

March 20, 2024

Regarding: PLP25-0005, application from Eldridge Renewal LLC

Dear Sonoma County Supervisors, Planning Commission, and Permit Sonoma staff,

The applicant asks for multiple changes to the layout dictated by the Specific Plan, saying that following the Specific Plan would make it impossible to build the allowed number of housing units. SEC finds two of these requested changes objectionable: moving the hotel to a hillside at the edge of the wildlife corridor (concession 1), and moving the ballfield north until it touches the Sonoma Creek setback (waiver 3). SEC asks the County, instead of allowing these waivers and concessions (possibly including waiver 2, which we don't understand), to double down on waiver 1 by allowing greater building heights across multiple building types. Increasing building heights would accomplish the higher unit numbers allowed by the Specific Plan, while retaining more open space and avoiding encroachment into the wildlife corridor. View analysis will be required to assure that greater heights still retain the site's irreplaceable sightlines to surrounding hills and forests.

The County's documents are inconsistent regarding the northernmost boundary of the developable area. This is a topic of intense interest to SEC and others, as this boundary determines how wide the wildlife corridor is at its narrowest. Thankfully, application PLP24-0005 uses the correct boundary, shown on p. 12, called "Roads", of the Major Subdivision document, as the inner (more southerly) dotted white line on the north edge of the campus. Please review the video of the planning commission hearing, consult with Planning Commissioner Greg Carr, and memorialize the correct northern boundary.

If the "hotel and conference facilities" use is retained, SEC asks the County to move it away from edges of campus, especially away from any northern edge including the northwest corner where the application places it. Part of the road proposed to serve this hotel does not appear in the Specific Plan, is on a steep slope, and should not be allowed.

Fencing appears not to be consistent with the Specific Plan's requirements for wildlife-friendly and fire-ready fencing: "Yards are fenced with wood and open through block landscape pathways have sustainable, resilient planting materials." "Trash and service areas located in the back [of buildings along the Central Green] have wood fenced enclosures to screen them from view." (both quotes from Project Statement p. 3-8).

Most of the proposed planted tree species (figure 8-5 in Preliminary Landscape Plans) are not native, contradicting the intent of the Specific Plan. Application documents do not show the ratio of native to non-native trees planted. Figure 8-5 shows substantial numbers of trees to be planted in the

wildfire buffer. This is generally unnecessary and even counter-productive; if it is allowed, all planted material should be locally sourced native species.

Figure 3-31 shows a 200' wildfire buffer width, but other figures show 300'.

In general, the application has not demonstrated consistency with many of the detailed design requirements and environmental protections in the Specific Plan. SEC asks the County to hold the applicant to scrupulous consistency with the Specific Plan.

Sincerely,

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