

Resolution Number

County of Sonoma
Santa Rosa, California

October 27, 2022
PLP22-0024
Sonoma Developmental Center
Specific Plan Project

RESOLUTION OF THE PLANNING COMMISSION, COUNTY OF SONOMA, STATE OF CALIFORNIA, RECOMMENDING TO THE BOARD OF SUPERVISORS CERTIFICATION OF THE ENVIRONMENTAL IMPACT REPORT FOR THE SONOMA DEVELOPMENTAL CENTER SPECIFIC PLAN PROJECT, LOCATED IN SONOMA VALLEY AND ADOPTION OF FINDINGS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AND A STATEMENT OF OVERRIDING CONSIDERATION

WHEREAS, the Sonoma Developmental Center site (the “Property”) consists of a developed campus covering approximately 180 acres and approximately 765 acres of agriculture, recreation, and ecologically valuable natural areas adjacent to the Sonoma Valley Regional Park and the Jack London State Historic Park; and

WHEREAS, in 2018, the State of California officially closed the facility. Thereafter, in 2019, the California State Legislature enacted Government Code Section 14670.10.5, outlining the State’s goals and objectives for the ultimate disposition of the Property and authorizing Sonoma County to lead the planning process, resulting in the development of the proposed Sonoma Developmental Center Specific Plan (“Specific Plan”) as well as corresponding amendments to the County’s General Plan and zoning ordinance (collectively, the “Project.”); and

WHEREAS, the Project has been environmentally reviewed pursuant to the provisions of the California Environmental Quality Act (Public Resources Code Sections 21000, et seq. (“CEQA”), the State CEQA Guidelines (California Code of Regulations, Title 14, Sections 15000, et seq.), and the County’s Local CEQA Guidelines. Accordingly, an Environmental Impact Report was prepared; and

WHEREAS, on February 9, 2022, the County distributed a Notice of Preparation (“NOP”) to the State Office of Planning and Research. The NOP was circulated from February 9, 2022 through March 25, 2022, to receive input from interested public and private parties on issues to be addressed in the Environmental Impact Report (“EIR”). In addition, a public scoping meeting was held on February 17, 2022, to provide information on the Project and receive additional comments on issues to be addressed in the Final EIR. On August 10, 2022, a Notice of Availability (“NOA”) of the Draft EIR was published and Notice of a Public Hearing to be held September 15, 2022. In accordance with CEQA and the CEQA Guidelines, the County analyzed the Project’s potential impacts on the environment. The County circulated the Draft EIR and its appendices for the Project to the public and other interested parties for a 45-day comment period, in accordance with CEQA Guidelines Section 15105, from August 10, 2022 through September 26, 2022. The County prepared written responses to all comments received on the Draft EIR and those responses to comments are incorporated into Chapter 2 of the Final EIR.

WHEREAS, the Sonoma County Landmarks Commission considered the proposed Project on September 6, 2022, and,

WHEREAS, the Planning Commission held a meeting on September 15, 2022 regarding the project, and an in-person special meeting on September 29, 2022 to visit the Property; and

WHEREAS, in accordance with applicable provisions of law, the Planning Commission held a public hearing on October 27, 2022 at which time the Planning Commission heard and received all relevant testimony and evidence presented orally or in writing regarding the Project. All interested persons were given an opportunity to hear and be heard regarding the Project; and

NOW, THEREFORE, BE IT RESOLVED that the Planning Commission makes the following findings:

1. The foregoing recitals are true and correct, and incorporated into the findings herein.
2. The Final EIR is comprised of the Draft EIR dated August 2022 and all appendices thereto; the Comments and Responses to Comments on the Draft EIR; the clarifications, revisions, and corrections to the Draft EIR; the Final EIR and Final EIR Appendices; all of which collectively is referred to herein as the "Final EIR" and incorporated herein by this reference. The Planning Commission has considered the Sonoma Developmental Center Specific Plan and associated General Plan and Zoning Ordinance amendments, the Final EIR, and the evidence, both written and oral, including staff reports, supporting documentation, and public comment letters, presented at the various hearings.
3. The findings made in this Resolution are based upon the information and evidence set forth in the Final EIR and upon other substantial evidence that has been presented at the hearings and in the record of the proceedings. The Final EIR, staff reports, technical studies, appendices, plans, specifications, and other documents and materials that constitute the record of proceedings on which this Resolution is based are on file for public examination during normal business hours at the office of the Sonoma County Permit and Resource Management Department, 2550 Ventura Avenue, Santa Rosa, CA 95403. Each of these documents is incorporated herein by reference.
4. The Planning Commission finds and recommends that the Board of Supervisors find that agencies and interested members of the public have been afforded ample notice and opportunity to comment on the Final EIR and the Project.
5. Section 15091 of the CEQA Guidelines requires that the County, before approving the Project, make one or more of the following written finding(s) for each significant effect identified in the Final EIR, accompanied by a brief explanation of the rationale for each finding:
 - a. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final EIR; or,
 - b. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency; or,

- c. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.
6. The required findings are set forth in Exhibit "A", attached hereto and incorporated herein by reference.
 7. Prior to taking action, the Planning Commission has heard, been presented with, reviewed, and considered the information and data in the record, including oral and written testimony presented to it for and during public hearing. The County's independent environmental consultants and County staff reviewed and analyzed the comments received on the Project's environmental review. No comments or any additional information submitted to the County have produced any substantial new information requiring additional environmental review or re-circulation of the Final EIR under CEQA because no new significant environmental impacts were identified, nor was any substantial increase in the severity of any previously disclosed environmental impacts identified, nor was a feasible project alternative or mitigation measure considerably different from others previously analyzed added. Further, the draft EIR was neither inadequate and conclusory in nature and meaningful public review and comment opportunities were provided.

BE IT FURTHER RESOLVED that the Planning Commission recommends that the Board of Supervisors, pursuant to CEQA Guidelines Section 15090, certify that the Final EIR 1) reflects the Board of Supervisor's independent judgement and analysis; 2) was presented to, and reviewed and considered by, the Board of Supervisors; and 3) has been completed in compliance with CEQA.

BE IT FURTHER RESOLVED that the Planning Commission recommends that the Board of Supervisors adopt findings as required pursuant to CEQA, substantially similar to the "Findings and Facts in Support of Findings" attached hereto as Exhibit "A" and incorporated herein by reference.

BE IT FURTHER RESOLVED that Guidelines Section 15093 requires that if a project will cause significant unavoidable adverse impacts, the County must adopt a Statement of Overriding Considerations prior to approving the project. The EIR identifies significant, unavoidable impacts for cultural, historical, and tribal resources and transportation. The Planning Commission further recommends that the Board of Supervisors adopt a Statement of Overriding Consideration finding that the benefits of the project outweigh the Project's environmental impacts, substantially as attached hereto as Exhibit "B."

BE IT FURTHER RESOLVED that the Planning Commission designates the Secretary of the Planning Commission as the custodian of the documents and other material which constitute the record of proceedings upon which the decision herein is based. These documents may be found at the office of the Sonoma County Permit and Resource Management Department, 2550 Ventura Avenue, Santa Rosa, CA 95403.

THE FOREGOING RESOLUTION was introduced by Commissioner _____ who moved its adoption, seconded by Commissioner _____ and adopted on roll call by the following vote:

Commissioner District 1 Carr	_____
Commissioner District 2 Reed (Chair)	_____
Commissioner District 4 McCaffery	_____
Commissioner District 5 Koenigshofer	_____
Commissioner District 3, Ocana	_____

Ayes: _ Noes: _ Absent: _ Abstain: _

WHEREUPON, the Chair declared the above and foregoing Resolution duly adopted; and

SO ORDERED.

SONOMA DEVELOPMENTAL CENTER SPECIFIC PLAN

DRAFT CEQA FINDINGS OF FACT

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OCTOBER 2022

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Acronyms and Abbreviations

AB	Assembly Bill
CEQA	California Environmental Quality Act
EIR	Environmental Impact Report
EO	Executive Order
GHG	Greenhouse gas
NOP	Notice of Preparation
SB	Senate Bill
SDC	Sonoma Developmental Center
SSHHD	Sonoma State Home Historic District
TDM	Transportation Demand Management
TMA	Transportation Management Association
VMT	Vehicle Miles Traveled

Sonoma Developmental Center Specific Plan CEQA Findings of Fact

1. Introduction

The purpose of these findings is to satisfy the requirements of Sections 15091 and 15092 of the California Environmental Quality Act (CEQA) Guidelines, associated with approval of the Sonoma Developmental Center (SDC) Specific Plan. A statement of overriding considerations, found at the end of this document, consistent with Section 15093 is adopted separately. The CEQA statute (Public Resources Code Sections 21000 et seq.) and State CEQA Guidelines (Title 14, California Code of Regulations Sections 15000, et seq.) state that if it has been determined that a project may or will have significant impacts on the environment, then an Environmental Impact Report (EIR) must be prepared. Prior to approval of the project, the EIR must be certified pursuant to Section 15090 of the State CEQA Guidelines. When a certified Final EIR identifies one or more significant environmental impacts, the approving agency must make one or more of the following findings, accompanied by a brief explanation of the rationale for each identified significant impact (Section 15091 of the CEQA Guidelines).

- Changes or alterations have been required in, or incorporated into, such project that avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the EIR.

No findings are required for impacts that are less than significant and require no mitigation.

Section 15092 of the State CEQA Guidelines states that after consideration of a Final EIR, and in conjunction with making the Section 15091 findings identified above, the lead agency may decide whether to approve the project. A project that would result in a significant environmental impact can be approved only if the agency has eliminated or substantially lessened all significant effects on the environment where feasible.

Only when specific economic, legal, social, technological, or other considerations outweigh the unavoidable adverse environmental effects, can a project with unmitigated significant impacts be approved. Section 15093 requires the lead agency to document and substantiate any such determination in a *Statement of Overriding Considerations*. A Statement of Overriding Considerations is being adopted separately from these findings.

2. Project Location, Description, and Objectives

Established in 1891 in the heart of the Sonoma Valley, the SDC is the oldest facility in California created specifically to serve the needs of individuals with developmental disabilities, and was sited at its current location for its picturesque, therapeutic setting, gaining national renown as a place of healing and community. In 2018, the State of California officially closed the facility, and relocated clients to smaller, community-based care facilities.

Through an agreement signed in 2019, the State of California and Sonoma County forged a unique partnership that allows the County to prepare a Specific Plan and related environmental review for future reuse of the property. The State of California owns the entire property and continues to control and operate the property as the Specific Plan process is underway.

The Planning Area includes all SDC property, encompassing approximately 945 acres, or about 1.5 square miles, which includes a developed Core Campus covering approximately 180 acres, the surrounding approximately 755 acres of contiguous open space, and the 11-acre non-contiguous Camp Via grounds within Jack London State Historic Park. The State of California owns the entire SDC site area, including the campus and the surrounding open space. Open space includes former agricultural lands, recreational uses, the Eldridge Cemetery, and many acres of valuable wildlife habitat. Embedded in the open space is an existing network of trails and access roads as well as a water system consisting of two reservoirs, aqueducts, spring head, storage tanks, treatment plant, pipelines and a water intake in Sonoma Creek.

The Core Campus contains approximately 1.7 million square feet within 180 buildings constructed at various times, and includes two buildings on or eligible to be on the National Register – the Main Building and the Sonoma House. Several other buildings and landscape elements are contributing resources to the Sonoma State Home Historic District. Today, almost all of the buildings in the campus are vacant.

Project Description & Objectives

The purpose of the SDC Specific Plan is to guide development of the SDC Core Campus and preserve open space and natural resources on the SDC property. The State of California enacted Government Code Section 14670.10.5 that outlines the State's goals and objectives for the SDC Specific Plan and disposition of the property. In light of the statewide affordable housing crisis, State law stipulates that the SDC Specific Plan prioritize housing, especially affordable housing and housing for individuals with developmental disabilities, and stipulates that the open space surrounding the Core Campus be preserved as open space.

In December 2019, the State and the County of Sonoma entered into an agreement for the County to prepare a Specific Plan and related Environmental Impact Report that furthers the State's objectives as outlined in State legislation for the site, undertake technical studies, and provide for community engagement in land use planning. The State legislation for the site does not mandate that the State will accept the outcome of the County-driven process, and requires the State Department of General Services to proceed with actions that best represent the interests of the State. However, should the State dispose of the site to private or other non-State entities, the property will be subject to County regulatory control and the policies established in the Specific Plan.

Vision and Guiding Principles

Following initial outreach and working with the Planning Advisory Team appointed by Permit Sonoma, the planning team developed a Draft Vision and Guiding Principles. In January 2021, the Sonoma County Board of Supervisors reviewed and indicated support for these as a framework to guide the development of the SDC Specific Plan. The full Vision and Guiding Principles are available at the project website. The Vision includes:

“The former Sonoma Developmental Center is reinvigorated as a vibrant and sustainable community in the heart of Sonoma Valley. A mixed-use, pedestrian-oriented core provides a diverse array of housing choices, and serves as a magnet of innovation, research, education, and visitation. The surrounding open spaces flourish as natural habitats and as agricultural and recreational land linked to regional parks and open space systems. Development builds on the site’s rich historic legacy while meeting contemporary needs, emphasizing resiliency and sustainable building practices. Civic uses, community gathering places, and events attract visitors from Glen Ellen, Eldridge, and the broader Sonoma region, making the center a hub of community life in Sonoma Valley.”

The following are the 10 Guiding Principles for the future of SDC:

1. Promote a Vibrant, Mixed-Use Community
2. Emphasize a Cohesive Sense of Place and Walkability
3. Integrate Development with Open Space Conservation 4
4. Balance Redevelopment with Existing Land Uses
5. Promote Sustainability and Resiliency
6. Support Housing Development and Provide a Variety of Housing Types
7. Balance Development with Resource Conservation
8. Promote Multi-Modal Mobility
9. Ensure Long-Term Fiscal Sustainability
10. Embrace Diversity

3. Final Environmental Impact Report

The Final EIR consists of the Draft EIR, comments on the Draft EIR, and the responses to those comments, including all appendices thereto. The Final EIR also includes the revisions made in response to comments on the Draft EIR and errata reflecting those text corrections made for purposes of clarity. The Final EIR is a single document; its contents supersede those of the Draft EIR on which it is based.

EIR Process

Prior to preparing the Draft EIR, the County released a Notice of Preparation (NOP) to solicit the comments of public agencies and interested organizations and individuals regarding the scope and content of the EIR. The NOP was distributed for this EIR in February of 2022. The comments to the NOP received from agencies and the public are included in Appendix A of the Draft EIR.

In order to offer an additional opportunity for input prior to preparation of the Draft EIR, the County held a scoping meeting for public agencies and members of the public on February 17, 2022. The comments received at the scoping meeting were considered during preparation of the Draft EIR.

The Draft EIR was released for review and comment by public agencies and interested organizations and individuals on August 10, 2022. A notice of availability was published, and a copy posted with the Sonoma County Clerk. In addition, copies of the Draft EIR were sent to the State Clearinghouse for circulation to state responsible and trustee agencies. The review period for the Draft EIR closed on September 26, 2022. The comments received have been responded to in this Final EIR.

Record of Proceedings

For the purposes of CEQA and the findings hereinafter set forth, the administrative record consists of those items listed in Section 21167.6(e) of the Public Resources Code. Pursuant to the requirements of State CEQA Guidelines Section 15091(e), the location and custodian of the documents and other materials that constitute the record of proceedings upon which these decisions are presented below.

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4. Findings Required Under CEQA

Public Resources Code section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]” The same statute states that the procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” Section 21002 goes on to state that “in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.”

The mandates and principles announced in Public Resources Code section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which an EIR is required. (See Pub. Resources Code, § 21081, subd. (a); CEQA Guidelines, § 15091, subd. (a).) For each significant environmental effect identified in an EIR for a proposed project, the

approving agency must issue a written finding, supported by substantial evidence, reaching one or more of three permissible conclusions.

The first such finding is that "[c]hanges or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines, § 15091, subd. (a)(1).)

The second permissible finding is that "[s]uch changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency." (CEQA Guidelines, § 15091, subd. (a)(2).)

The third potential conclusion is that "[s]pecific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR." (CEQA Guidelines, § 15091, subd. (a)(3).)

Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." CEQA Guidelines section 15364 adds another factor: "legal" considerations. (See also *Citizens of Goleta Valley v. Board of Supervisors* ("Goleta II") (1990) 52 Cal.3d 553, 565.)

The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417.) "[F]easibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (*Ibid.*; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715; *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1507-1508 (the failure to meet project objectives can be sufficient evidence demonstrating infeasibility of an alternative).)

The CEQA Guidelines do not define the difference between "avoiding" a significant environmental effect and merely "substantially lessening" such an effect. The County must therefore glean the meaning of these terms from the other contexts in which the terms are used. Public Resources Code section 21081, on which CEQA Guidelines section 15091 is based, uses the term "mitigate" rather than "substantially lessen." The CEQA Guidelines therefore equate "mitigating" with "substantially lessening." Such an understanding of the statutory term is consistent with the policies underlying CEQA, which include the policy that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." (Pub. Resources Code, § 21002.)

For purposes of these findings, the term "avoid" refers to the effectiveness of one or more mitigation measures to reduce an otherwise significant effect to a less-than-significant level. In contrast, the term "substantially lessen" refers to the effectiveness of such measure or measures to substantially reduce the severity of a significant effect, but not to reduce that effect to a less-than-significant level. These interpretations are mandated by the holding in *Laurel Hills Homeowners Association v. City Council* (1978) 83 Cal.App.3d 515, 519-521, where the court of appeal held that an agency had satisfied its obligation to substantially lessen or avoid significant effects by adopting numerous

mitigation measures, not all of which rendered the significant impacts in question to a less-than-significant level.

CEQA Guidelines section 15091 requires only that approving agencies specify that a particular significant effect is "avoid[ed] or substantially lessen[ed]." The findings, for purposes of clarity, in each case will specify whether the effect in question has been reduced to a less-than-significant level or has simply been substantially lessened but remains significant. Moreover, although section 15091, read literally, does not require findings to address environmental effects that an EIR identifies as merely "potentially significant," these findings will nevertheless fully account for all such effects identified in the EIR.

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required; however, where such changes are infeasible or where the responsibility for modifying the project lies with some other agency. (CEQA Guidelines, § 15091, subd. (a), (b).)

In seeking to effectuate the substantive policy of CEQA to substantially lessen or avoid significant environmental effects to the extent feasible, an agency, in adopting findings, need not necessarily address the feasibility of both mitigation measures and environmentally superior alternatives when contemplating approval of a proposed project with significant impacts. Where a significant impact can be mitigated to an "acceptable" level solely by the adoption of feasible mitigation measures, the agency, in drafting its findings, has no obligation to consider the feasibility of any environmentally superior alternative that could also substantially lessen or avoid that same impact – even if the alternative would render the impact less severe than would the proposed project as mitigated. (*Laurel Hills Homeowners Ass'n v. City Council* (1978) 83 Cal.App.3d 515, 521; see also *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 730-731; and *Laurel Heights Improvement Ass'n v. Regents of the University of California* ("Laurel Heights I") (1988) 47 Cal.3d 376, 400-403.)

In these Findings, the County explains that because of the Specific Plan policies and conditions of approval there are not mitigation measures that would substantially lessen or avoid the project's significant environmental effects. Nonetheless, the County also addresses the extent to which alternatives described in the EIR are (i) environmentally superior with respect to that effect and (ii) "feasible" within the meaning of CEQA.

Legal Effect of Findings

These findings satisfy the requirements of Sections 15091, 15092, and 15093 of the State CEQA Guidelines and constitute the County's evidentiary and policy bases for its decision to approve the project in a manner consistent with the requirements of CEQA. In doing so, they disclose the final disposition of the significant impacts identified in the Final EIR and the reasons for not adopting the project alternative. The County also incorporates by reference all of the policies, programs and conditions of approval from the Specific Plan that avoid or lessen environmental impacts. Adoption of the statement of overriding considerations allows the Board of Supervisors to approve the project, even though it would result in significant and unavoidable impacts.

Findings on Alternatives

In accordance with State CEQA Guidelines Section 15126.6, the Draft EIR analyzed a Reduced Development Alternative that further prioritizes open space preservation, a Historic Preservation Alternative that focuses on adaptively reusing existing buildings, and a No Project Alternative with two different scenarios if the State were to proceed with development under its own regulatory auspices. The Draft EIR conducted a comparative impact assessment of each of these Alternatives. See Chapter 4 of the Draft EIR.

Overall, the Historic Preservation Alternative is the environmentally superior alternative, although significant impacts of the Proposed Plan and the two alternatives are largely comparable, and the Historic Preservation Alternative would be less superior in some environmental features such as energy use, biological resources, and wildfire risks. Additionally, this alternative would not support key project objectives related to increased housing supply, varied housing opportunities, community vibrancy, and long-term fiscal stability to the same degree as the Proposed Plan. These alternatives are discussed in turn below.

Reduced Development Alternative. The Reduced Development Alternative is described in Chapter 4 of the Draft EIR and considers a project that further prioritizes open space preservation and minimizes potential development on the project site.

Finding: As described in Chapter 4 of the Draft EIR, because of the reduced level of development and high level of infrastructure and other costs involved, this alternative will be less economically viable and would therefore not meet project objective such as the objective to “Ensure Long-Term Fiscal Sustainability.” Thus, this alternative would not meet sufficient project objectives and would not achieve the underlying project purpose. The Board of Supervisors therefore rejects the Reduced Development Alternative as undesirable and infeasible. Therefore, the Board of Supervisors declines to adopt this alternative pursuant to the standards in CEQA and the CEQA Guidelines.

Historic Preservation Alternative. The Historic Preservation Alternative is described in Section 4 of the Draft EIR and considers a project that focuses on adaptively reusing existing buildings.

Finding: As described in Chapter 4 of the Draft EIR, because complete preservation and restoration of all existing buildings in the Planning Area is not financially feasible this alternative will be less economically viable and would therefore not meet project objective such as the objective to “Ensure Long-Term Fiscal Sustainability.” This alternative would not support key project objectives related to increased housing supply and varied housing opportunities (e.g., “Support Housing Development and Provide a Variety of Housing Types”), community vibrancy (e.g., “Promote a Vibrant, Mixed-Use Community”), and long term fiscal stability to the same degree as the Proposed Plan (e.g., “Ensure Long-Term Fiscal Sustainability”). Thus, this alternative would not meet sufficient project objectives and would not achieve the underlying project purpose. The Board of Supervisors therefore rejects the Historic Preservation Alternative as undesirable and infeasible and declines to adopt this alternative pursuant to the standards in CEQA and the CEQA Guidelines.

No Project Alternative. The No Project Alternative is described in Section 4 of the Draft EIR and considers a project where the State were to proceed with development under its own regulatory auspices.

Finding: As described in Chapter 4 of the Draft EIR, the State Legislature established land use objectives for the site, per Government Code Section 14670.10.5, which informed the Proposed Project and its objectives. As a result, the No Project Alternative would result in a palette of uses similar to those outlined in the Proposed Project and the same outcomes of significance with respect to environmental impacts. However, the No Project Alternative could differ in the amounts and mixes of uses, densities/intensities of proposed development, and variations in development footprint within the Core Campus. Further, Government Code Section 14670.10.5 does not provide as a state objective that development at the site meet several objectives contain in the Project like “Emphasize a Cohesive Sense of Place and Walkability” or “Promote Multi-Modal Mobility. Thus, this alternative would not meet sufficient project objectives. The Board of Supervisors therefore rejects the No Project Alternative as undesirable and infeasible, and declines to adopt this alternative pursuant to the standards in CEQA and the CEQA Guidelines.

Resources Code Section 15091(a) states that if the public agency rejects any or all of the alternatives analyzed in the EIR, it must describe why the alternatives are infeasible. Infeasibility can be the result of “specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers.” Based on the impacts identified in the EIR, the Board of Supervisors rejects each Alternative as infeasible. The Proposed Project fulfills the project objectives most completely, including providing greater levels of housing including affordable housing, and superior financial feasibility, with overall environmental impacts that are largely comparable between the Proposed Plan and the alternatives, with the exception of greater preservation of historic resources in the Historic Preservation Alternative. The Board therefore declines to adopt any of the alternatives pursuant to the standards in CEQA and the CEQA Guidelines.

Less Than Significant Impacts

Although not require by CEQA, the Board of Supervisors hereby finds, based on the evidence in the record and as set forth in the Final EIR that the Project will not result in significant environmental project level or cumulative impacts in the following topical areas:

- Aesthetics [Impact 3.1]
- Agriculture and Forestry Resources [Impact 3.2]
- Air Quality [Impact 3.3]
- Biological Resources [Impact 3.4]
- Cultural, Historic, and Tribal Resources [Impact 3.5], but for Impact 3.5-2 which is significant and unavoidable as discussed below.
- Energy and Greenhouse Gas Emissions [Impact 3.6]
- Geology, Soils, and Mineral Resources [Impact 3.7]
- Hazards and Hazardous Materials [Impact 3.8]
- Hydrology and Water Quality [Impact 3.9]
- Land Use and Planning [Impact 3.10]

- Noise [Impact 3.11]
- Population and Housing [Impact 3.12]
- Public Services and Recreation [Impact 3.13]
- Transportation [Impact 3.14], but for Impact 3.14-2 which is significant and unavoidable, and cumulatively considerable as discussed below.
- Utilities and Service Systems [Impact 3.15]
- Wildfire [Impact 3.16]

Significant Impacts

The following impacts are described in detail in the Draft EIR under the titles listed below. The Draft EIR's descriptive discussions of each of these impacts and policies, programs and conditions of approval from the Specific Plan that avoid or lessen environmental impacts are incorporated by reference. The analysis of impacts compares the existing environment to the level of development that is anticipated to be built during the period from 2022 to 2040, the Specific Plan's planning horizon.

Cultural, Historic, and Tribal Cultural Resources

Summary Description

Impact 3.5-2: Implementation of the Proposed Plan would cause a substantial adverse change to the significance of a historic district, as defined as physical demolition, destruction, relocation, or alteration of the historic district or its immediate surroundings such that the significance of the historic district would be materially impaired pursuant to § 15064.5.

While some of the historic character of the SSHHD would be preserved, demolition of some contributing resources to the historic district is assumed in the Proposed Plan. Contributing resources are located within the Maker Place, Core North Residential, Historic Core, Utilities, Fire House Commons, Core South Residential, and Walnut Court districts/neighborhoods, which include proposed residential, commercial retail and office, recreational, and institutional uses with maximum heights for new buildings between 30' and 45', depending on the district/neighborhood. Implementation of future development and redevelopment permitted under the Proposed Plan would allow more dense new development adjacent to contributing resources, as well as alteration and reconstruction of contributing resources in the Core Campus area. New construction has the potential to disconnect the remaining contributing resources in the Core Campus from those in Community Separator and Regional Parks lands to the east and west, consequently disrupting the feeling and character within the historic district. This would affect the cohesiveness of SSHHD's overall integrity to the point that it would no longer be eligible for listing in the NRHP, CRHR, or as a California Historic Landmark. The impact of such activities is considered significant because they would cause a substantial adverse change to the historical district as defined by CEQA Guidelines Section 15064.5.

Findings

- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible any mitigation measures or project alternatives.

Basis for Findings:

The Proposed Plan includes policies and actions that encourage the preservation of the historic character of the Core Campus. This includes retention, rehabilitation, and adaptive reuse of buildings, structures, and landscape features in the Core Campus area that contribute to the SSHHD (policies 4-20 through 4-31), as well as considering the preservation of contributing resources that are located in the hog and poultry area east of the Core Campus and the SDC water and sewage system to the west and north (Goals 2-I and 2-J and policy 4-32). The proposed policies and Standard Conditions of Approval (LU-1, LU-2, LU-3, LU-4, LU-5, and LU-6) would help reduce these impacts to the maximum extent practicable, therefore, there are no mitigation measures available to avoid impacts entirely or further reduce the level of impact.

Furthermore, as discussed in Chapter 4 of the EIR and above in the alternatives section, the Historic Preservation Project Alternative is not feasible. It would be less superior in some environmental features than the Proposed Plan, such as energy use, biological resources, and wildfire risks and would retain a significant and unavoidable impact as a result of VMT. Additionally, the Historic Preservation Project Alternative would not support key project objectives related to increased housing supply, varied housing opportunities, community vibrancy, and long-term fiscal stability to the same degree as the Proposed Plan.

As such, this impact would remain significant and unavoidable.

Transportation

Summary Description

Impact 3.14-2: Implementation of the Proposed Plan would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) pertaining to Vehicle Miles Traveled. (Project level and Cumulative)

Although the implementation of the Specific Plan policies and strategies can be expected to reduce the total VMT generated by uses in the Planning Area and additionally the plan includes requirements for transportation demand management (TDM) for reducing development related VMT impacts as well as offsetting induced VMT, their effectiveness cannot be accurately estimated since performance would vary according to the specific attributes of individual development projects and the synergies existing among them, which will evolve over time and is thus not reflected in the VMT information outlined in the Draft EIR. The effectiveness of the required 15 percent reduction in development project VMT also cannot be guaranteed, and will need to be monitored over time, with ongoing adjustments in response to observed effectiveness and changes in uses that occur over the years. It may be particularly difficult for the earliest development projects within the Plan area to achieve TDM reductions sufficient to reduce VMT impacts to less

than significant levels since it may take some time before aspects such as jobs/housing balances materialize, and since the number of feasible TDM strategies may be limited until a sufficient amount of development within the campus has occurred. Thus, the EIR conservatively assumes that the VMT reduction due to implementation of these strategies would be inadequate to reduce residential VMT per capita and induced VMT to less-than-significant levels. Therefore, this impact would be significant and unavoidable both at the project level and cumulatively.

Findings

- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible any mitigation measures or project alternatives.

Basis for Findings:

Policies in the Proposed Plan are designed to reduce VMT in the Planning Area through required TDM reductions, establishment of a TMA to oversee VMT reduction strategies and programs, multi-modal transportation improvements, and parking-related demand management strategies. See the Goals and Policies included in Section 3.14.4.3 of the Draft EIR, including:

GOALS

3-G Parking: Manage parking resources as a coordinated, shared system to efficiently and flexibly serve the needs of residents, employees, and visitors.

3-H Parking: Provide parking in amounts that balance the needs of residents and workers without overburdening development with parking, and promote alternative transportation options.

3-I Transportation Demand Management: Reduce reliance on single-occupant vehicles (SOV) and limit the number of SOV trips made by residents and visitors by supporting alternative modes of transportation, ridesharing, and on-site services.

POLICIES

Parking

3-27 Provide no free parking within campus.

3-28 Establish minimum parking requirements that do not exceed average peak parking demand rates observed in the Institute for Transportation Engineers Parking Generation manual. Plan for shared parking facilities to serve multiple uses and destinations.

3-29 Provide lower minimum parking requirements when parking facilities are shared with other users or made publicly-accessible to maximize the efficiency and use of spaces.

3-30 Allow adjacent on-street parking spaces to apply towards minimum parking requirements.

3-31 Allow residential uses to apply “unbundled parking” pricing, which separates the cost of parking from the price of housing.

- 3-32 Explore the feasibility of partnering with a carshare company or creating an SDC-specific carshare program to provide rentable shared vehicles on-site.
- 3-33 Back-in diagonal parking should be prioritized for on-street parking wherever feasible.
- 3-34 Develop a special event parking management plan to accommodate surges in parking demand.
- 3-35 Manage on-street parking as necessary using time limits, pricing, or permits to ensure the adequate availability of spaces. If pricing is implemented, consider using parking revenues for mobility enhancements, beautification projects, or other improvements that have a direct benefit to the SDC.
- 3-36 Allow flexible use of on-street parking spaces, curb space, and loading areas as appropriate for restaurants, cafes, and other businesses that activate and enhance the pedestrian realm.
- 3-37 Determine the appropriate number of accessible public parking spots and drop off zones in all on-street parking areas. Off-street parking facilities must comply with accessible parking regulations.
- 3-38 Institute a wayfinding system so that motorists can easily identify available shared parking spaces.
- 3-39 Apply new technologies as appropriate to better manage the parking supply such as real-time parking availability notifications or signs.
- 3-40 Provide one assigned protected parking space for single family homes.

Transportation Demand Management

- 3-41 Require all development to reduce vehicle trips by at least 15 percent below rates listed by the Institute of Transportation Engineers Trip Generation manual using transportation demand management strategies. Potential strategies may include subsidies for not driving alone, transit passes, parking cash-out, rideshare matching, telecommute or alternative work scheduling, upgraded bicycle facilities, and other measures proven to reduce vehicle trips and VMT.
- 3-42 Establish a Transportation Management Association (TMA) for the entire SDC to create a cost-effective and coordinated approach to reducing single-occupancy vehicle travel. The TMA can implement a variety of programs to assist individual developments in meeting their vehicle trip reduction goals. Potential TMA programs could include the overseeing of a subsidized transit pass program, carpool or vanpool ride-matching services, marketing and education to residents and businesses, and other measures.
- 3-43 Work with Sonoma Regional Parks Department to ensure that there is adequate off-street parking for parks users on both the east and west sides of Arnold Drive, including through the use of shared parking areas, and eliminate existing on-street parking along Arnold Drive north of the Core Campus

3-44 Develop the Sonoma Valley Trail, a multi-use path, on the eastern side of SDC, parallel to Highway 12, connecting Santa Rosa with Sonoma, consistent with the General Plan and Sonoma Valley Trail Feasibility Study.

While these VMT reduction measures can be expected to reduce VMT, their effectiveness cannot be guaranteed, and they may be insufficient to reduce residential VMT per capita in the Planning Area below the applicable significance threshold or fully offset the effects of induced VMT.

Furthermore, as noted on table 4.5-1 of the Draft EIR, all alternatives would result in a significant and unavoidable, and cumulative considerable, impact with respect to VMT. Additionally, for the reasons discussed in Chapter 4 of the EIR and above in the alternatives section, the alternatives are infeasible.

Thus, there are no other feasible mitigation measures available or feasible alternatives. Impacts would be significant and unavoidable. Further, these impacts would be cumulatively considerable.

5. Significant Irreversible Environmental Changes

CEQA Guidelines require an EIR to consider whether “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely” (CEQA Guidelines Section 15126.2(d)). Specifically, per the Guidelines (Section 15126.2[d]), such an impact would occur under the circumstances listed below.

- The project would involve a large commitment of nonrenewable resources.
- Irreversible damage can result from environmental accidents associated with the project.
- The proposed consumption of resources is not justified.

Implementation of the Proposed Plan could result in the long-term commitment of various resources to residential and non-residential development. While the Proposed Plan itself would not directly entitle or result in any new development, it is reasonably foreseeable that the Proposed Plan, which acts as a blueprint for growth and development in the Planning Area over the next 20 years, could result in significant irreversible impacts related to the commitment of non-renewable and/or slowly renewable natural and energy resources, such as air quality, water resources, energy sources, agricultural resources, and cultural resources.

Irreversible environmental changes could also occur during the course of constructing development projects anticipated by the Proposed Plan. New construction would result in the consumption of building materials (such as lumber, sand and gravel), natural gas, and electricity, water, and petroleum products to process, transport and build with these materials. Though it is possible for construction equipment to be fueled by renewable sources over the course of the Proposed Plan buildout, the timing and availability of these energy sources is unknown. Construction equipment running on fossil fuels would be needed for excavation and the shipping of building materials. Due to the non-renewable or slowly renewable nature of these resources, this represents an irretrievable commitment of resources.

However, development allowed under the Proposed Plan would not necessarily result in the inefficient or wasteful use of resources. Compliance with all applicable building codes, as well as existing and Proposed Plan policies and standard conservation features would ensure that natural resources are conserved to the maximum extent feasible. It is possible that new technologies or systems will emerge, or become more cost-effective or user-friendly, to further reduce the reliance upon non-renewable natural resources. Nonetheless, future activities related to implementation of the Proposed Plan could result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment.

Demolition and construction activities associated with implementation of the proposed Project would involve some risk for environmental accidents. However, accidental spills and soil contamination, as discussed in Section 3.8, Hazards and Hazardous Materials, would be addressed by County, State, and federal agencies, and would follow professional industry standards for safety and construction. There is a possibility for contaminated soil to be encountered during grading, excavation, and/or ground disturbance associated with implementation of the Proposed Project, or that contaminated materials may be encountered during renovations or redevelopment of older buildings at the property. However, the risks of accidental contamination from handling construction materials or transport of these materials off site would be less-than-significant through compliance with the many federal, State, and local regulations regarding the handling and disposal of such construction materials. Additionally, the land uses proposed by the Proposed Project would not include any uses or activities that are likely to contribute to or be the cause of a significant environmental accident, such as industrial-related spills or leaks. As a result, the Proposed Project would not pose a substantial risk of environmental accident.

6. Recirculation Not Required

The revisions made to the Draft EIR, and Specific Plan policies are intended to reflect comments made by the public to enhance resource protection, and clarify plan policies or EIR analysis. No overall change in program, land uses, or infrastructure or other development not previously included in the Public Review Draft Specific Plan has been made. These do not result in substantive changes that would rise to the level of “significant new information” requiring recirculation. Under Section 15088.5 of the CEQA Guidelines, recirculation of an EIR is required when “significant new information” is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. The term “information” can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(CEQA Guidelines, § 15088.5.)

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The above standard is "not intend[ed] to promote endless rounds of revision and recirculation of EIRs." (*Laurel Heights Improvement Assn. v. Regents of the University of California* (1993) 6 Cal. 4th 1112, 1132.) "Recirculation was intended to be an exception, rather than the general rule." (*Ibid.*)

CEQA case law emphasizes that "[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new, and unforeseen insights may emerge during investigation, evoking revision of the original proposal." (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 736-737; see also *River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154, 168, fn. 11.) "CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process.' In short, a project must be open for public discussion and subject to agency modification during the CEQA process." (*Concerned Citizens of Costa Mesa, Inc. v. 33rd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 936.) Here, the changes to the Draft EIR are exactly the kind of revisions that the case law recognizes as legitimate and proper because they offer clarifying information to the reader and do not result in an exacerbation of existing impacts or create new impacts.

7. Statement of Overriding Considerations

According to CEQA Guidelines 15021 (d), "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian. An agency shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing of competing public objectives when the agency decides to approve a project that will cause one or more significant effects on the environment."

This statement of overriding considerations describes the project benefits that outweigh its environmental impacts. It is adopted in accordance with Public Resources Code section 21081(b) and CEQA Guidelines Section 15093:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining

whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”

(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

The EIR for the SDC Specific Plan examines the changes to the existing environment that would occur as the Specific Plan is built-out over time to the 2040 planning horizon. The significant, unavoidable impacts are described below. These are detailed in the respective sections of the Draft EIR.

- Cultural, Historic, and Tribal Cultural Resources
- Transportation

These impacts are outweighed individually and collectively by the following benefits of the SDC Specific Plan project.

8. Benefits and Supporting Facts

The SDC Specific Plan complies with current statutory requirements of the State legislature. Government Code Section 14670.10.5, enacted in 2019, outlines the State’s goals and objectives for the SDC Specific Plan. In light of the statewide affordable housing crisis, State law stipulates that the SDC Specific Plan prioritize housing, especially affordable housing and housing for individuals with developmental disabilities. The legislation recognizes the exceptional open-space, natural resources, and wildlife characteristics of SDC, and it is the intent of the legislature that the lands outside of the core developed campus and its related infrastructure be preserved as public parkland and opens space. The legislation also recognizes the need for conservation of water resources to preserve or enhance habitat, fish and wildlife resources, groundwater resources, and recreation.

The SDC Specific Plan envisions transformation of the SDC campus into a vibrant mixed-use, pedestrian-scaled district, with concentration of cultural, civic, retail, visitor, and other uses around the Central Green, creating a draw for the wider Sonoma Valley. It also aims to improve multi-modal access from the SDC to Highway 12 (State Route 12 or SR 12) by exploring the feasibility of constructing an additional east-west emergency access connection from the site. Utilities and infrastructure improvements are also incorporated into the Proposed Plan, such as the construction of new sewer laterals and mains, connections of each building within the Core Campus to a microgrid, and construction of all new utility lines underground. Further, the campus will be surrounded by a vast network of permanently preserved open spaces. The Specific Plan seeks to balance new development with conservation and rehabilitation and outlines a framework for land use designations and locations, including the overall amount of development and balance between uses, housing types, including affordable housing, and added infrastructure improvements.

9. Other Benefits

Under California law, counties may use the specific plan process to develop policies, programs, and regulations for implementing their general plans on specific sites or in specific areas. A specific plan frequently serves as the bridge between the general plan and site development plans in this regard. Once a specific plan is adopted, no rezoning, subdivision, use permit, development plan, or other entitlement for use shall be authorized for construction within the specific plan area that is not in substantial conformance with that specific plan. The Proposed Plan is intended to serve as the County's guide for development of the SDC Core Campus and protection of the surrounding open space, recreational, and agricultural areas, establishing policies and programs related to land use, circulation, infrastructure, historic preservation, urban design, economic development, and the environment.

The SDC Specific Plan supports the following key strategies:

- **Promote a Vibrant, Mixed-Use Community.** Promote a diverse and integrated mix of residential development and employment uses, including research, education, office, retail, and small businesses, to promote optimal development patterns and site revitalization in the Core Campus, and provide economic opportunities for Sonoma Valley communities.
- **Emphasize a Cohesive Sense of Place and Walkability.** Establish a cohesive visual landscape with consistent streetscapes and improved sidewalks within the Core Campus. Locate land uses and enhance the existing street network to encourage development of a walkable and pedestrian-friendly environment with gathering spaces, diverse activities, and connections within and to surrounding communities and regional trail systems. Ensure that new development complements the adjacent communities of Glen Ellen and Eldridge.
- **Integrate Development with Open Space Conservation.** Promote a sustainable, climate-resilient community surrounded by preserved open space and parkland that protects natural resources, fosters environmental stewardship, and maintains and enhances the permeability of the Sonoma Valley Wildlife Corridor for safe wildlife movement throughout the site. Support the responsible use of open space as a recreation resource for the community.
- **Balance Redevelopment with Existing Land Uses.** Use recognized principles of land use planning and sustainability to gauge how well proposed land uses protect public trust resources and fit the character and values of the site and surrounding area, as well as benefit local communities and residents.
- **Promote Sustainability and Resiliency.** Promote sustainable development practices in building and landscape design. Plan infrastructure efficiently and sustainably, conserving water and creating opportunities for water reuse and recharge. Proactively plan for community safety in natural disasters, especially ensuring that emergency plans and egress routes are in place with adequate capacity, and landscapes and buildings are designed with fire defenses.
- **Support Housing Development and Provide a Variety of Housing Types.** Promote housing to address Sonoma County's pressing housing needs and the State's key development objectives for the site. Support a range of housing opportunities, including affordable housing, workforce housing, mid-income housing, housing for individuals with developmental disabilities, senior housing, and market rate housing.

- **Balance Development with Historic Resource Conservation.** Preserve and adaptively reuse the Main Building and the Sonoma House complex, conserve key elements of the site's historic landscape, and strive to maintain the integrity of the historic district to the west of Arnold Drive by adaptive reuse of contributing buildings where feasible. Support a cohesive community feel and character, while allowing a diversity of architectural styles.
- **Promote Multi-Modal Mobility.** Promote car-free circulation within the site and promote transportation connections between the SDC site and the larger Sonoma Valley and Bay Area, including through transit access, safe sidewalks and crossings, and regional bicycle routes. Ensure that new development takes into consideration resultant traffic and levels of transportation activity from when SDC was operational.
- **Ensure Long-Term Fiscal Sustainability.** Ensure that the proposed plan is financially feasible and sustainable, as financial feasibility is essential to the long-term success of the project. Ensure that the proposed plan supports funding for necessary infrastructure improvements and historic preservation while supporting the Sonoma Valley community's needs and galvanizing regional economic growth.
- **Embrace Diversity.** Accommodate the needs of people of diverse backgrounds, interests, and income levels, creating an inclusive, accessible, inviting, and safe place that preserves SDC's legacy of care and creates opportunities for marginalized communities.

10. Statement of Overriding Considerations

Sonoma County has independently reviewed the information in the EIR and the record of proceedings and made a reasonable and good faith effort to eliminate or substantially lessen the impacts resulting from the proposed SDC Specific Plan to the extent feasible, by including policies and actions in the Specific Plan that mitigate potential environmental impacts to the greatest extent feasible, while balancing the project's benefits against significant and unavoidable impacts.

Adoption and implementation of the SDC Specific Plan would provide the following economic, social, legal, and other considerable benefits:

1. The SDC Specific Plan promotes environmentally sustainable development through goals and policies that balance the need for adequate infrastructure, housing, and economic vitality with the need for resource management, open space preservation, environmental protection, and preservation of quality of life for residents of the county.
2. The SDC Specific Plan implements principles of sustainable growth by concentrating new development within the existing urbanized area of the SDC Core Campus.
3. The SDC Specific Plan improves mobility options through the development of complete streets with walkable communities, transit and regional connections, and development of transportation demand strategies.
4. The SDC Specific Plan addresses adverse environmental impacts associated with global climate change by promoting a climate-resilient community that generates its own energy, reduces waste, and designs for resiliency in a changing climate.

5. The SDC Specific Plan enhances the local economy and provides opportunities for future jobs and businesses.
6. The SDC Specific Plan is the product of comprehensive public planning efforts, comprised of the public, staff, the Planning Commission, and the Board of Supervisors, and results in a thoughtful balance of community, economic, and environmental interests.

11. Conclusion

After balancing the specific economic, legal, social, technological, and other benefits of the proposed project, the Board of Supervisors of the County of Sonoma, find that the significant unavoidable impacts may be considered "acceptable" due to the specific considerations listed herein, which outweigh the impacts.

The Board of Supervisors has considered the information presented in the EIR, as well as public testimony, and the record of proceedings in which the SDC Specific Plan was considered. Recognizing that significant unavoidable impacts exist in cultural, historic, and tribal cultural resources and transportation, the Board nevertheless finds that the benefits of the SDC Specific Plan outweigh the impacts of the Project. Having included all feasible mitigation measures as policies, conditions of approval and actions in the SDC Specific Plan, and recognized all unavoidable significant impacts, the Board hereby finds that each of the separate benefits of the Specific Plan, as stated herein, are determined to be unto themselves separated overriding considerations, independent of other benefits, and warrant adoption of the SDC Specific Plan.

Based on the foregoing findings, the Board of Supervisors hereby determines that:

1. All significant environmental impacts due to the adoption of the SDC Specific Plan have been eliminated or substantially lessened where feasible.
2. There are no feasible alternatives to the Project which would mitigate or substantially lessen the impacts while attaining most or all of the Project objectives.
3. Any remaining unavoidable significant environmental impacts are acceptable due to the factors stated herein.

EXHIBIT B
[DRAFT] Statement of Overriding Considerations

The following Statement of Overriding Considerations is made in connection with the approval of the Sonoma Developmental Center Specific Plan Project (hereafter referred to as the “Proposed Project”), to allow for development within a core 180-acre developed area that is surrounded by a vast protected open space of oak woodlands, native grasslands, wetlands, forests, creeks, and lakes that provide habitats and wildlife movement corridors; agricultural land; and recreational open space integrated with the surrounding park systems. The developed core area comprises a complementary mix of housing, commercial, and institutional uses, and related supporting infrastructure. A variety of housing—including affordable, workforce, mid-income, and market-rate housing; senior housing; housing for people with developmental disabilities; and in new and adaptively re-used buildings—will foster a diverse and inclusive community.

The Board of Supervisors of the County of Sonoma finds that the economic, social and other benefits of the Proposed Project outweigh the significant and unavoidable environmental impacts identified in the EIR and in the record. In making this finding, the Board of Supervisors has balanced the benefits of the Proposed Project against its significant and unavoidable environmental impacts in the following areas, which are further described in the FEIR and Findings of Fact:

1. Transportation (Significant and unavoidable impact; project and cumulative impacts)
Implementation of the Proposed Plan would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) pertaining to Vehicle Miles Traveled (Impact 3.14-2).

2. Historic Resources (Significant and unavoidable impact; project impact)
Impact 3.5-2 Implementation of the Proposed Plan would cause a substantial adverse change to the significance of a historic district, as defined as physical demolition, destruction, relocation, or alteration of the historic district or its immediate surroundings such that the significance of the historic district would be materially impaired pursuant to § 15064.5.

The Board of Supervisors finds that each one of the following benefits of the Proposed Project independently warrant approval of the Proposed Project notwithstanding the unavoidable environmental impacts of the Proposed Project.

1. The SDC Specific Plan promotes environmentally sustainable development through goals and policies that balance the need for adequate infrastructure, housing, and economic vitality with the need for resource management, open space preservation, environmental protection, and preservation of quality of life for residents of the county.
2. The SDC Specific Plan implements principles of sustainable growth by concentrating new development within the existing developed area of the SDC Core Campus.
3. The SDC Specific Plan improves mobility options through the development of complete streets with walkable communities, transit and regional connections, and creation of transportation demand management strategies.
4. The SDC Specific Plan addresses adverse environmental impacts associated with global climate change by promoting a climate-resilient community that generates its own energy, reduces waste, and designs for resiliency in a changing climate.
5. The SDC Specific Plan enhances the local economy and provides opportunities for future jobs and businesses.
6. The SDC Specific Plan is the product of comprehensive public planning efforts, comprised of the public, staff, the Planning Commission, and the Board of Supervisors, and results in a thoughtful balance of community, economic, and environmental interests.