SDC developer resubmits application; Sierra Club responds

Posted on July 2, 2024 by Sonoma Sun

Re: Initial Comments on Resubmittal of Eldridge Renewal LLC, SDC Development Application, File Number: PLP24-0005 Owner Name: State Of California

Summary: Resubmitted Proposed Development is Larger, Encroaches on Wildlife Corridor, Creates Climate Warming Urban Sprawl and Ignores De-Certification of Specific Plan and Environmental Impact Report by Court Order

Sierra Club is taking this opportunity to provide our initial statement of environmental concerns and to provide comments and questions on the **resubmitted** Eldridge Renewal LLC application for the development of the former Sonoma Developmental Center (SDC). Please include it in the Administrative Record.

We understand that an application has been **resubmitted** to Permit Sonoma and that a referral to agencies was recently sent out for review and response with a recommended deadline of July 2, 2024. This letter is in response to that referral.

CEQA – SDC Specific Plan and EIR De-Certified by Court Order

Sierra Club is concerned that the Eldridge Renewal application is moving forward at Permit Sonoma even though the county's SDC Specific Plan and Environmental Impact Report (EIR) were decertified by court order due to its failure to meet its legal obligations under the California Environmental Quality Act. Please answer these questions immediately:

- 1. How can development at SDC move forward without a certified Specific Plan or EIR?
- 2. How does the county (and state) plan to meet its obligations under CEQA regarding the Eldridge Renewal application?

Given the size and scale of the Eldridge Renewal proposed development, Sierra Club believes that any further planning by the County of Sonoma must be delayed at least until the EIR is revised and approved by the courts.

Because the Sonoma County Superior Court judge issued a decisive ruling over the proposed mega-development on the historic Sonoma Developmental Center campus, Sierra Club urges the county and state to undertake a complete reset on the future of the open space lands and historic campus in the heart of rural Sonoma Valley. (See our "Close to Home" in the May 26, 2024 Press Democrat.)

ENVIRONMENTAL CONCERNS

Sierra Club was shocked and surprised to see that the resubmitted Eldridge Renewal application is actually LARGER than the original proposal given the fact that the Specific Plan and the EIR were decertified due to inadequately mitigating the multitude of negative environmental impacts from the proposal for a massive urban development in the middle of a wildlife corridor in a high wildfire area. The resubmitted Eldridge Renewal plan for the core campus deviates significantly from the final Specific Plan for the SDC core campus and it now includes 962 residential units (200 affordable at some level), roughly 400,000 square feet of mixed-use space including a 150-key four-story boutique hotel in the Sonoma Valley Wildlife Corridor, and 2,750 parking spaces.

Sierra Club has provided detailed comments about the development of the SDC lands and the protection of open space throughout the county and state public planning processes, including review of the county SDC Specific Plan and Environmental Impact Report. We have urged scaling back the development and stronger environmental protections throughout the public process. Once again, these concerns have been ignored or dismissed by the development application.

EIR NEEDS TO ASSESS 100-ACRE CARVE OUT IN COMMUNITY SEPARATOR FOR DEVELOPMENT

In addition, the revised EIR must consider the last-minute carve out of 100 acres of designated open space by the state without any public consultation or environmental review for a large new development of a CalFIRE training facility in a voter approved community separator that prohibits any intensification of development without a vote of the people of Sonoma County. In particular, we wonder how state monies could be allocated for such a project as well as a grant for a non-profit to do studies when the 100 acres of open space were always designated for transfer to state parks; and without any environmental review.

Please see attached for reference the previous letters we have submitted that detail the litany of concerns that remain relevant and have so far never been adequately addressed by the county, the state or the developer.

Please include Sierra Club as an interested party and stakeholder and provide notifications of all activities related to the application to the Redwood Chapter and Sonoma Group.