



# Sonoma County Planning Commission STAFF REPORT

FILE: GPA25-0001

DATE: July 10, 2025

TIME: At or after

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

Supervisorial District(s): All

**Description:** Amendments to General Plan 2020 adopting a new Environmental Justice

Element for compliance with Government Code section 65302.

**CEQA Review:** CEQA Guidelines Section 15061(b) (common sense exemption)



Staff Report – File No. GPA25-0001 July 10, 2025 Page 2 of 12

## **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. Adopt a resolution finding the Environmental Justice Element consistent with the General Plan and recommending that the Board of Supervisors approve a General Plan amendment to adopt the Environmental Justice Element.

## **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 (EJ) Element. These updates are being completed in advance of a comprehensive update to General Plan 2020 to meet state requirements.

The new EJ Element will establish goals, policies, and implementation programs to advance health in low-income communities that are disproportionately impacted by environmental burdens. A draft of the EJ Element 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 all feedback and prepared a revised draft for the Planning Commission's consideration. Permit Sonoma recommends that the Planning Commission adopt a resolution finding the new Environmental Justice Element consistent with the General Plan and recommending that the Board of Supervisors adopt the Element.

The Planning Commission considered the Safety Element Update separately on June 5, 2025 and made a recommendation to the Board of Supervisors to adopt the update. Both elements are anticipated to proceed to the Board of Supervisors for adoption on August 12, 2025.

## PROJECT DESCRIPTION

Senate Bill 1000, enacted in 2016, requires that cities and counties identify disadvantaged communities in their jurisdiction and incorporate environmental justice into the general plan, either through a standalone element or by integrating environmental justice goals, policies, and objectives into other elements (Government Code Section 65302(h)). Cities and counties are subject to this requirement upon the revision of two or more elements. With the state-mandated updates to the Housing Element (adopted in 2023) and Safety Element (update planned for adoption in 2025), the County must incorporate environmental justice into its general plan. California law defines environmental justice as "the fair treatment of people of all races, cultures, and incomes





Staff Report – File No. GPA25-0001 July 10, 2025 Page 3 of 12

with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies," (Government Code Section 65040.12(e)).

Permit Sonoma proposes a general plan amendment to add a new Environmental Justice (EJ) Element to General Plan 2020 that will set goals, policies, and implementation measures to advance health in low-income communities that are disproportionately burdened by environmental conditions (called "Environmental Justice Communities"), as well as across the unincorporated county. The EJ Element will generally address disproportionate pollution burden and exposure; access to public facilities, services, and community amenities; health and physical activity; healthy food access; safe and sanitary housing; and civic engagement in the public decision-making process. Permit Sonoma proposes a standalone element, instead of environmental justice policies spread throughout various elements, to recognize the importance of the topic and centralize core policies in one place.

## **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 late 2022. The Safety Element Update was presented to the Planning Commission on June 5, 2025. The Planning Commission voted 4-0 to recommend that the Board of Supervisors adopt the Safety Element Update, with one commissioner absent. Staff anticipates presenting both elements to the Board of Supervisors for adoption on August 12, 2025.

Concurrently, Permit Sonoma has initiated the first phase of a comprehensive update to the Sonoma County General Plan. 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 EJ Element is expected to require modest revisions as part of the comprehensive General Plan update to ensure consistency across the elements. The comprehensive update process will provide further opportunities for community conversations and input on the various topics addressed in the EJ Element beyond the engagement conducted to date, discussed further below. New or revised policies and programs for the EJ Element may be proposed with the comprehensive update.





Staff Report – File No. GPA25-0001 July 10, 2025 Page 4 of 12

## **Environmental Justice (EJ) Element Requirements**

State law requires the County to integrate environmental justice into its general plan as follows:

- Identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by means that include, but are not limited to, the reduction of pollution exposure (including the improvement of air quality), and the expansion of public facilities, food access, safe and sanitary homes, and opportunities for physical activity;
- Identify objectives and policies to enable civic engagement in the public decision-making process; and
- Identify objectives and policies that **prioritize improvements and programs** that address the needs of disadvantaged communities. (Government Code Section 65302(h).)

The law defines disadvantaged communities as areas identified by the California Environmental Protection Agency (CalEPA) as disadvantaged utilizing a tool called <u>CalEnviroscreen</u><sup>1</sup>, or areas that are low-income and disproportionately affected by environmental pollution or other hazards that can lead to negative health effects (Government Code Section 65302(h)(4)(A)). Lands under the control of federally recognized Tribes are also considered disadvantaged by the State. In Sonoma County, this includes Dry Creek Rancheria, Stewarts Point Rancheria, and Kashia Coastal Reserve.

## Identifying Environmental Justice Communities

Staff, with the guidance of a community advisory group (i.e. the Equity Working Committee), discussed later in this report, identified disadvantaged communities within the unincorporated county consistent with the State's definition and guidance published by the Office of Land Use and Climate Innovation (LCI), using a methodology tailored to Sonoma County. These areas are proposed as the County's Environmental Justice Communities (EJ Communities). The EJ Communities comprise 22 census tracts across the County that meet any of the following criteria:

- A census tract that scores at or above the 50th percentile for *Overall Pollution Burden* in CalEnviroscreen 4.0; or
- A census tract that is low-income and has one of the following accompanying conditions:
  - The census tract scores at or above the 75th percentile for any individual pollutant indicator in CalEnviroscreen 4.0; or

<sup>&</sup>lt;sup>1</sup> CalEnviroscreen 4.0 is a mapping tool developed by the Office of Environmental Health Hazard Assessment (OEHHA), an office within the California Environmental Protection Agency. The tool analyzes and presents environmental, public health, and socioeconomic data for all California census tracts to provide an overview of cumulative pollution burdens and vulnerabilities in communities throughout the state. The tool incorporates 21 data-based indicators that are used to assign percentile-based scores to each census tract. The scores represent a ranking of each community relative to other places in the state. For more information about the methodology for the CalEnviroscreen tool, please visit: <a href="https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40">https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40</a>





Staff Report – File No. GPA25-0001 July 10, 2025 Page 5 of 12

> The census tract scores at or above the 75th percentile for housing burden in CalEnviroscreen 4.0.

Housing burden was identified through community engagement as one of the most important determinants of well-being. Housing-burdened households spend a greater proportion of their income on housing, which has cascading impacts on health. Because access to safe, decent, and affordable housing is fundamentally linked to other environmental inequities, housing burden was included as a factor in determining which census tracts in Sonoma County should be considered EJ Communities.

#### Environmental Justice Technical Report

The Environmental Justice Technical Report, Appendix A to the draft EJ Element, provides a baseline understanding of the environmental justice issues in unincorporated Sonoma County. The analysis presented in this report and community input gained throughout the planned process directly shaped the goals and policies proposed in the draft EJ Element. This background report identifies Sonoma County's EJ Communities and explores existing conditions within those areas.

## **Project History**

In addition to the assessment of existing conditions, the EJ Element planning 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 EJ Element and Safety Element Update (reviewed by the Planning Commission on June 5, 2025) are included as Appendix B to the draft EJ Element (see Attachment 1, Exhibit A).

## 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 environmental justice and safety general plan 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 the EJ and Safety Elements.

Specific to the EJ Element, the EWC helped develop the methodology for identifying EJ Communities, 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 EJ 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 EJ Element, with most concerns focusing on the feasibility of implementation.





Staff Report – File No. GPA25-0001 July 10, 2025 Page 6 of 12

#### **Focus Groups**

The project team held a focus group on environmental justice topics with County department and agency staff (including but not limited to the Department of Health Services, Community Development Commission, Department of Emergency Management, and the Regional Climate Protection Agency). Staff also held a focus group with community leaders and organizations. The focus group with County staff was held to understand the constraints facing the County organization in providing resources or programs. The focus group with community members and organizations helped identify and understand barriers to accessing public resources and support.

## Pop Up Events and Community Meetings

To hear directly from community members across the county, focusing on EJ Communities, the project team set up a booth at six community events including farmers' 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 community meetings were held between May 2023 and October 2024.

## **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 Environmental Justice Technical Report, 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 community input received up to that point 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 EJ Element were developed for the following topic areas:

- Healthy Environments (Pollution Burden)
- Healthy Public Facilities and Physical Activity
- Community Health
- Healthy Food Access
- Safe and Sanitary Housing
- Community Engagement and Language Access

## **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 EJ Element, directed staff to explore policy and program options to prioritize infrastructure improvements in EJ Communities, address the impacts of pollutant sources such as litter and wastewater, and provide for community-specific needs where feasible. In response, the draft EJ Element includes policies that prioritize community involvement in decisions about public infrastructure and amenities such as parks, encourages water





Staff Report – File No. GPA25-0001 July 10, 2025 Page 7 of 12

stewardship and pollution prevention activities, and prioritizes improvements in EJ Communities. 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 EJ 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	Workshop – informational only
	(Pre-recorded meeting and online survey)	
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, Office of Equity, Department of Emergency Management, Sonoma Public Infrastructure, Regional Parks, Department of Health and Human Services, Community Development Commission, Agricultural Commissioner's Office, Agricultural Preservation and Open Space District, Sonoma Water, Economic Development Collaborative, and the Sonoma County Transportation Authority/Regional Climate Protection Agency. In coordination with these entities, the County refined the early draft policies and implementation measures, and these revisions were incorporated into the public review draft of the EJ Element.





Staff Report – File No. GPA25-0001 July 10, 2025 Page 8 of 12

## **ANALYSIS**

#### EJ Element Issue Areas

The draft EJ Element is broken up by six topical issue areas, which are discussed in detail below. Each issue 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 EJ Element also includes an implementation plan, with specific actions to carry out the goals and policies. The draft provides maps of pollution burden scores, access to public amenities like transit, bicycle lanes, and parks, access to food, and community health indicators such as asthma rates and provides existing conditions information for each topic.

## 1. Healthy Environments

This section addresses the most common sources of pollution exposure in Sonoma County's EJ Communities, including solid waste sites, impaired water bodies, and pesticides. The first of two goals focuses on general pollution reduction and eliminating disproportionate impacts on EJ Communities. Policies in this section call for the use of land use strategies to discourage new sources of pollution or locate sources away from EJ Communities; require additional assessments to consider health impacts prior to project approvals; and continue existing efforts on solid waste diversion and work cooperatively to support cleanup of contaminated environments. The second goal emphasizes maintaining safety of groundwater and surface water resources through resources and partnerships. Related policies direct the County to promote water resource stewardship and pollution prevention, support reduced-risk pesticide use and other activities to limit pesticide exposure, and support well users with water quality concerns through testing and technical assistance.

## 2. Healthy Public Facilities and Promoting Physical Activity

Access to safe and affordable public facilities and resources that support healthy living and physical activity, such as parks, open spaces, and active transportation infrastructure (e.g., sidewalks and dedicated bikeways), is a critical component of environmental justice. This section includes two goals and a set of policies to improve equitable access to safe and affordable outdoor spaces and transportation opportunities. Policies for parks, open space, and physical activity focus on improving existing parks and open spaces, coordinating between agencies, involving the community in decision-making, and reducing barriers to access. Policies for transportation opportunities focus on improvements to safety and access.

## 3. Community Health

Unequal exposure to environmental hazards and limited access to healthcare or healthy environments directly contribute to health disparities. This section provides policies for improving public health outcomes through institutional recognition of health inequities and investments in systems that support community health. Policies call for assessments of County actions on health, data-gathering for informed decision-making, better integration of health services across County government, incorporating health-promoting features in public facilities, and abating environmental health hazards.





Staff Report – File No. GPA25-0001 July 10, 2025 Page 9 of 12

## 4. Healthy Food Access

Access to healthy food is a basic human need and critical determinant of positive health outcomes and quality of life. The policies in this section aim to complement and build upon existing systems, services, and initiatives focused on improving food access across the county and increasing the resilience of our local food system. Policies focus on the importance of accurately measuring food access, improving the effectiveness of existing food programs, local and regional coordination, incentivizing locally sourced healthy food options, and public education.

## 5. Safe and Sanitary Housing

Adequate housing conditions, including access to proper sanitation and ventilation, reduce the risk of diseases and exposure to toxins. Environmental justice recognizes that everyone, regardless of their socioeconomic status or background, deserves to live in a safe and healthy home environment. The policies in this section focus on reducing the harmful impacts of poor living conditions to make homes in EJ Communities safer. While housing affordability and availability are critical factors in safe living conditions, these issues are comprehensively addressed in the Housing Element.

## 6. Civic Engagement and Language Access

Actively involving the communities in the development, adoption, implementation, and enforcement of environmental laws and regulations that affect those communities is the foundation of environmental justice. This section aims to improve opportunities for equitable and meaningful community engagement on environmental policies and programs through diverse and thoughtful engagement strategies, improvements to language access, and reducing barriers to participation. This section also includes a goal and related policies to actively acknowledge and respect the sovereignty of Tribal Nations to build lasting government to government relationships.

## **EJ Element Implementation Plan**

Environmental justice elements are required to include implementation measures to carry out the established goals and policies. The draft EJ Element includes 41 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 or interagency coordination or with external partners, planning and feasibility studies, analysis or assessment, community outreach and engagement, improving public information, technical assistance, 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.





Staff Report – File No. GPA25-0001 July 10, 2025 Page 10 of 12

## **General Plan Consistency**

The draft EJ 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 EJ Element goals, policies, and implementation measures complement goals and policies in the Land Use Element, such as Policy LU-6b, Policy LU-8a, Goal LU-11, Policy LU-11a, and Policy LU-11f, aimed at protecting public health in land use decisions, protecting water and soil quality, and reducing harmful emissions. Policies and implementation measures in the draft EJ Element related to community access to public facilities and amenities are consistent with the Public Facilities Element and Circulation and Transit Element, including Goal PF-2, Goal CT-1, Goal CT-2, and Policy CT-2x. Policies and programs related to food access in the draft EJ Element align with the objectives of the Agricultural Resources Element to support the local food system and agricultural producers. The EJ Element policies and implementation measures related to community health, safe and sanitary housing, and community engagement and participation are also consistent with policies of the Housing Element, including Policies HE-6d, HE-6f, HE-6g, and HE-6i.

#### **Environmental Review**

The draft EJ Element is subject to review for environmental impacts under the California Environmental Quality Act (CEQA). Permit Sonoma has determined that the proposed general plan amendment is exempt from CEQA under CEQA Guidelines Section 15061(b)(3) (the common sense exemption) because CEQA applies only to projects which have the potential for causing a significant effect on the environment. The EJ Element is a programmatic document that will not result in any direct or indirect physical change in the environment or approval of any development project. It does not make any changes in land use, building density and intensity, or cause any other change in the physical environment. It would not directly or indirectly cause population growth, or place additional demands on natural resources, public services, or infrastructure. Future implementation actions under the proposed EJ Element that could have a significant effect on the environment, if any, would be subject to all applicable CEQA review. Therefore, it can be seen with certainty that there is no possibility the proposed general plan amendment will result in a direct or indirect physical change in the environment.

## **PUBLIC COMMENT/REVIEW**

Staff released the draft EJ 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).

The section provides an overview of each input opportunity and discusses any revisions made to the draft EJ 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 six EJ issue areas. Participants could answer as many or as few questions as they wanted. A total of 49 responses were received. The survey responses discussed pollution-related concerns about air quality from cannabis operations and land use conflicts





Staff Report – File No. GPA25-0001 July 10, 2025 Page 11 of 12

such as asphalt plants near residential communities. Other responses noted a desire for County action to: focus resources on fixing roadways; create more free opportunities for open space and parks within residential communities; and provide land use solutions for incentivizing health-related businesses such as dentists and gyms. Concerns about cannabis-related impacts will be addressed with the cannabis ordinance update, which is expected to be reviewed for adoption by the Board of Supervisors in late 2025. Parcel-specific land use changes are not proposed with this general plan amendment because the County is embarking on a comprehensive update to the General Plan, a multi-year process that will review land use changes countywide. The EJ Element does include policies and programs in Sections 3.1 (Health Environments) and 3.4 (Healthy Food Access) to evaluate and propose zoning code updates to mitigate land use conflicts that impact health and incentivize health-promoting development.

## **Virtual Community Workshop**

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 EJ Element workshop took place on April 22<sup>nd</sup> from 6:00 PM to 8:00 PM and resulted with 7 attendees. During the workshop, the project team provided an overview of the EJ Element and participants were given the opportunity to provide their comments on select policies and implementation measures. General comments were also accepted. Among comments that generally supported the intent of the policies, participants made suggestions to clarify or strengthen certain policy language and offered considerations for implementation.

## **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 EJ Element. The EWC shared general support for the draft element with concerns about the feasibility of implementing proposed actions due to changes with the federal government that are impacting local funding availability. Some EWC members made text suggestions for the element to provide clarity or supporting information. The EWC also encouraged staff to strengthen policies with more action words. While general plan policies and implementation programs should be specific and unambiguous, they should not provide step-by-step instructions or complete details about how the policy or program will be accomplished as this will occur during implementation. Some policies or programs direct the County to "consider" or "explore" certain actions because there may be limitations on funding, potential impacts of the action that should be evaluated prior to implementation, or barriers to implementation that need to be addressed for the action to be feasible.

## **Written Public Comment**

During the public review period, staff received comments from several individuals and local groups, including Greenbelt Alliance and Sonoma County Food System Alliance (see Attachment 3). Comments discussed potential unintended impacts of policies and programs and recommended revisions or additions to policies or programs. For example, one commenter shared apprehension that the EJ Community designation would have limit where affordable housing could be located. The draft EJ Element does not include any policies or programs that would impact the location of new affordable housing projects. Staff revised language for several policies for clarity of intent or scope, incorporating suggestions from public comment where appropriate. One comment suggested that the environmental justice address the impacts of sea level rise. Potential impacts to groundwater quality from sea level rise are addressed in the Safety Element Update and in existing policies in the Water Resources





Staff Report – File No. GPA25-0001 July 10, 2025 Page 12 of 12

Element. Other comments called for additional accountability mechanisms including detailed metrics and timelines for implementation. The EJ Element includes a general timeline and metric for completion of each implementation program.

## **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. Adopt a resolution finding the Environmental Justice Element consistent with the General Plan and recommending that the Board of Supervisors approve a General Plan amendment to adopt the Environmental Justice Element.

## **ATTACHMENTS**

- 1. Draft Planning Commission Resolution
  - Exhibit A. Draft Environmental Justice Element and Appendices
- 2. Sonoma County General Plan 2020
- 3. Public Comment Received Through July 2, 2025



