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7 November 2024

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

Rob Toste
The Grupe Company
rtoste@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 second completeness determination that the above referenced planning project involving major subdivision, design review, and density bonus applications for a mixed-use housing development, originally received on February 16, 2024, and resubmitted on October 8, 2024, is **incomplete for processing**. In order for the application to be determined complete, please review the completeness items identified below and provide revised or supplemental application material as needed.

The application has been revised since the initial submittal and proposes a mixed-use housing development across three parcels on the Sonoma Development Center campus consisting of the following:

- 1) **1,778,900 square feet of residential space** across 990 residential units. The residential program includes 56 courtyard units, 312 detached homes, 26 duets, 57 triplets, 254 townhomes, 200 apartment units, 74 mixed-use units, 6 cohousing units, and 5 independent living units. In each development phase, the project will provide (or will have already cumulatively provided based on a previous phase of development) the same 20% ratio of affordable units to market rate units in the phase as being proposed for the development as a whole. The project will always have at least 20% of the total number of residential units available for rent to lower income households.

- 2) **253,250 square feet of non-residential** commercial, institutional, and retail spaces including but not limited to a center for climate action and innovation, a 150-room hotel and associated amenities (approximately 120,000 sf in total) with a parking structure and conference spaces, office, retail, research and development, micro-manufacturing.
- 3) **Approximately 70 acres** of outdoor public parks, active recreational areas, and open space areas including walking trails, sports fields, children's playgrounds, dog parks and riparian corridors. A community center and gym are also proposed.
- 4) A new Fire Station and evacuation command center.

The Project includes approximately 2,800 parking spaces distributed throughout the Core Campus and various water, wastewater, road, and power infrastructure improvements.

You may appeal this determination to the Planning Commission, in accordance with Sonoma County Code Section 26-92-040(b) and Government Code Section 65943, within ten days of the date of this letter.

Please submit supplemental application materials electronically in PDF format to respond to all identified completeness items within 90 days of the date of this letter. Include a transmittal or cover memo to accompany your application resubmittal that outlines how each item in this letter has been addressed. Provide an explanation to justify a request to remove or modify any item noted in this letter.

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.

The Superior Court has issued a final judgment and writ finding the SDC Specific Plan Environmental Impact Report (EIR) did not comply with the California Environmental Quality Act (CEQA) and directing the County to decertify the EIR and set aside the Specific Plan and related approvals. The Board has not yet taken action in response to the writ.

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
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
 [Previous Completeness Analysis and Referral Responses](#)
 Public Comment to Date

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

1. PROPOSAL STATEMENT AND SUPPLEMENTAL INFORMATION.

a. Residential Affordability Levels.

- i. Previous submittals included detailed breakdowns of which affordability levels applied to specific unit counts. This has not been revised to reflect the proposed unit counts. Please see below for information provided from previous submittal and revise to reflect latest proposal:

1. "Of the total units 200 are proposed as affordable to lower income households including 124 units proposed for households earning at-or-below 50% Area Median Income (AMI) with monthly rent limited to no more than 30% to 50% of Sonoma County's AMI. 76 units are reserved for lower income households with incomes earning at-or-below 60% AMI for Sonoma County with monthly rent restricted to no more than 30% of 60% of Sonoma County's AMI."

- ii. The residential tabulation indicates that the 5 Independent Living Units will be affordable units. Please clarify affordability levels for the proposed Independent Living Units.

b. Water Supply and Sewage Disposal (PJR-128). Please clarify the project's proposed water and sewer utility services from public providers in the proposal statement and applicable plan sheets in accordance with the request from the Sonoma County Local Agency Formation Commission (LAFCO). See the Referrals section below.

2. 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.

The Applicant has stated:

- The project also includes a Vesting Tentative Map with the intent to file multiple Final Maps in conformance with the DSGs and Government Code Section 66456.1.
- The subdivision is meant to be phased per general notes 12 and 13 on the cover sheet TM1.0. Individual lots will be created in future subdivisions. Each phase will include a

minimum of 20% affordable housing. Please see Figure 2B for a site plan with the currently intended phases overlaid.

- Phasing and filing of multiple final maps are planned for this project. Timing of the project phasing shall comply with the Subdivision Map Act.
 - At the time this tentative map is filed, the subdivider informs the advisory agency of the local agency that it is the intention to file multiple final maps on this tentative map.
- a. The tentative map does not depict proposed parcels associated with the ownership units or those specified for rental, mixed-use, and commercial areas. Final maps that contain individual parcels not depicted on the vesting tentative map would not be in substantial conformance with the tentative. Thus, those subsequent maps could not proceed under the same vesting as this tentative map and would require new tentative map applications, subject to the policies, regulations, and procedures in place at the time of application. **These future subdivisions would be subject to the traditional entitlement process including public hearings and consideration.** Environmental analysis completed under the current entitlement process may consider the future subdivisions, but they must be processed and vested separately at time of submission. In order to process all development under the current permit process, please revise the tentative map to show lots associated with the ownership units or those specified for rental, mixed-use, and commercial areas. This should include *all* proposed lots for the project. Instead, if the intent is to subdivide through subsequent tentative maps, please clarify in the project description and on the map (development proposed on those parcels to be later subdivided will not vest). Note that to the extent proposed development requires subsequent tentative maps, the square footage and residential units proposed for those future lots will not be included in determining whether the application meets the definition of a housing development project for very low-, low-, or moderate-income households and thus whether it qualifies for protection under the builder's remedy (Cal. Gov. Code Section 65589.5(d)(5)), regardless of whether the application states an intent for 20% of future residential units to be affordable.

3. PRELIMINARY PLANS AND RENDERINGS (PJR-128 and SDC Area Specific Plan).

- a. To facilitate design review Permit Sonoma requests that a comprehensive design booklet be compiled for the total buildout of the project. It should include:
- i. Architectural diagrams and design information as provided, broken up by neighborhoods and unique public realms;
 - ii. All exterior lighting fixture choices including building-mounted and streetlights;
 - iii. All public realm improvements including diagrams of chosen benches, fire hydrants, public area fences, etc.;
 - iv. Renderings of the buildouts including day and night renderings of each neighborhood and unique public realms.
 - v. Landscape Plans as provided.
- b. The most recent submission appears to indicate that Sonoma House will be demolished but does not state so explicitly. Please confirm.

4. TREE PROTECTION PLAN (PJR-128).

- a. Please provide additional information in the Tree Protection Plan to evaluate consistency with the County Tree Protection Ordinances including protected perimeters of all trees to remain.
- b. Please address outstanding comments from previous submissions. Please see revised comments from the Permit Sonoma Natural Resources Division for more information.

PLEASE RESUBMIT THE ENTIRE APPLICATION PACKAGE INCLUDING ALL PLANS, DOCUMENTS, ANALYSES, ETC. EACH SHOULD BE UP TO DATE AND REFLECT THE MOST CURRENT DESIGNS, UNIT COUNTS, AND PROPOSED USES.

REFERRAL AGENCY REVIEW

In response to the resubmittal of your revised application, a third referral has been initiated to request additional comments or modifications to conditions already received. The following is a summary of additional comments or requests for information from referral agencies based on the October 8, 2024 resubmittal.

- **Northwest Information Center.** Northwest Information Center recommends cultural resource studies be completed to address the proposed project. For further information see attached comments.
- **Pacific Gas and Electric Company.** Comments are provided regarding power and gas infrastructure at the site.
- **Permit Sonoma Natural Resources.** Revised comments are provided related to tree and oak woodland protection, The following are specifically requested:
 - a. Additional information in the Tree Protection Plan to evaluate consistency with the County Tree Protection Ordinances including *protected perimeters of all trees to remain*.
 - b. Additional information including water infrastructure within protected lands.
 - c. Outstanding comments from previous submissions.
- **Sonoma County Fire Prevention.** Comments have been revised and conditions provided based on information provided under this submittal. Plans should be revised to comply with applicable standards as detailed in the enclosed comments from Fire Prevention.
- **Sonoma Public Infrastructure (SPI).** No new comments have been provided. Previous comments state: A full Traffic Impact Study (TIS) is required per the County Traffic Impact Study Guidelines, subject to peer review and referral to Caltrans due to SR-12 impacts and project scale. We will provide a Scope of Work by EOB Wednesday 11/20. If used, the previous traffic analyses will require updated counts collected within 2 years and updated trip generation to conform with the revised project description.
- **Sonoma Water / Sonoma Valley County Sanitation District.** Additional comments have been issued. Sonoma Water staff have comments regarding the applicant's responses to comments and supporting information. Please see the enclosed detailed comments.

- **Sonoma Valley Groundwater Sustainability Agency.** Comments related to wells, groundwater recharge, and coordination with the agency on the project are provided.
- **State Water Resources Control Board Division of Drinking Water.** Before the Division can fully respond to the Applicant's request the Applicant must clarify whether it intends to (1) establish and operate a new PWS after applying for and being issued an initial water supply permit or (2) receive drinking water from a PWS with an existing permit that will need to be amended. Any resubmittal must be explicit to describe the intended path the Applicant wants to pursue of these two options.
- **Sonoma Valley Fire District.** Comments provided regarding reference of Agency in Emergency Preparedness and Evacuation Plan. See attached for detailed comment.

The following is a summary of referral responses to the earlier project submittals.

- **Permit Sonoma Building Division.** Draft conditions of approval were issued in the previous submittal.
- **Permit Sonoma Grading and Stormwater.** No further information is required at this time. The Grading and Stormwater Section will review the Preliminary Stormwater Control Plan and provide comment on its adequacy.
- **Permit Sonoma Survey.** Draft conditions of approval have been issued and are attached herein.
- **California Department of Transportation (CalTrans).** No new comments have been provided. **Previous comments state:** Permit Sonoma has provided CalTrans traffic studies prepared for the SDC Specific Plan EIR. Further information, or study, may be required. Permits for work in CalTrans right of way will be required.
- **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.
- **Sonoma Local Agency Formation Commission (LAFCO). Utility Services and Service Annexation.** **Previous unaddressed comments:** 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. Please see attached comments for further details.

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. Please note that comments in this section remain largely unchanged with the resubmittal.

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 STANDARDS DETERMINATION

In accordance with Government Code § 65589.5(j)(2), 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 as specified in Gov. Code § 65589.5, subdivision (j), 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.

HISTORIC SITE DETERMINATION

In accordance with California Government Code Section 65913.10, the site of the proposed housing development is determined to be a historic site based on the following:

- APN No. 054-090-001 is within the County's Historic Combining District. (See Official Zoning Database and SCC Chapter 26 Article 68.)

- The Sonoma State Home Historic District is eligible for listing on the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR), meets the eligibility requirements as a California Historical Landmark, and is on the master list of state-owned historic resources under California Public Resource Code Section 5024(d). (Site state study.)
- The Main Building is listed on the NRHP and CRHR as an individual resource.
- Sonoma House and support structures are eligible for listing on the NRHP.
- The site contains many buildings, structures, and permanently located objects that have been in existence for at least 50 years. Please see Appendix B of the Sonoma Developmental Center Specific Plan for more information.

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.

KEY ISSUES

Water Rights. Much of the proposed water utility infrastructure and supply relies on water rights that are unclear in the current proposal in relation to state-owned property surrounding the SDC Core. Legal access to adequate water supply, whether on site or supplied by local utility agencies, to support the proposed development will need to be demonstrated prior Environmental Review under CEQA.