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6 March 2025

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. Toste,

This letter provides the Permit Sonoma's determination that the resubmittal of the above referenced project involving a Design Review application with a revised project description involving major subdivision, design review, and density bonus applications for a 990 unit mixed-use housing development, originally received on February 16, 2024, and resubmitted on February 4, 2025 is **complete** for processing. Additional advisory comments are provided below.

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. Previous advisory comments have been attached for your records. Additionally, public comment received since the previous submission is included for your consideration.

CONSISTENCY WITH APPLICABLE PLANS, POLICIES, AND STANDARDS

Government Code § 65589.5(j)(2) requires that within 60 days of the date that the application for the housing development project is determined to be complete, if the local agency considers a proposed housing development project to be inconsistent, not in compliance, or not in conformity with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision as specified in Gov. Code § 65589.5, subdivision (j), it shall provide the applicant with written documentation identifying the provision or provisions, and an explanation of the reason or reasons it considers the housing development to be inconsistent, not in compliance, or not in conformity. The County will provide a written determination within 60 days of the date of this letter.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

In accordance with CEQA Guidelines Section 15060, Permit Sonoma will begin environmental review of the project now that the application is complete for processing.

Permit Sonoma has determined that the scope and intensity of development proposed under PLP24-0005 has the potential to result in significant environmental impacts that cannot be fully mitigated, and therefore an Environmental Impact Report (EIR) will be prepared. As the lead agency, Permit Sonoma will manage the environmental review process and prepare the required environmental document. Technical studies prepared on behalf of the applicant and submitted to Permit Sonoma will be reviewed and used by staff provided that the final environmental document reflects the lead agency's independent judgement in accordance with Public Resources Code § 21082.1(b) and (c).

In accordance with the At Cost Agreement signed for the project, preparing the EIR is a component of application processing and the applicant will be responsible for the cost of its preparation, including applicable studies. The County will release a Request for Proposals for consultant services to prepare the EIR. A Notice of Preparation (NOP) and public scoping meeting will follow the award of the contract. An additional deposit covering the full cost of these services will be required once the scope of work for the EIR is defined and the contract for consultant services to prepare the EIR is awarded.

At their December 3rd, 2024, hearing, the Sonoma County Board of Supervisors voided certification of the Sonoma Developmental Center Specific Plan Environmental Impact Report and set aside all related SDC Specific Plan approvals as directed by the Writ of Mandamus issued by the California Superior Court on October 22, 2024. The Board further directed Permit Sonoma to revise that EIR in accordance with the Writ and Judgment and bring the EIR back to the Board to consider recertification along with approval of the SDC Specific Plan and related legislative amendments. The project proposal is inconsistent with portions of the Specific Plan. Regardless of the builder's remedy, these inconsistencies must be remedied in order to conduct environmental review in compliance with CEQA and the State CEQA Guidelines.

REFERRAL AGENCY REVIEW

The following is a summary of outstanding comments/conditions or requests for information from County agencies or departments that have not been addressed. Full comments and conditions are under separate attachment.

- **Northwest Information Center. Outstanding.** The Northwest Information Center recommended a qualified archaeologist conduct further archival and field study to identify or evaluate archaeological resources as warranted. Field study may include, but is not limited to, pedestrian survey, hand auger sampling, shovel test units, or geoarchaeological analyses as well as other common methods used to identify the presence of archaeological resources. Please refer to the list of consultants who meet the Secretary of Interior's Standards at <http://www.chrisinfo.org>.

- **Sonoma Public Infrastructure.** Outstanding. 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.
- **Sonoma Water and State Water Resource Control Board.** Outstanding questions anticipated to be resolved under CEQA evaluation include finalization of water rights, supply, infrastructure, as well as wastewater treatment and disposal.
- **Power Utilities.** Outstanding questions related to the extent of on-site power generation and storage are anticipated to be resolved under CEQA evaluation.
- **Evacuation.** Outstanding questions regarding cumulative impacts from multiple large housing developments in the area are anticipated to be studied under CEQA evaluation.

UTILITIES

The application will be required to demonstrate that there is adequate sewer service available and accessible to the project by providing a will serve letter or equivalent documentation issued by the Sonoma Water District and/or Valley of the Moon Water District. Any LAFCO approvals must be obtained prior to any planning entitlement approvals.

The application will be required to demonstrate that there is adequate water service for the project.

CONCLUSION

Permit Sonoma looks forward to providing continued assistance with the processing of this application. If you feel any item in this letter requires further discussion, please do not hesitate to contact me. I can be reached via telephone at (707) 565-7388 or email at wil.lyons@sonoma-county.org.

Sincerely,

Wil Lyons

Planner III

ec: File No. PLP24-0005
Katrina Braehmer, Supervising Planner
Cecily Condon, Project Review Manager
Scott Orr, Assistant Director
Tennis Wick, AICP Director

Enclosed: Prior Agency Responses
Prior Advisory Comments
Public Comment