



County of Sonoma
Permit & Resource Management Department

Sonoma County Planning Commission **STAFF REPORT**

FILE: GPA25-0001
DATE: June 5, 2025
TIME: At or after 1:05 pm
STAFF: Katrina Braehmer

A Board of Supervisors hearing on the project will be held at a later date and will be noticed at that time.

SUMMARY

Applicant:	County of Sonoma
Supervisory District(s):	All
Description:	Amendments to the Sonoma County General Plan 2020 Public Safety Element, last updated in 2014, for compliance with Government Code Section 65302.
CEQA Review:	Addendum to the Sonoma County General Plan 2020 Environmental Impact Report



RECOMMENDATION

Permit Sonoma recommends that the Planning Commission:

1. Accept the staff report and presentation;
2. Open and close the public hearing to accept public comments;
3. Consider the Addendum to the certified General Plan 2020 Environmental Impact Report (EIR) together with the General Plan 2020 EIR; and
4. Adopt a resolution finding the Safety Element Update consistent with the General Plan and recommending that the Board of Supervisors approve a General Plan amendment repealing the Public Safety Element and adopting the Safety Element Update, and adopt the Addendum to the General Plan 2020 EIR.

EXECUTIVE SUMMARY

The General Plan is a planning and policy document that guides land use, physical development, and public action through a set of goals, policies, and implementation measures. It is a shared community vision that reflects priorities and values, shapes future growth, encourages housing and job development, fosters healthy and resilient communities, guides the protection and management of natural resources, and promotes social and economic equity. Permit Sonoma is preparing an update to the County's existing General Plan 2020 Public Safety Element ("Safety Element Update") and developing a new Environmental Justice Element. These updates are being completed in advance of a comprehensive update to General Plan 2020 to meet state requirements.

The Safety Element Update will establish goals and policies to reduce the potential short- and long-term risks to people, property, and systems resulting from fires, floods, earthquakes, landslides, climate change, and other hazards. The draft Safety Element Update was released for a public review period from March 28, 2025 to April 30, 2025 during which interested members of the public could provide input through an online survey, by attending a virtual workshop, or providing written public comment. Staff has reviewed and considered all feedback and prepared a revised draft for the Planning Commission's review. Permit Sonoma recommends that the Planning Commission adopt a resolution finding the Safety Element Update consistent with the General Plan and recommending that the Board of Supervisors adopt the Safety Element Update and an addendum to the General Plan 2020 Environmental Impact Report. After the Planning Commission's review and prior to proceeding to the Board of Supervisors for consideration, the draft Safety Element will be reviewed by the State Board of Forestry and Fire Protection as required by Government Code Section 65302.5.

The Environmental Justice Element will be presented to the Planning Commission separately before both elements proceed to the Board of Supervisors for adoption in August 2025.

PROJECT DESCRIPTION

All jurisdictions in California are required to have a safety element as part of their general plan. The County General Plan 2020 Public Safety Element was last updated in 2014. The Safety Element Update incorporates and builds upon the risk assessment findings in the 2021 Sonoma County Multi-Jurisdictional Hazard Mitigation Plan

to identify known hazards, assess vulnerability, and provide goals, policies, and strategies to protect the public from unreasonable risks associated with the effects of seismic and geologic hazards, flooding, and wildland and urban fires as required by Government Code Section 65302(g). Updates to State law now further require updated Safety Elements to:

- Evaluate climate vulnerabilities and, based on the findings of the assessment, include climate adaptation and resilience policies and implementation measures (Government Code Section 65302(g)(4); Senate Bill 379, 2015);
- Identify evacuation routes and their capacity, safety, and viability and evacuation locations under a range of emergency scenarios (Gov. Code Section 65302.15(a); Assembly Bill 747, 2019; Assembly Bill 1409, 2021); and
- Identify residential developments in hazard areas without at least two emergency evacuation routes (Gov. Code Section 65302(g)(5); Senate Bill 99, 2019).

The Public Safety Element is also proposed to be retitled as the Safety Element to align with terminology in the state law and prevent confusion about its core purpose to reduce the risks of environmental hazards.

BACKGROUND

General plans are the constitutions of land use and development for a city or county, and are structured by topical elements, each with a set of goals, policies, and implementation measures. Policies are required to be implemented through actions, programs, procedures, or other techniques. Zoning and subdivision ordinances and specific plans are the primary regulatory tools used for implementing general plans, although general plans often provide the framework for other local regulations such as building and fire codes.

General Plan Update Timeline

The County's existing general plan ("General Plan 2020") has served our community since 2008. Certain general plan elements are required by state law to be updated at established frequencies, including the general plan housing element and safety element. Additionally, when two or more general plan elements are updated, state law requires the County to develop an environmental justice element. The County's Housing Element update was completed in 2023 and work began on the General Plan Safety Element Update and new Environmental Justice Element in 2022. The Environmental Justice Element will be presented to the Planning Commission separately before both elements proceed to the Board of Supervisors for adoption in August 2025.

Concurrently, Permit Sonoma has initiated the first phase of a comprehensive update to the Sonoma County General Plan that involves auditing the existing General Plan 2020 and area plans. A year of related community engagement workshops and activities are nearing completion. In August 2025 Permit Sonoma will report out to the Board of Supervisors on the year of engagement and recommend moving into policy development and environmental review. Because the comprehensive General Plan update will be a multi-year process, Permit Sonoma seeks to complete the safety and environmental justice updates to General Plan 2020 in August 2025 to adhere to state-mandated timeframes. The primary objective for these interim updates is to comply with new state requirements in a timely manner.

Once completed, the Safety Element is expected to require modest technical revisions as part of the comprehensive General Plan update since it will have been updated recently. However, the comprehensive update process will provide further opportunities for community conversations and input on the various topics addressed in the Safety Element Update beyond the engagement conducted to date, discussed further below. New or revised policies and programs for the Safety Element may be proposed with the comprehensive update.

Safety Element Requirements

State law requires safety elements to do the following:

- **Protect the community from unreasonable risks** associated with a variety of hazards, including geologic and seismic hazards such as landslides and ground shaking from earthquakes, flooding, and wildland and urban fires (Government Code Section 65302(g)(1)).
- **Map and assess the risk associated with flood hazards**, and establish a set of goals and policies with related implementation measures to avoid or minimize flood risk to new development, protect essential public facilities from flooding, and establish cooperative relationships between public agencies responsible for flood protection (Government Code Section 65302(g)(2)).
- **Map and assess the risk associated with wildfire hazards**, and establish a set a goals and policies with related implementation measures to avoid or minimize wildfire risk, protect essential public facilities from wildfire, ensure adequate infrastructure for new development in fire hazard areas, and establish cooperative relationships between public agencies responsible for fire protection (Government Code Section 65302(g)(3)).
- Assess the vulnerability of populations and local assets to **climate change impacts** and establish a set of climate change adaptation and resilience goals and policies with related implementation measures that include ways to minimize impacts from new land uses, protect essential public facilities, provide adequate infrastructure in at-risk areas, work cooperatively with relevant public agencies on reducing risks, and identify natural infrastructure that may be used for climate adaptation (Government Code Section 65302(g)(4)).
- **Identify “residential developments in any hazard area identified in the safety element that do not have at least two emergency evacuation routes”** (Government Code Section 65302(g)(5)).
- The Local Hazard Mitigation Plan or Safety Element must **identify evacuation routes and their capacity, safety, and viability and evacuation locations** under a range of emergency scenarios (Government Code Section 65302.15).

Three technical assessments were prepared for the Safety Element to comply with State law and inform the policies and implementation measures. These assessments are discussed below.

Climate Change Vulnerability Assessment (Safety Element Appendix A)

A Climate Change Vulnerability Assessment was prepared to inform the Safety Element Update in compliance with state law. This assessment follows the methodology put forth by California Governor’s Office of Emergency Services in the California Adaptation Planning Guide and relies on California Adaptation Forum and Ocean

Protection Council for climate projection data. The assessment provides a high-level evaluation of potential climate change impacts on community members rendered vulnerable by systemic inequities; parks and natural resources; agriculture; and critical facilities, buildings, services, and infrastructure in unincorporated Sonoma County. Specifically, the assessment explores vulnerability to extreme heat, drought, wildfire, landslides, riverine and stormwater flooding, and sea level rise. The findings from this assessment informed the development of climate adaptation goals, policies, and implementation measures in the draft Safety Element.

The Vulnerability Assessment includes an assessment of the groups of individuals most susceptible to harm from environmental and climate changes, called “populations made sensitive by systems” in recognition of the systemic inequities that influence sensitivity levels to climate change. Generally, people with high-outdoor exposure, under-resourced individuals, individuals facing societal barriers (i.e. low-income, renters, low educational attainment, etc.), and individuals with chronic health conditions and sensitivities are disproportionately harmed by climate change. The Safety Element collectively refers to these sensitive population groups, and Environmental Justice Communities identified in the draft Environmental Justice Element, as “systemically vulnerable communities.” Certain policies and implementation measures in the draft Safety Element use this term to prioritize these communities.

On September 10, 2024 the Board of Supervisors approved the Climate Resilience Comprehensive Action Plan (CR-CAP). The document, which was also informed by public outreach for the Safety and Environmental Justice Elements, serves as an extension of the resiliency goals in the 2021 Sonoma County 5-year Strategic Plan. While the Safety Element broadly addresses climate hazards for the entire county, the CR-CAP is focused on County of Sonoma internal government operations and county-owned lands. This is an example of how the broad community vision contained within the General Plan results in more detailed implementation documents that reinforce rather than duplicate efforts.

Residential Egress Assessment (Safety Element Appendix B)

Along with assessing roadway capacity and the time needed to evacuate under potential scenarios, the County also completed a Residential Egress Assessment in alignment with Government Code Section 65302(g)(5), provided in Appendix C. This assessment identifies residential developments in hazard areas that lack at least two emergency evacuation routes, specifically residential developments of 30 or more parcels with only a single access route. The Residential Egress Assessment found that there are twelve clusters of residential parcels with a single access roadway under the assumptions and methodology used.

The assessment differs from the approach used by CAL FIRE in the Subdivision Review Program mandated by California Public Resources Code 4290.5, which requires CAL FIRE to identify existing subdivisions with 30 or more dwellings that are in either a State Responsibility Area or a Very High Fire Hazard Severity Zone in a Local Responsibility Area, and that are without secondary egress routes. While the residential egress assessment requirement for the Safety Element and the CAL FIRE Subdivision Review Program are different programs, they are parallel efforts intended to inform evacuation and planning efforts in preparation for wildfire and other hazards. The Residential Egress Assessment conducted as part of this Safety Element Update is an initial screening effort to identify communities that may have limited access. The assessment may be further broadened and refined by community input and additional analysis over time with direction from the Board of Supervisors. The assessment does not provide a comprehensive status of evacuation accessibility for individual

parcels in the unincorporated county. The draft element calls for additional evaluation of evacuation constraints to inform future planning and hazard mitigation efforts (see Policy SE-2i and Implementation Program 2).

Evacuation Routes and Locations Assessment (Safety Element Appendix C)

The County has conducted an Evacuation Routes and Locations Assessment as required by Government Code Section 65302.15. This assessment evaluates roadway capacity and the time required to evacuate geographically large areas under current and projected future population conditions in three scenarios. The assessment reviews scenarios in which the following areas of the county must evacuate: Scenario 1) the mountain western portions of the County from the coast to the valley floor, Scenario 2) the mountainous areas in the northeast of the County, including Alexander Valley and the Mayacamas Mountains north of Mark West Springs, and Scenario 3) the southeastern portions of the County, including Sonoma Valley, parts of Santa Rosa east of Farmers Lane, and the Sonoma Mountains south of Mark West Springs.

The assessment aims to give a broad understanding of the transportation system capacity during evacuations but does not guarantee that actual evacuations will match the modeled scenarios. The modeling results show areas of the county road network that could be heavily congested during the evacuation scenario under the specific assumptions used, and the time it would take for traffic to return to free flow conditions. The assessment includes further details on the scenarios modeled, assumptions used, and mapped results of the modeling analysis showing. The results should be viewed as sources of information and not a complete picture of evacuation considerations within the county. The draft Element calls for additional evaluation of evacuation constraints to inform future planning and hazard mitigation efforts (see Policy SE-2i and Implementation Program 2).

The assessment also includes a set of recommendations related to demand (i.e. when, how, and where people evacuate in an emergency), supply (i.e. the physical and operational infrastructure that facilitates and emergency evacuation); and policy (i.e. how information is shared and received in an emergency). Many of the recommendations are reflected in the policies and implementation measures in the draft Safety Element and/or are already being implemented by the Sheriff's Office and Department of Emergency Management during evacuation events. Some recommendations may not be reflected in the draft element to afford the Sheriff's Office and Department of Emergency Management the necessary flexibility during evacuation events. Further, the Safety Element is ultimately a long-term planning and policy document, and certain measures relating to evacuation best belong in other protocol plans like the County's Emergency Operations Plan.

Project History

In addition to assessments of existing conditions and the collection and analysis of data, the Safety Element update process involved extensive public engagement to identify and integrate community needs and values into draft policy. The following sections summarize engagement and outreach efforts and how they influenced the iterative policymaking process.

Written summaries of engagement activities for both the Safety Element Update and new Environmental Justice Element (to be reviewed by the Planning Commission at a later date) are included Attachment 6.

Community Engagement and Outreach

Equity Working Committee (EWC)

At the beginning of the project, the County project team convened a group of 19 members of the public to serve as community advisors to the Safety and Environmental Justice Element updates. The purpose of the advisory group, called the Equity Working Committee (EWC), was to center the experiences of under-resourced and under-represented communities to develop more equitable policy. EWC members were selected through an application process and chosen for their experiences as community leaders with varied personal and professional expertise in community change advocacy, housing, emergency preparedness, conservation, and more. The project team has held 6 meetings with the EWC since December 2022 to involve and collaborate with members on key decision points in the planning process for both the Safety and Environmental Justice Elements.

Specific to the Safety Element, the EWC contributed to the identification of systemically sensitive population groups for the Climate Change Vulnerability Assessment, provided guidance to staff on best practices for engagement, and spent two meetings refining draft policy concepts to feed into Policy Frameworks to assist with the policymaking process. The Policy Frameworks were presented to the Board of Supervisors on July 23, 2024, and played a key role in shaping the goals, policies, and implementation programs for the Safety and Environmental Justice Elements. During the public review period of the draft elements, the project held a final reflection session with the EWC to gather input. The EWC was generally supportive of the draft Safety Element, with most concerns focusing on evacuation and emergency infrastructure.

Focus Groups

The project team held four focus groups on safety element topics with County department and agency staff (including but not limited to the Department of Emergency Management, the Regional Climate Protection Agency, the Climate Action and Resiliency Division, and Health Services), as well as community leaders and organizations between December 2022 and July 2023. Focus groups with County staff were held to understand the constraints facing the County organization in providing resources or programs. Focus groups with community members helped identify and understand community barriers to accessing resources and public amenities.

Pop Up Events and Community Meetings

To hear directly from community members across the county, the project team set up a booth at six community events including farmer's markets, emergency preparedness fairs, and townhalls at a mix of times and locations. These events allowed staff to connect with members of the public that may not typically be engaged in the process. All engagement materials were provided in both English and Spanish, and Spanish-speaking staff were available. The project team also joined several community group and organization meetings to listen to their experiences and hear ideas on specific topics. The pop-up events and meetings were held between May 2023 and October 2024.

Survey

The project team hosted an online survey in Spring 2023 to learn more about the types of actions Sonoma County community members have already taken to prepare for natural disaster emergencies and climate change, what prevents them from preparing, communication and evacuation challenges they've experienced during past emergencies, and how the County should provide resources and programs. A total of 560 individual respondents participated in the survey.



Policy Development

To assist with the policymaking process, the project team, along with the Equity Working Committee (EWC), developed Policy Frameworks for various broad topic areas. The Policy Frameworks were developed based on key findings from the Climate Change Vulnerability Assessment, hazard and risk information from the County's Hazard Mitigation Plan, State requirements and guidance, and community and EWC input. Each Framework paper briefly introduced one or more subtopics and related issues identified from background analysis; identified existing County plans already in place that address the issue area; outlined desired outcomes of the planning effort; and listed potential strategies that could contribute to achieving those outcomes. The Policy Frameworks also summarized findings of community input thus far to demonstrate how input related to the potential strategies. The EWC spent two meetings providing input on policy concepts to feed into the Policy Frameworks. Policy Frameworks for the Safety Element were developed for the following topic areas:

- Extreme Heat, Air Quality, and Drought
- Emergency Preparedness & Response
- All Hazards General Public Safety
- Wildfire Resilient Landscapes
- Sea Level Rise and Resilience
- Seismic and Flooding Hazards
- Resilient and Equitable Infrastructure

Board of Supervisors Workshop

On July 23, 2024, staff presented a status update on the planning process and the Policy Frameworks refined by the EWC to the Board of Supervisors at an informational workshop. The Board provided general support for the Policy Frameworks, directed the project team to continue engagement throughout the County, and, specific to the Safety Element, directed staff to consider policy approaches to incorporate disaster recovery and the need for warming and cooling centers; conduct additional evacuation analyses, and emphasize emergency preparedness and risk avoidance. In response, the draft Safety Element includes a full section dedicated to emergency preparedness, response, and recovery, policies and implementation measures to support improved evacuation and further study evacuation constraints, and policies and implementation measures that emphasize reducing and avoiding risks across all hazards. See the Analysis section of this report for further discussion of proposed policies.

Advisory Councils

After the Board workshop, the project team continued engagement efforts throughout the County. The team met with the County's Community Advisory Councils (CACs) and Municipal Advisory Councils (MACs) to present information about the Safety and Environmental Justice Elements and gather additional feedback on the Policy Frameworks. Municipal and Community Advisory Councils are advisory bodies of local residents that provide input and recommendations to the Board of Supervisors. The project team coordinated with each CAC or MAC to identify select Policy Frameworks that would be of most interest to the Councils and each local community. Staff heard from appointed CAC and MAC members and local community members about which policy strategies in the Frameworks were priorities, concerns about the issues and potential strategies, and other strategy ideas not represented in the Frameworks. This input was used to further develop the policy strategies for inclusion in the draft Safety Element.

Table 1. Prior Public Meetings

Meeting Date	Authority	Review Level/Action Taken
07/23/2024	Board of Supervisors	Workshop – informational only
09/11/2024	Mark West Area Municipal Advisory Council	Workshop – informational only
09/12/2024	Lower Russian River Municipal Advisory Council	Workshop – informational only
09/24/2024	Special Joint Meeting of the North Sonoma Valley and Springs Municipal Advisory Councils	Workshop – informational only
09/25/2024	Geyserville Alexander Valley Municipal Advisory Council	Workshop – informational only
10/17/2024	Dry Creek Citizen’s Advisory Council	Workshop – informational only
10/23/2024	Sonoma Valley Community Advisory Commission	Workshop – informational only
10/2024	Sonoma County Coast Municipal Advisory Council (Pre-recorded meeting and online survey)	Workshop – informational only
04/22/2025	Environmental Justice Element Community Workshop	Workshop – informational only
04/23/2025	Safety Element Community Workshop	Workshop – informational only

County Department/Agency Review

Staff consulted the following County departments, agencies, and special districts to discuss the feasibility and appropriateness of early draft policies and implementation measures developed using the Policy Frameworks and community input: County Administrator’s Office, Department of Emergency Management, Sonoma Public Infrastructure, Regional Parks, Sonoma Water, Department of Health and Human Services, Community Development Commission, Agricultural Commissioner’s Office, Economic Development Collaborative, Sonoma County Agricultural Preservation and Open Space District, the Sonoma County Transportation Authority/Regional Climate Protection Agency, and the Sonoma County Local Agency Formation Commission. In coordination with these departments and agencies, the County refined the early draft policies and implementation measures, and these revisions were incorporated into the public review draft of the Safety Element.

Staff coordinated with the Sonoma County Fire Chiefs Association to distribute draft policies for fire hazards to Sonoma County fire districts and departments prior to the public review period. Fire districts and departments also received a formal notice of the proposed general plan amendment and availability of the public review draft Safety Element on April 23, 2025. Permit Sonoma did not receive any feedback on the draft Safety Element.

ANALYSIS

Safety Element Issue Areas

The draft Safety Element is broken up by ten topic areas, which are discussed in detail below. Each topic area includes one or more goals and related policies to help achieve the goal. A policy is a specific statement that guides decision-making and commits the County to a particular course of action. The draft Safety Element also includes an implementation plan, with specific measures or actions to carry out the policies. The draft provides

updated maps of hazard areas based on the latest available data, context on each topic including relevant local, state, or federal regulations, and new and amended goals, policies, and implementation measures. The draft carries forward many of the policies from the 2014 Public Safety Element, includes new strategies to address the new topic areas (e.g. climate change hazards), and incorporates related planned and ongoing County department and agency work. Since the last update to the Safety Element in 2014, the County has made significant investments in emergency planning and hazard mitigation following the 2017 wildfires and subsequent fire and flooding events. The draft Safety Element seeks to reflect these investments, lessons learned over the last decade, and best practices.

Consistent with the general policy direction in the Sonoma County 2021-2026 Strategic Plan, available guidance for emergency planning published by the California Office of Emergency Services and the Federal Emergency Management Agency (FEMA), and best practices outlined by the Office of Land Use and Climate Innovation (LCI) in its General Plan Guidelines, the Safety Element Update was prepared through an equity lens to ensure the County is planning for the whole community, especially populations that may be disproportionately vulnerable to impacts. Certain federal funding programs, such as the Hazard Mitigation Grant Program (HMGP) managed by FEMA, are common funding sources for implementation of risk reduction actions like those proposed in the Safety Element Update.

1. Emergency Preparedness, Response, and Recovery (New)

This section is new to the Safety Element and includes goals and policies related to the three general phases of the emergency management cycle. Draft policies for emergency preparedness emphasize the importance of updating and maintaining plans like the Hazard Mitigation Plan and Sonoma County Operational Area Emergency Operations Plan and call for increased capacity and redundancy during emergencies, relationship-building with community-based organizations, continuation and promotion of community emergency preparedness programs, and inter-agency training for emergency services and response staff. Policies related to response focus on improving the efficiency and safety of evacuations, alerts and warnings. Policies for disaster recovery direct the County to prepare a Disaster Recovery Framework (currently underway by the Department of Emergency Management), coordinate health services and resources, establish streamlined rebuilding processes and temporary housing programs, assist with debris removal and site remediation, and support efforts to restore landscapes to improve safety.

2. Equitable Community Safety (New)

This section is new to the Safety Element and highlights the importance of planning for the County's most vulnerable community members, including population groups that may be highly sensitive to climate change, Environmental Justice Communities identified by the draft Environmental Justice Element, and access and functional needs populations. Policies in this section focus on ensuring that all community members can prepare, respond to, recover from emergencies by providing equitable resources, investments, and services.

3. Resilient Facilities and Infrastructure (New)

This section is new to the Safety Element and provides policies to improve the physical resilience of the County's critical facilities and infrastructure, such as communications infrastructure, roadways, bridges, and public facilities. This section also includes policies to improve telecommunication and broadband access, and general

communication systems to support community safety during emergency events. This section was informed by the Climate Change Vulnerability Assessment and aligns with goals of the County’s 2021-2026 Strategic Plan.

4. Wildland and Structural Fires

This section carries forward or modifies many of the policies in the current Safety Element and is organized around three goals: minimize risk and vulnerability; regulate new development to prevent unnecessary exposure to harm and damage; and increase overall wildfire and climate resilience through strategic coordination in planning and land management. New policies address compliance with fire safe standards for existing nonconforming development, new development and redevelopment, establishing and maintaining community fire breaks and safe vegetation road clearance, requirements for new development (e.g. fire protection plans), coordination on funding and provision of fire suppression needs, and coordination on multi-benefit wildfire resilience projects. As discussed later in this report, CAL FIRE reviewed the draft Safety Element and found the draft to meet all state requirements related to fire hazards with the incorporation of minor adjustments.

5. Flooding and Inundation

This section carries forward or modifies many of the policies in the current Safety Element and is organized around two goals: reducing flood hazards to prevent unnecessary exposure and building long-term flood resilience. New policies focus on protecting existing communities within flood hazard areas by reducing flood risks through floodplain management, supporting retrofitting or relocation of structures, and expanding public awareness programs. New policies for flood resilience call for multi-benefit nature-based solutions, considering climate changes in the design of flood control measures, and balancing the need for continuity of resident-serving businesses and services in existing flood-prone communities with risk reduction efforts.

6. Geologic and Seismic Hazards

This section carries forward or modifies many of the policies in the current Safety Element and emphasizes preventing unnecessary exposure to harm or damage. New policies relate to seeking funding opportunities for building retrofits and minimizing alterations to land that may increase landslide hazards.

7. Hazardous Materials

This section largely carries forward or modifies policies in the current Safety Element. A new policy requires remediation on known contaminated sites prior to development.

8. Sea Level Rise (New)

This section is new to the Safety Element and addresses both coastline and shoreline areas that may be impacted by sea level rise, and largely reflects the policy direction of the updated Sonoma County Local Coastal Plan certified by the California Coastal Commission in November 2024. Policies call for the use of updated data and the best available science in sea level rise planning and development project review, assessing vulnerability and preparing adaptation plans, coordinating with stakeholders to limit saltwater intrusion on groundwater, and consideration of vulnerable communities in adaptation planning.

9. Air Quality and Extreme Temperatures (New)

This section is new to the Safety Element and includes policies to reduce community exposure to air quality and temperature climate impacts and build community capacity to adapt to changing conditions. Adaptation and resilience policies address access to and the functionality and availability of resilience centers and requirements for new development to mitigate heat gain and reduce energy demand during extreme heat events.

10. Drought (New)

This section is new to the Safety Element and establishes a framework to proactively plan for drought and improve the reliability and safety of water supply during drought periods. Policies direct the coordination between public and private agencies and the community on drought preparedness and response, monitoring of drought conditions, provision of drought information resources, and development strategies to improve water conservation. The General Plan Water Resources Element further provides water conservation and supply and watershed management strategies.

Safety Element Implementation Plan

Safety elements are required to include implementation measures to carry out the established goals and policies. The draft Safety Element includes 80 programmed actions that the County will undertake on either a set timeline or ongoing basis. For each program, the implementation plan establishes a lead County department or agency, supporting departments or agencies (if any are applicable), the anticipated timeframe to accomplish the program, the related policies that the program implements, and a metric to use as a measure of successful implementation. The programs include a variety of actions such as interdepartmental coordination or with external partners, planning and feasibility studies, analysis or assessment, community outreach and engagement, improving public information, funding identification, and code updates. Staff coordinated with County departments and agencies with a role in implementation to consider the feasibility and appropriateness of each program and provide feedback on draft policies. Many of the implementation programs reflect ongoing or planned departmental work and do not require additional funding. Where funding may not be currently available, the program states that funding will need to be identified and established before implementation.

General Plan Consistency

The draft Safety Element is consistent with the other elements of the General Plan because it furthers the overall goals and objectives of the other elements. The draft Safety Element's goals, policies, and implementation measures regulating development in known hazard areas to reduce risk are consistent with Goal LU-7 in the Land Use Element, and related objectives and policies, to prevent the unnecessary exposure of people and property to environmental risks and hazards and limit development on lands that are vulnerable or sensitive to environmental damage. Policies and implementation measures in the draft Safety Element that support landscape restoration and conservation to improve resilience to climate hazards are consistent with the goals and policies in the Land Use Element and Open Space and Resource Conservation Element that encourage the protection of the County's natural landscapes and resources, including but not limited to Policy LU-11f, Goal OSRC-7 and OSRC-8, and Policy OSRC-7o. The draft Safety Element goal, policies and implementation measures for drought planning complement those in the Water Resources Element related to water supply and conservation.

The draft Safety Element incorporates by reference relevant components of the [Sonoma County Multi-Jurisdictional Hazard Mitigation Plan](#), including Volume 1, which provides a risk assessment, and the Sonoma County Annex in Volume 2. The Safety Element goals and policies are informed, in part, by the risk assessment in the Hazard Mitigation Plan. Policies and implementation measures in the Safety Element Update also align with specific mitigation actions identified in the Hazard Mitigation Plan.

Environmental Review

The draft Safety Element is subject to review for environmental impacts under the California Environmental Quality Act (CEQA). Under CEQA, when changes are proposed to a previously approved project for which an environmental impact report (EIR) was certified, a subsequent or supplemental EIR is not required unless one of three triggering conditions exist:

- Substantial changes are proposed in the project that will require major revisions of the EIR;
- Substantial changes occur in the circumstances under which the project is being undertaken that will require major revisions in the EIR;
- New information of substantial importance to the project that was not known and could not have been known when the EIR was certified becomes available. (Public Resources Code Section 21166; CEQA Guidelines Section 15162.)

Here, the County is considering adoption of an update to the General Plan Safety Element, which is an amendment to the County's General Plan 2020. An EIR for General Plan 2020 was certified by the Board of Supervisors on September 23, 2008. For purposes of the triggering conditions outlined above, the "project" is General Plan 2020, and the EIR is the Final EIR certified for General Plan 2020. Staff evaluated the proposed Safety Element Update consistent with Public Resources Code Section 21166 and Guidelines Section 15162, and determined that none of the above conditions exist. Therefore, consistent with CEQA and the CEQA Guidelines, the General Plan 2020 EIR is adequate for adoption of the Safety Element Update, and no subsequent or supplemental CEQA review is necessary. Staff prepared the attached Addendum to the General Plan 2020 EIR, consistent with CEQA Guidelines Section 15164, to document the analysis and basis for this determination (Attachment 1, Exhibit B). CEQA Guidelines Section 15164 specifies that circulation for public review and comment is not required for an addendum to an EIR, and that the decision-making body must consider the addendum with the final EIR prior to making a decision on the project. (CEQA Guidelines Section 15164, subds. (c), (d).)

Agency Review

State law requires the County to submit the draft Safety Element for review to the State Board of Forestry and Fire Protection (BOF) at least 90 days prior to adoption and to the California Geological Survey of the Department of Conservation at least 45 days prior to adoption (Government Code Section 65302.5).

CAL FIRE staff support the BOF in the review of submitted safety elements. CAL FIRE staff reviewed the public review period draft of the Safety Element and provided minor recommendations to ensure the Safety Element meets state requirements. In response, the draft Safety Element was revised with language regarding periodic updates to fire hazard maps to keep the Safety Element current (see draft Safety Element Section 1.2) and language to clarify the County's fire service coverage (draft Safety Element Section 2.4). New Policy SE-1h was

added to discuss inter-agency training between emergency services and response staff and Policy SE-7c was revised to specify cooperation with Fire Safe Councils, community organizations, and local agencies on long-term maintenance of fuel reduction projects.

With these additions, CAL FIRE has determined that the draft Safety Element will meet state requirements. CAL FIRE will present the draft to the BOF for final review after the Planning Commission hearing and prior to the Board of Supervisors' adoption hearing. If the Planning Commission recommends substantive edits to the sections of the Safety Element Update related to fire hazards, the edits will be resubmitted to CAL FIRE for additional review prior to proceeding to the BOF.

Staff submitted the draft Safety Element Update to the California Geological Survey on April 23, 2025, and the agency may review and provide comments within 30 days of receipt. No response has been received to date.

PUBLIC COMMENT/REVIEW

Staff released the draft Safety Element for a public review period from March 28, 2025 to April 30, 2025 to solicit public input prior to proceeding to the Planning Commission. The County offered several opportunities for public input on the draft, including an online survey, a virtual workshop, and written public comment. The County also held a final reflection session with the Equity Working Committee (EWC).

Across all input opportunities, staff noted broad public support for policies and implementation measures related to helping under-resourced households meet defensible space requirements, working with and supporting community-based organizations on emergency preparedness and response, making improvements to resilience center operations, promoting and providing backup power during emergencies, providing transportation support for those with access and functional needs during evacuation events, and implementing multi-benefit wildfire resilience projects.

The section provides an overview of each input opportunity and any revisions made to the draft Safety Element in response to input received.

Online Survey

During the public review period, the project team published an online survey to obtain public feedback on the draft elements. Each survey contained a set of similar questions for each of the 10 safety issue areas. Participants could answer as many or as few questions as they wanted. A total of 37 responses were received.

The survey responses cited concerns with emergency evacuation and the need to improve egress conditions. Draft Policy SE-2i and Implementation Program 2 call for additional evaluation of evacuation constraints during the comprehensive General Plan update to inform the update and other hazard mitigation efforts. Survey responses also highlighted the importance of balancing defensible space and wildfire risk reduction goals with preservation of forests and natural habits. Policy SE-9h calls for the balance between safety and environmental goals. To address concerns with hazard impacts on mobile homes, staff drafted a new program (new Implementation Program 55) to implement Policy SE-10b, which assists in supporting emergency towing services during emergencies for travel trailers and mobile home parks.

Virtual Community Workshops

The project team organized a virtual community workshop to allow community members to share their ideas and comments directly with the project team during the public review draft period. The Safety Element workshop took place on April 23rd from 6:00 PM to 8:00 PM and resulted with seven attendees. During the workshop, the project team provided an overview of the Safety Element and participants were given the opportunity to provide their comments on select policies and implementation measures. General comments were also accepted.

Participant comments did not identify significant concerns with the draft policies and implementation measures that were discussed. A specific policy recommendation was to require fire protection plans for all development (not just discretionary development) as part of proposed Policy SE-8g. All development, whether permitted by right or on a discretionary basis, must meet building and fire codes; Policy SE-8g proposes to require more subjective review of fire protection measures for discretionary development. In response to general comments provided at the workshop, staff incorporated the latest Fire Hazard Severity Zone maps for Local Responsibility Areas issued by CAL FIRE into the Safety Element and adjusted Figure 1 in the Evacuation Routes and Locations Assessment for clarity.

Equity Working Committee

Staff hosted a final reflection session for the Equity Working Committee (EWC) during the public review period on April 24, 2025. The team was able to connect with small subset of the EWC, who provided general support for the draft Safety Element Update. The EWC commented on the importance of evacuation notifications and alerts, particularly for seniors and individuals with disabilities, and the need for improvements on evacuation routes. There were discussions about transportation needs and accessibility during emergencies, especially for those without vehicle access or available accessible transportation, and about hazard impacts on mobile homes. The Safety Element Update includes draft policies in for emergency alerts, evacuation route improvements, and emergency transportation in Sections 2.1 (Emergency Preparedness, Response, and Recovery), 2.2 (Equitable Community Safety), 2.3 (Resilient Facilities and Infrastructure), and 2.4 (Wildland and Structural Fire). In response to EWC comments, staff refined the narrative in Section 2.2 to specifically highlight access and functional needs populations and added new Program 55 to support mobile home owners with towing during flood events.

Written Public Comment

During the public review period, staff received comments from individuals and local organizations and groups, including Greenbelt Alliance and Valley of the Moon Alliance (see Attachment 7). Most comments relate to the evacuation assessments and policies for fire hazards. There was support for the proposed fire hazard policies and recommendations to strengthen certain policies. Some comments cite concerns about the comprehensiveness, granularity, or clarity of the Evacuation Routes and Location Assessment and Residential Egress Assessment. For example, there are concerns that the Residential Egress Assessment did not identify certain communities, neighborhoods, or parcel clusters that have less than two emergency evacuation routes.

In response to input, staff refined the narrative in Section 2.1 (Emergency Preparedness, Response, and Recovery) and Section 2.4 (Wildland and Structural Fires) for clarity related to applicability of regulations and the

scope and limitations of the evacuation assessments. Staff also made minor amendments to policy language for clarity on scope. In response to concerns about the evacuation assessments, staff further refined draft Policy SE-2i and Implementation Program 2, which call for additional evaluation of evacuation constraints during the comprehensive General Plan update to inform the update and other hazard mitigation efforts.

Some public comments requested stricter limitations on land uses and development in areas with significant hazards. These recommendations are more appropriate for consideration with the comprehensive General Plan update, which will evaluate amendments to the Land Use Element.

RECOMMENDATION

Permit Sonoma recommends that the Planning Commission:

1. Accept the staff report and presentation;
2. Open and close the public hearing to accept public comments;
3. Consider the Addendum to the certified General Plan 2020 Environmental Impact Report (EIR) together with the General Plan 2020 EIR; and
4. Adopt a resolution finding the Safety Element Update consistent with the General Plan and recommending that the Board of Supervisors approve a General Plan amendment repealing the Public Safety Element and adopting the Safety Element Update, and adopt the Addendum to the General Plan 2020 EIR.

ATTACHMENTS

1. Draft Planning Commission Resolution
 - Exhibit A. Draft Safety Element Update and Appendices
 - Exhibit B. Addendum to the Sonoma County General Plan 2020 Environmental Impact Report
- 2a. General Plan 2020 Final Environmental Impact Report (EIR), Volume 1
- 2b. General Plan 2020 Final EIR, Volume 2
- 2c. General Plan 2020 Final EIR, Volume 3
3. Board of Supervisors Resolution No. 08-0807 Certifying the General Plan 2020 EIR
4. Board of Supervisors Resolution No. 08-0808 Adopting General Plan 2020
5. Board of Supervisors Resolution No. 14-0355 Amending the General Plan 2020 Public Safety Element
6. Community Engagement Summaries for the General Plan Safety and Environmental Justice Element Updates
7. Public Comment Received Through May 26, 2025

