patterns and engage open space, especially where streets and buildings front creeks and signature open space features while protecting important viewsheds.
- xv. **Provide a greater mixture of product types within various block scapes.** For example, long single blocks of one product type should be broken down with “H alleys” that create “end cap” opportunities for a new product type that is more dense and helps frame the streetscape.

- xvi. **Incorporate Power Generation into the Core Campus.** Permit Sonoma disagrees with the intent to place solar generation on adjacent state-owned lands. Many of the lands to the East of the core district are designated wetlands and inappropriate for solar generation. There exists unprecedented potential to incorporate other novel power generation such as roof-top solar, solar-covered parking areas, a demonstrated capacity for geothermal energy and heating, “slow hydro,” and more. SDC Specific Plan Policy 6-19 requires novel approaches to energy resiliency as part of the proposal and more consideration should be given to this.