

Addendum to the Sonoma County General Plan 2020 Certified Final Environmental Impact Report

Prepared for the 2025 Safety Element Update

State Clearinghouse No. 2003012020

Project location: countywide

Draft For Planning Commission Consideration, June 2025

1 Introduction

This document is an Addendum to the Final Environmental Impact Report for Sonoma County General Plan 2020 (referred to in this document as the “GP2020 EIR”), which was certified by the Sonoma County Board of Supervisors on September 23, 2008. The Addendum analyzes the Safety Element Update as a modification to the existing General Plan, and specifically to the General Plan Safety Element, to determine whether adoption of the Safety Element Update could result in any environmental impact not previously considered in connection with General Plan 2020 by the GP2020 EIR. Approval of the Safety Element Update is a discretionary action by the Sonoma County Board of Supervisors, and the County of Sonoma is the CEQA lead agency for the proposed action.

Because the Safety Element Update is a modification to a project for which a final EIR was certified and is a later activity under a Program EIR, it is subject to CEQA’s subsequent review standards provided in Public Resources Code Section 21166 and CEQA Guidelines Sections 15162-15164.¹ Under these provisions, when an agency considers changes to a project that was previously approved based on a certified EIR, preparation of an Addendum is appropriate if the agency determines, based on substantial evidence, that a subsequent or supplemental EIR is not required. Public Resources Code Section 21166 provides that after an EIR has been prepared for a project, no subsequent or supplemental EIR shall be required by the lead agency or by any responsible agency, unless one or more of the following events occurs:

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.
- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.
- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

Per CEQA Guidelines Section 15164 (Addendum to an EIR or Negative Declaration), the lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in CEQA Guidelines Section 15162 have occurred. An addendum need not be

¹ All references to CEQA are to Public Resources Code, §§ 21000-21189.91. All references to the CEQA Guidelines are to Title 14 of the California Code of Regulations, §§ 15000 et. seq.

circulated for public review. (Guidelines § 15164, subd. (c).) The decision making body shall consider the addendum with the final EIR prior to making a decision on the project. (Id. at subd. (d).)

The Project Description section of this Addendum details the proposed Safety Element Update and changes to the existing GP2020 Public Safety Element.

As the CEQA lead agency for the Safety Element Update, based on the facts and analysis presented in this Addendum the County has determined that none of the conditions listed in CEQA Guidelines Section 15162 apply that would require preparation of a subsequent or supplemental EIR. Accordingly, pursuant to Guidelines Section 15164, the County determined that an Addendum to the certified GP2020 EIR is appropriate to document the County's determination that no further CEQA review is required for the Safety Element Update. This Addendum will be considered by the Board of Supervisors with the GP2020 Final EIR before the Board takes any action on the proposed Update.

2 Background

2.1 Procedural history of General Plan 2020 and GP2020 EIR

On September 23, 2008, the Sonoma County Board of Supervisors approved Resolution No. 08-0807 certifying the Final Environmental Impact Report for General Plan 2020 (GP2020 EIR), and also approved Resolution No. 08-0808, adopting Sonoma County General Plan 2020 (GP2020), making findings required by CEQA, and adopting a Statement of Overriding Considerations.

The General Plan 2020 Safety Element (called the "Public Safety Element") has been amended twice since GP2020 was adopted in 2008. In September 2014, the Board of Supervisors adopted Resolution No. 14-0355, approving a limited, technical update to the Public Safety Element that incorporated updated hazard maps, new discussion on wildfire hazards in response to changes in state law, and integrated the Sonoma County Hazard Mitigation Plan. The 2014 Update did not make any substantive changes to goals, objectives, or policies of the Public Safety Element, and instead made only grammatical and technical changes to objectives and policies. As provided in the Planning Commission resolution recommending Board of Supervisors approval, the 2014 Update did "not involve revising existing policies in the Public Safety Element except to correct terminology and references to hazard maps; and does not involve adding new policies."² The 2014 Public Safety Element update was found to be within the scope of the GP2020 EIR, pursuant to CEQA Guidelines Section 15168(c)(2).

On December 11, 2018, the Board of Supervisors adopted a minor amendment to the Public Safety Element to add new policy PS-1p, modifying local requirements for development in the Alquist-Priolo Earthquake Fault Zone (locally known as the Geologic Hazard Area combining district) for reconstruction of single-family homes located in the Alquist-Priolo Earthquake Fault Zone and destroyed in the 2017 Sonoma Complex Fires.

Unless otherwise specified or clear in context, references to the "GP2020 Public Safety Element" or the "Public Safety Element" include the current Public Safety Element, inclusive of the later amendments.

² Planning Commission Resolution No. 14-014, July 17, 2013.

2.2 General Plan 2020 and the General Plan 2020 EIR

2.2.1 The “Project” Analyzed in the GP2020 EIR

The EIR for GP2020 is a Program EIR, as described in CEQA Guidelines § 15168. The “project” analyzed by the GP2020 EIR was implementation and buildout of General Plan 2020, plus adoption of certain zoning code amendments to the Sonoma County Code that were proposed concurrent with General Plan 2020 to create new zoning combining districts and apply the newly created zoning to selected sites. As described in the GP2020 Draft EIR (“DEIR”), for purposes of the EIR’s analysis,

[t]he project encompasses all of the future land uses and development that are projected to occur, including residential, commercial, industrial, agricultural, and other land uses and development, as well as the entire foreseeable public infrastructure that is necessary to serve the projected uses. The Draft GP 2020 is based upon a projected amount of growth, and does not assume that all properties would be fully developed.³

The Draft EIR explained that the General Plan was drafted to anticipate and address many of the impacts discussed in the EIR.⁴ The analysis in the GP2020 EIR evaluated the draft policies and programs for General Plan 2020 that “would lead to alterations in the physical environment... includ[ing] changes in population, housing, and land use patterns that would occur in Sonoma County as the GP 2020 is implemented.”⁵

A key aspect of the EIR’s analysis of the changes that would occur in Sonoma County “as the GP 2020 is implemented” was its assumptions about population growth. As a basis for its analysis, the EIR projected that the population of Sonoma County as a whole would increase from 458,614 in 2000 to 546,030 residents in 2020, and that the unincorporated area population would increase from 128,596 in 2000 to 147,660 residents in 2020.⁶

2.2.2 Mitigation Measures

Among other identified measures, the GP2020 Draft EIR identified five CEQA mitigation measures for incorporation into the Public Safety Element in the form of new and revised policies. Distinct from mitigation measures, the GP2020 EIR also discussed “mitigating policies” of GP2020, which were policies already included in the proposed project (the draft General Plan 2020) analyzed by the EIR, which would contribute to reducing the significance of project impacts.

As defined by CEQA Guidelines Section Section 15370, “mitigation” includes:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

³ General Plan 2020 Draft EIR (Vol. 3 of Final EIR), at p. 2.0-2.

⁴ General Plan 2020 Draft EIR (Vol. 3 of Final EIR), at p. 1.0-2.

⁵ Ibid.

⁶ Ibid.

- (e) Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.

The Draft EIR identified and recommended five mitigation measures for adoption as policies in the Public Safety Element. Of these, one was adopted as recommended; two were revised and restructured into three policies and then adopted; one was eliminated by staff before publication of the Final EIR; and one was determined by the Board of Supervisors to be infeasible. The adopted CEQA mitigation measures are listed in Table 1. Underlined portions of a measure or policy denote that portion was specifically added or modified as the EIR mitigation measure.

Table 1. Mitigation Measures Adopted In the GP2020 Public Safety Element

Impact	Mitigation Measure As Identified In DEIR	Policy Adopted as Mitigation
<p>Impact 4.5-12: Potential failure of levees or dams could expose people and structures to inundation and result in loss of property, increased risk, injury or death.</p>	<p>Mitigation Measure 4.5-12 Revise Policy PS-2u to include a provision for review and rehabilitation of dams and levees that pose a significant threat of inundation to adjacent or downstream development. Revise the end of Policy PS-2u to include the following text:</p> <p>Policy PS-2u: Encourage the timely completion and filing of inundation maps for all dams whose failure could cause loss of life or personal injury within Sonoma County. <u>Where inundation maps indicate dam or levee failure could cause loss of life or property or personal injury, coordinate with the corresponding responsible party to investigate levee or dam stability and management and identify rehabilitative maintenance needs as appropriate.*</u></p>	<p>Policy PS-2w: Encourage the timely completion and filing of inundation maps for all dams whose failure could cause loss of life or personal injury within Sonoma County. <u>Where inundation maps indicate dam or levee failure could cause loss of life or property or personal injury, coordinate with the corresponding responsible party to investigate levee or dam stability and management and identify rehabilitative maintenance needs as appropriate.*</u></p>
<p>Impact 4.13-2: Land uses and development consistent with the Draft General Plan 2020 could result in the increased exposure to hazardous materials in the vicinity of schools.</p>	<p>Mitigation Measure 4.13-2(a) Add a new policy to the Public Safety Element as follows: Policy PS-4p: Avoid siting of hazardous waste repositories, incinerators, facilities that use a substantial quantity of hazardous materials, or other similar facilities intended primarily for hazardous waste disposal within one-quarter mile of an existing or proposed school facility.</p> <p>Mitigation Measure 4.13-2(b) Add a new policy to the Public Safety Element as follows: Policy PS-4q: Work with School Districts to avoid siting of schools within one-quarter mile of hazardous waste repositories, incinerators, facilities that use a substantial quantity of hazardous materials, or other similar facilities intended primarily for hazardous waste disposal.</p>	<p>Policy PS-4h: Avoid siting of hazardous waste repositories, incinerators, <u>facilities that use a substantial quantity of hazardous materials</u>, or other similar facilities intended primarily for hazardous waste disposal in any area subject to <u>a very strong ground shaking hazard identified on Figures PS-1a through PS-1i or within one quarter mile of schools.*</u></p> <p>Policy PS-4i: Avoid siting of hazardous waste repositories, incinerators, or similar facilities intended primarily for hazardous waste disposal in any area designated for urban residential or rural residential use or on agricultural lands <u>or at County approved solid waste disposal facilities.*</u> Site hazardous waste facilities which have the primary purpose of reuse, recycling, or source reduction of hazardous wastes in areas designated for industrial use in close proximity to users of hazardous materials and/or generators of hazardous wastes.*</p> <p>Policy PS-4j: Site hazardous waste facilities which have the primary purpose of reuse, recycling, or source reduction of hazardous wastes in areas designated for industrial use in close proximity to users of hazardous materials and/or generators of hazardous wastes.*</p>

Recommended mitigation measures identified in the Draft EIR but not adopted are as follows:

1. Mitigation measure 4.9-10. This measure was revised by staff before publication of the adoption draft GP2020 to eliminate the proposed mitigation measure. (As noted in the Final EIR, Vol. 2 at p. 2.2-213: “Public Safety Element Policy PS-3m has been revised to require automatic sprinklers in new development with some exceptions. Details would be determined as part of the Code implementation.”) The Draft EIR notes that the remainder of the policy was already in effect due to the recent passage of ordinances requiring sprinklers in most new residential and commercial structures and conditionally requiring them at the time of expansion of existing structures.⁷

Mitigation Measure 4.9-10. *Revise Policy PS-3m as follows:*

Policy PS-3m: *Require automatic fire sprinkler systems in all new residential and commercial structures, with exceptions for detached utility buildings, garages, and agricultural-exempt buildings. Require automatic fire sprinkler systems at the time of expansion of existing residential and commercial buildings except as provided for in the Sonoma County Code.*

Ultimately, Policy PS-3m was renumbered as Policy PS-3l, and provides:

Policy PS-3l: *Require automatic fire sprinkler systems or other on-site fire detection and suppression systems in all new residential and commercial structures, with exceptions for detached utility buildings, garages, and agricultural exempt buildings.**

2. Mitigation Measure 4.7-1. This measure recommended modifications to the hearing draft Policy PS-1o was deemed infeasible by the Board of Supervisors and not adopted. In the Statement of Overriding Considerations adopted with Resolution No. 08-0808, the Board found that “applying the UMB requirement to older multi family residential structures under recommended Policy PS-1o is not considered appropriate due to the potential impact of costly retrofitting work on rental housing and the potential for displacement of lower income households,” among other reasons for finding the measure infeasible. The adopted text of Policy PS-1o was not identified or adopted as a mitigation measure.

Mitigation Measure 4.7-1. *Revise Policy PS-1o to specifically include all multiple family residential URM structures.*

Policy PS-1o: *Adopt an ordinance requiring strengthening and / or reinforcement of Unreinforced Masonry Buildings, including multi-family, but not single family residential structures.*

As adopted, additional wording was added, reflecting the Board’s policy direction. Policy PS-1o was not adopted as a mitigation measure, but was designated as a “mitigating policy,” and provides:

Policy PS-1o: *Adopt an ordinance requiring strengthening and/or reinforcement of Unreinforced Masonry Buildings, except residential structures, considering the cost of the work and the value, frequency of use, and level of occupancy of the buildings.**

⁷ Draft EIR at p. 4.9-67, citing Ordinances 5373 and 5402.

2.2.3 Mitigating Policies

The GP2020 EIR discussed most of the policies in the Public Safety Element as contributors to reducing the significance of relevant impacts. In some cases, the analysis of a policy's contribution to reducing an impact was very general, such as a string of citations to policies that were deemed collectively to contribute to reducing the significance of an impact.

The text of GP2020 does not distinguish between "mitigating policies" and adopted mitigation measures that meet the CEQA Guidelines Section 15370 definition of "mitigation." All 47 of the 1989 Public Safety Element policies that were carried forward into the 2020 General Plan were designated as "mitigating policies." "Mitigating policies" were those policies of GP2020 that were considered to contribute to reduction of the General Plan's environmental impacts. However, as noted in a Master Response D (Effectiveness of Mitigation Measures) in the Final EIR, many of the mitigating policies used non-mandatory wording, such as "avoid" or "encourage," instead of mandatory wording such as "shall" or "will." The Master Response states that "the effectiveness of each policy in reducing the applicable impact was weighed in light of the degree to which future land use and related decisions were bound by the policy. If a policy requires future land use decisions to meet defined environmental standards, then the policy was given relatively high credit for mitigation. However, if a policy encourages future land use decisions to meet the same standard, it was given relatively low credit for mitigation. For example, a policy requiring that 75% of the crops at an agricultural processing operation be locally grown in order to reduce conversion of farmland would be given more credit for mitigation than one which only encouraged locally grown produce." (GP2020 Final EIR, Vol. 2, p. 2.1-3.)

As to the 47 policies that were carried forward to GP2020 from the 1989 General Plan, those policies are designated by the GP2020 EIR and GP2020 as "mitigating policies," but as part of the pre-existing regulatory landscape and to the extent that they are not mandatory and enforceable, they are less likely to qualify as CEQA mitigation measures. Regardless, as discussed in the Project Description, the proposed Safety Element Update the GP2020 mitigating policies forward, although in a reorganized format.

2.2.4 Required CEQA Findings of Fact

When it approved Resolution No. 08-0808 and adopted General Plan 2020, the Board of Supervisors also made the findings of fact required by CEQA Guidelines Section 15091, which provides that a public agency shall not approve or carry out a project for which an EIR is certified which identifies one or more significant environmental effects unless the agency makes written findings regarding each of those significant effects. The possible findings are:

1. Changes 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.
2. 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.
3. 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.

The Board of Supervisors adopted the findings required by Guidelines Section 15091, subd.(a)(1), for the potentially significant impacts that it determined had been reduced to less than significant by GP2020 policies or by incorporating adopted mitigation measures, including the following findings pertinent to the Public Safety Element and the Safety Element Update:

- **Impact 4.5-9: Increased Flood Risk from Drainage System Alteration.** Section 4.5-9 of the Draft EIR found that future land uses and development consistent with GP 2020 would result in increases in stormwater runoff and peak discharge that could result in failure of existing storm drain systems and subsequent flooding. Mitigating Policies were included in the Public Safety Element that would contribute to reducing this impact to a less than significant level, such as Policies PS-2a through PS-2w that call for increased availability of flood hazard information, coordinated inter-jurisdictional approaches to flood management, and new regulations applying to development activities in flood hazard areas. Most of the Goals, Objectives and Policies cited in the Draft EIR are either unchanged or changes are limited to non-substantive editing in the "Board Draft GP 2020".

However, Policy PS-2n, which calls for developing new "Low Impact Development" regulations, has been revised to provide for reduction rather than prevention of runoff. In addition, Policy PS-2v has been expanded to further address flooding resulting from failure of dams.

Finding: Based upon the Final EIR and the entire record, the Board finds that the impacts of GP 2020 on flood risk from drainage alteration as described in Section 4.5-9 of the Draft EIR and the responses to comments thereon will be less than significant. This finding is based upon the inclusion of mitigating policies that, among other things, call for increased availability of flood hazard information, coordinated inter-jurisdictional approaches to flood management, and new regulations applying to development activities in flood hazard areas. The revision to the policies described above do not lower the mitigation value of the Policy. First, the revision to Policy PS-2v increases its mitigation value by addressing the flooding that could result from dam failure. Second, the revision to Policy PS-2n reflects the fact that 100% elimination of site runoff is often physically impossible due to site conditions, while retaining the provisions that require that runoff not increase flood risk. Therefore, the Goals, Objectives and Policies of GP 2020 continue to ensure that the impact remains less than significant.

- **Impact 4.5-10: Place Housing or Structures in 100-Year Flood Hazard Areas**

Section 4.5-10 of the Draft EIR found that future land uses and development consistent with GP 2020 would allow continued development in the 100 year Flood Hazard Areas, Mitigating Policies were included in the Public Safety Element that would contribute to reducing this impact to a less than significant level, including Policies PS-2e, PS-2h, PS-2i, PS-2o, and PS-2r that call for heightened analyses of flood risks for development proposed in areas subject to 100 year floods as well as expansion of the County "no net fill" regulations to all 100 year flood zones. These Goals, Objectives and Policies are either unchanged or changes are limited to non-substantive editing in GP 2020.

Finding: Based upon the Final EIR and the entire record, the Board finds that the impacts of GP 2020 from placing structures in flood hazard areas as described in Section 4.5- 10 of the Draft EIR and the responses to comments thereon will be less than significant. This finding is based upon the inclusion of mitigating policies that, among other things, call for heightened analyses of flood risks for development proposed in areas subject to 100 year floods as well as expansion of the County

"no net fill" regulations to all 100 year flood zones. Therefore, the Goals, Objectives and Policies of GP 2020 ensure that the impact remains less than significant.

- **Impact 4.5-12: Failure of Levee or Dam.** Section 4.5-12 of the Draft EIR found that the potential failure of levees or dams under GP 2020 could expose people and structures to inundation, could result in the loss of property, and could result in increased risk of injury or death and determined that this impact would be significant. Mitigating Policies were included in the Public Safety Element, such as Policy PS-2w, that would encourage the completion of flood inundation maps for all dams that could fail. In addition, the Draft EIR recommended Mitigation Measure 4.5-12 that would reduce this impact to a less than significant level. As a result, Policy PS-2w was added to GP 2020, calling for the County to coordinate with the responsible party to investigate structure stability and identify appropriate remedies wherever the inundation maps indicate that failure could cause injury or death.

Finding: Based upon the Final EIR and the entire record, the Board finds that the potential for exposure of people and structures to damage from failure of dams or levees will be mitigated to a less than significant level by a combination of existing regulations and the implementation of Mitigation Measure 4.5-12 as described above. This mitigation measure has been incorporated into GP 2020 in the form of Policy PS-2w. Accordingly, changes or alterations have been required in, or incorporated into GP 2020 that mitigate or avoid the significant impact related to failure of dams or levees. As a result, the Goals, Objectives, and Policies of General Plan 2020 will now ensure that the impact will be less than significant.

- **Impact 4.7-7: Expansive Soils.** Section 4.7-7 of the Draft EIR found that land uses and development consistent with GP 2020 could expose property improvements to adverse effects from expansive soils, leading to structural damage to residences, commercial or industrial buildings, and pavement. This potential impact was determined to be less than significant due to the existing regulations of the Uniform Building Code for soil testing and mitigation, and due to GP 2020 Public Safety Element policies, such as PS-1a, PS-1b, PS-1e, PS-1f, and PS-1k, requiring geologic analysis and mitigation for new development in areas subject to ground shaking. These Goals, Objectives, and Policies have been edited, primarily for clarity, without changing their effectiveness in reducing these impacts.

Finding: Based upon the Final EIR and the entire record, the Board finds that the impacts of GP 2020 regarding expansive soils described above will be less than significant.

- **Impact 4.7-8: Septic Suitability of Soils.** Section 4.7-8 of the Draft EIR found that land uses and development consistent with GP 2020 could cause damage to improvements and impacts to water resources from development of septic systems on soils incapable of adequately supporting such systems. This potential impact was determined to be less than significant through compliance with existing septic system standards implemented by the County and the applicable Regional Water Quality Control Board and due to GP 2020 Public Safety Element policies, such as PS-1a, PS-1b, PS-1e, and PS-1m, addressing construction in areas subject to serious ground shaking by increasing the available geologic data and by requiring geologic reports and mitigation for projects.

Finding: Based upon the Final EIR and the entire record, the Board finds that the impacts of GP 2020 related to septic suitability of soils as described in Section 4.7-8 of the Draft EIR and the responses to comments thereon will be less than significant.

This finding is based upon future compliance with existing septic system regulations and by the inclusion of mitigating policies that, among other things, address construction in areas subject to

serious ground shaking by increasing the available geologic data and by requiring geologic reports and mitigation for projects.

- **Impact 4.2-8: Lack of Parking Capacity or Emergency Access.** Section 4.2-8 of the Draft EIR found that land uses and development consistent with GP 2020 could result in safety hazards or lack of emergency services due to inadequate parking and/or access. This potential impact was determined to be less than significant due to the existing regulations of the Zoning Code that include requirements for adequate parking and by the GP 2020 Public Facilities and Services Element Policies PS-3d and PS-3e providing for Emergency Service providers to review development projects for appropriate access.

Finding: Based upon the Final EIR and the entire record, the Board finds that the impacts of GP 2020 on parking and emergency service access as described in Section 4.2-8 of the Draft EIR and the responses to comments thereon will be less than significant.

- **Impact 4.13-1: Release of Hazardous Materials.** Section 4.13-1 of the Draft EIR found that land uses and development consistent with GP 2020 could result in the transport, use, and/or disposal of hazardous materials, which could result in exposure of such materials to the public either through routine use or due to accidental release. Mitigating Policies were included in the Public Safety Element that would contribute to reducing this impact to a less than significant level, including Policies PS-4a through PS-4o that provide for the regulation of land uses that involve hazardous materials and the control of hazardous materials usage in County operations and impose siting requirements for hazardous waste facilities. Most of the Goals, Objectives and Policies cited in the Draft EIR are either unchanged or changes are limited to non-substantive editing in GP 2020. Policy PS-4h has been revised to also avoid siting hazardous waste facilities near schools. Policy PS-4o has been revised to encourage, rather than require through an ordinance, less use of potentially hazardous pesticides associated with County operations.

Finding: Based upon the Final EIR and the entire record, the Board finds that the impacts of GP 2020 regarding the transport, use, and/or disposal of hazardous materials and subsequent exposure of such materials to the public as described in Section 4.13-1 of the Draft EIR and the responses to comments thereon will be less than significant. This finding is based upon the inclusion of mitigating policies that, among other things, provide for control of hazardous materials usage in County operations and impose siting requirements for hazardous waste facilities. The revision to PS-4h described above will further reduce hazardous materials impacts compared to the impact analyzed in the Draft EIR. Although the above revision to PS-4o would slightly reduce the effectiveness of this Policy in mitigating the hazardous materials impact, other policies in this section provide a sufficient basis for control of these substances in County operations to avoid a significant environmental impact. In addition, the revision reflects that an ordinance is not the appropriate mechanism for controlling County operational use of pesticides.

Therefore, the Goals, Objectives, and Policies of GP 2020 continue to ensure that the impact remains less than significant.

- **Impact 4.13-2: Hazardous Materials, Substances, or Waste near School Sites.** Section 4.13-2 of the DEIR found that future land uses and development consistent with GP 2020 could result in increased exposure to hazardous materials in the vicinity of schools and that this impact would be potentially significant.

Mitigating Policies were included in the Public Safety Element that would contribute to reducing this impact to a less than significant level, including Policies PS-4a through PS-4o that provide for the

regulation of land uses that involve hazardous materials and the control of hazardous materials usage in County operations and impose siting requirements for hazardous waste facilities. The Draft EIR also identified Mitigation Measure 4.13-2(a) and 4.13-2(b) that would reduce this impact to a less than significant level by reducing the potential for siting of hazardous waste facilities near schools and vice-versa. These measures, in the form of Policies PS-4h, PS-4i, and PS-4j, have been incorporated into GP 2020.

Finding: Based upon the Final EIR and the entire record, the Board finds that the potential for exposure to hazardous materials near schools will be mitigated to a less than significant level by Policies PS-4a through PS-4o, as well as the implementation of Mitigation Measures 4.13-2(a) and 4.13-2(b). These mitigation measures have been incorporated into GP 2020 in the form of Policies PS-4h, PS-4i, and PS-4j.

Accordingly, changes or alterations have been required in, or incorporated into GP 2020 that mitigate or avoid the significant effect on exposure of people to hazardous materials near schools. As a result, the Goals, Objectives, and Policies of GP 2020 will now ensure that the impact will be less than significant.

The Board also adopted findings pursuant to Guidelines Section 15091 for significant impacts that could not be fully mitigated and were therefore unavoidable, including the following findings most pertinent to the Public Safety Element and the Safety Element Update:

- ***Impact 4.5-5: Groundwater Level Decline.*** *Section 4.5-5 of the Draft EIR found that land uses and development consistent with GP 2020 would increase demand on groundwater supplies and could result in the decline of groundwater levels and that this impact is significant and unavoidable. Mitigating Policies in the Public Safety and Water Resources Elements have been included in GP 2020, including proposed Mitigation Measure 4.5-5, in the form of a revised Policy WR-2f, that will reduce these impacts.*

Revised Policy WR-2f calls for voluntary guidelines for protecting groundwater recharge and retention of runoff from rural development. Policies WR-2a through WR-2n provide for improved groundwater monitoring and assessment, improved well permit standards, and groundwater management actions in problem areas.

These Mitigating Policies have been edited since the publication of the DEIR, primarily for clarity, without changing their effectiveness in reducing these impacts. However, Policy WR-2g has been revised to limit well monitoring to public wells and voluntary private wells. Also, Policy PS-2m has been revised to call for the reduction, rather than the prevention, of stormwater runoff.

However, in spite of these measures, groundwater conditions in many parts of the County are largely unknown and declines could occur before the assessments are completed.

Finding and Rationale: Based upon the Final EIR and the entire record, the Board finds that all feasible mitigation to reduce groundwater decline has been incorporated into GP 2020. The Board further finds that, in spite of the inclusion of Water Resources and Public Safety Element policies calling for voluntary guidelines for protecting groundwater recharge and retention of runoff from rural development, improved groundwater monitoring and assessment, improved well permit standards, groundwater management actions in problem areas, and consideration of low impact development regulations protecting recharge areas, groundwater decline will be a significant and unavoidable impact.

The revision to Policies PS-2m and WR-2f described above will not result in a substantially more severe groundwater impact because development involving impervious surfaces in rural areas is not likely to cover a significant portion of the typically larger lots in these areas, leaving ample room for groundwater recharge. Larger projects in rural areas are also subject to existing County requirements for minimizing stormwater runoff.

Similarly, the revision to Policy WR-2g described above will not result in a substantially more severe groundwater impact. The existing well monitoring program for commercial and industrial uses (Policy WR-2d) remains in effect and will be supplemented by information from public wells and voluntary private wells, with the latter supported by consideration of funding assistance from the County. In addition, Policy WR-2d calls for additional monitoring of new wells if the need is established by the voluntary program. Based upon testimony from numerous agricultural representatives and rural land owners, across-the-board monitoring of all new private wells may not be justified based upon current knowledge of groundwater conditions. Such an aggressive monitoring program may also lead to delays in the implementation of the monitoring program due to the lack of acceptance by participating well owners.

In addition, numerous parties recommended that the County immediately engage in a countywide groundwater management plan. However, the Board finds that such a strategy is premature and not as likely to succeed as one that focuses on areas where geologic conditions suggest that groundwater decline is a problem and where there is sufficient agreement among affected parties in resolving the problems. For that reason, the Board favors a cooperative approach with public water suppliers, agriculture, environmental groups, and landowners in studying groundwater conditions in each of the major basins in the County. In addition, the Board has commissioned groundwater studies (Kleinfelder) in several areas of fractured geology in order to determine groundwater conditions outside of the basins. These studies will form the basis of annual reports to the Board that will enable groundwater management to be designed to address the specific conditions in each area.

The Board finds that the success of a monitoring program in identifying groundwater conditions in the County as well as future groundwater management initiatives is dependent upon the willingness of property owners in order to succeed. Therefore, it is not feasible for the County to further reduce this impact to a less than significant level and additional feasible mitigation measures are not available. This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

- ***Impact 4.5-8: Changes to Drainage Patterns Leading to Streambank Erosion*** Section 4.5-8 of the Draft EIR found that land uses and development consistent with GP 2020 would result in alterations to drainage patterns that would increase erosion and that this impact is significant and unavoidable. Mitigating Policies in the Public Safety, Water Resources and Open Space and Resource Conservation Elements have been included in GP 2020. These include Mitigation Measure 4.5- 8, in the form of Policy WR-1v, that will reduce this impact by calling for revision of the Sonoma County Water Agency (SCWA) Flood Control Design Criteria to address stream geomorphology and bank protection. Policies PS-2c, PS-2g, PS-2h, PS-2i, and PS-2m would add new regulations for development along streams, stormwater retention, and cooperative flood hazard planning in the Petaluma Watershed. Policies OSRC-8b, OSRC-8c, and OSRC-8d would regulate land uses and development along all USGS streams to protect against erosion.

These Mitigating Policies have been edited in GP 2020, primarily for clarity, without changing their effectiveness in reducing these impacts. However, Policies PS-2g, PS-2h, and PS-2i have been added

to GP 2020 to further address drainage impacts at a watershed level. Policies OSRC-8b and OSRC-8d have been revised to reduce the streamside conservation area and to provide more flexible development standards within the area.

In spite of these measures, erosion from drainage patterns will likely continue to occur, at least until the new regulations and drainage programs are in place and their effectiveness can be determined.

Finding and Rationale: Based upon the Final EIR and the entire record, the Board finds that all feasible mitigation to reduce alterations to drainage patterns that would increase erosion has been incorporated into GP 2020. The Board further finds that, in spite of the inclusion of Public Safety, Water Resources and Open Space and Resource Conservation Element policies adding new regulations for development along streams, stormwater retention, and cooperative flood hazard planning in the Petaluma Watershed as well as regulations for land uses and development along all USGS streams, drainage alterations increasing erosion will be a significant and unavoidable impact.

The revision to Policies OSRC-8b and OSRC-8d described above will not result in a substantially more severe drainage/erosion impact since the reduced streamside conservation areas and standards appear to be sufficient for protection against erosion, as noted by comments from the Agricultural Commissioner and agricultural industry representatives. In addition, the larger conservation areas would reduce the available land for agricultural use and subject currently permitted uses that could alter drainage courses, such as agricultural production, to lengthy and costly discretionary permit procedures, contrary to GP 2020 goals fostering agriculture. Therefore, it is not feasible for the County to further reduce this impact to a less than significant level. Additional feasible mitigation measures are not available. This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

- **Impact 4.5-11: Impede or Redirect Flows in Flood Hazard Areas.** Section 4.5-11 of the Draft EIR found that land uses and development consistent with GP 2020, particularly structures within the 100 year flood hazard areas, could impede or redirect flood flows resulting in secondary flooding and erosion and that this impact is significant and unavoidable. Mitigating Policies in the Public Safety and Water Resources Elements have been included in GP 2020. These include Mitigation Measure 4.5-8, in the form of Policy WR-1v, that will reduce this impact by calling for revision of the Sonoma County Water Agency (SCWA) Flood Control Design Criteria to address stream geomorphology and bank protection. In addition, Policies PS-2e and PS-2f would regulate fills in flood hazard areas. These Mitigating Policies have been edited in GP 2020, primarily for clarity, without changing their effectiveness in reducing these impacts.

However, in spite of these measures, flooding and erosion from structures impeding or redirecting flood flow will likely continue to occur, at least until the new regulations are in place and their effectiveness can be determined.

Finding and Rationale: Based upon the Final EIR and the entire record, the Board finds that all feasible mitigation to reduce the impact of land uses in flood hazard areas leading to flooding and erosion has been incorporated into GP 2020. The Board further finds that, in spite of the inclusion of Public Safety and Water Resources Element policies regulating fills in flood hazard areas, impedance or redirection of flood flows will be a significant and unavoidable impact. These policies, coupled with current regulations regarding the placement of structures in flood hazard areas, would not affect some land uses that are not subject to County permit review procedures. In addition, subjecting currently permitted uses that could alter drainage courses, such as agricultural

production, to lengthy and costly discretionary permit procedures could jeopardize the success of agricultural operations in the County, contrary to GP 2020 goals fostering agriculture.

Therefore, it is not feasible for the County to further reduce this impact to a less than significant level. Additional feasible mitigation measures are not available for the reasons stated above. This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

Cumulative Impact: Hydrology and Water Resources. *Section 6.0 of the Draft EIR found that land uses and development consistent with GP 2020, when combined with future growth within the Cities, would result in significant cumulative water quality, groundwater, drainage, and flooding impacts and that the County's contribution to these impacts would be cumulatively considerable. Based upon the Final EIR and the entire record, the Board finds that, in spite of the inclusion of Mitigating Policies in GP 2020 described in Exhibit A and above for Impacts 4.5-1 through 4.5-12, these impacts will be cumulatively considerable and that additional feasible mitigation measures are not available. This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.*

- **Impact 4.7-1: Seismic Ground Shaking**

Section 4.7-1 of the Draft EIR found that land uses and development consistent with GP 2020 would expose people or structures to substantial adverse seismic effects, including the risk of loss, injury, or death involving strong seismic ground shaking and that this impact is significant and unavoidable. Mitigating Policies have been included in GP 2020 that will reduce this impact, including Policies PS- 1a through PS-1o. These policies call for increased assessment of geologic conditions, increased regulation of development in geologic hazard areas, strategic siting of essential service buildings to avoid hazardous areas, and strengthening and reinforcement of non residential Unreinforced Masonry Buildings (UMB). These Mitigating Policies have been edited, primarily for clarity, without changing their effectiveness in reducing this impact. Recommended Mitigation Measure 4.7-1, revising Policy PS-1o to include reinforcement of older multi-family residential structures, was not included.

However, in spite of these measures, there is a likelihood that significant damage could still occur during a severe earthquake and associated ground shaking.

Finding and Rationale: *Based upon the Final EIR and the entire record, the Board finds that all feasible mitigation to reduce the risk of loss, injury, or death involving strong seismic ground shaking has been incorporated into GP 2020. The Board further finds that, in spite of the inclusion of GP 2020 Public Safety Element policies that call for increased assessment of geologic conditions, increased regulation of development in geologic hazard areas, strategic siting of essential service buildings to avoid hazardous areas, and strengthening and reinforcement of non residential Unreinforced Masonry Buildings (UMB), damage resulting from seismic ground shaking will be a significant and unavoidable impact.*

The Board finds that applying the UMB requirement to older multi family residential structures under recommended Policy PS-1o is not considered appropriate due to the potential impact of costly retrofitting work on rental housing and the potential for displacement of lower income households. Given the fact that the entire County is subject to seismic ground shaking to some degree, it is not feasible for GP 2020 to assure that these policies would reduce the impact from the most severe seismic events to a less than significant level. As a result, it is not feasible for the County to further reduce this impact to a less than significant level. Additional feasible mitigation

measures are not available. This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

- **Impact 4.7-2: Seismic Related Ground Failure.** Section 4.7-2 of the Draft EIR found that land uses and development consistent with GP 2020 would expose people or structures to substantial adverse seismic effects, including the risk of loss, injury, or death from seismic related ground failure and that this impact is significant and unavoidable. Mitigating Policies have been included in GP 2020 that will reduce this impact, including Policies PS-1a through PS-1g, PS-1k, and PS-1m that provide for increased assessment and knowledge of geologic conditions and appropriate mitigation for development in hazard areas. These Mitigating Policies have been edited, primarily for clarity, without changing their effectiveness in reducing this impact.

However, in spite of these measures, future loss and/or damage from seismic related ground failure, particularly to roads, public facilities, and other County projects, during a severe earthquake will likely be significant.

Finding and Rationale: Based upon the Final EIR and the entire record, the Board finds that all feasible mitigation to reduce the risk of loss, injury, or death from seismic related ground failure has been incorporated into GP 2020. The Board further finds that, in spite of the inclusion of GP 2020 Public Safety Element policies that call for increased assessment and knowledge of geologic conditions and appropriate mitigation for development in hazard areas, increased risk of loss or injury from seismic related ground failure would be a significant and unavoidable impact.

Given the fact that the entire County is subject to seismic related ground failure to some degree, it is not feasible for GP 2020 to assure that these policies would reduce this impact from the most severe seismic events to a less than significant level. Additional feasible mitigation measures are not available. This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

- **Impact 4.7-3: Landsliding.** Section 4.7-3 of the Draft EIR found that land uses and development consistent with GP 2020 would expose people or structures to substantial damaging effects of landsliding, including the risk of loss, injury, or death from downslope earth movement, set off by earthquake, soil saturation, and/or grading and that this impact is significant and unavoidable. Mitigating Policies have been included in GP 2020 that will reduce this impact, including Policies PS-1a through PS-1g, PS-1k, and PS-1m that provide for increased assessment and knowledge of geologic conditions and appropriate mitigation for development in hazard areas. These Mitigating Policies have been edited, primarily for clarity, without changing their effectiveness in reducing this impact.

However, in spite of these measures, future loss and/or damage from landslides and downslope earth movement will not be entirely avoidable during severe seismic events.

Finding and Rationale: Based upon the Final EIR and the entire record, the Board finds that all feasible mitigation to reduce the risk of loss or injury from landsliding and downslope earth movement has been incorporated into GP 2020. The Board further finds that, in spite of the inclusion of GP 2020 Public Safety Element policies that provide for increased assessment and knowledge of geologic conditions and appropriate mitigation for development in hazard areas, increased risk of loss or injury from landsliding and downslope earth movement would be a significant and unavoidable impact. Given the fact that the entire County is subject to landsliding and earth movement, particularly during heavy rainfall and intense seismic events, it is not feasible for GP 2020 to ensure that these policies would reduce this impact from the most severe seismic

events to a less than significant level. Additional feasible mitigation measures are not available. This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

- **Impact 4.7-4: Subsidence and Settlement.** Section 4.7-4 of the Draft EIR found that land uses and development consistent with GP 2020 would expose property or structures to the damaging effects of ground subsidence triggered by seismic activity, soil saturation, or grading and that this impact is significant and unavoidable. The current UBC requirements also address geologic hazards. Mitigating Policies have been included in GP 2020 that will reduce this impact, such as Policies PS-1f, PS-1k, and PS-1m that require geologic reports and mitigation for private and public projects and provide geologic hazard information to the public. These Mitigating Policies have been edited, primarily for clarity, without changing their effectiveness in reducing this impact.

However, in spite of these measures, future loss and/or damage from ground subsidence and settlement will not be entirely avoidable during severe seismic events.

Finding and Rationale: Based upon the Final EIR and the entire record, the Board finds that all feasible mitigation to reduce the risk of loss or injury from ground subsidence has been incorporated into GP 2020. The Board further finds that, in spite of the inclusion of GP 2020 Public Safety Element policies that require geologic reports and mitigation for private and public projects and provide geologic hazard information to the public, as well as the existence of the current UBC requirements for addressing geologic hazards in structures, the risk of loss or injury from ground subsidence would be a significant impact. Given the fact that much of the County is susceptible to seismic activity and resulting subsidence, particularly during the most intense seismic events, it is not feasible for GP 2020 to ensure that these future damages from these events can be reduced to a less than significant level.

Additional feasible mitigation measures are not available. This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

- **Impact 4.7-5: Tsunamis and Seiches.** Section 4.7-5 of the Draft EIR found that land uses and development consistent with GP 2020 would expose people or structures in Coastal and Bay margins of the County to substantial adverse effects from seismically induced flooding and tidal action that could include risk of loss, injury, or death and that this impact is significant and unavoidable. Mitigating Policies have been included in GP 2020 that will reduce this impact, including Policies PS-1a through PS-1-PS-1k, and PS-1m that provide for increased assessment and knowledge of geologic conditions, appropriate mitigation for development in hazard areas, and improved availability of geologic hazard information. These Mitigating Policies have been edited, primarily for clarity, without changing their effectiveness in reducing this impact.

However, in spite of these measures, future loss and/or damage from such flooding and tidal action will not be entirely avoidable during the most severe seismic occurrences.

Finding and Rationale: Based upon the Final EIR and the entire record, the Board finds that all feasible mitigation to reduce the risk of loss or injury from seismically induced flooding or tidal action has been incorporated into GP 2020. The Board further finds that, in spite of the inclusion of GP 2020 Public Safety Element policies that provide for increased assessment and knowledge of geologic conditions, appropriate mitigation for development in hazard areas, and improved availability of geologic hazard information, the risk of loss or injury from seismically induced flooding or tidal action would be a significant impact. Given the fact that the Coastal and Bay margins of the County cover a significant geographic area where damage could result from

tsunamis and seiches, it is not feasible for GP 2020 to ensure that these policies would reduce this impact from the most severe seismic events to a less than significant level. Additional feasible mitigation measures are not available.

This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

- **Impact 4.7-6: Soil Erosion.** Section 4.7-6 of the Draft EIR found that land uses and development consistent with GP 2020 would result in erosion and exposure of improvements to erosion-related damage and that this impact is significant and unavoidable. Mitigating Policies have been included in GP 2020 that will reduce this impact, including Policies PS-1a through PS-1e, PS-1f, and PS-1k that provide for increased assessment and knowledge of geologic conditions and appropriate mitigation for development in hazard areas. These Mitigating Policies have been edited, primarily for clarity, without changing their effectiveness in reducing this impact.

However, in spite of these measures, future loss and/or damage from erosion will not be entirely avoidable during the more severe maximum rainfall occurrences.

Finding and Rationale: Based upon the Final EIR and the entire record, the Board finds that all feasible mitigation to reduce increased damages from erosion has been incorporated into GP 2020. The Board further finds that, in spite of the inclusion of GP 2020 Public Safety Element policies that provide for increased assessment and knowledge of geologic conditions, appropriate mitigation for development in hazard areas, and improved availability of geologic hazard information, as well as existing UBC requirements, erosion and exposure of improvements to erosion-related damage would be a significant impact. Given the fact that the much of the County is susceptible to soil erosion due to steep slopes and high rainfall events, it is not feasible for GP 2020 to assure that these policies would reduce this impact during periods of high rainfall over a short duration to a less than significant level.

Additional feasible mitigation measures are not available. This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

Cumulative Impacts: Geology and Soils. Section 6.0 of the Draft EIR found that land uses and development consistent with GP 2020, when combined with future growth within the Cities and the cumulative projects, would result in significant cumulative geology and soils impacts, primarily from geologic and soil hazards, such as seismic ground shaking and landsliding, and from soil erosion and that the County's contribution to these impacts would be cumulatively considerable. Based upon the Final EIR and the entire record, the Board finds that, in spite of the inclusion of Mitigating Policies in GP 2020 described in Exhibit A and above for Impacts 4.7-1 through 4.7-9, geology and soils impacts from severe rainfall and seismic events will be cumulatively considerable and that adopting standards that address the impacts of the most extreme possible events would be costly and of little benefit in return.

Additional feasible mitigation measures are not available. This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

- **Impact 4.9-10: Wildland Fire Hazards**

Section 4.9-10 of the Draft EIR found that implementation of GP 2020 would expose people or structures to risk of loss, injury, or death involving wildland fires and that this impact is significant and unavoidable. Mitigating Policies in the Public Safety and Land Use Elements have been included in GP 2020, including Mitigation Measure 4-9-10, in the form of Policy PS-31, and the

Land Use Maps. Policies PS-3a through PS-3m reduce this impact by requiring consideration of fire safety as part of project review, by educating residents about fire safety, and by standardizing the County's street addressing system. Policies WR-3b, WR-3o, WR-Sa, WR-Sb, LU-2a, LU-3c, LU-3d, LU-Sb, LU-Sd, and LU-6a contribute to reducing wildland fire danger and related fire and emergency service demand by placing limitations on development in the unincorporated area. These policies have been edited, primarily for clarity, in GP 2020 without changing their effectiveness in reducing these impacts.

However, in spite of these measures, there is considerable uncertainty about the ability of fire and emergency service providers to respond to wildland fires in a timely manner in the future.

Finding and Rationale: Based upon the Final EIR and the entire record, the Board finds that all feasible mitigation to reduce the risk of loss, injury, or death involving wildland fires has been incorporated into GP 2020. The Board further finds that, in spite of the inclusion of GP 2020 Public Safety, Water Resources, and Land Use Element policies requiring consideration of fire safety as part of project review, by educating residents about fire safety, by standardizing the County's street addressing system, and by placing limitations on development in the unincorporated area, increased exposure of people and structures to wildland fire will be a significant and unavoidable impact. Given the large size of the rural county, the uncertainty of funding for increased service capabilities and the high vulnerability of the rural landscape to wildland fires in the County, it is not feasible for GP 2020 to assure that these policies would reduce this impact to a less than significant level. Additional feasible mitigation measures are not available. Therefore, this impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

2.2.5 Statement of Overriding Considerations

When significant effects cannot be mitigated to a less than significant level, the agency is required to balance the benefits of the project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse effects may be considered “acceptable,” in which case the lead agency must adopt a formal statement of overriding considerations in accordance with Public Resources Code Section 21081 and CEQA Guidelines Section 15093.

After balancing the following specific economic, legal, social, technological and other benefits of GP 2020, the Board identified those benefits in a Statement of Overriding Consideration (Exhibit D to Res. No. 08-0808) and determined that any one of benefits, independently, outweighed the unavoidable adverse impacts of GP 2020. The Statement of Overriding Considerations provided the following specific considerations and rationale for each:

- **Need for an Updated General Plan:** GP 2020 fulfills a necessary mandate under State Planning law, a General Plan that provides the County with policy guidance for its future decisions regarding growth, land use and development, and environmental quality. It is critical that the General Plan be periodically updated so that it accurately reflects the vision and desire of the community over time.
- **Agricultural Production:** GP 2020 fully supports the continued economic viability of agricultural production. Among other policies, accommodating agricultural support uses and agricultural tourism on agricultural lands is a necessary component of this continuing support.

Fundamentally, GP 2020 goals, objectives, and policies allow farmers to continue making a living in agriculture as the primary means of withstanding the increasing pressure from urbanizing areas to convert to non-agricultural use. Contributing to this support is the County's desire to continue to treat agricultural production as a permitted use, to streamline permits for such uses as farmworker housing, and to reduce operational costs as much as possible through such provisions as the Right- To-Farm ordinance. Agriculture industry representatives have provided testimony regarding the necessity of minimizing the regulatory cost for their operations, particularly with respect to currently permitted uses such as grazing and cultivation. By continuing to support agricultural viability in this way, County residents benefit from the contribution of agriculture to the local economy and from the by products of agricultural activity, including the visual aesthetics of growing crops and raising animals, the maintenance of large areas of open space, reduced pressure for urban and rural residential development, control of urban sprawl, and continuing employment opportunities in the agricultural industry.

- **Water Resources Element:** Adoption of GP 2020 includes a new Water Resources Element that integrates previous General Plan policies addressing water issues into one Element and expands upon the scope of water resource issues that are addressed. The focus of this stand-alone Element reflects its importance to the community at large and enables the Board, other County decision makers, and the public to have a comprehensive picture of water resource issues and, more importantly, the County's strategy to address them in the context of land use planning. Whether the issue is effective planning for future water supplies, resolving problems associated with groundwater decline, or other water issues, the adoption of this new element is critically important to a successful General Plan and reducing the water related impacts of GP 2020.
- **Stream Protection:** The GP 2020 Open Space and Resource Conservation Element includes policies addressing the protection of streams. The policies were substantially revised from the then-current (1989) General Plan to increase stream protection and preserve the wide range of riparian functions, including groundwater recharge, flooding, streambank stability, water quality, water supply, and fish and wildlife habitat. The GP 2020 revisions will increase the protected streams from about 500 to about 3200 stream miles, with concurrent policy support for improved mapping and understanding of stream conditions over time.
- **Housing and Employment:** As described in Master Response I of the Final EIR, GP 2020 supports and plans for a level of growth in housing that reflects regional population projections as well as the ability of the County to sustain its quality of life and public services and infrastructure into the future. This growth includes housing for all income levels as mandated by State law. While reducing the potential housing growth in GP 2020 would reduce the impacts of residential construction and use, housing opportunities are necessary not only for addressing the housing needs of County citizens, but also to maintain consistency with the General Plan Housing Element, certified by the State in 2002, that is required to demonstrate that an adequate inventory of housing sites is available to meet its identified housing needs. In addition, GP 2020 plans for business and industrial growth that will provide employment opportunities to existing and future residents. Reductions in job opportunities would have a secondary effect of forcing existing workers to commute out of the county for work or leave for other areas. Balanced

housing and employment opportunities are also fundamental to implementing GP 2020's community centered "smart growth" land use policies.

- **Economy:** GP 2020 supports economic activities in the form of businesses and industry that not only provide the agricultural production, housing, and employment benefits described above, but that also stimulate revenue growth in the community that enable residents and businesses to contribute to community activities, charities, and a full range of programs that improve the quality of life. These endeavors also provide a sales and property tax base that contribute funds for public services and infrastructure that are necessary for existing and future citizens.
- **Public Services and Infrastructure:** GP 2020 includes substantial support for maintaining and, where necessary, expanding public services and infrastructure as needed to serve planned growth. Although future growth is substantially limited in GP 2020, many services and infrastructure facilities are not currently adequate to meet the needs of existing, let alone future residents and businesses. This problem is compounded by budget problems at the State and Federal level, as well as increasing restrictions on the County's ability to obtain the revenue it needs. Without this policy support, the County's ability to access some revenues will be further undermined, including fair-share funding for transportation improvements, grant funds for the planning and development of locally operated wastewater management systems, funding of transit operations and facilities, and the like.
- **Cooperation of Property Owners:** GP 2020 recognizes the importance of willing property owners in development and implementation of its land use policies. A large majority of Sonoma County is privately owned, meaning that successful implementation of many GP 2020 policies and programs is dependent upon the cooperation of private individuals. Since the impacts of GP 2020 are cumulative in nature and future growth is limited, many of these impacts, such as air quality, groundwater, biological resources, and traffic congestion, can only be substantially lessened by the future activities of existing landowners, residents, and businesses that are typically not subject to new regulation. In some cases, aggressive policy restrictions on the use of property may actually hinder efforts to improve environmental quality. For example, it appears on the surface that the most effective way to obtain data regarding groundwater conditions is by requiring that all new wells be monitored. However, many existing residents oppose this new regulation without substantial evidence of groundwater problems. In the end, the shift to a voluntary program offers the potential for a more successful monitoring program over time because it can be initiated right away, albeit on a more limited basis, rather than waiting many years for litigation to be completed. Similarly, GP 2020 recognizes that expanding permit requirements for all future land uses, such as discretionary permits for single family homes or growing crops, will also likely result in substantially increased costs and time, placing an unreasonable burden on property owners and their reasonable use and enjoyment of their property.
- **Climate Change:** Although the issue of climate change did not come to the forefront of GP 2020 until well into the process, GP 2020 was modified to include a number of additional policies and programs that support the Statewide efforts to implement AB 32, the Global Warming Solution Act or 2006. GP 2020 does this through a wide array of policies related to energy resources, air

and water resources, transportation, etc. Without GP 2020, the County's ability to provide policy support for new programs, regulations, studies, and funding would be impaired.

2.3 Statutory Requirements for Safety Elements

All jurisdictions in California are required to have a safety element as part of their General Plan. Safety elements must provide for the protection of the community from unreasonable risks associated with seismic and geologic hazards such as landslides and ground shaking, flooding, and wildland and urban fires. Required components of a safety element are generally outlined in Government Code Sections 65302(g) and 65302.15. Safety elements must be revised upon each revision of the jurisdiction's housing element or local hazard mitigation plan, but not less than once every eight years, to identify new information relating to flood and fire hazards and climate adaptation and resiliency strategies. (Government Code § 65302.15(b)).

Since the last planned update to the Sonoma County General Plan Safety Element in 2014, a series of changes to state law expanded the information and assessment requirements for safety elements. Updated safety elements are now required to:

- Evaluate climate vulnerabilities and, based on the findings of the assessment, include climate adaptation and resilience policies and implementation measures upon the next revision to the local hazard mitigation plan, or beginning on or before January 1, 2022 (Government Code § 65302(g)(4), enacted via Senate Bill 379, 2015);
- Identify evacuation routes and their capacity, safety, and viability and evacuation locations under a range of emergency scenarios upon the next revision to the local hazard mitigation plan, or beginning on or before January 1, 2022 (Gov. Code § 65302.15(a); enacted by Assembly Bill 747, 2019, and amended by Assembly Bill 1409, 2021); and
- Identify residential developments in hazard areas without at least two emergency evacuation routes (Gov. Code § 65302(g)(5); enacted by Senate Bill 99, 2019).

The current Sonoma County Local Hazard Mitigation Plan was adopted in December 2021, and the Sonoma County Housing Element Update was adopted in August 2023. These plan updates triggered an

update to the County's General Plan Safety Element. Concurrently, the County is preparing a draft Environmental Justice Element for adoption into the General Plan.

3 Project Description

3.1 Description of Proposed Safety Element Update

The proposed Safety Element Update would replace the existing GP2020 Public Safety Element in its entirety. Similar to the existing Public Safety Element, the proposed Safety Element Update establishes 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 document is broken into ten topic areas. The draft Safety Element also includes updated maps of hazard areas based on the latest available data; context on each topic including relevant local, state, or federal regulations; and an implementation plan. The draft carries forward many of the policies from the existing Public Safety Element, includes new strategies to address the new statutory topic areas (e.g. climate change hazards and vulnerabilities), and incorporates related planned and ongoing County department and agency work. The draft Safety Element Update is broken into the following 10 topic areas. Topics 4, 5, 6, and 7 (Wildland and Structure Fire, Flooding and Inundation, Geologic and Seismic Hazards, and Hazardous Materials) are continued from General Plan 202. Six of the 10 topic areas are new, as noted below.

1. Emergency Preparedness, Response, and Recovery. This section is new to the Safety Element and includes goals and policies related to the three general phases of the emergency management cycle: emergency preparedness, response, and disaster recovery.
2. Equitable Community Safety. This section is new. Its policies 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. This section is new 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 Protection From Fire Hazards topic in the existing GP2020 Public Safety Element. 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.
5. Flooding and Inundation. This section carries forward or modifies many of the policies in the Protection from Flood Hazards topic in the current GP2020 Public Safety Element and is organized around two goals: reducing flood hazards to prevent unnecessary exposure and building long-term flood resilience.

6. Geologic and Seismic Hazards. This section carries forward or modifies many of the policies in the Protection from Geologic Hazards topic in the existing GP2020 Public Safety Element. 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 Protection from Hazardous Materials topic in the existing GP2020 Public Safety Element. A new policy requires remediation on known contaminated sites prior to development.
8. Sea Level Rise. 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 newly updated Sonoma County Local Coastal Plan. 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. This section is new and includes policies to reduce community exposure to air quality and temperature climate impacts and build community capacity to adapt to changing conditions.
10. Drought. This section is new 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.

3.1.1 All Proposed Goals and Policies

Each of the draft Safety Element's 10 topic areas has one or more goals and related policies to help achieve the goal. The goals and policies included in the Safety Element Update are listed below. Policies that are being carried forward and were designated as "mitigating policies" in the GP2020 Public Safety Element are noted with an asterisk (*).

Emergency Preparedness, Response, and Recovery

Goal SE-1: Prepare community members and County staff for emergencies through information and resources, training, planning, and assessment.

Policy SE-1a: Maintain and update as necessary the Sonoma County Operational Area Emergency Operations Plan and associated annexes, including evacuation protocols.

Policy SE-1b: Update the Hazard Mitigation Plan every five years and use the plan to guide mitigating actions to protect the whole community and the environment.

Policy SE-1c: Continue to prepare for increased capacity and redundancy during emergencies through strategic coordination and partnerships, such as through memorandums of understanding, before disasters occur between community-based organizations, fire agencies, CAL FIRE, the Department of Emergency Management, the Sheriff's Office, and other public safety partners.

Policy SE-1d: Invest in building trust and relationships with community-based organizations to improve communication systems, address language access needs, and develop a shared understanding of community needs and resources available (such as legal or medical support, transportation, and evacuation or resilience centers) as a core strategy for emergency preparedness. Assist with building community-based organizations capacity to support their community members during a disaster.

Policy SE-1e: Coordinate, assist, and promote community-specific emergency preparedness and evacuation planning through new and existing programs like Community Emergency Response Training (CERT), Communities Organized to Prepare for Emergencies (COPE), and Map your Neighborhood (MYN) to increase disaster preparedness at the community/neighborhood level. Prioritize efforts in high hazard areas and systemically vulnerable communities, and coordinate with community organizations to target hard-to-reach populations.

Policy SE-1f: Promote a culture of self-preparedness for residents and businesses to increase readiness for and resilience to disaster events.

Policy SE-1g: Continue to conduct community evacuation exercises in known hazard areas.

Policy SE-1h: Provide and support opportunities for inter-agency training with local fire agencies, the Sheriff's Office, the Department of Emergency Management, and other emergency services and response staff to effectively coordinate multi-agency response and mutual aid in the event of a wildfire or other hazard incident.

Goal SE-2: Support safe and efficient emergency response and evacuation through accessible and effective alerts, improved safety of evacuation routes, and emergency response planning.

Policy SE-2a: Continue to use and refine early warning notification systems to provide emergency response information, alert community members of the need to evacuate, provide the location of evacuation routes and locations, and identify how to access transportation support. Distribute evacuation information in multiple languages and increase the number of channels of communication.

Policy SE-2b: Continue to refine protocols for dissemination of information during an emergency through all available media sources to ensure that messages are coordinated, accurate, and available in multiple languages. Coordinate information flow between frontline emergency personnel, media sources, school districts, and other community channels.

Policy SE-2c: Continue to explore and implement strategies to enhance safe evacuation protocols for workers inside evacuation zones.

Policy SE-2d: Encourage undergrounding of utilities where feasible along evacuation routes to prevent downed wires.

Policy SE-2e: Ensure road design supports efficient and safe evacuations during emergencies.

Policy SE-2f: Explore the viability of on-street parking limitations to ensure that access roads are not blocked by parked vehicles.

Policy SE-2g: Ensure that fire departments and fire districts have adequate access to all locations in the County, including gated communities and critical infrastructure within the County's jurisdiction.

Policy SE-2h: Require new development and redevelopment to provide adequate access for fire and emergency services consistent with local and State regulations.

Policy SE-2i: Continue to evaluate constraints to safe and efficient evacuation, building upon existing efforts and studies. Use data on demographics, infrastructure, and environmental factors to continue to explore the safety, viability, and capacity of the local road network and to identify additional areas of the unincorporated county without at least two evacuation routes. Incorporate findings into future updates to the General Plan, the Hazard Mitigation Plan, and the County's Emergency Operations Plan as appropriate.

Policy SE-2j: Develop traffic control strategies as part of emergency response planning and explore traffic control improvements that reduce vulnerability and allow for dynamic emergency response.

Policy SE-2k: Consider the presence of non-residents, including visitors and tourists, in all evacuation planning efforts.

Policy SE-2l: Work with the Sheriff's Office and Department of Emergency Management to explore decision-support tools that provide insight into real-time evacuation conditions. Consider technological solutions to monitor traffic to identify problem areas, determine the effectiveness of responses, and change responses as needed. Seek to provide evacuees with information on evacuation route conditions and rerouting information to decrease travel times and reduce congestion on highly traveled roads.

Policy SE-2m: Partner with Caltrans, cities, and neighboring jurisdictions on measures to protect and maintain critical evacuation routes. Work with local agencies to develop contingency plans that address disconnected routes and explore roadway improvements for better emergency access.

Policy SE-2n: Continue to develop and maintain evacuation options for populations with Access and Functional Needs.

Goal SE-3: Increase the community's ability to recover from a disaster event.

*Policy SE-3a: Work collaboratively with disaster survivors, the community, County departments and agencies, key groups and stakeholders, and other local and regional governments to develop and implement a Post-Disaster Recovery Framework, including a strategic plan for damage assessment and recovery of County-owned public facilities after a major disaster. **

Policy SE-3b: Use disaster relief funding to support long-term recovery efforts, targeting small businesses and systemically vulnerable communities. Create dedicated funds to provide immediate financial assistance to those affected by disasters, ensuring that mixed-documentation-status households and other marginalized groups have access.

Policy SE-3c: Partner with the cities, community groups, and other relevant agencies or organizations to ensure people have access to medical and mental health services and resources in the aftermath of disasters. Where feasible, deploy mobile clinics to provide medical and mental health services in affected areas, ensuring accessibility for people with physical limitations or transportation barriers.

Policy SE-3d: Establish streamlined rebuilding processes and temporary housing programs, including measures that support displaced renters and low-income households, for post-disaster recovery.

Policy SE-3e: Assist property owners with debris removal and site remediation post-disaster through coordinated resources and information.

Policy SE-3f: Work with County departments and agencies, conservation organizations, and property owners to support efforts to restore wildfire-impacted landscapes and protect against post-fire flooding and soil movement by removing debris along watercourses, implementing erosion control measures, replanting native vegetation, and educating property owners on soil stabilization.

Equitable Community Safety

Goal SE-4: Support all community members in preparing for, responding to, and recovering from emergencies through equitable resources, investments, and services.

Policy SE-4a: Provide resources for risk reduction in areas that are vulnerable to hazards and within systemically vulnerable communities, including public education about risk reduction and effective resilience improvements, and information on funding options.

Policy SE-4b: Collaborate with health care providers to augment physical and mental health care capacity in areas with systemically vulnerable communities during and after emergencies.

Policy SE-4c: Continue to incorporate diversity, equity, inclusion, and belonging (DEIB) principles and language access into County Emergency Operations Center operations and emergency services to ensure culturally responsive emergency management.

Policy SE-4d: Increase peak capacity of emergency services to respond to anticipated increased demand during climate hazards events and other disasters.

Policy SE-4e: Strengthen communication between County departments and agencies, cities, and emergency service providers to reduce gaps and enhance coordination of emergency service provision countywide.

Policy SE-4f: Promote household awareness and personal preparation for evacuation scenarios. Support the development of evacuation strategies for all community members, including those with limited or no access to transportation in the event of an emergency.

Policy SE-4g: Engage and involve the Sonoma County community, especially systemically vulnerable communities and access and functional needs populations, in emergency planning.

Policy SE-4h: Provide culturally appropriate emergency preparedness, response, and recovery communications in multiple languages and through a variety of channels, strategies, and media, including radio.

Resilient Facilities and Infrastructure

Goal SE-5: Protect the well-being of community members and emergency personnel through resilient facilities and infrastructure.

Policy SE-5a: Seek to close gaps in backup power availability for critical services and community members with underlying health conditions or sensitivities that require uninterrupted power sources.

Policy SE-5b: Maintain defensible space and additional vegetation management around critical transportation and utility infrastructure at-risk to wildfire hazards.

Policy SE-5c: Prioritize road design improvements and maintenance that increase safe ingress and egress for emergency responders and residents, and resilience to anticipated climate extremes.

Policy SE-5d: Engage and empower rural communities by expanding self-sufficiency resources for disaster-isolated communities.

Policy SE-5e: Assess risks to and vulnerability of County-owned critical facilities to all hazards and climate change impacts and evaluate adaptation and resilience strategies such as a relocation or hardening.

Policy SE-5f: Continue to explore funding sources for capital improvements necessary for emergency response. Prioritize capital improvements and maintenance of existing at-risk facilities and infrastructure serving the greatest number of people and systemically vulnerable communities, and improvements to existing facilities that ensure they can operate as resilience centers, local assistance centers, or other community resource centers during emergency events.

Policy SE-5g: Prioritize equity in the capital improvement plan process by engaging systemically vulnerable and underserved communities and using data to assess impacts and benefits.

Policy SE-5h: Pursue redundancy of critical transportation infrastructure, such as roadways, bridges, and traffic control measures, to allow for continued access and movement in the event of an emergency or power outage.

Policy SE-5i: Locate new critical facilities, such as hospitals and health care facilities, emergency shelters, fire stations or police stations, emergency command centers, and other emergency service facilities and infrastructure to minimize exposure to hazards identified in this Element where feasible, except those facilities that provide frontline access. New facilities that must be located in hazard areas should be designed, located, and sufficiently protected to remain operational during hazard events.

Policy SE-5j: Consider climate impacts and risk in the design of capital improvements.

Goal SE-6: Improve telecommunication and broadband access and communication system resilience.

Policy SE-6a: Provide and expand alternative channels of communication, such as radios, for emergency personnel and community emergency notification in the case of telecommunication system disruption.

Policy SE-6b: Promote the availability of backup power at telecommunication facilities in alignment with state and federal requirements.

Policy SE-6c: Support efforts to improve the reliability of critical communications facilities during disasters.

Policy SE-6d: Streamline permitting for new telecommunication and broadband facilities.

Policy SE-6e: Identify underserved broadband areas and support efforts of the Economic Development Collaborative through its Access Sonoma Broadband program to coordinate countywide broadband planning and broadband deployment, grant application development, and outreach.

Wildland and Structural Fire

Goal SE-7: Minimize risk and vulnerability to fire hazards to protect people, property, and environmental resources.

Policy SE-7a: Identify existing development and public roads that do not conform to contemporary fire safety standards and, as feasible, assist in the retrofit and/or upgrade of such development to meet current standards.

Policy SE-7b: Ensure that redevelopment of property within the State Responsibility Area and Very High Fire Hazard Severity Zones in Local Responsibility Areas complies with the Office of the State Fire Marshal and California Board of Forestry requirements, including adequate provisions for emergency access, vegetation management, and firefighting, in compliance with current fire codes.

Policy SE-7c: Establish and maintain community fire breaks and fuel modification or reduction zones, including public and private road clearance in areas at risk to wildfire. Work cooperatively with local agencies, Fire Safe Councils, community organizations, and private landowners to achieve long term maintenance of fuel reduction projects.

Policy SE-7d: Through inspection programs, community education, and grant seeking, provide assistance to systemically vulnerable communities to help ensure that all properties and private roadways comply with applicable state and local regulations for defensible space and vegetation management.

Policy SE-7e: Where feasible, support the development of additional points of ingress and egress, roadway improvements, and other fire safety measures in single access neighborhoods identified by this Element, in subdivisions identified by CAL FIRE's Subdivision Review Program pursuant to Public Resources Code Section 4290.5, in High and Very High Fire Hazard Severity Zones, and in areas that have experienced repeated fires over time.

Policy SE-7f: Encourage utility undergrounding projects to reduce potential fire ignition sources. Promote and support vegetation management around high voltage utility lines as necessary to maintain public safety.

Policy SE-7g: As part of regular roadway maintenance, keep public roads clear of encroaching vegetation, prioritizing critical evacuation routes, areas with high hazard risk, or areas with a history of repeated fire events.

*Policy SE-7h: The Fire Prevention Division of Permit Sonoma shall continue to offer assistance to local fire agencies in adoption and enforcement of fire safety regulations and continue work with local agencies to develop proposed improvements to County codes and standards to align with changing State legislation and current industry research. **

*Policy SE-7i: Continue enforcement of the Office of the State Fire Marshal requirements for fire safety. **

Policy SE-7j: Continue to identify local funding sources and leverage grant funding to support and participate in wildfire risk reduction and forest health projects, including strategic placement, creation and maintenance of shaded fuel breaks, targeted vegetation management, prescribed/cultural burning, maintenance of fire roads, and other priorities as identified in the current Hazard Mitigation Plan, the Sonoma-Lake-Napa Unit Strategic Fire Plan, the Sonoma County Community Wildfire Protection Plan and other planning documents.

*Policy SE-7k: Continue the Permit Sonoma addressing and road naming program that improves and standardizes the County street addressing system in order to reduce emergency service response times. Where applicable, coordinate the program with the cities and local tribal governments. **

*Policy SE-7l: Continue to provide fire hazard information signs in areas at risk to wildfire in a manner consistent with Area Plans and that does not degrade Scenic Corridors and scenic views.**

Policy SE-7m: Evaluate regulatory barriers to vegetation management activities and identify opportunities for streamlining.

Goal SE-8: Regulate new development to prevent unnecessary exposure of people and property to risks of damage, injury, or loss from fire hazards.

*Policy SE-8a: Consider the severity of natural fire hazards (as may be exacerbated by climate change), potential damage from wildland and structural fires, and adequacy of fire protection and mitigation measures, consistent with the General Plan, in the review of discretionary projects.**

*Policy SE-8b: Maintain and update County building and fire codes and regulations to meet or exceed State requirements and reflect contemporary fire safe practices.**

Policy SE-8c: In reviewing development projects, maintain stringent initial site design and ongoing maintenance standards, and incorporate adequate mitigation measures as necessary to achieve an acceptable level of risk. Development must meet State Minimum Fire Safe Regulations (Title 14, California Code of Regulations (CCR), §§ 1270-1276.05), State Fire Hazard Reduction Around Buildings and Structures Regulations (Title 14 CCR, §§ 1299-1299.05) the California Building Standards Code (Title 24, CCR), and the County Fire Code as applicable.

*Policy SE-8d: Continue to refer projects and code revisions to the Fire Prevention and Hazardous Materials Division of Permit Sonoma and responsible fire protection agencies for their review and comment.**

*Policy SE-8e: Continue to require automatic fire sprinkler systems or other on-site fire detection and suppression systems in all new residential and commercial structures, with exceptions for detached utility buildings, garages, agricultural exempt buildings, and certain accessory dwelling units.**

Policy SE-8f: In Very High Fire Hazard Severity Zones, avoid new residential development and new or expanded commercial or industrial development that involves highly flammable materials or that could place large numbers of occupants at unreasonable risk of wildfire, where feasible. Prioritize new housing in areas with lower wildfire hazard.

Policy SE-8g: Require fire protection plans for all new discretionary developments in all High and Very High Fire Hazard Severity Zones. Ensure the plans include a site-specific risk analysis and address fire response capabilities, compliance with fire safety requirements including but not limited to defensible space, access and water supply, building materials and site design, emergency preparedness and evacuation plans, property maintenance, and other hazard and risk reduction measures.

Policy SE-8h: Require all new development to have adequate water supply to meet fire suppression needs and comply with applicable fire flow requirements.

Goal SE-9: Increase wildfire and climate resilience through strategic coordination in fire preparedness planning, response, and land management.

*Policy SE-9a: Continue to utilize the most recent available data and information on wildland and structural fire hazards from CAL FIRE and research institutions. Make fire hazard maps available to the public.**

*Policy SE-9b: Continue to work with CAL FIRE, local fire agencies, and community members to identify areas of high fire fuel loads and take advantage of opportunities to reduce those fuel loads, particularly in areas where fuels may increase fire spread to nearby communities.**

*Policy SE-9c: Partner with Fire Safe Sonoma, local Fire Safe councils and FireWise Communities, CAL FIRE, local fire districts, Resource Conservation Districts and other community groups to provide educational opportunities for residents and property owners on the best available science for defensible space, home hardening, and vegetation management. Continue to promote emergency preparedness including “know your evacuation Zone” efforts, pre-emergency planning and supplies for family safety, and executing evacuation drills. Target at-risk populations such as older adults, individuals with disabilities, non-English speaking residents, and individuals with chronic health conditions.**

Policy SE-9d: Coordinate with Sonoma Water, Santa Rosa Plain Groundwater Sustainability Agency (GSA), Petaluma Valley Groundwater Sustainability Agency (GSA), Sonoma Valley Groundwater Sustainability Agency (GSA), other water districts and agencies, CAL FIRE, and fire districts as appropriate to support the provision of adequate water supply and storage to meet peak fire demands during times of peak domestic demand.

Policy SE-9e: Coordinate with local fire agencies to support funding availability to maintain all fire equipment in an operable state and adequate to respond to a major disaster. Ensure adequate equipment, staffing, training, and resources are provided to meet current and future projected service demands and fire protection needs.

Policy SE-9f: Regularly evaluate the county’s fire suppression capacity and future water supply availability as part of the Sonoma County Hazard Mitigation Plan updates.

Policy SE-9g: Support and prioritize wildfire resilience projects on natural and working lands, including wildlands, that have multiple benefits, including but not limited to wildfire hazard and risk reduction, species and habitat protection, agricultural and forest resource protection, water quality, and carbon sequestration and storage. Consider the ecological, environmental, social, and economic benefits and tradeoffs. Utilize existing plans and guidance, such as the Climate Resilient Lands Strategy, to inform project design.

Policy SE-9h: Balance and integrate fuel modification with habitat and open space management, and vegetative soil cover and erosion management to reduce conflicts between safety and environmental goals.

Policy SE-9i: Encourage efforts to restore wildfire impacted areas and reduce the potential for post-fire flooding and landslides through replanting of native vegetation cover using best practices and slope stabilization measures.

Flooding and Inundation

Goal SE-10: Reduce existing flood and inundation hazards and prevent unnecessary exposure of people and property to risks of damage, injury, or loss from flood hazards.

*Policy SE-10a: Maintain data and information on flooding and flood hazards in the appropriate County departments and make flood hazard maps available to the public.**

Policy SE-10b: Support efforts to provide cost-effective strategies for reducing flood risk to low income communities located in nonurbanized areas.

*Policy SE-10c: Partner with local, regional, State, and federal agencies, including but not limited to the cities, Sonoma Water, the U.S. Army Corps of Engineers, and the Federal Emergency Management Agency (FEMA), to develop and maintain an adequate information base on existing and potential flood hazards and drainage impacts for the County's major watersheds, prepare analyses and risk assessments, and identify and implement floodplain management activities and other strategies to reduce flooding impacts. Request changes in FEMA flood hazard maps where appropriate to reflect new data or analyses.**

*Policy SE-10d: Work with regional flood protection responsible agencies, the public, and other stakeholders to develop and implement a long-term plan for reducing repetitive flood losses in the Russian River basin. As part of the plan, consider upstream improvements that could expand flood storage capacity and existing regulatory barriers to flood prevention projects.**

*Policy SE-10e: Continue to participate in the National Flood Insurance Program (NFIP) by maintaining and enforcing County code requirements on construction in flood hazard areas and other adopted floodplain management regulations. Consider participating in the NFIP's Community Rating System to qualify Sonoma County property owners for discounted flood insurance.**

Policy SE-10f: Continue and expand public awareness programs to inform the general public, property owners and renters about flood hazards, potential dam failure inundation, flood elevation and risk reduction resources, and the importance of watershed management.

*Policy SE-10g: Continue to enforce zero net fill requirements in the 100-year FEMA Special Flood Hazard Area to retain floodplain storage capacity. Avoid fill in areas outside of the 100-year FEMA Special Flood Hazard Area that retain or could retain flood waters.**

Policy SE-10h: When making land use decisions and during development review:

- a) On-site and off-site flood related hazards shall be reviewed for all projects located within areas subject to known flood hazards;
- b) Use FEMA flood hazard maps and data, or parcel specific scaled interpretations of these maps and site specific elevation data;
- c) Use the 100-year flood event and corresponding elevations as the County measure of acceptable level of risk and protection in the consideration of amendments to the General Plan Land Use Map; and
- d) Consider the potential risk of damage from flooding in the design and review of projects, including projects that could facilitate floodplain development.*

*Policy SE-10i: Avoid variances to building setbacks along streams and in the 100-year floodplain.**

*Policy SE-10j: Regulate development, water diversion, vegetation management, grading, and fills to minimize any increase in flooding and related damage to people and property.**

*Policy SE-10k: Require that tentative and final subdivision maps and development site plans show flood hazard areas as designated by FEMA.**

*Policy SE-10l: Give priority to floodplain management over flood control structures for preventing damage from flooding except where the intensity of development requires a high level of protection and justifies the costs of structural measures. Where possible, maintain flood channel capacity.**

*Policy SE-10m: Require that the design and construction of drainage facilities be subject to the review and approval of Permit Sonoma. The costs of drainage facilities to handle surface runoff from new development shall be the responsibility of the developer. **

*Policy SE-10n: Support Sonoma Water in the prioritization and implementation of flood hazard mitigation projects within waterways subject to the policies of the Open Space and Resource Conservation Element. **

Policy SE-10o: Require that the design and location of new dams and levees be in accordance with applicable design standards and specifications and accepted design and construction practices.

*Policy SE-10p: Encourage the timely completion and filing of inundation maps for all dams whose failure could cause loss of life or personal injury within Sonoma County. Where inundation maps indicate dam or levee failure could cause loss of life or property or personal injury, coordinate with the corresponding responsible party to investigate levee or dam stability and management and identify rehabilitative maintenance needs as appropriate. **

Policy SE-10q: Explore funding sources, such as the Building Resilient Infrastructure and Communities, Flood Mitigation Assistance, and Hazard Mitigation grant programs from the Federal Emergency Management Agency, to further support retrofitting and relocation of structures in flood-prone areas. Consider developing a voluntary, community-led relocation program through public purchase of flood-prone property, prioritizing repetitive loss areas.

Goal SE-11: Build long-term flood resilience.

Policy SE-11a: Encourage and participate in multi-benefit, nature-based solutions, such as restoration and conservation projects on natural and working lands, that increase flood resilience, reduce risks of related hazards such as landslides and erosion, and improve watershed management.

Policy SE-11b: Work with agencies and private providers that operate public facilities, such as wastewater treatment plants, gas, electrical, and water systems, located within areas subject to 100- and 500-year frequency floods to relocate or retrofit facilities to minimize or eliminate potential flood damage.

Policy SE-11c: Consider projected increases in precipitation from climate change in the design of upgraded flood control channels and basins, and design and siting of new critical facilities and infrastructure.

Policy SE-11d: Identify areas in need of expansion of stormwater and flood protection infrastructure capacity to accommodate changes in precipitation and extreme weather events.

Policy SE-11e: Prioritize flood prevention efforts in areas with high flood hazard exposure and systemically vulnerable communities.

Policy SE-11f: Balance the need for continuity of existing resident-serving businesses and services in flood-prone communities with risk reduction goals to protect life and property in the creation of new or modified development standards and rebuilding policies.

Geologic and Seismic Hazards

Goal SE-12: Prevent unnecessary exposure of people and property from risks of damage, injury, or loss from geologic and seismic hazards.

*Policy SE-12a: Continue to use the most recent available data on geologic hazards and related risks from the appropriate agencies. Make available to the public all maps identifying geologic hazards in Sonoma County.**

*Policy SE-12b: Upon each update to the Safety Element, review and update building standards to ensure up-to-date considerations of earthquake and liquefaction risk in building siting and design. Adopt, upon approval by the International Code Council (ICC) and the State of California, revisions to the Uniform Building Code which increase resistance of structures to ground shaking and other geologic hazards.**

Policy SE-12c: Seek grant funding opportunities to support building retrofits, particularly in systemically vulnerable communities, to improve seismic resilience.

*Policy SE-12d: Continue to require appropriate studies of geologic and seismic hazards during the development review process. In earthquake fault zones, geologic reports shall describe the hazards and include mitigation measures to reduce risks to acceptable levels. Where appropriate, require an engineer's or geologist's certification that risks have been mitigated to an acceptable level and, if indicated, obtain indemnification or insurance from the engineer, geologist, or developer to minimize County exposure to liability. For regulatory hazard areas covered by the Seismic Hazards Mapping Act, require the preparation of and review of geotechnical reports and geologic hazards assessments by a California Registered Geologist, Civil Engineer, or Soils Engineer prior to decisions on projects within or in close proximity to geologic or seismic hazards, including landslide, ground rupture, liquefaction, and ground shaking areas.**

*Policy SE-12e: Continue to prohibit structures intended for human occupancy (or defined as a "project" in the Alquist-Priolo Earthquake Fault Zoning Act and implementing provisions of Title 14 of the California Code of Regulations) within 50 feet of the surface trace of any fault. Continue to implement existing regulations in the County Code governing development in designated Earthquake Fault Zones.**

Policy SE-12f: Pursuant to the Seismic Hazards Mapping Act (SHMA) of 1990 (Public Resources Code, Chapter 7.8), the County shall not authorize the subdivision of land nor permit any structure for human occupancy, as defined by the Act, within designated Seismic Hazard Zones unless the specific provisions of the Act and Title 14 of the California Code of Regulations have been satisfied.

Policy SE-12g: Minimize soil erosion by maintaining compatible land uses, suitable building designs, and appropriate construction techniques. Contour grading, where feasible, and revegetation shall be required to mitigate the appearance of engineered slopes and to control erosion.

Policy SE-12h: Discourage avoidable alteration of land that will increase landslide hazards, including concentration of water through drainage, irrigation, or septic system installation, removal of vegetative cover, and steepening or undercutting of unstable slopes.

Policy SE-12i: To address the increased frequency and severity of landslides, explore enhanced landslide monitoring and improved response protocols.

Policy SE-12j: Reduce vulnerability and safeguard essential services by relocating or hardening critical facilities within tsunami hazard areas.

*Policy SE-12k: Require dynamic analysis of structural response to earthquake forces prior to County approval of building permits for structures whose irregularity or other factors prevent reasonable load determination and distribution by static analysis.**

*Policy SE-12l: Enforce State seismic safety requirements for design and construction of buildings and facilities subject to State and Federal standards such as bridges, dams, power plants, hospitals and schools.**

*Policy SE-12m: Incorporate measures to mitigate identified geologic hazards for all County roads, public facilities, and other County projects to an acceptable level.**

Policy SE-12n: Use the following criteria in siting and design of essential service buildings and facilities, particularly those of high public occupancy:

(1) To the extent feasible, avoid siting such buildings and facilities in areas subject to a Modified Mercalli Index (MMI) Groundshaking Intensity Level of Very Violent (X), Violent (IX), or Very Strong (IIX).

*(2) Where such buildings and facilities must be located in the above areas, design and construct them to the highest feasible safety standard.**

*Policy SE-12o: Support and integrate research on geologic hazards, their probabilities, and their effects within Sonoma County.**

*Policy SE-12p: Develop a program, including outreach, regulation, and funding, to strengthen and/or reinforce unreinforced masonry buildings throughout the County. Consider the cost of the work and the value, frequency of use, and level of occupancy of the buildings in designing the program.**

Hazardous Materials

Goal SE-13: Regulate the handling, storage, use, and disposal of hazardous materials to minimize community exposure and reduce risks of damage and injury to people and environmental resources.

*Policy SE-13a: Ensure that facilities involving the storage, handling, disposal, or use of hazardous materials or hazardous wastes be designed, constructed, and operated in accordance with applicable federal, state, and local hazardous materials and waste management laws and regulations, including requirements for management plans, security precautions, and contingency plans.**

Policy SE-13b: Maintain existing hazardous materials programs administered by the County's Hazardous Materials Unit acting as the Certified Unified Program Agency (CUPA).

*Policy SE-13c: Continue to promote the reduction of the use of hazardous materials in County operations, private businesses, and households.**

*Policy SE-13d: Support and coordinate with regulatory agencies to ensure the safe transportation of hazardous materials.**

*Policy SE-13e: Continue to encourage and educate the public about green business opportunities, safe alternatives to common hazardous materials, and resources and programs for the proper management and disposal.**

Policy SE-13f: Continue to require remediation, cleanup, and risk evaluation on known contaminated sites prior to development.

Policy SE-13g: Consider siting and design during application review for new and redevelopment projects to minimize impacts to surrounding uses and people due to pesticide runoff, aerial spray, or other means of exposure.

*Policy SE-13h: Continue to design and operate County owned solid waste disposal facilities to prevent improper disposal of and contamination by hazardous materials.**

*Policy SE-13i: Require a use permit for any commercial or industrial use involving hazardous materials in threshold quantities as determined by Federal and State laws. Require development applications to include detailed information concerning hazardous waste reduction, recycling, and storage. Hazardous materials management plans shall be required as a condition of approval for such permits.**

*Policy SE-13j: Avoid siting of hazardous waste repositories, incinerators, facilities that use a substantial quantity of hazardous materials, or other similar facilities intended primarily for hazardous waste disposal in any area subject to a very strong ground shaking hazard as identified in this Element or within one quarter mile of schools.**

*Policy SE-13k: Avoid siting of hazardous waste repositories, incinerators, or similar facilities intended primarily for hazardous waste disposal in any area designated for urban residential or rural residential use or on agricultural lands or at County approved solid waste disposal facilities.**

*Policy SE-13l: Site hazardous waste facilities which have the primary purpose of reuse, recycling, or source reduction of hazardous wastes in areas designated for industrial use in close proximity to users of hazardous materials and/or generators of hazardous wastes.**

*Policy SE-13m: Maintain inventories of sites with storage or use of hazardous materials in threshold quantities as determined by Federal and State laws.**

*Policy SE-13n: Maintain the Hazardous Materials Area Plan, consistent with State requirements, which provides for effective responses to releases of hazardous materials, the safe disposal of hazardous wastes, and a public information program.**

Sea Level Rise

Goal SE-14: Increase community resilience to sea level rise, and prevent unnecessary exposure of people, property, and environmental resources to risks of damage, injury, or loss from the impacts of sea level rise.

Policy SE-14a: Update hazard data every 5 years or at intervals recommended by responsible agencies, whichever is more frequent, using the best available scientific estimates, aligning with projections used by regional, state and federal agencies.

Policy SE-14b: Use the best available science and technical analyses available in combination with site-specific information when evaluating discretionary land use or development proposals in areas vulnerable to sea level rise.

Policy SE-14c: Identify and assess risks to existing development, critical facilities and infrastructure, and environmental resources that are vulnerable to projected sea level rise inundation, and develop an adaptation plan, consistent with the directives of the Local Coastal Plan.

Policy SE-14d: Coordinate with groundwater sustainability agencies, public water system operators, and private groundwater users to develop and implement strategies to limit saltwater intrusion from

sea level rise and avoid impacts caused by saltwater intrusion to beneficial uses of freshwater aquifers.

Policy SE-14e: Coordinate land use strategies with the Local Coastal Plan to ensure a cohesive approach to protecting communities, critical facilities and infrastructure, and environmental resources from sea level rise.

Policy SE-14f: Regulate the location, design, and construction of development and redevelopment in areas vulnerable to sea level rise. In coastal areas, follow the directives of the Local Coastal Plan.

Policy SE-14g: Continue to coordinate with local, regional and State entities, and engage the broader community, to address sea level rise and align adaptation efforts. In the development and implementation of adaptation strategies, consider the impacts and benefits to vulnerable communities.

Air Quality and Extreme Temperatures

Goal SE-15: Reduce the community's exposure to poor air quality and extreme temperature events and build community capacity to adapt to a changing climate.

Policy SE-15a: Broaden the functionality and expand the locations of resilience centers, beginning in systemically vulnerable communities.

Policy SE-15b: Support transportation access to resilience centers for systemically vulnerable communities and people with mobility or transportation constraints.

Policy SE-15c: Consider lowering threshold temperature or air quality triggers for the activation and operation of resilience centers.

Policy SE-15d: Seek grant funding to identify and map existing community facilities that can serve as resilience centers.

Policy SE-15e: Incentivize, promote, and establish standards for temporary resilience centers on private property, especially clean air refuges for outdoor workers.

Policy SE-15f: Explore the development of programs for private employers to provide hazard pay to include employees working during extreme heat events, wildfires, and unhealthy air quality days.

Policy SE-15g: Work with energy service providers to promote programs encouraging reduced energy use during extreme heat events without negatively impacting the health and wellbeing of community members.

Policy SE-15h: Require parking lots for new commercial and industrial uses to mitigate heat gain through installation of shade trees, shade structures with solar arrays, or other emerging cooling technologies. Prioritize the use of solar arrays where feasible and appropriate.

Policy SE-15i: Utilize drought-tolerant plantings and shade structures, including solar arrays, as part of cooling strategies for County projects located in areas with impermeable surfaces to help reduce heat islands and energy demand during extreme heat events.

Drought

Goal SE-16: Proactively plan for drought, and improve the reliability and safety of water supply during periods of drought.

Policy SE-16a: Proactively coordinate with public agencies, private agencies, and community organizations that have roles in drought preparedness and response on conditions monitoring, hazard and risk assessments, contingency planning, and water resources management.

Policy SE-16b: Continuously monitor drought conditions, weather, and water availability.

Policy SE-16c: Provide drought information resources, including the timely and accurate assessments of drought impacts on agriculture, industry, government, wildlife, tourism, health, and other areas.

Policy SE-16d: Provide resources, guidance, and technical assistance, as feasible, to groundwater well users, small water suppliers, and other water users vulnerable to drought on water quality testing and water conservation measures. Prioritize resources for low-income households.

Policy SE-16e: Identify and support the pursuit of State and federal drought resources and funding.

Policy SE-16f: Improve drought resiliency and minimize economic risk through assessment of past drought periods in Sonoma County to identify barriers and opportunities.

Policy SE-16g: Encourage and support nature-based solutions for increasing the resilience of the watershed.

Policy SE-16h: Support the implementation of the Groundwater Sustainability Plans for the Santa Rosa Plain, Sonoma Valley, and Petaluma Valley groundwater subbasins.

Policy SE-16i: Evaluate, prioritize, and implement water saving features and stormwater best management practices to promote groundwater recharge in existing and newly constructed County facilities.

Policy SE-16j: Explore opportunities to update design guidelines and building or zoning codes to require or incentivize low impact development, recycled and greywater use, rainwater capture, water-efficient landscaping, and other water conservation measures.

Policy SE-16k: Consider developing pre-approved design details for low impact development and greywater systems to reduce design and permitting costs.

3.1.2 Changes to General Plan 2020 Public Safety Element Policies

The Safety Element Update carries forward all of the existing Public Safety Element policies that were adopted as EIR mitigation measures. It also carries forward the policies denoted as “mitigating policies.” Although many of the retained GP2020 policies have been revised and reordered, the substance of each is substantially retained. Table 2 includes each policy in the GP2020 Public Safety Element, shown with its corresponding policy or policies in the proposed Safety Element Update. These policies are shown side by side to demonstrate that the substance of the GP2020 “mitigating policies” has been retained in the draft Public Safety Element draft. Several of the policies in GP2020 were combined into a single policy in the draft Safety Element Update, as shown. Four policies are not being carried forward, and are noted with “N/A” in the Safety Element Update column; none of these policies were identified in GP2020 as a mitigating policy.

Table 2. GP2020 Public Safety Element policies with corresponding Safety Element Update policies

GP2020 Policy #	Text of GP2020 Policy	2025 Policy #	Text of Safety Element Update Policy
PS-1a	Continue to use all available data on geologic hazards and related risks from the appropriate agencies.*	SE-12a	Continue to use the most recent available data on geologic hazards and related risks from the appropriate agencies. Make available to the public all maps identifying geologic hazards in Sonoma County.*
PS-1b	Continue to use studies of geologic hazards prepared during the development review process.*	SE-12d	Continue to require appropriate studies of geologic and seismic hazards during the development review process. In earthquake fault zones, geologic reports shall describe the hazards and include mitigation measures to reduce risks to acceptable levels. Where appropriate, require an engineer's or geologist's certification that risks have been mitigated to an acceptable level and, if indicated, obtain indemnification or insurance from the engineer, geologist, or developer to minimize County exposure to liability. For regulatory hazard areas covered by the Seismic Hazards Mapping Act, require the preparation of and review of geotechnical reports and geologic hazards assessments by a California Registered Geologist, Civil Engineer, or Soils Engineer prior to decisions on projects within or in close proximity to geologic or seismic hazards, including landslide, ground rupture, liquefaction, and ground shaking areas.*
PS-1c	Consider amendments of this Element to incorporate new data which significantly change the hazard assessments contained herein.*		See Implementation Program SE-M.1; also see Policy SE-12a
PS-1d	Support and integrate research on geologic hazards, their probabilities, and their effects within Sonoma County.	SE-12o	Support and integrate research on geologic hazards, their probabilities, and their effects within Sonoma County.*
PS-1e	Continue to implement the "Geologic Hazard Area" combining district which establishes regulations for permissible types of uses and their intensities and appropriate development standards.*	SE-12e	Continue to prohibit structures intended for human occupancy (or defined as a "project" in the Alquist-Priolo Earthquake Fault Zoning Act and implementing provisions of Title 14 of the California Code of Regulations) within 50 feet of the surface trace of any fault. Continue to implement existing regulations in the County Code governing development in designated Earthquake Fault Zones.*
PS-1f	Require and review geologic reports prior to decisions on any project which would subject property or persons to significant risks from the geologic hazards areas shown on Public Safety Element hazard maps and related file maps and source documents. Geologic reports shall describe the hazards and	SE-12d	<i>See text of SE-12d paired with GP2020 PS-1b, above</i>

GP2020 Policy #	Text of GP2020 Policy	2025 Policy #	Text of Safety Element Update Policy
	include mitigation measures to reduce risks to acceptable levels. Where appropriate, require an engineer's or geologist's certification that risks have been mitigated to an acceptable level and, if indicated, obtain indemnification or insurance from the engineer, geologist, or developer to minimize County exposure to liability.*		
PS-1g	Prohibit structures intended for human occupancy (or defined as a "project" in the Alquist-Priolo Special Studies Zones Act and related Administrative Code provisions) within 50 feet of the surface trace of any fault.*	SE-12e	<i>See text of Policy SE-12e, above</i>
PS-1h	Adopt, upon approval by the International Code Council (ICC) and the State of California, revisions to the Uniform Building Code which increase resistance of structures to groundshaking and other geologic hazards.*	SE-12b	Upon each update to the Safety Element, review and update building standards to ensure up-to-date considerations of earthquake and liquefaction risk in building siting and design. Adopt, upon approval by the International Code Council (ICC) and the State of California, revisions to the Uniform Building Code which increase resistance of structures to ground shaking and other geologic hazards.*
PS-1i	Require dynamic analysis of structural response to earthquake forces prior to County approval of building permits for structures whose irregularity or other factors prevent reasonable load determination and distribution by static analysis.*	SE-12k	Require dynamic analysis of structural response to earthquake forces prior to County approval of building permits for structures whose irregularity or other factors prevent reasonable load determination and distribution by static analysis.*
PS-1j	Encourage strong enforcement of State seismic safety requirements for design and construction of buildings and facilities subject to State and Federal standards such as bridges, dams, power plants, hospitals and schools.*	SE-12l	Enforce State seismic safety requirements for design and construction of buildings and facilities subject to State and Federal standards such as bridges, dams, power plants, hospitals and schools.*
PS-1k	Incorporate measures to mitigate identified geologic hazards for all County roads, public facilities, and other County projects to an acceptable level.*	SE-12m	Incorporate measures to mitigate identified geologic hazards for all County roads, public facilities, and other County projects to an acceptable level.*
PS-1l	Use the following criteria in siting and design of essential service buildings and facilities, particularly those of high public occupancy: (1) To the extent feasible, avoid siting such buildings and facilities in areas subject to a Modified Mercalli Index (MMI) Groundshaking Intensity Level of Very Violent (X), Violent (IX), or Very Strong (IIX) as shown on Figures PS-1a. (2) Where such buildings and facilities must be located in the above areas, design and construct them to the highest feasible safety standard.*	SE-12n	Use the following criteria in siting and design of essential service buildings and facilities, particularly those of high public occupancy. To the extent feasible, avoid siting such buildings and facilities in areas subject to a Modified Mercalli Index (MMI) Groundshaking Intensity Level of Very Violent (X), Violent (IX), or Very Strong (IIX). Where such buildings and facilities must be located in the above areas, design and construct them to the highest feasible safety standard.*

GP2020 Policy #	Text of GP2020 Policy	2025 Policy #	Text of Safety Element Update Policy
PS-1m	Make readily available to property owners and the public all maps identifying geologic hazards in Sonoma County, particularly the MMI Groundshaking Intensity Level maps noted above.*	SE-12a	Continue to use the most recent available data on geologic hazards and related risks from the appropriate agencies. Make available to the public all maps identifying geologic hazards in Sonoma County.*
PS-1n	Develop a Strategic Plan for damage assessment and recovery of essential service buildings and facilities, particularly those of high public occupancy, as part of the County's emergency response planning, focused in areas subject to an MMI Groundshaking Intensity level of Very Violent (X), Violent (IX), or Very Strong (IIX). *	SE-3a	Work collaboratively with disaster survivors, the community, County departments and agencies, key groups and stakeholders, and other local and regional governments to develop and implement a Post-Disaster Recovery Framework, including a strategic plan for damage assessment and recovery of County-owned public facilities after a major disaster.*
PS-1o	Adopt an ordinance requiring strengthening and/or reinforcement of Unreinforced Masonry Buildings, except residential structures, considering the cost of the work and the value, frequency of use, and level of occupancy of the buildings. *	SE-12p	Develop a program, including outreach, regulation, and funding, to strengthen and/or reinforce unreinforced masonry buildings throughout the County. Consider the cost of the work and the value, frequency of use, and level of occupancy of the buildings in designing the program. *
PS-1p	Notwithstanding the foregoing, Policies PS-1f and PS-1g shall not apply to an application to reconstruct a single-family dwelling located in the Geologic Hazard Area Combining District that was destroyed in the October 2017 Sonoma Complex Fires, provided that the dwelling would comply with and qualify for an exemption under the state Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code, sec. 2621 et seq.), and provided further that the application complies with all applicable requirements of that certain ordinance adopted by the Board of Supervisors on December 11, 2018 and relating to reconstruction of single family homes in the Geologic Hazard Area Combining District. This policy shall not be interpreted to apply to any project other than reconstruction of a single-family home destroyed in the 2017 Sonoma Complex Fires that is proposed to be rebuilt on the same lot.		N/A
PS-2a	Maintain available information on flooding and flood hazards in the appropriate County departments. *	SE-10a	Maintain data and information on flooding and flood hazards in the appropriate County departments and make flood hazard maps available to the public.*

GP2020 Policy #	Text of GP2020 Policy	2025 Policy #	Text of Safety Element Update Policy
PS-2b	Coordinate flood hazard analysis and management activities with the U.S. Army Corps of Engineers, Federal Emergency Management Agency (FEMA), and other responsible agencies. Using the flood data collection program, request changes in FEMA maps where appropriate to reflect new data or analyses.*	SE-10c	Partner with local, regional, State, and federal agencies, including but not limited to the cities, Sonoma Water, the U.S. Army Corps of Engineers, and the Federal Emergency Management Agency (FEMA), to develop and maintain an adequate information base on existing and potential flood hazards and drainage impacts for the County's major watersheds, prepare analyses and risk assessments, and identify and implement floodplain management activities and other strategies to reduce flooding impacts. Request changes in FEMA flood hazard maps where appropriate to reflect new data or analyses.*
PS-2c	Participate with the City of Petaluma in implementation of the regional components of the Petaluma River Watershed Master Drainage Plan (Sonoma County Water Agency, June 2003), Petaluma River Floodplain Management Plan (City of Petaluma, October 2001), Petaluma River Access and Enhancement Plan (City of Petaluma, May 1996), and City of Petaluma General Plan 2025 (Water Resources Element).*	SE-10c	<i>See text of SE-10c, above</i>
PS-2d	Work with the County Community Development Commission, County Department of Fire and Emergency Services, responsible agencies, public, and other stakeholders to develop and implement a long-term plan for reducing repetitive flood losses in the Russian River basin, to include: (1) Systematic collection of flood data and damage by geographic location; (2) Consideration of acquisition of properties in flood hazard areas; (3) An ongoing Flood Elevation Program; (4) A Sonoma County Flood Mitigation Plan, including a Repetitive Loss Plan, to allow County participation in FEMA's Flood Mitigation Assistance (FMA) Program and additional Hazard Mitigation Grant Program (HMGP) grants; (5) Possible participation in the National Flood Insurance Program's Community Rating System; (6) Use of Redevelopment funds to supplement FEMA grant funds in reducing repetitive flood losses; and (7) Consideration of permit fee reductions for elevation of structures in flood hazard areas and outreach to inform property owners in flood hazard areas about various options for coverage under the National Flood Insurance Program, including Increased Cost of Compliance (ICC) coverage.*	SE-10d	Work with regional flood protection responsible agencies, the public, and other stakeholders to develop and implement a long-term plan for reducing repetitive flood losses in the Russian River basin. As part of the plan, consider upstream improvements that could expand flood storage capacity and existing regulatory barriers to flood prevention projects.*

GP2020 Policy #	Text of GP2020 Policy	2025 Policy #	Text of Safety Element Update Policy
PS-2e	Expand the County's zero net fill requirements to address all areas of the unincorporated County that are located within the 100-year FEMA special flood hazard area.*	SE-10g	Continue to enforce zero net fill requirements in the 100-year FEMA Special Flood Hazard Area to retain floodplain storage capacity. Avoid fill in areas outside of the 100-year FEMA Special Flood Hazard Area that retain or could retain flood waters.*
PS-2f	Preserve floodplain storage capacity by avoiding fill in areas outside of the 100-year FEMA special flood hazard area that retain or could retain flood waters.*	SE-10g	<i>See text of SE-10g, above</i>
PS-2g	Base land use planning and development review on FEMA maps and data or parcel specific scaled interpretations of these maps and site specific elevation data.*	SE-10h	When making land use decisions and during development review: a) On-site and off-site flood related hazards shall be reviewed for all projects located within areas subject to known flood hazards; b) Use FEMA flood hazard maps and data, or parcel specific scaled interpretations of these maps and site specific elevation data; c) Use the 100-year flood event and corresponding elevations as the County measure of acceptable level of risk and protection in the consideration of amendments to the General Plan Land Use Map; and d) Consider the potential risk of damage from flooding in the design and review of projects, including projects that could facilitate floodplain development.*
PS-2h	Work cooperatively with each City to prepare a comprehensive analysis of the potential flood hazards and drainage impacts for the watersheds with major flood problems in the County (i.e., Russian River, Sonoma Creek, and Petaluma River). Include the following in the analysis: (1) Identification of flood hazard areas; (2) Identification of historic drainage patterns and existing retention/detention characteristics serving each watershed; (3) Identification of impacts associated with placement of significant new impervious surfaces; (4) Identification of downstream impacts on existing development and land uses; (5) Identification of mitigation measures to reduce flood hazards; (6) Identification of significant water recharge areas; (7) Identification of sources of significant soil sedimentation and/or stream bank failures; and (8) Identification and adoption of regional mitigation measures to be applied to new development to address the proportionate fair share of flood hazard reduction.*	SE-10c	Partner with local, regional, State, and Federal agencies, including but not limited to the cities, Sonoma Water, the U.S. Army Corp of Engineers, and the Federal Emergency Management Agency (FEMA), to develop and maintain an adequate information base on existing and potential flood hazards and drainage impacts for the County's major watersheds, prepare analyses and risk assessments, and identify and implement floodplain management activities and other strategies to reduce flooding impacts. Request changes in FEMA flood hazard maps where appropriate to reflect new data or analyses.*

GP2020 Policy #	Text of GP2020 Policy	2025 Policy #	Text of Safety Element Update Policy
PS-2i	Until such time as the analysis under Policy PS-2h is completed and the regional mitigation measures adopted, each discretionary project located in the above watersheds with major flood problems shall analyze drainage and flooding impacts and include feasible and appropriate mitigation measures to reduce flood hazards from the project. Thereafter, each project shall implement its proportionate fair share of the regional mitigation measures.*	SE-10h	When making land use decisions and during development review: a) On-site and off-site flood related hazards shall be reviewed for all projects located within areas subject to known flood hazards; b) Use FEMA flood hazard maps and data, or parcel specific scaled interpretations of these maps and site specific elevation data; c) Use the 100-year flood event and corresponding elevations as the County measure of acceptable level of risk and protection in the consideration of amendments to the General Plan Land Use Map; and d) Consider the potential risk of damage from flooding in the design and review of projects, including projects that could facilitate floodplain development.*
PS-2j	Work with the City of Petaluma to preserve critical floodplain detention areas, including but not limited to the confluence of Willow Brook and Lichau Creeks and Liberty, Marin, and Wiggins Creeks north of Petaluma.		N/A
PS-2k	Use the 100-year flood event and corresponding elevations as the County measure of acceptable level of risk and protection in the consideration of any amendments of the Land Use Map.*	SE-10h	<i>See full text of SE-10h above, and particularly Policy SE-10h, subsection (c), excerpted here:</i> *** (c) Use the 100-year flood event and corresponding elevations as the County measure of acceptable level of risk and protection in the consideration of amendments to the General Plan Land Use Map; ***
PS-2l	On-site and off-site flood related hazards shall be reviewed for all projects located within areas subject to known flood hazards.*	SE-10h	<i>See full text of SE-10h above, and particularly, subsection (a), excerpted here:</i> *** a) On-site and off-site flood related hazards shall be reviewed for all projects located within areas subject to known flood hazards; ***
PS-2m	Regulate development, water diversion, vegetation management, grading, and fills to minimize any increase in flooding and related damage to people and property.*	SE-10j	Regulate development, water diversion, vegetation management, grading, and fills to minimize any increase in flooding and related damage to people and property.*
PS-2n	Consider developing regulations that require the use of low impact development techniques to reduce stormwater runoff from future development.*	SE-16j	Explore opportunities to update design guidelines and building or zoning codes to require or incentivize low impact development, recycled and greywater use, rainwater capture, water-efficient landscaping, and other water conservation measures.

GP2020 Policy #	Text of GP2020 Policy	2025 Policy #	Text of Safety Element Update Policy
PS-2o	Costs for drainage facilities to handle the surface runoff from new development shall be the responsibility of the new development. *	SE-10m	Require that the design and construction of drainage facilities be subject to the review and approval of Permit Sonoma. The costs of drainage facilities to handle surface runoff from new development shall be the responsibility of the developer.*
PS-2p	Require that design and construction of drainage facilities be subject to the review and approval of the Permit and Resource Management Department.*	SE-10m	See text of SE-10m, above
PS-2q	Require that tentative and final subdivision maps and approved site plans show areas subject to flooding as shown on the FEMA maps.*	SE-10k	Require that tentative and final subdivision maps and development site plans show flood hazard areas as designated by FEMA.*
PS-2r	Give priority to floodplain management over flood control structures for preventing damage from flooding except where the intensity of development requires a high level of protection and justifies the costs of structural measures. Where possible, maintain flood channel capacity.	SE-10l	Give priority to floodplain management over flood control structures for preventing damage from flooding except where the intensity of development requires a high level of protection and justifies the costs of structural measures. Where possible, maintain flood channel capacity.*
PS-2s	Consider the potential risk of damage from flooding in the design and review of projects, including those which could facilitate floodplain development.*	SE-10h	See full text of Policy SE-10h, above, and particularly subsection (d), as follows: *** d) Consider the potential risk of damage from flooding in the design and review of projects, including projects that could facilitate floodplain development.*
PS-2t	Avoid variances to building setbacks along streams and in 100-year flood plains without the review and approval of the Permit and Resource Management Department. *	SE-10i	Avoid variances to building setbacks along streams and in the 100-year floodplain.*
PS-2u	Request that the Sonoma County Water Agency prioritize and undertake flood hazard mitigation projects on a continuous basis on selected waterways subject to the policies of the Open Space and Resource Conservation Element. *	SE-10n	Support Sonoma Water in the prioritization and implementation of flood hazard mitigation projects within waterways subject to the policies of the Open Space and Resource Conservation Element.*
PS-2v	Continue to enforce County code requirements on construction in flood hazard areas and other adopted regulations which implement the National Flood Insurance Program.*	SE-10e	Continue to participate in the National Flood Insurance Program (NFIP) by maintaining and enforcing County code requirements on construction in flood hazard areas and other adopted floodplain management regulations.* Consider participating in the NFIP's Community Rating System to qualify Sonoma County property owners for discounted flood insurance.

GP2020 Policy #	Text of GP2020 Policy	2025 Policy #	Text of Safety Element Update Policy
PS-2w	Encourage the timely completion and filing of inundation maps for all dams whose failure could cause loss of life or personal injury within Sonoma County. <u>Where inundation maps indicate dam or levee failure could cause loss of life or property or personal injury, coordinate with the corresponding responsible party to investigate levee or dam stability and management and identify rehabilitative maintenance needs as appropriate.*</u>	SE-10p	Encourage the timely completion and filing of inundation maps for all dams whose failure could cause loss of life or personal injury within Sonoma County. Where inundation maps indicate dam or levee failure could cause loss of life or property or personal injury, coordinate with the corresponding responsible party to investigate levee or dam stability and management and identify rehabilitative maintenance needs as appropriate.*
PS-3a	Continue to use available information on wildland and structural fire hazards.*	SE-9a	Continue to utilize the most recent available data and information on wildland and structural fire hazards from CAL FIRE and research institutions. Make fire hazard maps available to the public.*
PS-3b	Consider the severity of natural fire hazards, potential damage from wildland and structural fires, adequacy of fire protection and mitigation measures consistent with the Public Safety Element in the review of projects.*	SE-8a	Consider the severity of natural fire hazards (as may be exacerbated by climate change), potential damage from wildland and structural fires, and adequacy of fire protection and mitigation measures, consistent with the General Plan, in the review of discretionary projects.*
PS-3c	Continue to adopt revisions to the Uniform Fire and Building Codes and other standards which address fire safety as they are approved by inspection organizations and the State of California. Review, revise, and/or adopt existing or new local codes, ordinances, and Fire Safe Standards to reflect contemporary fire safe practices.*	SE-8b	Maintain and update County building and fire codes and regulations to meet or exceed State requirements and reflect contemporary fire safe practices.*
PS-3d	Refer projects and code revisions to the County Department of Fire and Emergency Services and responsible fire protection agencies for their review and comment.*	SE-8d	Continue to refer projects and code revisions to the Fire Prevention and Hazardous Materials Division of Permit Sonoma and responsible fire protection agencies for their review and comment.*
PS-3e	The County Department of Fire and Emergency Services shall offer assistance to local agencies in adoption and enforcement of fire safety regulations and shall work with local agencies to develop proposed improvements to County codes and standards.*	SE-7h	The Fire Prevention Division of Permit Sonoma shall continue to offer assistance to local fire agencies in adoption and enforcement of fire safety regulations and continue work with local agencies to develop proposed improvements to County codes and standards to align with changing State legislation and current industry research.*
PS-3f	Encourage strong enforcement of State requirements for fire safety by the California Department of Forestry and Fire Protection.*	SE-7i	Continue strong enforcement of the Office of the State Fire Marshal requirements for fire safety.*

GP2020 Policy #	Text of GP2020 Policy	2025 Policy #	Text of Safety Element Update Policy
PS-3g	Encourage continued operation of California Department of Forestry and Fire Protection (CalFire) programs for fuel breaks, brush management, controlled burning, re-vegetation, and fire roads.*	SE-7j	Continue to identify local funding sources and leverage grant funding to support and participate in wildfire risk reduction and forest health projects, including strategic placement, creation and maintenance of shaded fuel breaks, targeted vegetation management, prescribed/cultural burning, maintenance of fire roads, and other priorities as identified in the current Hazard Mitigation Plan, the Sonoma-Lake-Napa Unit Strategic Fire Plan, the Sonoma County Community Wildfire Protection Plan and other planning documents.
PS-3h	Develop a program to improve and standardize the County street addressing system in order to reduce emergency service response times. Where applicable, coordinate the program with the cities.*	SE-7k	Continue the Permit Sonoma addressing and road naming program that improves and standardizes the County street addressing system in order to reduce emergency service response times. Where applicable, coordinate the program with the cities and local tribal governments.*
PS-3i	Encourage and promote fire safe practices and the distribution of fire safe educational materials to the general public, permit applicants, and local planning agencies.*	SE-9c	Partner with Fire Safe Sonoma, local Fire Safe councils and FireWise Communities, CAL FIRE, local fire districts, Resource Conservation Districts and other community groups to provide educational opportunities for residents and property owners on the best available science for defensible space, home hardening, and vegetation management. Continue to promote emergency preparedness including “know your evacuation Zone” efforts, pre-emergency planning and supplies for family safety, and executing evacuation drills. Target at-risk populations such as older adults, individuals with disabilities, non-English speaking residents, and individuals with chronic health conditions.*
PS-3j	Provide fire hazard information signs in Very High or High Fire Hazard Severity Zones in a manner consistent with Area Plans and that does not degrade Scenic Corridors and scenic views.*	SE-7l	Continue to provide fire hazard information signs in areas at risk to wildfire in a manner consistent with Area Plans and that does not degrade Scenic Corridors and scenic views.*
PS-3k	Work with the California Department of Forestry and Fire Protection (CalFire) to identify areas of high fire fuel loads and take advantage of opportunities to reduce those fuel loads, particularly in Very High or High Fire Hazard Severity Zones.	SE-9b	Continue to work with CAL FIRE, local fire agencies, and community members to identify areas of high fire fuel loads and take advantage of opportunities to reduce those fuel loads, particularly in areas where fuels may increase fire spread to nearby communities.*
PS-3l	Require automatic fire sprinkler systems or other on-site fire detection and suppression systems in all new residential and commercial structures, with exceptions for detached utility buildings, garages, and agricultural exempt buildings.*	SE-8e	Continue to require automatic fire sprinkler systems or other on-site fire detection and suppression systems in all new residential and commercial structures, with exceptions for detached utility buildings, garages, agricultural exempt buildings, and certain accessory dwelling units.*

GP2020 Policy #	Text of GP2020 Policy	2025 Policy #	Text of Safety Element Update Policy
PS-3m	Consider additional impact or mitigation fees, or a benefit assessment, to offset the impact of new development on fire services.		N/A
PS-4a	While maintaining the autonomy granted to it pursuant to State zoning laws, implement Federal, State, and County requirements for the storage, handling, disposal, and use of hazardous materials, including requirements for management plans, security precautions, and contingency plans. *	SE-13a	Ensure that facilities involving the storage, handling, disposal, or use of hazardous materials or hazardous wastes be designed, constructed, and operated in accordance with applicable federal, state, and local hazardous materials and waste management laws and regulations, including requirements for management plans, security precautions, and contingency plans.*
PS-4b	Prepare and maintain an inventory of sites with storage or use of hazardous materials in threshold planning quantities as determined by Federal and State laws.*	SE-13m	Maintain inventories of sites with storage or use of hazardous materials in threshold quantities as determined by Federal and State laws.*
PS-4c	Require a use permit for any commercial or industrial use involving hazardous materials in threshold planning quantities as determined by Federal and State laws. Hazardous materials management plans shall be required as a condition of approval for such permits. *	SE-13i	Require a use permit for any commercial or industrial use involving hazardous materials in threshold quantities as determined by Federal and State laws. Require development applications to include detailed information concerning hazardous waste reduction, recycling, and storage. Hazardous materials management plans shall be required as a condition of approval for such permits.*
PS-4d	Work with applicable regulatory agencies to regulate the transportation of hazardous materials consistent with adopted County policies.*	SE-13d	Support and coordinate with regulatory agencies to ensure the safe transportation of hazardous materials. *
PS-4e	Continue to design and operate County owned solid waste disposal facilities to prevent disposal of and contamination by hazardous materials.*	SE-13h	Continue to design and operate County owned solid waste disposal facilities to prevent improper disposal of and contamination by hazardous materials.*
PS-4f	Continue as needed the hazardous materials business advisory group, and consider adding an agricultural representative.*		N/A
PS-4g	Maintain the Sonoma County Operational Area Hazardous Materials Incident Response Plan, which provides for effective responses to releases of hazardous materials, the safe disposal of hazardous wastes, and a public information program.*	SE-13n	Maintain the Hazardous Materials Area Plan, consistent with State requirements, which provides for effective responses to releases of hazardous materials, the safe disposal of hazardous wastes, and a public information program.*
PS-4h	Avoid siting of hazardous waste repositories, incinerators, facilities that use a substantial quantity of hazardous materials, or other similar facilities intended primarily for hazardous waste disposal in any area subject to a very strong ground shaking hazard identified on Figures PS-1a through PS-1i or within one quarter mile of schools. *	SE-13j	Avoid siting of hazardous waste repositories, incinerators, facilities that use a substantial quantity of hazardous materials, or other similar facilities intended primarily for hazardous waste disposal in any area subject to a very strong ground shaking hazard as identified in this Element or within one quarter mile of schools.*

GP2020 Policy #	Text of GP2020 Policy	2025 Policy #	Text of Safety Element Update Policy
PS-4i	Avoid siting of hazardous waste repositories, incinerators, or similar facilities intended primarily for hazardous waste disposal in any area designated for urban residential or rural residential use or on agricultural lands or at County approved solid waste disposal facilities.*	SE-13k	Avoid siting of hazardous waste repositories, incinerators, or similar facilities intended primarily for hazardous waste disposal in any area designated for urban residential or rural residential use or on agricultural lands or at County approved solid waste disposal facilities.*
PS-4j	Site hazardous waste facilities which have the primary purpose of reuse, recycling, or source reduction of hazardous wastes in areas designated for industrial use in close proximity to users of hazardous materials and/or generators of hazardous wastes.*	SE-13l	Site hazardous waste facilities which have the primary purpose of reuse, recycling, or source reduction of hazardous wastes in areas designated for industrial use in close proximity to users of hazardous materials and/or generators of hazardous wastes.*
PS-4k	Continue to educate the public about and promote the Sonoma County Waste Management Authority's Household Hazardous Waste Program. Encourage free drop-off and reuse of computers and similar equipment containing hazardous materials.*	SE-13e	Continue to encourage and educate the public about green business opportunities, safe alternatives to common hazardous materials, and resources and programs for the proper management and disposal.*
PS-4l	Continue to educate the public about green business opportunities and expand and promote the County Department of Fire and Emergency Services Sonoma Green Business Program.*	SE-13e	Continue to encourage and educate the public about green business opportunities, safe alternatives to common hazardous materials, and resources and programs for the proper management and disposal.*
PS-4m	Continue to educate the public about, encourage, and promote the reduction in use of hazardous materials and the use of safe alternatives to hazardous materials in County operations and private businesses.*	SE-13c	Continue to promote the reduction of the use of hazardous materials in County operations, private businesses, and households.*
PS-4n	Encourage the private sector to reduce the use of potentially hazardous pesticides and to use alternatives such as best management practices.*	EJ-2b	Environmental Justice Element Policy EJ-2b: Minimize agricultural pollution spray and runoff by supporting implementation of reduced-risk pesticide use, bioswale and groundcover vegetation plans, and agricultural field location and orientation, particularly in Environmental Justice Communities and in areas with high levels of pesticide exposure.
PS-4o	Encourage reduction in the use of potentially hazardous pesticides and increased use of alternatives, such as best management practices, in County operations, including but not limited to maintenance of roads, parks, and facility grounds. Emphasize the use of alternatives to potentially hazardous pesticides in areas likely to drain to waterways. Coordinate with the cities in this effort.*	EJ-1e	Environmental Justice Element Policy EJ-1e: Reduce or eliminate the use of pesticides and herbicides on County-owned parks and other county-owned landscaped areas such as medians and parkways, publicly accessible open spaces, and facility grounds. Support the use of safe alternatives and best management practices.

3.1.3 Implementation Plan

The draft Safety Element includes 80 programmed implementation actions that the County will undertake on either a set timeline or ongoing basis. Each program is associated with one or more goals

and policies of the Safety Element. For each program, the implementation plan establishes a lead County department or agency, supporting departments or agencies (if any), 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. 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.

The programs included in the Implementation Plan are listed in Table 3, in short form, with their associated policies. Additional detail regarding identity of lead and supporting department(s) and metrics is available in the draft Safety Element Update document.

Table 3. Proposed Safety Element Update Implementation Programs.

Program	
1	Continue to maintain and update as necessary the Sonoma County Emergency Operations Plan and associated annexes. Develop new annexes as warranted.
2	Update the Local Hazard Mitigation Plan (LHMP) for Sonoma County, incorporated by reference into this Element, at least every five years and use the plan to guide decisions on mitigating actions to protect the community and the environment, particularly vulnerable communities. With each LHMP update, evaluate the County's fire suppression capacity and future water supply availability. Where feasible, coordinate and collaborate on hazard mitigation planning with other jurisdictions and special districts within the County. During the comprehensive update to the General Plan, update and expand upon the evacuation route assessment required by Government Code Section 65302.15 and the residential egress assessment required by Government Code Section 65302(g)(5), based on the availability of new information, data, or assessment techniques, to evaluate the capacity, safety, and viability of evacuation routes and locations under a range of emergency scenarios and areas of the unincorporated county in hazard areas without at least two evacuation routes. Use the findings from the updated studies to inform the land use and circulation elements, and future updates to the safety element and LHMP. (SE-1b, SE-2i)
3	Identify collaborative networks and community-based organizations within the County that provide emergency services, such as Sonoma Community Organizations Active in Disaster (COAD), and meet bi-annually to identify opportunities for the County to work in collaboration with these community-based organizations (CBOs) in their emergency response approach and discuss how to fill gaps in community needs and resources for emergency preparation, response, and recovery. (SE-1c, SE-1d)
4	Identify funding streams to provide community-based organizations involved in the County's emergency planning with grants or other forms of compensation for their planning and action efforts. (SE-1c, SE-1d)
5	Continue supporting and administering community preparedness programs, such as Community Emergency Response Training (CERT), Communities Organized to Prepare for Emergencies (COPE), and Map your Neighborhood (MYN), to foster neighbor to neighbor collaboration efforts. Prioritize efforts in high hazard areas and systemically vulnerable communities, and coordinate with community organizations and partners to target hard-to-reach populations. (SE-1e)
6	Conduct alert and warning, and evacuation exercises at the neighborhood or community levels, prioritizing high hazard areas and single-access communities, to provide public safety agencies an opportunity to test the County alert system and residents an opportunity to practice evacuating. To reduce last-minute evacuations and concentrated demand on the roadway network, encourage advanced preparation, leaving early, and limiting the number of evacuating vehicles during the exercises and as part of other emergency preparedness public information initiatives. (SE-1g)

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- 7 Continue to provide easy to access public emergency response information on the County's website and social media pages. (SE-2b)

 - 8 Work with schools and local businesses to promote emergency preparedness, distributing age-appropriate educational materials or business continuity planning resources. (SE-2b)

 - 9 Partner with local media, including popular local social media pages, to provide information on emergency preparedness and response. (SE-2b)

 - 10 Secure funding to assess on-street parking on County-owned roads in Moderate, High, or Very High Fire Hazard Severity Zones to evaluate parking constraints to safe and efficient egress. If the assessment indicates potential constraints, explore options to implement more stringent on-street parking limitations. (SE-2f)

 - 11 Conduct a study to identify vulnerable areas for traffic signal improvements and contingency plans for loss of power and communications grids. Investigate adaptive signal control (ASC) systems that can adjust traffic signal timing to account for high volumes that occur during hazard events. (SE-2j)

 - 12 Work with community stakeholders and County agencies/departments to prepare a Post-Disaster Recovery Framework to increase the County's capacity to recover after disaster events. (SE-3a)

 - 13 Secure funding for and develop a strategic plan for damage assessment and recovery of County-owned public facilities after a major disaster event. (SE-3a)

 - 14 Secure funding for long-term recovery efforts for small businesses and systemically vulnerable communities through federal and state disaster relief funds and local budget. (SE-3b)

 - 15 Partner with local hospitals, clinics, and non-profit organizations to secure medical staff, equipment, and supplies for mobile clinics following disaster. (SE-3c)

 - 16 Update the County code to establish streamlined rebuilding standards and procedures, and temporary housing allowances that apply after proclamation of a local emergency. (SE-3d)

 - 17 Create an at-home hazard guide, focusing on hazards identified in the Safety Element and Hazard Mitigation Plan, for residents in multiple languages that provides details on hazard avoidance, prevention, and response, and points to various funding sources, such as the Green and Resilient Retrofit Program or local programs, for residents seeking climate-resilient home retrofits. Distribute guides in English and Spanish at community events and provide guides in additional languages upon request. (SE-4a)

 - 18 Partner with healthcare providers throughout the County to regularly meet with the Sonoma County Mobile Support Team (MST), Community Oriented and Equity (CORE) Team, Specialized Assistance for Everyone (SAFE) Team, and other crisis response or mental health services teams to create an Emergency Medical Assistance Plan identifying opportunities to provide mobile mental and physical health services and coordinated operations during and after an emergency event. (SE-3c, SE-4b)

 - 19 Partner with healthcare providers to identify funding sources to support efforts to increase physical and mental health care capacity during emergencies and post-disasters, including the Centers for Disease Control, California Department of Public Health, California Department of Social Services, and the California Department of Managed Health Care. Assist in applying for funding through collaborative partnerships, information sharing, and technical support as needed. (SE-3c, SE-4b)

 - 20 Establish and train a formalized network of community organizations and volunteers to provide additional support during emergencies and post-disasters. This can include mental health first aid training, establishing community health worker programs, and creating support networks for vulnerable populations. (SE-3c, SE-4b, SE-4d)

 - 21 Continue to host regular seasonal readiness meetings that include public safety partners, community-based organizations, and County agencies to discuss the capacity of emergency services to serve all community members equitably. (SE-4c, SE-4d, SE-4e)
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- 22** Continue to integrate Diversity, Equity, Inclusion, and Belonging (DEIB) principles into Emergency Operations Center (EOC) operations through the EOC Management positions of Equity Officer and Access and Functional Needs Coordinator, in alignment with the Sonoma County Strategic Plan Racial Equity and Social Justice Pillar for departments engaged in emergency and safety related and post-disaster recovery programs. (SE-4c)
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- 23** Schedule regular meetings between County departments and public agencies working on projects or initiatives related to emergency response or services to discuss ongoing projects, share updates, and address any communication gaps. (SE-4e)
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- 24** Identify funding for and conduct an evacuation transportation needs assessment to identify areas of the County with populations that have access and functional needs that need transportation support to evacuate safely and timely during a disaster event. The assessment should be informed by data and community input. Log the findings in a GIS database for reference by the Emergency Operations Center during disaster response and planning efforts. (SE-4f)
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- 25** Encourage and support community or neighborhood efforts in developing localized emergency response plans, in alignment with the County Emergency Operations Plan, by providing hazard data and technical guidance and coordination with local fire agencies and other public safety partners. (SE-4f)
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- 26** Create a public information campaign in multiple languages and using multiple forms of media, including through trusted community-based organizations, informing the public of various existing emergency alert options and where to look for information regarding public emergencies, hazards, resilience center openings, and safety instructions. Provide this information virtually and in frequented public locations, such as libraries, with printouts of the necessary links and numbers residents may call, text, or search for additional information on emergencies and evacuation routes. Collaborate with County departments and agencies that work closely with the public, such as Health Services, to disseminate information. (SE-2a, SE-4h)
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- 27** Address language and accessibility barriers to emergency alert programs and emergency preparedness resources by ensuring County emergency response operations follow the County of Sonoma's Language Access Plan and require that contractors hired by the County follow the County's Language Access Plan. (SE-4h)
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- 28** Provide information and handouts on preparedness resources and procedures at County events and tabling opportunities. (SE-1e, SE-4h)
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- 29** Identify funding to acquire additional sources of backup power, power storage, and/or onsite power generation for critical facilities and services, and resilience centers. (SE-5a)
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- 30** Conduct a feasibility study to identify potential areas to install neighborhood microgrids and battery energy storage facilities to improve electricity grid resilience. Prioritize areas with systemically vulnerable communities. (SE-5a)
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- 31** Work with utility providers to establish and adhere to standards for maintaining defensible space around critical infrastructure such as power lines, electrical substations and other energy facilities, cell phone towers and communications facilities, broadband infrastructure, water pipelines, reservoirs, waste water facilities, solid/hazardous waste facilities, and recycling facilities. (SE-5b)
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- 32** Continue to regularly assess County-maintained roads and facilities and conduct any needed vegetation clearing or maintenance to ensure defensible space is maintained. (SE-5b)
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- 33** Conduct a study to identify County transportation infrastructure that is critical for the provision of emergency services such as evacuation, or that provide access to critical facilities that are located within high-risk wildfire, landslide, or flood hazard areas. Integrate information into a GIS-based database for critical transportation infrastructure to incorporate into emergency plans and to help prioritize and track improvements and upgrades. (SE-5c)
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- 34** Identify strategies for near- and long-term hardening/resilience projects of critical transportation infrastructure, especially those needed for the continuation of critical services in highly impacted and systemically vulnerable communities during climate hazards. Hardening projects may include widening evacuation routes, strengthening bridges, raising drainage and creek crossings, repaving flood-prone roads with permeable pavement, regular hazardous fuels clearing, and other projects and maintenance activities. (SE-5c)
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- 35 Using the countywide Community Engagement Plan as a guide, increase participation of community members in small and isolated rural communities in emergency planning and decision-making processes and disaster preparedness events. Strategies should include locating engagement events in small and isolated rural communities, timing events outside of work hours, providing child-friendly options at the events, running bilingual engagement events, and providing tangible resources to improve self-sufficiency and disaster preparedness when feasible. (SE-1f, SE-5d)
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- 36 Conduct a detailed assessment of vulnerability and risks to County-owned critical facilities and infrastructure from all hazards and climate change impacts, and identify adaptation and resilience strategies to reduce risks and ensure continuity of services. Integrate findings and recommended projects into the Capital Improvement Plan. (SE-2.5, SE-12g)
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- 37 Identify and apply for funding that may be used for capital improvements necessary for emergency response. Explore funding sources that could be used for assessment or physical improvements of critical facilities and infrastructure throughout the county. Prioritize capital improvements that serve the greatest number of people and systemically vulnerable communities, and that allow existing facilities to be used during emergency events. (SE-5f)
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- 38 Conduct a programmatic equity impact assessment with each update to the County's Capital Improvement Plan. Gain input from community leaders of systemically vulnerable communities to ensure the equity impact assessment addresses concerns meaningfully. This can be achieved by organizing community forums and focus groups, conducting surveys, and holding one-on-one interviews. (SE-5g)
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- 39 During the comprehensive update to the Sonoma County General Plan, review existing land use designations for public facilities in relation to planned critical facilities, evacuation routes, and hazard areas. Work with Sonoma Public Infrastructure and the Department of Emergency Management to identify necessary changes to the land use map to accommodate planned projects. (SE-5i)
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- 40 Continue the existing Auxiliary Communication Service program to supplement government emergency communications with professional, unpaid volunteer staff. (SE-6a)
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- 41 Assess new technologies and seek funding as needed to upgrade County emergency response communications equipment. (SE-6c)
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- 42 Work with the federal Cybersecurity & Infrastructure Security Agency to obtain free telecommunications priority services by enrolling in programs such as Wireless Priority Service (WPS) or the Government Emergency Telecommunications Service (GETS). Notify County public safety partners of the availability of these programs. (SE-6c)
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- 43 Evaluate zoning requirements and explore opportunities to streamline the permitting process for new or modified telecommunication and broadband facilities. Explore the development of guidelines for microtrenching to support broadband deployment without harming infrastructure. (SE-6d)
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- 44 Coordinate with the Economic Development Collaborative's Access Sonoma Broadband initiative to expand and improve wireless broadband services in the county. (SE-6e)
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- 45 Identify and map public roads in the State Responsibility Area that do not meet the standards of the State Fire Safe Regulations. Make the map publicly available on the County's online GIS mapping hub. (SE-7a)
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- 46 Review and evaluate the County's existing defensible space and vegetation management regulations in Sonoma County Code Chapter 13A (Duty to Maintain Defensible Space and Abate Hazardous Vegetation and Combustible Material) to identify amendments to better align the regulations with State legislation and current industry research. (SE-7h)
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- 47 Continue the work of the Resilience Coordination Team, led by the County Administrator's Office, and its corresponding technical advisory committees and/or working groups to coordinate the scope, organization, management, and funding mechanisms of wildfire resilience programs, projects, and initiatives across County departments, agencies, and partners. (SE-7c, SE-7d, SE-7j, SE-9b, SE-9g)
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- 48 Actively seek grant funding for defensible space and vegetation management projects. Coordinate project identification, prioritization, and selection with the County Resilience Coordination Team (Program SE-14.11.1). (SE-7c, SE-7d, SE-7j, SE-9b, SE-9g)
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- 49 Working through the Resilience Coordination Team (Program SE-14.11.1), conduct an assessment of regulatory barriers to vegetation management activities and identify opportunities for streamlining, including the use of the California Vegetation Treatment Program (CalVTP) and Program Environmental Impact Report for eligible projects in the State Responsibility Area. The assessment should recommend updates to Sonoma County Code, plans, or policies to reduce barriers. (SE-7j, SE-7m)
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- 50 Publish on the County's website information, resources, and guidance to assist development applicants with complying with the County's Fire Safe Standards (Sonoma County Code Chapter 13, Article V) and the State Fire Safe Regulations, including instructions on the process for applying for exceptions to standards. (SE-8c)
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- 51 Track Exceptions to Standards with Same Practical Effect Determinations made by the Director and County Fire Marshal pursuant to State Minimum Fire Safe Regulations (Title 14, California Code of Regulations (CCR), Division 1.5, Chapter 7, Subchapter 2) through the publicly available permit information and parcel history available through Permit Sonoma. (SE-8c)
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- 52 Review and update as necessary relevant County Code sections and application submittal checklists to require fire protection plans for all discretionary development projects in High and Very High Fire Hazard Severity Zones in both the Local and State Responsibility Areas. Required plans shall include a site-specific risk analysis and address fire response capabilities, compliance with fire safety requirements including but not limited to defensible space, access and water supply, building materials and site design, emergency preparedness and evacuation plans, property maintenance, and other hazard and risk reduction measures. Risk reduction measures should be incorporated into project design or conditions of approval. (SE-8g)
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- 53 In partnership with Fire Safe Councils, local fire agencies, CAL FIRE, and other community groups and agencies, implement a public information campaign in multiple languages and through multiple forms of media on defensible space, home hardening, and vegetation management. Educational materials should discuss the risk reduction impact, regulatory requirements, and resources available to support property owners and renters on implementing hardening or fuels reduction activities. (SE-7d, SE-9c)
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- 54 Develop fire-safe landscaping guidelines, including native, fire- and drought-resistant plant palettes and defensible space measures. (SE-7d, SE-9c)
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- 55 Explore the feasibility of a pilot program to provide emergency towing services during flood events for travel trailers occupied by tenants renting space in RV or mobile home parks sited in flood hazard areas to reduce damage or loss of housing units. (SE-10b)
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- 56 Secure funding to establish the Countywide Flood Risk Assessment Management Partnership as recommended by the 2024 Countywide Flood Risk Management Assessment Project report. The Partnership, composed of organizations and agencies with flood risk management roles and responsibilities in Sonoma County, should meet quarterly to build relationships across flood risk management functions and jurisdictions, facilitate interorganizational communication, and carry out the recommendations identified in the 2024 Assessment report related to policies and standards; monitoring, modeling, and decision support; stream maintenance; and communication and community engagement. (SE-10c)
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- 57 Develop a systematic approach for conducting proactive technical review on Sonoma County waterways for the purpose of updating the Flood Insurance Rate Maps (FIRMs) through collaboration with the Federal Emergency Management Agency (FEMA). (SE-10c)
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- 58 Secure funding to conduct a flood risk and vulnerability assessment then prepare a flood mitigation and adaptation plan for the Russian River watershed to develop long-term strategies to reduce repetitive flood losses and build flood resilience. The plan should include systematic collection of flood data and damage, community engagement and outreach, and coordination with relevant partner agencies and jurisdictions. The mitigation and adaptation plan should consider strategies such as the acquisition of properties in flood hazard areas; an ongoing flood elevation program; permit fee reductions for structure elevations; floodplain conservation and restoration; updates to policies and
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regulations; and site- or area-specific projects. The planning process should evaluate potential upstream improvements that could expand flood storage capacity and existing regulatory barriers to flood prevention projects. (SE-10c, SE-10d)

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- 59** Update the County website to expand on and integrate existing informational resources to create a comprehensive public information program on flood and inundation hazards, risk reduction resources, and the importance of watershed management. (SE-10f)
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- 60** Secure funding to identify, evaluate, and prioritize conservation projects to implement on County-owned lands to mitigate flooding, drought, and sea level rise. (SE-11a, SE-14c, SE-14g, SE-16g)
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- 61** Review Sonoma County Code Chapter 7B Flood Damage Prevention Ordinance) and Chapter 26 (Zoning), including standards for construction or fill in special flood hazard areas and regulations limiting the reconstruction of non-conforming uses, to identify potential code amendments necessary to support the replacement of damaged or destroyed resident-serving businesses and services in repetitive loss, flood-prone areas to ensure that communities continue to have access to daily resources and services, such as grocery stores. Proposed code amendments should support existing residents and businesses while continuing to implement necessary floodplain management regulations to maintain compliance with the National Flood Insurance Program and provide for adequate retention of floodplain capacity and protection for structures located within special flood hazard areas. (SE-10e, SE-10g, SE-11f)
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- 62** Adopt Appendix A of the California Existing Building Code entitled Guidelines for the Seismic Retrofit of Existing Buildings. (SE-12b)
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- 63** Update the County Code to require geologic hazard assessments or geotechnical reports for new development within or in close proximity to geologic or seismic hazards, including landslide, ground rupture, liquefaction, and ground shaking areas. (SE-12d)
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- 64** Explore the deployment of advanced monitoring technologies to detect early signs of landslides and review existing response protocol. (SE-12i)
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- 65** Using the County's existing inventory of unreinforced masonry buildings, conduct outreach to property owners to gather and confirm data on existing unreinforced buildings. Then apply for grant funding from sources like the California Office of Emergency Services to conduct a seismic retrofit feasibility study, adopt an ordinance requiring the strengthening and/or retrofitting of unreinforced masonry buildings, and fund necessary retrofits for identified structures in the county, prioritizing retrofits to buildings in systemically vulnerable communities. (SE-12c, SE-12p)
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- 66** Maintain existing hazardous materials programs administered by the County's Hazardous Materials Unit acting as the Certified Unified Program Agency (CUPA). Provide program information on the County website. (SE-13b)
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- 67** Update the County website and provide resources to educate residents and businesses about integrated pest management principles and ways to reduce or discontinue the use of pesticides and herbicides on their property. (SE-13c)
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- 68** Develop a maintenance program for all County facilities that specifies the least toxic maintenance methods and materials. (SE-13c)
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- 69** Update the relevant pages of the County's website to include information about common household chemicals or items that can be hazardous, such as electronic cigarettes, and that require safe disposal practices. Include the common examples of household hazardous wastes list generated by the Zero Waste Sonoma, safer alternatives, and information on resources and programs for safe disposal. (SE-13c, SE-13e)
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- 70** Continue to use data from sources like the California Department of Toxic Substances Control to ensure buildings and sites have been adequately remediated prior to development or redevelopment. If there is reason to believe an existing building or site may contain hazardous materials that pose a threat to occupants, require investigation for the presence of hazardous materials or contamination and risk evaluation prior to development. Continue to require remediation and construction techniques as conditions of approval where necessary for adequate protection of construction workers, future occupants, adjacent residents, and the environment from hazards associated with contamination. (SE-13f)
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- 71** Prepare updated sea level rise and coastal hazard assessments and adaptation plans for the Sonoma County outer-coast, San Pablo Bay and Petaluma area shorelines based on the best available science and State guidance, and in compliance with State legislation (Public Resources Code Section 30985) and the directives of the Local Coastal Plan. The assessments and plans shall evaluate vulnerability and identify adaptation strategies, including policy recommendations and potential projects for private development, critical public facilities, infrastructure and land, and natural ecosystems. Coordinate with the City of Petaluma, Coastal Commission, and the San Francisco Bay Conservation and Development Commission on this effort. (SE-14c, SE-14g)
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- 72** In coordination with the local Groundwater Sustainability Agencies, study, monitor, develop, and implement a plan to mitigate the impacts to groundwater from saltwater intrusion resulting from sea level rise and storm events based on the best available science. (SE-14d)
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- 73** Complete an analysis of physical locations and County-owned assets within the County that have the potential to serve as resilience centers, in coordination with community-based organizations that serve systemically vulnerable communities. Identify opportunities to establish new resilience centers or expand the functionality of existing centers. Develop a searchable database, accessible across all county departments, of all County-owned facilities that can function as resilience centers, and update regularly to reflect improvements and retrofit or hardening efforts. (SE-15a)
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- 74** Coordinate with local transit providers to publicize transit options to reach resilience centers during emergency events. (SE-15b)
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- 75** Secure grant funding to work with the community to identify and map existing community facilities that could serve as potential resilience centers in partnership with the County. Document existing conditions, capabilities, and resources of each facility such as air conditioning, heat pumps, air filters, backup power, or emergency supplies. (SE-15d)
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- 76** Update the County Code to establish permitting, design, development, and operation standards for temporary resilience centers on private property. Use community input to inform the Code update. (SE-15e)
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- 77** Use County communication channels to promote methods of safe energy conservation during extreme heat events in alignment with energy providers' messaging. Share information on improvements that are low-cost and low-effort, such as caulking, door sweeps, portable fans, and home window insulation. (SE-15g)
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- 78** Update the County Code to require parking lots for new commercial uses to incorporate cooling strategies such as landscaping or shade structures. Enforce requirement during application review, providing flexible options for compliance. (SE-15h)
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- 79** Maintain and regularly convene the Sonoma County Drought Task Force, led by the Department of Emergency Management with support from Sonoma Water, in compliance with California Water Code Section 10609.70. The Task Force shall proactively coordinate with public agencies, private agencies, and community organizations that have roles in drought preparedness and response on conditions monitoring, hazard and risk assessments, contingency planning, and water resources management. The Task Force shall monitor drought conditions, weather, and water availability; identify and support the pursuit of State and federal drought resources and funding; and during periods of drought, provide public report outs on drought impacts to agriculture, industry, government, wildlife, tourism, health, and other areas. (SE-10a, SE-10b, SE-10c, SE-10d)
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- 80** Review and evaluate the Sonoma County Code and development design guidelines for opportunities to require or incentivize low impact development, recycle and greywater use, rainwater capture, water-efficient landscaping, and other water conservation measures. Explore the development of pre-approved design details for low impact development or greywater systems to reduce costs to applicants. (SE-16j, SE-16k)
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- M.1** Periodically review and update as necessary the General Plan to include new information related to climate adaptation and resiliency strategies and geologic and seismic, flooding and inundation, and wildfire hazards, as required by Government Code Section 65302.15. Continue to use data from appropriate agencies and research institutions to inform the Safety Element. Make hazard maps available to the public and maintain and share hazard data across departments and agencies. (SE-9a, SE-10a, SE-12a)
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M.2 When updated or new hazard maps that impact land use and development regulations are produced by state or federal agencies, notify property owners that are directly impacted by changes. Hazard maps include but may not be limited to Earthquake Fault Zones mapped by the California Department of Conservation, Fire Hazard Severity Zones mapped by the State Fire Marshal, and Special Flood Hazard Areas mapped by the Federal Emergency Management Agency. (SE-9a, SE-10a, SE-12a)

While it is clear in the above table that most of the implementation programs could not have a significant effect on the environment, where it is applicable CEQA review will be conducted before the program action is undertaken. The scope of this Addendum is limited to the programmatic goals and policies of the proposed Safety Element Update, consistent with the GP2020 Program EIR.

3.1.4 Changes to GP2020 Public Safety Element Implementation Plan

The existing Public Safety Element has eleven implementation programs. Ten of these programs were approved when GP2020 was adopted in 2008; Program 11 (Implement Sonoma County Hazard Mitigation Plan) was added in 2014 in the technical update. Program 6 (Unreinforced Masonry Buildings) is carried forward in the Safety Element Update, in a modified form. The current status of each program is shown in Table 4. Where applicable, such as with Programs 8 (Zero Net Fill) and 11 (Local Hazard Mitigation Plan), implementation actions were subject to CEQA review.

Table 4. General Plan 2020 Public Safety Element Implementation Programs and Current Status

GP2020 Public Safety Element Program	Program Description and GP2020 Policy Reference	Status
1. Safety Hazards Information System	Log and maintain records of all mapping and reports regarding geologic and flood hazards information prepared for project applications and by other sources. Use the information in assessing constraints (Policies PS-1a, 1b, 1c, 2a, 2b).	Ongoing and incorporated into 2025 Safety Element Update.
2. Drainage, Erosion & Fire Safety Standards for Subdivisions	Prepare amendments to Chapter 25 of the Sonoma County Code to clarify standards for drainage, erosion control, and fire safety (Policies PS-2n, 2v, 3c).	Grading ordinance adopted 2009. Fire Safe Standards address fire safety.
3. Hazard Materials Incident Response Plan	Maintain the Sonoma County Operational Area Hazardous Materials Incident Response Plan addressing prevention of and response to releases of hazardous materials and the proper disposal of hazardous wastes (Policy PS-4g).	Ongoing; Operational Area Hazardous Materials Incident Response Plan is now called the Hazardous Materials Area Plan.
4. Fire Sprinkler Ordinance	Prepare and adopt an ordinance requiring automatic sprinkler or other on-site fire detection and suppression systems in new residential and commercial structures (Policy PS-3l).	Completed
5. Public Facility Recovery Plan	Develop a strategic plan for recovery of essential public facilities following disasters, particularly earthquakes (Policy PS-1n).	A Continuity of Operations Plan is included in County's Emergency Operations Plan.
6. Unreinforced Masonry Buildings	Prepare and adopt an ordinance requiring strengthening and/or reinforcement of unreinforced masonry buildings, except residential structures, that would consider the cost of the work and the value, frequency of use, and level of occupancy of the buildings (Policy PS-1o).	Carried forward to 2025 Safety Element Update; see Implementation Programs
7. Reduction of Russian River Flood Damage	Develop a comprehensive plan addressing flood losses in the Russian River (Policy PS-2d).	Emergency Management regularly updates the Incident Response Plan. Emergency Management prepared a Russian River Flood Plan in March 2023, which addresses resident warning, life safety,

		and timely evacuation procedures.
8. Zero Net Fill Ordinance	Prepare and adopt an ordinance addressing zero net fill requirements in all areas of the unincorporated County subject to the 100-year FEMA special flood hazard areas (Policy PS-2e).	Completed
9. Reduction of Petaluma River Flood Damage	Cooperatively with the City of Petaluma, initiate a program to identify existing risks and implement regional flood reduction projects within the Petaluma Subbasin (Policy PS-2h).	Ongoing. Sonoma Water working partnership with City of Petaluma.
10. Street Addressing Improvements	Develop a program to improve countywide street addressing in order to reduce emergency response times (Policy PS-3h)	Program developed; implementation ongoing. (See 2025 draft Policy SE-7k)
11. Implement Sonoma County Hazard Mitigation Plan	Implement mitigation measures and actions identified in the Sonoma County Hazard Mitigation Plan to the degree possible based on their priority and available funding. Update the plan and monitor mitigation progress on an ongoing basis as required by law.	Partially completed; ongoing. The County's current Hazard Mitigation Plan was adopted by the Board of Supervisors in 2021.

4 Analysis

4.1 Legal Standards

The GP2020 EIR is a Program EIR, prepared in compliance with CEQA and the CEQA Guidelines. A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related, including geographically or in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program. (CEQA Guidelines, § 15168(a).) An agency must examine later activities in the program in light of the Program EIR to determine whether a further CEQA document must be prepared. (Ibid. at subd. (c).) If the agency finds that no subsequent EIR would be required pursuant to CEQA Guidelines Section 15162, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. (Id. at subds. (c), (c)(2).) Guidelines Section 15168, subd. (c), explains that whether a later activity is within the scope of a program EIR is a factual question for the lead agency, based on substantial evidence in the record. Section 15168 enumerates factors that the lead agency may consider in its determination, including “consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.” (Id. at subd. (c)(2).) Feasible mitigation measures developed in the Program EIR must be incorporated into later activities in the program. (Id. at subd. (c)(3).)

Under Public Resources Code Section 21166 and CEQA Guidelines Section 15162, when an EIR has been certified for a project, no subsequent EIR shall be prepared for the project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, that one or more of the following has occurred:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Under Public Resources Code Section 21166 and CEQA Guidelines Section 15162, no subsequent EIR shall be prepared for the project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (4) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (5) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (6) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR ;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

4.2 Comparison of the Safety Element Update to the conditions listed in CEQA Guidelines Section 15162

The proposed Safety Element Update is a program-level policy document. 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 Safety Element that could have a significant effect on the environment, if any, would be subject to all applicable CEQA review.

For purposes of the analysis in this Addendum, General Plan 2020 and the General Plan 2020 Public Safety Element are the “Original Project” that is proposed to be revised; the proposed Safety Element Update is the “Revised Project.”

The discussion below addresses each of the primary conditions set forth in CEQA Guidelines 15162 as they relate to the Safety Element Update.

- 1. Are substantial changes proposed in GP2020 that will require major revisions to the GP2020 EIR, due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects?*

Adoption of the Safety Element Update will not cause new or substantially increased significant environmental effects, beyond those already identified in the GP2020 EIR. The proposed Safety Element carries forward the mitigation measures and mitigating policies in the current Public Safety Element, and adds new policies that either complement the effectiveness of the existing policies, or clearly would cause no effect on the environment. These changes are not “substantial changes” requiring “major revisions” to the GP2020 EIR.

As noted in the background section on the General Plan 2020 EIR, one of the foundations of the EIR’s analysis of the environmental effects of project buildout was its assumptions about population growth through 2020. The EIR projected that the population of Sonoma County as a whole would increase from 458,614 in 2000 to 546,030 residents in 2020, and that the unincorporated area population would increase from 128,596 in 2000 to 147,660 residents in 2020.⁸

Sonoma County’s population remains well below the population projected by the GP2020 EIR. The annual State Department of Finance (DOF) population estimates for Sonoma County show that Sonoma County’s population today remains well below the population projected for 2020 by the GP2020 EIR. In its May 2025 *Population and Housing Estimates for Cities, Counties, and the State*, DOF provisionally

⁸ Ibid.

estimated that on January 1, 2025, the countywide population was 482,848 and the unincorporated area population was 130,801.⁹

As discussed above, in the CEQA Findings of Fact adopted for General Plan 2020, the Board of Supervisors addressed each of GP2020's significant and unavoidable impacts, as well as impacts reduced to less than significance through mitigation or by design of the mitigating policies. The Safety Element Update retains each of the GP2020 policies that is discussed as contributing to reducing the significance or severity of an impact pertinent to the Safety Element. The Safety Element Update will not cause new or substantially more severe significant environmental effects, beyond those already identified in the GP2020 EIR.

2. *Have substantial changes occurred in the circumstances under which the project is being undertaken that will require major revisions in General Plan 2020 EIR?*

No substantial changes have occurred in the circumstances under which the project is being undertaken that will require major revisions in the General Plan 2020 EIR. The "project" is General Plan 2020, and General Plan 2020 as amended by the Safety Element Update. The General Plan is a policy-level document that applies countywide. Countywide population remains less than the population that GP2020 EIR projected for General Plan buildout.

3. *Has new information of substantial importance to the project, that was not known and could not have been known when the EIR was certified, become available?*

There is no new information of substantial importance to the project, that was not known and could not have been known when the EIR was certified. New regulations and new regulatory maps are not "new information" within the meaning of Guidelines Section 15162. (*Olen Props. Corp. v. City of Newport Beach* (2023) 93 Cal. App. 5th 270, 280-81; *Concerned Dublin Citizens v. City of Dublin* (2013) 214 Cal.App.4th 1301, 1318–132.) Information about the impacts of greenhouse gases and climate change are not new information if the issue was known and could have been raised before the original EIR was certified. (See *Citizens for Responsible Equitable Environmental Development v. City of San Diego* (2011) 196 Cal. App. 4th 515 [new information on greenhouse gases and climate change did not trigger Subsequent EIR because issue could have been raised in 1994 when city considered Final EIR]; *Citizens Against Airport Pollution v. City of San Jose* (2014) 227 Cal. App. 4th 788 [impacts of greenhouse gas emissions did not constitute new information].) General Plan 2020, the GP2020 EIR, and the Board's CEQA findings extensively addressed climate change. Similarly, severe wildfire hazards were recognized and addressed in the GP2020 EIR. To establish "new information" as a ground for requiring preparation of a subsequent EIR, the information must be both "of substantial importance" and "not known and could not have been known with the exercise of reasonable diligence at the time GP2020 was certified. (CEQA Guidelines Section, § 15162(a); *Citizens for a Megaplex-Free Alameda v. City of Alameda* (2007) 149 Cal. App. 4th 91, 113.)

The revised and new policies and programs in the Safety Element Update would not result in changes to the physical environment or approval of any development project.

⁹ State of California, Department of Finance, *E-1 Population Estimates for Cities, Counties and the State with Annual Percent Change — January 1, 2024 and 2025*. Sacramento, California, May 2025.

5 Conclusion

No substantial changes are proposed in the project (again, defined as the existing General Plan and Public Safety Element), and there are no substantial changes in the circumstances under which the updated project will be undertaken, that will require major revisions to the GP2020 EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. There is no "new information of substantial importance," as provided in CEQA Guidelines Section 15162(a)(3). The Safety Element Update is a programmatic document that will not result in any direct or indirect physical change in the environment. Therefore, based on all the information in this Addendum and incorporated by reference in this Addendum, the County of Sonoma has determined that the GP2020 EIR is adequate for adoption of the Safety Element Update, and no subsequent or supplemental CEQA review is necessary or appropriate. The Addendum documents the County's basis for this determination, pursuant to Guidelines Sections 15162 and 15164. No additional CEQA documentation is required.

6 Documents incorporated by reference

The GP2020 Final EIR evaluated impacts associated with General Plan 2020, including cumulative impacts associated with future development occurring under the General Plan. The Final EIR is made up of three volumes: Vol. 1 (Introduction to Comments and Responses; List of Agencies/Persons Commenting; Comment letters), Volume 2 (Master Responses and Responses to Comments); and Volume 3 (Draft EIR), plus technical appendices. General Plan 2020 was adopted by Board of Supervisors Resolution No. 08-0808, and the Final EIR for GP2020 was certified by the Board via Resolution No. 08-0807. General Plan 2020 The Public Safety Element was updated in 2014, via Board of Supervisors Resolution No. 14-0355, and amended in 2018, via Board of Supervisors Res. No. 18-0535. All of the documents referenced in this paragraph are incorporated into this Addendum by reference, including any attachments, exhibits, technical reports and appendices, and documents incorporated by reference, consistent with CEQA Guidelines Section 15150. The incorporated documents are hyperlinked in References, below.

7 References

[Final EIR for Sonoma County General Plan 2020, Volume 1](#) (Introduction to Comments and Responses; List of Persons and Agencies Commenting; Comment Letters)

[Final EIR for Sonoma County General Plan 2020, Volume 2](#) (Master Responses; Responses to Comments)

[Draft EIR for Sonoma County General Plan 2020](#) (Vol. 3 of Final EIR Sonoma County General Plan 2020)

[Sonoma County General Plan 2020](#)

[Sonoma County General Plan 2020 Public Safety Element](#) (as updated 2014)

[Board of Supervisors Resolution No. 08-0807](#) (September 23, 2008), certifying the Final EIR for General Plan 2020

[Board of Supervisors Resolution No. 08-0808](#) (September 23, 2008), adopting General Plan 2020 and making the findings required by CEQA

[Board of Supervisors Resolution No. 14-0355](#) (September 9, 2014), amending General Plan 2020 to adopt a technical update to the Public Safety Element and finding the update within the scope of the GP2020 EIR

[Board of Supervisors Resolution No. 18-0535](#) (December 11, 2018), amendment to GP2020 Public Safety Element adding new Policy PS-1p, modifying local geologic report requirements for reconstruction of single-family homes located in the Alquist-Priolo Earthquake Fault Zone and destroyed in the 2017 Sonoma Complex Fires.

State of California, Department of Finance, [E-1 Population Estimates for Cities, Counties and the State with Annual Percent Change — January 1, 2024 and 2025](#). Sacramento, California, May 2025.