



December 14, 2022

Mr. Brian Oh, Project Planner
Permit Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

Dear Mr. Oh:

Sonoma Land Trust (SLT) respectfully provides the following comments on the Sonoma Development Center Specific Plan (Project) and the Final Environmental Impact Report (FEIR). As required by state law, future uses of the Sonoma Developmental Center (SDC) must support affordable housing development goals, while also protecting the property's abundant ecological and recreational resources for future generations. As the Sonoma County Board of Supervisors considers approval of these historic planning documents, it is critically important to take a holistic and comprehensive approach to reviewing and evaluating the Specific Plan. There are several pending decisions at the state level that will ultimately shape the future of SDC and surrounding communities, historical preservation and wildlife habitat.

As SLT has repeatedly stated, the FEIR does not adequately analyze the potential environmental impacts of the Project. It lacks key information which would normally be provided when a viable development project is considered by Permit Sonoma. Key details related to the scale, location, environmental compatibility, and financial feasibility of future development must be identified before the County can conduct meaningful analysis and mitigation of negative impacts under the California Environmental Quality Act (CEQA). Without these details, an informed conversation cannot take place.

To rectify the deficiencies and gaps in the CEQA process—and to reassure the public that needed environmental review will occur before any development begins—SLT urges the Board to require the preparation of a project-level EIR based on a development plan prepared by the buyer of the SDC campus and vetted through a comprehensive community engagement process. If the first phase of development is 100% affordable housing, that will also allow for appropriate CEQA streamlining through the Specific Plan.

The California Department of General Services (DGS) selection process for the sale of the SDC campus has been significantly delayed, and because of this, the Board and public do not have adequate information about the alignment of the Specific Plan's land use framework and the proposal selected by the state. DGS was originally supposed to select a buyer in late October, which would have given Permit Sonoma, the public, and the Board an opportunity to focus on the specific proposal that will drive "*the exact amount and location of future development.*" Having this information would also start to resolve questions about financial feasibility, and

subsidies and incentives that the state can provide to meet affordable housing mandates.

Several of the proposals submitted to DGS that are supported by SLT also focus on the need for a governance plan that includes state engagement and investment in a public-private partnership model (ex. trust, development authority, independent special district) that will oversee and manage the property as part of the transfer of authority by DGS.

The other significant pending decision is the 2023 state budget proposal to authorize and fund the transfer of SDC's preserved open space lands to appropriate park and open space agencies. One of the most important recommendations made by the Sonoma County Planning Commission is the addition of new language in Section 2.1 (Goals and Policies) to transfer title of the "Preserved Parkland and Open Space" areas of the property to the Sonoma County Agricultural Preservation and Open Space District and to require preparation of an open space plan. We hope this transfer, which will provide a tremendous community and environmental benefit, will take place within the next 18 months.

Finally, SLT appreciates the many insightful recommendations made by the Sonoma County Planning Commission to the Specific Plan. In particular, the expanded wildlife corridor protection areas and riparian buffers are significant improvements in the Project. We urge the Board to adopt the Planning Commission's proposed change to the campus's northern boundary to further protect the corridor. There is a discrepancy between the Commission's recommendation and the map in Attachment 2, Exhibit A-3 that needs to be corrected to conform with the Commission's intent and specific guidance.

We have also attached a series of edits to the proposed changes in Attachment 2, Exhibit A-2 and ask that these also be incorporated in the final version of the Specific Plan and FEIR.

Thank you for the opportunity to comment.

Sincerely,



Eamon O'Byrne
Executive Director

C.C. Members of the Sonoma County Board of Supervisors

Sonoma Land Trust Revisions to Specific Plan

Key: Black ~~strikethrough~~ and grey highlights reflect edits by staff per Planning Commission direction. Red ~~strikethrough~~ and red additions reflect Sonoma Land Trust edits.

1. Amend Policy 2-4 as follows:

- 2-4 Realign and upgrade the trails to improve the user experience and accessibility, including designated parking areas for trail users, while minimizing impacts to open space. Trails that are duplicative or that are actively causing erosion or other resource damage shall be removed.

2. Amend Policy 2-11 as follows:

- 2-11 Implement “dark skies” standards for all public realm lighting and all new lighting on the site, including by requiring that all outdoor fixtures are fully shielded, that outdoor lights have a color temperature of no more than 2,200 Kelvins, and that lighting for outdoor recreational facilities be prohibited after 11pm.

Deleted: buildings

Deleted: 3,000

3. Amend Policy 2-17 as follows:

- 2-17 Adhere to residential nighttime noise standards.

Deleted: to the extent feasible

4. Amend Policy 2-19 as follows:

- 2-19 Select a planting palette composed entirely of native plant species that are climate appropriate, drought-resistant, non-invasive, support local insects and animals, and that require minimal irrigation and maintenance.

Deleted: and/or low-water

5. Amend Policy 2-21 as follows:

- 2-21 Preserve and enhance the wetlands east of the Core Campus as a fire break, groundwater recharge, and habitat area. Enhancements may include construction of groundwater recharge wells or ponds. Ensure that enhancements protect or improve wildlife habitat values.

6. Amend Policy 2-24 as follows:

2-24 Incorporate bird-friendly-building design features, including by minimizing use of reflective glass; avoiding transparent glass skyways, walkways, or entryways, free-standing glass walls, and transparent building corners; utilizing glass or window treatments that create a visual signal or barrier to help alert birds to presence of glass; avoiding funneling open space to a building façade; strategically placing landscaping to reduce reflection and views of foliage inside or through glass; avoiding or minimizing up-lighting and spotlights; and turning non-emergency lighting off (such as by automatic shutoff) at night to minimize light from buildings that is visible to birds.

7. Amend Policy 2-25 as follows:

2-25 Include protective buffers of at least ~~50~~ 100 feet along Sonoma and along Mill creeks, exempting existing roadways, as measured from the top-of-bank and as shown on Figure 2.2-1: Open Space Framework, to protect wildlife habitat and species diversity, facilitate movement of stream flows and groundwater recharge, improve water quality, and maintain the integrity and permeability of the Sonoma Valley Wildlife Corridor, and the ability of wildlife to use and disperse through the SDC site. Manage protective buffers so that they support continuous stands of healthy native plant communities.

Deleted: at least 50 feet

8. Amend Policy 2-28 as follows:

2-28 Prior to the commencement of the approval of any specific project in the Proposed Plan area, including any residential development project, a project-specific EIR shall be prepared for which 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. Provided, however, that a project-specific EIR may not be required prior to commencement of the approval of a project consisting solely of the first 200 units of 100 percent affordable housing (“Initial Affordable Housing”) where such Initial Affordable Housing is otherwise consistent with this Specific Plan.

9. Amend Goal 2-F as follows:

2-F Wildfire Hazards: Provide protections at the site against the growing risk of climate change exacerbated wildfire hazards and limit the potential impacts of wildfire to development through intelligent site and building design, and open space management. Manage human activities to limit ignition potential.

10. Amend Policy 2-34 as follows:

2-34 Within the managed landscape buffer, one of the following fuel management methods must be implemented in a manner and to a degree that minimizes harm

[to wildlife and the wildlife corridor](#). Combinations of the methods may be acceptable as long as the intent of the policy is met.

(a) Fuel Separation

Minimum clearance between fuels surrounding each building or structure will range from 4 feet to 40 feet in all directions, both horizontally and vertically. Clearance distances between vegetation will depend on the slope, vegetation size, vegetation type (brush, grass, trees), and other fuel characteristics (fuel compaction, chemical content, etc.). Properties with greater fire hazards will require greater separation between fuels. Groups of vegetation (numerous plants growing together less than 10 feet in total foliage width) may be treated as a single plant. For example, three individual manzanita plants growing together with a total foliage width of 8 feet can be “grouped” and considered as one plant.

(b) Defensible Space with Continuous Tree Canopy

To achieve defensible space while retaining a stand of larger trees with a continuous tree canopy, apply the following treatments:

- Generally, remove all surface fuels greater than 4 inches in height. Single specimens of trees or other vegetation may be retained, provided they are well-spaced, well-pruned, and create a condition that avoids spread of fire to other vegetation or to a building or structure.
- Remove lower limbs of trees (prune) to at least 6 feet up to 15 feet (or the lower 1/3 branches for small trees). Properties with greater fire hazards, such as steeper slopes or more severe fire danger, will require pruning heights in the upper end of this range. (c) *Irrigated Agriculture* Irrigated agricultural plantings, such as row crops, berries, or small orchard trees may be planted in the ground or in raised beds, with the following conditions:
 - Raised beds or planter areas may not be constructed of wood.
 - Orchard trees should be spaced in accordance with the Fuel Separation guidance above.
 - Agricultural plantings must be actively managed and regularly harvested or pruned, as appropriate, in order to avoid becoming overgrown.

- Irrigation must be regularly applied during months with little or no rainfall.

11. Amend Note 4 on Table 4-2 as follows:

4. This table provides a range for the total number of housing units within each Specific Plan district to provide implementation flexibility. It is not anticipated that development would be built to the maximum of the range in every district. ~~The total number of housing units anticipated under the Specific Plan is 1,000.~~

~~The base number of units allowed is 733, with a base of 550 market rate units allowed, roughly split between multifamily and single-family types. With inclusionary housing requirements of 25%, at least 183 additional affordable units will be produced. Developers will additionally be able to use State and County density bonuses for inclusionary housing, which, as of 2022, could lead to approximately an additional 200 market-rate units. With Sonoma County's additional planned affordable housing development of around 100-200 housing units, per related County Code the SDC site is anticipated to have around 1,000 total housing units at buildout.~~

The base number of units is 650, which includes 488 market rate units and 162 deed restricted affordable housing units, based on the 25% inclusionary requirement. Additionally, there will be 200 deed restricted affordable housing units to be built on site. Therefore, the total number of units is 850 units. Note that this excludes any density bonuses a project sponsor will be eligible for with the affordable housing being provided. Additionally, limit at least 90% of the market rate units to no more than 1,800 s.f.

Deleted: to no more than 10%

Deleted: (~80 units)

12. Amend Policy 5-2 consistent with the Planning Commission's recommendation. Attachment A-2 to the Board Resolution appears to have inadvertently blocked out these edits instead of highlighting them:

- 5-2 Provide new or complete existing sidewalks along all street frontages accommodating Core Campus development.

13. Amend Policy 5-5 consistent with the Planning Commission's recommendation. Attachment A-2 to the Board Resolution appears to have inadvertently blocked out these edits instead of highlighting them:

- 5-5 Restore and re-use existing, pedestrian-oriented traditional post-top "acorn" light fixtures as feasible, and install matching fixtures at a consistent spacing of approximately 100 feet on center along all street frontages and stagger new fixtures, where appropriate. Ensure all new restored and reused lighting is sensitive to the wildlife corridor.

14. Amend Policy 5-41 as follows:

- 5-41 Maintain at least a 100 foot setback from the top of bank of Mill Creek for any new construction.

Deleted: 50

15. Amend Section 7-2 as recommended by the Planning Commission:

7-2 Development Agreements and Enhanced Entitlements

It is common for local agencies to enter into a development agreement when conferring long-term entitlements for a major project. As part of the negotiation process, developers may offer to provide extraordinary benefits, including infrastructure and other public facilities. These commitments are agreed upon at the discretion of negotiating parties and as such are not subject to the Mitigation Fee Act. The nature and magnitude of benefits provided will depend on local market conditions, the entitlements, and the development economics of the project. Providing favorable entitlements can be an effective means for funding public benefits, infrastructure, and public facilities. Examples include: reducing parking requirements, increasing permitted floor to area ratios, etc. By increasing the value of the private development, additional “value” is created for public benefits and infrastructure improvements. Development agreements in the Sonoma Developmental Center Specific Plan Area must consider negotiated developer commitments on affordable housing (particularly for those in the Extremely Low Income, Very Low Income, and Low Income categories), environmental stewardship (particular with regard to the open-space preservation, the maintenance of wildlife corridors, and wildfire risk mitigation), economic opportunity for Sonoma residents through targeted hiring and job quality commitments, access and opportunity for persons with disabilities (particularly persons with developmental disabilities); and a commitment to community input into the depiction of the project site’s historical legacy.

If a developer and the County intend to enter into a development agreement in accordance with Sonoma County Code Chapter 26 Article 100, the developer must meaningfully and in good faith engage with the local community and the developer and the County must consider community benefits as part of the development agreement, including the provision of or support for the following: living wage and other worker protections, local and targeted hire policies, workforce housing, community gardens, public parks and recreation, local small business support/opportunities (e.g. allocate commercial store fronts for local small businesses, economic support for start-up costs, etc...), funding for job training, commitment to economic and educational opportunities for individuals with developmental and/or physical disabilities, local ad and outreach programs for affordable housing, application assistance programs, partnerships with

local Affordable Housing organizations and land trusts, among other community benefits.

16. Amend Condition of Approval MOB-2 as follows:

MOB-2 Construction of the Highway 12 connector should avoid damage to wildlife and the wildlife corridor and should avoid damage to scenic and open space resources such as trees, rock outcroppings, and historic buildings to the greatest extent feasible.

17. Remove from the Core Campus all lands north of Laurel, as shown by the blue Revised Northern Boundary line in the below map. Remove Paxton, Thompson, Bane, and Residences 138 and 139:

