



September 29, 2025

Sonoma County Permit and Resource Management Department  
2550 Ventura Avenue  
Santa Rosa, CA 95403

## **Re: NOP for the Eldridge Renewal Project (Sonoma Developmental Center)**

Dear Permit Sonoma and Planner Wil Lyons,

We submit the following comments regarding the Notice of Preparation (NOP) for the Eldridge Renewal Project at the former Sonoma Developmental Center (SDC). The proposed project creates numerous environmental impacts, many of which the NOP does not disclose. These comments are offered to ensure that the Environmental Impact Report (EIR) complies with CEQA and provides a meaningful assessment of project impacts, alternatives, and mitigation.

### **Inadequacy of the NOP**

The NOP fails to provide sufficient information for agencies and the public to meaningfully comment on project impacts, as required under CEQA Guidelines §15082(a)(1):

- The Project Description omits significant components occurring outside the core campus, including reconstruction and operation of the water system and possibly other utilities across State Parks lands, creation and ongoing maintenance of a 49-acre wildfire buffer on State Parks lands, construction of an emergency-only road to Highway 12, and a proposed multi-use path along Arnold Drive.
- The Project Description is unstable, with references to facilities that “could” be included, such as a water/wastewater treatment plant. These uncertainties prevent a clear understanding of scope.
- The Project Description does not include the inevitable widening of the Harney bridge.
- Required permits are undercounted. Additional approvals will be necessary, including: Lake and Streambed Alteration Agreement, Domestic Water Supply Permit, State Construction General Permit, MS4 and construction stormwater permits, Clean Water Act §404 permits, and both state and federal incidental take permits for listed species.

## Probable Environmental Impacts Inadequately Described

- Vegetation and Habitat Loss – Grading would remove 9.4 acres of sensitive natural communities, including Valley Oak forest and riparian forest. Another 26.5 acres of sensitive habitat would be degraded by wildfire buffer management, backyard encroachment, and water/sewer system reconstruction.
- Water System Impacts – The project would reconstruct and operate a complex surface water system reliant on Roulette Springs, Fern Lake, Lake Suttonfield, and Asbury Creek—all areas with habitat for special-status species. Water supply estimates show precarious reliance on Roulette Springs, raising concerns about reservoir drawdowns and impacts to aquatic ecosystems.
- Wildlife Connectivity – The project misrepresents the wildlife corridor as a fixed geography rather than a functional network along Sonoma Creek, Mill Creek, and campus edges. Proposed setbacks are too narrow relative to species needs.
- Aquatic and Riparian Impacts – Multiple project elements would disturb stream channels and wetlands, including ~1 acre of fill in Sonoma Creek, 5,800 linear feet of utilities in riparian areas, and stormwater redesign that risks erosion and pollutant loading.
- Special-Status Species – Species at risk include pond turtle, freshwater shrimp, red-legged frog, foothill yellow-legged frog, salamanders, steelhead, Chinook salmon, mountain lion, and multiple bat species. Field surveys during the appropriate season have never been done, and they need to be conducted before impacts can be reasonably evaluated.
- Recreation and Parks – The project controls access to State Parks lands, yet recreational impacts from 3,000 new residents are unaddressed.
- Wildfire Hazards – Construction of homes outside the existing campus footprint increases ignition risk and exposure. Detailed treatment prescriptions for the wildfire buffer are necessary to evaluate its environmental impacts. The proposed width of the wildfire buffer must be justified based on science; it exceeds conventional safe operational space for trucks and personnel.
- Cumulative Impacts – Other projects on SDC lands compound risks to sensitive habitats, species, and wildlife connectivity.
- Common Area Management – The project lacks any identified managing entity or funding mechanism for open space, riparian areas, or fire buffer maintenance.

## Alternatives and Mitigation

The EIR should evaluate a Natural Resources Alternative that reduces impacts while meeting project objectives. This Alternative's main effect would be to shrink the developable area, which could be compensated for by increasing the height and clustering of buildings. Elements of the Natural Resources Alternative should include:

- Water supply resilience: cease dry-season withdrawals from Roulette Springs, expand storage, explore aqueduct connections, and develop onsite treatment options.
- Riparian corridor redesign: expand setbacks, restore ~12 acres of riparian areas where buildings and pavement will be removed, orient development to face creeks, integrate stormwater treatment, and create linear parks with controlled public access.
- Wildfire avoidance: restrict development to existing campus footprint, prohibit new structures within 100 feet of riparian vegetation, reduce wildfire buffer to 100', and reduce hotel/housing footprints along southern and western edges.
- Recreation management: maintain trailhead access, provide on-campus parking, and manage visitor use to prevent resource degradation.
- Transportation: eliminate the “emergency-only road” to Highway 12, which provides no evacuation benefit and affects listed species.

Mitigation measures should include:

- Managing water to recover groundwater, streamflow, and water-dependent listed species
- Restoring eroding streambanks
- Managing wildfire buffer lands with prescribed fire and invasive species removal
- Establishing a funded management entity for natural areas, which will then have the resources, obligation, and capacity to indefinitely continue the above three mitigation measures
- Conducting focused field surveys of listed species and habitats, in the appropriate season, to inform the EIR
- Generating on-site renewable energy

## Summary

Fully complying with CEQA, the Eldridge Renewal Project can still achieve housing and economic goals while safeguarding biodiversity, water resources, and wildfire resilience. To comply with CEQA and protect the irreplaceable natural resources of the SDC and Sonoma Valley, the EIR must:

- Expand the project description to include all on- and off-campus components.
- Analyze the full suite of probable environmental impacts identified above.
- Develop and evaluate a Natural Resources Alternative.
- Include robust mitigation and avoidance measures.

Thank you for your work on this important, complex project. Sincerely yours,



Richard Dale, Executive Director