



SUMMARY REPORT

Agenda Date: 8/12/2025

To: Sonoma County Board of Supervisors

Department or Agency Name(s): Permit Sonoma

Staff Name and Phone Number: Scott Orr, Interim Director (707) 565-1754, Katrina Braehmer, Supervising Planner (707) 565-1903

Vote Requirement: Majority

Supervisory District(s): All

Title:

10:45 A.M. Adoption of the General Plan 2020 Safety Element Update and a New Environmental Justice Element (Permit Sonoma File No. GPA25-0001)

Recommended Action:

Conduct a public hearing and, after closing the public hearing:

- A. Adopt a Resolution amending the Sonoma County General Plan to repeal the current Public Safety Element and adopt the Safety Element Update, and adopting an addendum to the General Plan 2020 Environmental Impact Report; and
- B. Adopt a Resolution amending the Sonoma County General Plan to adopt the Environmental Justice Element and finding adoption of the Environmental Justice Element exempt from the California Environmental Quality Act (CEQA) under CEQA Guidelines Section 15061(b)(3).

Executive Summary:

The General Plan is a planning and policy document that guides land use, physical development, and public action through a set of goals, policies, and implementation measures. State law establishes timeframes for updates to certain general plan elements. The County is required to update the Safety Element and develop a new Environmental Justice Element in advance of the comprehensive General Plan Update that is in the early stages of development to comply with the state-mandated timeframes.

The Safety Element Update aims to reduce the potential short- and long-term risks to the community resulting from fires, floods, geologic and seismic hazards, and climate change hazards. The new Environmental Justice (EJ) Element will advance health in low-income areas that are disproportionately affected by pollution and other environmental burdens, called Environmental Justice Communities.

Following a robust planning process and community engagement, draft elements were released for a public review period from March 28, 2025 to April 30, 2025. Public input was considered and incorporated into the elements as feasible before presentation to the Planning Commission. On June 5, 2025, the Planning Commission considered the Safety Element Update and voted 4-0-1 to recommend approval of the update. On July 10, 2025, the Planning Commission considered the new Environmental Justice Element and voted 5-0 to recommend approval with minor recommended modifications to policy and program language. The Safety

Element was also reviewed and approved by the State Board of Forestry and Fire Protection on July 22, 2025.

Staff recommends that the Board of Supervisors approve an amendment to the Sonoma County General Plan to adopt the Safety Element Update and Environmental Justice Element.

Discussion:

Background

General Plans reflect community values, set the vision for future growth, and guide land use, housing, job creation, natural resource management, and social and economic equity. General plans are typically structured by topical elements such as Land Use or Open Space, each with a set of goals, policies, and implementation measures. A policy is a specific statement that guides decision-making and commits the County to a particular course of action to achieve a related goal. Policies are required to be implemented through actions and programs. Zoning and subdivision ordinances are the primary regulatory tools used for implementing general plans, although general plans often provide the framework for other local regulations such as building and fire codes.

General Plan Update Timeline

The County's existing general plan (called "General Plan 2020") has served our community since 2008. Certain general plan elements are required by state law to be updated at established frequencies, including the general plan housing element and safety element. Additionally, when two or more general plan elements are updated, state law requires the County to develop an environmental justice element. Because the County's Housing Element update was completed in 2023, the County is required by law to update the Safety Element and either develop a standalone environmental justice element or integrate environmental justice policies and programs into other elements.

Concurrently, Permit Sonoma has initiated a comprehensive update to the Sonoma County General Plan (called "General Plan Sonoma"). Permit Sonoma has recently completed a year of related engagement focused on community visioning and will report out to the Board of Supervisors prior to moving into policy development and environmental review. Because the comprehensive General Plan Update will be a multi-year process, Permit Sonoma seeks to complete the safety and environmental justice updates to General Plan 2020 in August 2025 to adhere to state-mandated deadlines. The primary objective for these interim updates is to comply with state requirements in a timely manner.

Once adopted, the Safety Element Update and Environmental Justice (EJ) Element are expected to require modest revisions as part of the comprehensive General Plan Update to ensure consistency across elements and make any necessary technical updates. The comprehensive update process will provide further opportunities for community input on the topics addressed in the Safety and EJ Elements as the County takes a holistic look at its land use and development policy. New or revised policies and programs for the Safety and EJ Elements may be proposed with the comprehensive update.

Board of Supervisors Workshop July 2024

During the July 23, 2024 workshop on the General Plan 2020 Public Safety Element Update and New Environmental Justice Element, the Board provided direction on the Safety Element for staff to consider policy approaches to incorporate disaster recovery and the need for warming and cooling centers; conduct additional evacuation analyses, and emphasize emergency preparedness and risk avoidance. In response, the

draft Safety Element includes a full section dedicated to emergency preparedness, response and recovery, policies and implementation measures to support improved evacuation and the further study of evacuation constraints, and policies and implementation measures that emphasize reducing and avoiding risks across all hazards.

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

County Department/Agency Review

Staff consulted the following County departments, agencies, and special districts to discuss the feasibility and appropriateness of early draft policies and implementation measures: County Administrator's Office, Department of Emergency Management, Sonoma Public Infrastructure, Office of Equity, Regional Parks, Sonoma Water, Department of Health Services, Human Services Department, Community Development Commission, Department of Agriculture/Weights & Measures, Economic Development Collaborative, Sonoma County Agricultural Preservation and Open Space District, the Sonoma County Transportation Authority/Regional Climate Protection Agency, and the Sonoma County Local Agency Formation Commission. In coordination with these departments and agencies, the County refined the early draft policies and implementation measures, and these revisions were incorporated into the public review drafts of both elements released for comment from March 28, 2025 to April 30, 2025.

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

Community Engagement

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

Staff designed a range of other engagement activities to make participation accessible and inclusive, including three focus groups with external community-based stakeholders, three focus groups with county staff, 11 community event pop-ups and community/neighborhood meetings, an online survey that garnered over 550

responses, and meetings with the County's eight Municipal and Citizens Advisory Councils/Commissions. Except for the focus groups, which were element-specific, all engagement activities provided information about and opportunities for public input on both elements. The community events and meetings were chosen based on their location within Environmental Justice Communities and likelihood of attendance by underrepresented communities to lower the barrier to participation by meeting people where they are. Across all activities, input was accepted verbally or in writing. Most activities had informational and activity-related materials available in Spanish, Spanish-speaking staff available, or live Spanish interpretation to ensure community members had the option to engage in a language they felt comfortable in.

Written summaries of most engagement activities for both the EJ Element and Safety Element Update are included as Appendix B to the draft EJ Element (Attachment 2, Exhibit A). Summaries of the remaining engagement activities, including responses to the online survey related to climate adaptation and resilience and the Safety Element stakeholder focus groups, are included in Appendix A to the draft Safety Element (Attachment 1, Exhibit A).

Proposed Safety Element Update

State law requires safety elements to protect the community from unreasonable risks associated with a variety of hazards, including geologic and seismic hazards such as landslides and ground shaking from earthquakes, flooding, and wildland and urban fires (Government Code Section 65302(g)(1) through (3)). Safety elements must identify areas at risk and establish goals, policies, and implementation measures to avoid or minimize risks, protect essential public facilities, design adequate infrastructure, and work cooperatively with agencies responsible for hazard protection.

Since the 2014 update to the County's Safety Element, changes to state law now require that safety elements assess vulnerability to climate change impacts and establish related adaptation and resilience strategies. Other new requirements include the identification of residential developments that do not have at least two emergency evacuation routes (Government Code Section 65302(g)(5)), and identification of evacuation routes and their capacity, safety, and viability, and evacuation locations under a range of emergency scenarios (Government Code Section 65302.15).

Three technical assessments were prepared for the Safety Element to comply with state law and inform the policies and implementation measures, and are included as appendices to the element: a *Climate Change Vulnerability Assessment* (Appendix A); a *Residential Egress Assessment* (Appendix B); and an *Evacuation Routes and Locations Assessment* (Appendix C).

The *Climate Change Vulnerability Assessment* (Safety Element Appendix A) follows the methodology put forth by California Governor's Office of Emergency Services in the California Adaptation Planning Guide and provides a high-level evaluation of potential climate change impacts on community members rendered vulnerable by systemic inequities; parks and natural resources; agriculture; and critical facilities, buildings, services, and infrastructure in unincorporated Sonoma County. The findings from this assessment informed the development of climate adaptation goals, policies, and implementation measures in the draft Safety Element.

The *Residential Egress Assessment* (Safety Element Appendix B), prepared to comply with Government Code Section 65302(g)(5), identifies residential developments in hazard areas that lack at least two emergency

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

The *Evacuation Routes and Locations Assessment* required by Government Code Section 65302.15 (Safety Element Appendix C) evaluates roadway capacity and the time required to evacuate geographically large areas under current and projected future population conditions in three scenarios. The modeling results show areas of the county road network that could be heavily congested during the evacuation scenario under the specific assumptions used, and the time it would take for traffic to return to free flow conditions. These results should be viewed as sources of information and not a complete picture of evacuation considerations within the county.

The Safety Element Update calls for additional evaluation of evacuation constraints to inform future planning and hazard mitigation efforts in Policy SE-2i and Implementation Program 2.

Safety Element Issue Areas

The draft Safety Element includes ten topic areas:

1. Emergency Preparedness, Response, and Recovery (New)
2. Equitable Community Safety (New)
3. Resilient Facilities and Infrastructure (New)
4. Wildland and Structural Fires
5. Flood and Inundation
6. Geologic and Seismic Hazards
7. Hazardous Materials
8. Sea Level Rise (New)
9. Air Quality and Extreme Temperatures (New)
10. Drought (New)

Each topic area includes one or more goals and related policies to help achieve the goal. The Safety Element Update also includes an implementation plan, with specific measures or actions to carry out the policies. The draft provides updated maps of hazard areas based on the latest available data, context on each topic including relevant local, state, or federal regulations, and new and amended goals, policies, and implementation measures. The draft carries forward many of the policies from the 2014 Public Safety Element, includes new strategies to address the new topic areas (e.g. climate change hazards), and incorporates related

planned and ongoing County department and agency work. Since the last update to the Safety Element in 2014, the County has made significant investments in emergency planning and hazard mitigation following the 2017 wildfires and subsequent fire and flooding events. The Safety Element Update reflects these investments, lessons learned over the last decade, and best practices. The Planning Commission Staff Report for the Safety Element Update includes further details about the proposed goals and policies for each issue area (see Attachment 4).

Public Comment on Draft Safety Element

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

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

Some input on the draft elements expressed concerns about the adequacy of the evacuation related assessments and requested stricter land use regulations in high-risk hazard areas.

The two evacuation assessments required by State law were guided by local experience and were prepared in alignment with available published guidance from State agencies and best practices in the field of evacuation traffic modeling. The Department of Emergency Management and the Sheriff's Office were consulted early on about assumptions used for the assessments. CAL FIRE staff and the State Board of Forestry and Fire Protection further found that the Safety Element, including the evacuation assessments, comply with the mandates in State law. Staff recognizes a strong desire from the community for more detailed study of evacuation factors and community-specific evacuation needs; in acknowledgement of that, proposed Policy SE -2i and Implementation Program 2 provide for additional evaluation of evacuation constraints during the comprehensive General Plan update to inform the update and other hazard mitigation efforts.

Further, requests for stricter limitations on land uses and development in areas with significant natural hazard risk are more appropriate for consideration with the comprehensive General Plan update, which will evaluate amendments to the Land Use Element.

Safety Element Planning Commission Recommendation

On June 5, 2025 at their regular meeting time, the Planning Commission considered the Safety Element Update at a public hearing and voted 4-0-1 to recommend approval of the update. The Commission discussed concerns brought up in public comment about the comprehensiveness, granularity, and clarity of the evacuation-related assessments prepared for the Safety Element as required by Government Code Sections 65302(g)(5) and 65302.15. Staff provided further explanation about the approaches taken for the assessments and the Commission ultimately recommended approval of the update considering that the comprehensive

General Plan update will provide an opportunity to conduct further assessment. The Commission also requested that climate change be considered in the environmental analysis for the comprehensive General Plan update.

State Agency Review

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

CAL FIRE staff support the BOF in the review of submitted safety elements. CAL FIRE staff reviewed the public review draft of the Safety Element and provided minor recommendations to ensure the Safety Element meets state requirements, which Permit Sonoma staff incorporated into the draft presented to the Planning Commission on June 5, 2025. The BOF reviewed and approved the Safety Element Update at a public meeting on July 22, 2025, offering praise on the clarity and organization of both the information presented and the policy language, describing it as an example for other jurisdictions. The BOF expressed appreciation for the emphasis on equitable community safety, community partnerships, and incorporation of debris removal considerations and commended the evacuation-related policies and analysis. The BOF's Final Review Checklist is provided as Attachment 5 and the recording of the July 22nd public meeting is available on the [BOF website <https://calfire-umb05.azurewebsites.net/business/view-only-webinars/>](https://calfire-umb05.azurewebsites.net/business/view-only-webinars/).

Staff submitted the draft Safety Element Update to the California Geological Survey on April 23, 2025, and the agency may review and provide comments within 30 days of receipt. No response has been received as of August 1, 2025.

Proposed Environmental Justice (EJ) Element

California law defines environmental justice as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies” (Government Code Section 65040.12(e)). The law requires the County to integrate environmental justice into its general plan as follows:

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

Permit Sonoma developed a standalone Environmental Justice (EJ) Element, instead of environmental justice policies spread throughout various elements, to recognize the importance of the topic and centralize core policies in one place.

Environmental Justice Communities

The law defines disadvantaged communities as areas identified by the California Environmental Protection Agency (CalEPA) as disadvantaged utilizing a tool called CalEnviroScreen (<https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>), or areas that are low-income and

disproportionately affected by environmental pollution or other hazards that can lead to negative health effects (Government Code Section 65302(h)(4)(A)). Lands under the control of federally recognized Tribes are also considered disadvantaged by the State. In Sonoma County, this includes Dry Creek Rancheria, Stewarts Point Rancheria, and Kashia Coastal Reserve.

Staff, in collaboration with the Equity Working Committee, identified disadvantaged communities within the unincorporated county consistent with the State's definition and guidance published by the Office of Land Use and Climate Innovation (LCI), using a methodology tailored to Sonoma County. These areas are proposed as the County's Environmental Justice Communities (EJ Communities), which are the focus of the EJ Element. The EJ Communities comprise 22 census tracts that meet either of the following criteria:

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

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

Environmental Justice Issue Areas

The draft EJ Element includes six topical issue areas:

1. Healthy Environments
2. Healthy Public Facilities and Promoting Physical Activity
3. Community Health
4. Healthy Food Access
5. Safe and Sanitary Housing
6. Civic Engagement and Language Access

Each issue area includes one or more goals and related policies to help achieve the goal. The draft EJ Element also includes an implementation plan, with specific actions to carry out the goals and policies. The draft provides maps of pollution burden scores, access to public amenities like transit, bicycle lanes, and parks, access to food, and community health indicators, such as asthma rates, and provides existing conditions information for each topic. The Planning Commission Staff Report for the Environmental Justice Element includes further details about the proposed goals and policies for each issue area (see Attachment 7).

Public Comment on Draft Environmental Justice Element

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

Public input expressed support for policies and programs in the EJ Element related to improving park and open space access and healthy food access. Other input called for stronger policy or program language to demonstrate commitment. Some policies or programs in the draft EJ Element direct the County to “consider” or “explore” certain actions because there may be limitations on funding, potential impacts of the action that should be evaluated prior to implementation, or barriers to implementation that need to be addressed for the action to be feasible.

Environmental Justice Element Planning Commission Recommendation

On July 10, 2025, at a special meeting, the Planning Commission considered the new Environmental Justice Element at a public hearing and voted 5-0 to recommend approval. The Commission expressed a desire to see greater community engagement moving forward with the comprehensive General Plan update, including with tribal communities. Some Commissioners initially expressed concern about the number of communities designated as EJ Communities by the EJ Element. Staff clarified that the EJ Element is programmed to be updated at least every eight years with each new housing element cycle, during which the County can make changes to EJ Community designations using updated data to consider changed conditions. At the direction of the Board, designation of EJ Communities could alternatively be reassessed earlier during the comprehensive General Plan update.

The Commission deliberated on policy and program modifications, ultimately recommending minor modifications to the text of Policies EJ-1a, EJ-1b, and EJ-1f. The Commission further recommended the addition of policies or programs to 1) integrate tribal affairs experience within Sonoma County job classifications necessary to implement Goal EJ-10; and 2) explore dedicated Environmental Justice Community and tribal seats to County Boards and Commissions. The Commission’s edits to Policies EJ-1a, EJ-1b, and EJ-1f have been incorporated into the staff-recommended draft EJ Element. If the Board decides to incorporate the Planning Commission’s recommended additions to the EJ Element, staff recommends the following:

1. Add new Policy EJ-10f, to read as follows: “Explore dedicated tribal community and Environmental Justice Community seats to County Boards and Commissions to improve representation in government decision-making.”
2. Renumber existing Program 41 as new Program 42 and add new Program 41 to implement Policy EJ-10c, to read as follows: “Integrate tribal affairs experience within Sonoma County job classifications necessary to implement Goal EJ-10.” The Department of Human Resources would be identified as the lead department.

Element Implementation Plans

General Plan elements are required to include implementation measures to carry out the established goals and policies. The Safety Element Update includes 80 programs, and the Environmental Justice Element includes 41 programs that the County will undertake on either a set timeline or ongoing basis following adoption. For each program, the implementation plans establish a lead County department or agency, supporting departments or agencies (if applicable), the anticipated timeframe in which to accomplish the program, the related policies that the program implements, and a metric to use as a measure of successful implementation. Identified timeframes are estimates and completion of programs may be impacted by funding availability. The programs include a variety of actions such as interdepartmental coordination or with

external partners, planning and feasibility studies, analysis or assessment, community outreach and engagement, improving public information, funding identification, and code updates. Staff coordinated with County departments and agencies with a role in implementation to consider the feasibility and appropriateness of each program and provide feedback on draft policies. The majority of 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. If funding is not available through alternate funding sources, such as grants, select programs may require discretionary funding in order to be completed. In that case, staff would return to the Board during future budget hearings with a Program Change Request. For more details on the implementation plans for both the Environmental Justice and Safety Elements, see the Exhibit As of Attachments 1 and 2.

General Plan Consistency

The Safety Element Update and Environmental Justice Element are consistent with the other elements of the General Plan because they further the overall goals and objectives of the other elements.

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

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

Environmental Review

The Safety Element and Environmental Justice Elements are subject to review for environmental impacts under the California Environmental Quality Act (CEQA).

Safety Element

Under CEQA, when changes are proposed to a previously approved project for which an environmental impact

report (EIR) was certified, a subsequent or supplemental EIR is not required unless one of three triggering conditions exist:

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

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

Environmental Justice Element

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

Staff Recommendation

Staff recommends that the Board of Supervisors:

- A. Adopt a resolution amending the Sonoma County General Plan to repeal the current Public Safety Element and adopt the Safety Element Update, and adopting an addendum to the General Plan 2020 Environmental Impact Report; and
- B. Adopt a resolution amending the Sonoma County General Plan to adopt the Environmental Justice Element and find the Environmental Justice Element exempt from the California Environmental Quality Act (CEQA) under CEQA Guidelines Section 15061(b)(3).

Strategic Plan:

This item directly supports the County's Five-year Strategic Plan and is aligned with the following pillar, goal, and objective.

Pillar: Climate Action and Resiliency

Goal: Goal 5: Maximize opportunities for mitigation of climate change and adaptation through land conservation work and land use policies

Objective: Objective 1: By 2025, update the County General Plan and other county/special district planning documents to incorporate policy language and identify areas within the County that have the potential to maximize carbon sequestration and provide opportunities for climate change adaptation. The focus of these actions will be to increase overall landscape and species resiliency, reduce the risk of fire and floods, and address sea level rise and biodiversity loss.

Updated Safety Elements are required to incorporate climate adaption and resilience strategies into policies and implementation measures. The proposed Safety Element Update includes goals, policies, and implementation programs to improve community resilience and adaptation to climate impacts including increased exposure to wildfires, flooding, extreme temperatures and poor air quality, sea level rise, and drought. For example, the Safety Element directs the County to prepare sea level rise vulnerability assessments and adaptation plans for the outer coast and the San Pablo Bay and Petaluma area shorelines (Safety Element Program 71). Similarly, Safety Element Program 58 calls for the development of a flood risk and vulnerability assessment followed by a mitigation and adaptation plan for the Russian River watershed to reduce repetitive flood losses and build long-term flood resilience. Other policies and programs encourage regional coordination on landscape-level resiliency strategies and establish commitments to integrate climate impacts and risk into County facility, infrastructure, and service planning.

The comprehensive General Plan Update will consider amendments to all elements of the plan and provide a broader opportunity to shape land use policy to maximize carbon sequestration opportunities and establish high-impact climate adaptation strategies. The comprehensive plan update will integrate work completed to date, such as the County's Carbon Inventory and Sequestration Potential Study and Climate Resilient Lands Strategy, in the evaluation and development of land use and development policies and implementation measures.

Racial Equity:

Was this item identified as an opportunity to apply the Racial Equity Toolkit?

Yes

The County of Sonoma is committed to equitable access to government decisions and services, and to equitable community outcomes. A Racial Equity Toolkit Analysis was completed for the Safety and Environmental Justice Elements and reviewed by the Office of Equity. Staff considered the questions and promptings of the Racial Equity Toolkit when developing the community engagement strategy for this effort and in the development of the goals, policies and programs for both elements. The Office of Equity was a key partner in the policy development process to ensure that equity was integrated from the beginning. Please refer to Attachment 9 for the project's Racial Equity Toolkit Analysis.

Prior Board Actions:

July 23, 2024: Workshop on the General Plan 2020 Public Safety Element Update and New Environmental

Justice Element (

<https://sonoma-county.legistar.com/LegislationDetail.aspx?ID=6784258&GUID=EAF66AF5-6DAA-4017-BCAD-DB6654091313>>)

FISCAL SUMMARY

Not Applicable

Narrative Explanation of Fiscal Impacts:

Implementation of the Safety and Environmental Justice Elements involves continuation of existing multi-departmental and agency activities and limited new activities that may require additional funding. Implementation measures were intentionally developed to reflect existing and expected investments. County departments and agencies responsible for implementing specific programs were consulted in the development of the implementation measures to gauge potential budget impacts. The Implementation Plans of both elements specify that funding identification is a first step for programs that are expected to be resource-intensive and may require additional staffing or contract support. Where possible, the Elements identify potential grant programs that could support implementation. Furthermore, where appropriate, individual departments may bring forward discretionary funding requests to the Board.

Staffing Impacts:

None

Narrative Explanation of Staffing Impacts (If Required):

Not Applicable

Attachments:

Attachment 1. Board Resolution for the Safety Element Update

Exhibit A. Safety Element Update and Appendices

Exhibit B. Addendum to the Sonoma County General Plan 2020 Environmental Impact Report

Attachment 2. Board Resolution for the Environmental Justice Element

Exhibit A. Environmental Justice Element and Appendices

Attachment 3. Planning Commission Resolution for the Safety Element Update, June 5, 2025

Attachment 4. Planning Commission Staff Report for the Safety Element Update, June 5, 2025

Attachment 5. State Board of Forestry and Fire Protection Safety Element Final Review Checklist

Attachment 6. Planning Commission Resolution for the Environmental Justice Element, July 10, 2025

Attachment 7. Planning Commission Staff Report for the Environmental Justice Element, July 10, 2025

Attachment 8a. General Plan 2020 Final Environmental Impact Report (EIR), Volume 1

Attachment 8b. General Plan 2020 Final EIR, Volume 2

Attachment 8c. General Plan 2020 Final EIR, Volume 3

Attachment 9. Racial Equity Toolkit Analysis

Attachment 10. Public Comment

Attachment 11: PowerPoint Presentation - English

Attachment 12: PowerPoint Presentation - Spanish

Related Items “On File” with the Clerk of the Board:

- Board of Supervisors Resolution No. 08-0807 Certifying the General Plan 2020 EIR
- Board of Supervisors Resolution No. 08-0808 Adopting General Plan 2020
- Board of Supervisors Resolution No. 14-0355 Amending the General Plan 2020 Public Safety Element
- Board of Supervisors Resolution No. 21-0494 Adopting the 2021 Sonoma County Multi-Jurisdictional Hazard Mitigation Plan
- Sonoma County Multi-Jurisdictional Hazard Mitigation Plan (2021)