

**From:** [Becky Boyle](#)  
**To:** [BOS](#)  
**Cc:** [GeneralPlan](#)  
**Subject:** So Co Gen. Plan  
**Date:** Thursday, August 7, 2025 5:30:36 PM

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## EXTERNAL

Dear SoCo Supervisors & SoCo General Plan,

We are writing to you today with an urgent request to address a critical public safety issue in west Sonoma County: the lack of adequate emergency egress routes, particularly along the Russian River corridor from the Laguna to the Sonoma Coast.

This issue is a matter of life and death, and we believe it requires your immediate attention and action.

Many of our local roads are narrow, steep and often serve as the sole point of travel in or out and In the event of a disaster. These roads quickly become impassable, leaving residents and first responders trapped.

In many cases, these routes have been obstructed with no public access across the width of a road's right-of-way. These actions effectively eliminate crucial escape paths for the public and emergency services.

For example: Terrace Drive. A locked gate has been erected across the road. This fence blocks a right-of-way; a vital alternate egress route for residents on Ogburn Court and Middle Terrace, connecting them to Woodside Drive via Ogburn Lane. Additionally, it is causing a direct and immediate hardship for an elderly couple living right next to it. It prevents them from using a ramp—required for the husband's mobility issues—to access their car and a portion of their own property. This is an unacceptable and dangerous situation that desperately needs your attention as this case screams of elder abuse.

We implore the Board of Supervisors and the Sonoma County General Plan to take swift action on this matter. We request that you:

Immediately address the situation on Terrace Drive in Forestville to restore access through the right-of-way.

Develop and implement a plan to identify, clear, and secure emergency egress routes throughout west Sonoma County, including those that have been blocked by private property owners.

Include clear language and enforceable policies in the General Plan that prevent the blocking of public rights-of-way and mandate the creation of alternative emergency egress routes.

The safety of our community cannot be compromised by private actions that block access to public rights-of-way. We urge you to act now before a disaster strikes.

This is just one of many examples, it serves as a starting place. Please care. Please show up.

Do not stand idly by while your constituents are abused, they need your help. We need you to show up and show them... show us... you care. We know you do, we just need to see actions vs 'talk'.... We need 'the walk' also.

Respectfully,  
Becky Boyle  
HCT COPE  
10825 Canyon Rd., Forestville

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** Rob Davis <robdavis76@gmail.com>  
**Sent:** Saturday, August 9, 2025 10:01 AM  
**To:** Geoff Peters  
**Cc:** GeneralPlan  
**Subject:** Re: Asti crossing bridge

**Categories:** Safety/EJ - Katrina to respond/save

## EXTERNAL

Thank you Geoff for the letter reminding the county of not only the safety needed for the bridge but also the expense of delaying the construction. I am so mad about their lack of attention. What does it take for them to begin construction now?

Rob

On Fri, Aug 8, 2025 at 1:47 PM Geoff Peters <[gpeters@showa-farm.com](mailto:gpeters@showa-farm.com)> wrote:

I'm the founder and a current board member of the Alexander Valley Citizens' League. I write on behalf of our members and neighbors to ask that you include as a very high priority project, the installation of a permanent Asti bridge.

For more than 250 resident families and countless visitors, tourists, farmworkers, and service tradespeople, having an alternative method of egress in the event of an emergency is critical. One way in and one way out is simply not an acceptable risk.

Further, every permitting organization and environmental group agrees that NOT taking a temporary bridge out and replacing it every year is better for the environment than the minor disruption on building a permanent bridge.

Lastly, as taxpayers, had a permanent bridge been built by Sonoma County 101 years ago when first requested by Cloverdale in a letter to the Board of Supervisors, the bridge would have been paid for many times over when compared to the annual costs of installation and removal.

For public safety, environmental and economic reasons please make this a top priority item in the General Plan.

Geoff Peters  
Owner - Showa Farm

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**Warning:** If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** [Cynthia Halliday](#)  
**To:** [BOS](#); [GeneralPlan](#)  
**Cc:** [Roberta MacIntyre](#); [Cyndi Foreman](#); [sheriff-outreach](#); [Amy](#); [Roxanne Ezzet](#); [samwallis@sonomacounty.gov](mailto:samwallis@sonomacounty.gov); [Nancy A. Brown](#); [Tracy.Lyons@sonomacounty.org](mailto:Tracy.Lyons@sonomacounty.org); [Hct Cope](#); [Fire Council](#); [Geoff Peters](#)  
**Subject:** Urgent request for Emergency and Safety needs of Elderly, disabled and many residents of West Sonoma County Russian River Corridor  
**Date:** Thursday, August 7, 2025 12:07:54 PM

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**EXTERNAL**

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Attachment available until Sep 6, 2025

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To the Sonoma County Board of Supervisors and General Plan,  
We are aware of your upcoming meeting and want to make sure that our voices are heard regarding the urgent need for policy related to identifying and securing adequate emergency egress for all residents of Sonoma County. We call your attention to specific areas within the Russian River corridor. Please see attached letter regarding urgent need to address Emergency evacuation and Safety for the West County Residents of the Russian River.  
Please contact me with any questions or follow up needs.

Sincerely,

[Click to Download](#)

Letter to BOS and General Plan Emergency Egress: Private Property policy needed.pdf  
139.8 MB

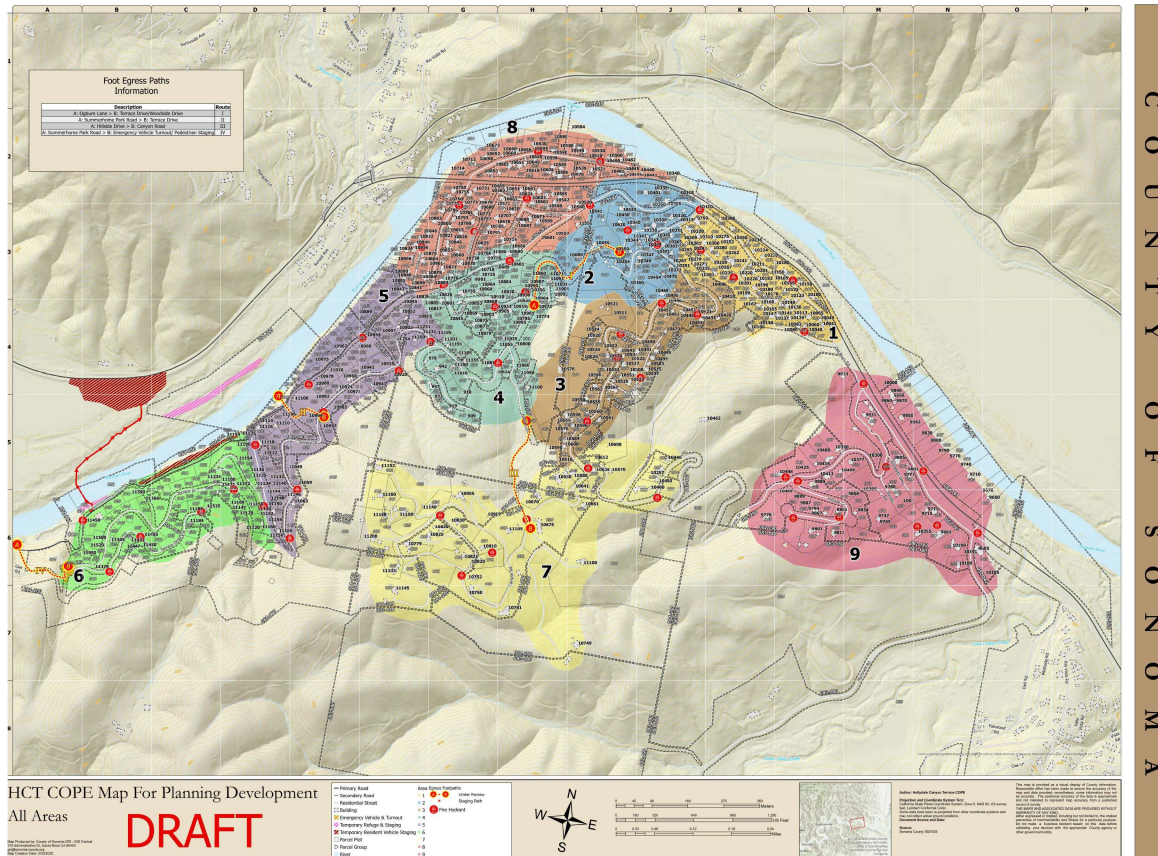
Cynthia Halliday  
HCT COPE representative and Russian River Community Resident Cell # 707-321-6050

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

To the Sonoma County Board of Supervisors and Sonoma County General Plan,

We are writing to you today with an urgent request to address a critical public safety issue in west Sonoma County: the lack of adequate emergency egress routes, particularly along the Russian River corridor from the Laguna to the Sonoma Coast. This issue is a matter of life and death, and we believe it requires your immediate attention and action.



HCT COPE Community of Neighborhoods #1-#9

Many of our local roads are narrow, steep, and often serve as the sole point of entry and exit for entire neighborhoods. In the event of a wildfire or other disaster, these roads would quickly become impassable, trapping residents and first responders. This situation is made even more dangerous by a pervasive issue that we are requesting the General Plan to address: **the blocking of potential alternative egress routes that cross over private property.**



We request that you:

1. **Immediately address the situation on Terrace Drive in Forestville** to restore access through the right-of-way.
2. **Develop and implement a plan** to identify, clear, and secure emergency egress routes throughout west Sonoma County, including those that have been blocked by private property owners.
3. **Include clear language and enforceable policies in the General Plan** that prevent the blocking of public rights-of-way and mandate the creation of alternative emergency egress routes.

The safety of our community cannot be compromised by private actions that block access to public rights-of-way. We urge you to act now before a disaster strikes.

Sincerely,

A Concerned Resident of West Sonoma County

**From:** Geoff Peters <gpeters@showa-farm.com>  
**Sent:** Friday, August 8, 2025 1:47 PM  
**To:** GeneralPlan  
**Subject:** Asti crossing bridge

**Categories:** Safety/EJ - Katrina to respond/save

## EXTERNAL

I'm the founder and a current board member of the Alexander Valley Citizens' League. I write on behalf of our members and neighbors to ask that you include as a very high priority project, the installation of a permanent Asti bridge.

For more than 250 resident families and countless visitors, tourists, farmworkers, and service tradespeople, having an alternative method of egress in the event of an emergency is critical. One way in and one way out is simply not an acceptable risk.

Further, every permitting organization and environmental group agrees that NOT taking a temporary bridge out and replacing it every year is better for the environment than the minor disruption on building a permanent bridge.

Lastly, as taxpayers, had a permanent bridge been built by Sonoma County 101 years ago when first requested by Cloverdale in a letter to the Board of Supervisors, the bridge would have been paid for many times over when compared to the annual costs of installation and removal.

For public safety, environmental and economic reasons please make this a top priority item in the General Plan.

Geoff Peters  
Owner - Showa Farm

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**Warning:** If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** twrossetti@aol.com  
**Sent:** Monday, August 11, 2025 6:51 AM  
**To:** BOS; GeneralPlan  
**Cc:** boardpresident@firesafesonoma.org; Cyndi Foreman; sheriff-outreach;  
amy@amybelharz.com; Roxanne Ezzet; samwallis@sonomacounty.gov; Nancy A. Brown;  
tracy.lyons@sonomacounty.org; firecouncilhct@gmail.com; gpeters@showafarm.com  
**Subject:** URGENT REQUEST FOR EMERGENCY AND SAFETY NEEDS OF ELDERLY,DISABLED AND  
MANY RESIDENTS OF THE WEST SONOMA COUNTY RUSSIAN RIVER CORRIDOR EMAIL  
FROM CYNTHIA HALLIDAY 8-7-25  
**Attachments:** LETTER TO SONOMA BOARD OF SUPERVISORS AND CC RE HALLIDAY EMAIL URGENT  
REQUEST FOR REVIEW.PDF

## EXTERNAL

Please find attached a partial response to the above captioned matter submitted by Cynthia Halliday. I am not sure if the Board of Supervisors are reviewing the matter at its meeting on August 12,2025 ? however,I cannot make it due to a urgent personal matter that has been scheduled for the same date and time frame.I am the legal Deed property owner of the property in question. In submitting this response,I am not waving any of my rights for providing supplemental information as maybe needed.

Thank you for your attention

Sincerely,

Timothy Rossetti  
10655 Terrace Drive  
CA 95436

SONOMA COUNTY BOARD OF SUPERVISORS  
575 ADMINISTRATION DRIVE ROOM 100 A  
SANTA ROSA, CA 95403

AUGUST 9, 2025

\*VIA EMAIL LISTED CC INDIVIDUALS ON CYNTHIA HALLIDAY'S EMAIL DATED 8-7-2025 TO THE SONOMA COUNTY BOARD OF SUPERVISORS

RE: URGENT REQUEST FOR EMERGENCY AND SAFETY NEEDS OF ELDERLY, DISABLED AND MANY RESIDENTS OF THE WEST SONOMA COUNTY RUSSIAN RIVER CORRIDOR (SIC) EMAIL FROM CYNTHIA HALLIDAY DATED AUGUST 7, 2025

This letter is in response to the above captioned matter.

My name is Timothy Rossetti, and I am the legal Deeded owner of the specific property, 10655 Terrace Drive, Forestville, CA, 95436, that Cynthia Halliday (he after referred to as Halliday) refers to in her email "request for urgent review of her issues".

This response is not to be considered full and final information and the complete facts regarding these matters. I reserve the right to supplement my responses and facts at a later date as necessary and in legal proceedings accordingly. Due to a pending criminal court case SD240913011 which is currently in proceedings here in Sonoma County Superior Court (I am the main victim of an attempted murder/"Assault with a Deadly Weapon on (2) persons" and for which charges the person is being prosecuted on). There are also pending Civil lawsuits with me as one of the Plaintiffs. Based on these proceedings, some of the information and facts being provided may be limited in scope to the allegations within Halliday's email.

Please Note! Due to prior commitments of an urgent nature, I will not be able to attend the Board of Supervisors (BOS) meeting on August 12, 2025 if this matter comes before the BOS's.

For the record, it is my personal opinion and belief that the document submitted to all of you, was actually prepared by we all know who and titled "A Concerned Resident of West Sonoma County" (sic). It's odd that it's not signed ??? Why is that?

It is my/our position that writer is lacking in candor as the way they allege and presented the facts. I believe they are intentionally providing misleading and erroneous facts in order to champion their cause and grab the BOS's and other unknowingly people's attention.

This matter is not new and has been ongoing for several years now. What is new is the installation of a fence at the advisement of Sonoma County Sheriff Deputy Sergeant G. Lawson due to numerous trespassing issues and threats of violence against me and my partner. Prior to the fence the area was blocked off by one to two of our personal vehicles with signage in accordance with the California Penal Code and Government Civil Code. Also, by my permissive usage allowance, the very neighbor that the writer alleges in their document used to park her own private vehicle in the area along with her husband (sic) John, and their tenants and visitor alike. It was only after I stopped allowing them to park there did it become an issue of it being an alleged safety issue (sic).

The fence in question, has been reviewed by the Sonoma County Code Enforcement during June 2025 and found to be within my Deeded property rights and not a violation as alleged by the writer.

I fully believe the writer and or their associates are the ones who called Code Enforcement over my fence; however, it did go as they hoped, and the issue was closed accordingly.

The fence had also been viewed by another Code Enforcement Office in January 2025 during an onsite review of my complaint about Halliday and her associates doing illegal road and creek work on property that was owned by three unknowing property owners adjacent to my property and the fence. Also, involved in that illegal work was the same "elderly people the writer notes in their document to the BOS's.

The writer falsely states there is a Public Right of Way though my Deeded property. You can check with the Sonoma County Road Department to verify this is false. The writer and Halliday are fully aware that there is no Public Right Away as she and her associates have been trying to force-manipulate access though my Deeded property for months and even years with advisements from the Sonoma County Sheriff Deputy directly to her husband a couple of years back.

In January 2025 Halliday and her associates were told by the Sonoma County Sheriff Department to leave the area in question as they were illegally trying to put a road in via three other unknowing and non-involved property owners. It was stopped by the California Department of Fish and Wildlife and the Sonoma County Code Enforcement. The area sitting is a horrible mess with slides and erosion with a spring being blocked from its former natural part to the creek.

The homeowner the writer references in their letter to the BOS's sent me a letter dated 7-21-2025, a copy of my response is attached. I have redacted the person's last name out of privacy concerns. In my response you can see this has been going on for years. She even hired a personal attorney in 2023 and had a property survey completed regarding the Deeded property lines. The results were not favorable to her and based on the results she tried to buy part of my Deeded property, which I declined the offer. She did not pursue any legal action and advised us that her attorney informed her she did not have any recourse.

I believe based on the facts (which I reserve to limit disclosure of all facts at this time due to pending litigations) this matter is being pushed based on personal resentment for a number of reasons/matters between individuals and myself and my partner. One example is my reporting the illegal road and creek work being done by her and her associates. There are prior issues with allegations of illegal Gray water and sewer dumping which I along with others reported to the County Code Enforcement. These are just a few examples.

The timing of the illegal road and creek work occurred shortly after I sent Halliday a letter (see included letter) regarding another road work project, she and her husband coordinated on Terrace Drive as the road is Private and not a county road with the property owners being fully responsible for the entire maintenance of the road which includes liability for anyone who gets hurt. Months after the road work was supposedly completed there with a few very serious safety concerns (which were expressed by other Terrace Drive property owners and not unaddressed) which had the potential for serious injuries. In my letter I advised her of the safety concerns and requested they be corrected accordingly. Well, that did not go well with her and the Contractor who performed the substandard work.

Within a week of sharing the road safety concerns, Halliday and her associates, which happened to include the same Contractor who did the other substandard work appeared in the rear canyon and actually tried to complete the illegal work by using my private property until they were ordered to leave my property by the Sonoma County Sherriff Department. However, they continued the illegal work by accessing it via Ogburn.

Note, at no time had either Halliday or any of her associates ever shared or advised me as the Deeded property owner that they had planned such an extensive project which would directly impact my Deeded property usage and enjoyment, the loss of monetary valuation and increased liability is simply unconscionable and borderline criminal.

There is also the fact that up until the morning of January 27, 2025 when I heard and saw the construction people illegally driving through my Deeded property, I had no prior knowledge of the extensive work project they had planned. In fact, Halliday and associates intentionally kept the information from me. This includes prior meetings and on-site reviews with outside individuals.

This part of Terrace Drive has never been a road or planned as a road for large or heavy traffic volume. This part of Terrace is actually a private driveway used for limited usage and is narrow, has areas of drop offs – no shoulder, large trees, culverts and narrow switch backs. There is no area for two vehicles to pass. The majority of this Terrace drive, consisting of about one half, is actually on my Deeded property and averages about 10 feet wide and runs the full length of my house which is about 14 feet away from all my bedrooms, kitchen, bathrooms and dining room. The loss of personal property rights cannot be overly stated here.

Over the years, there have been numerous issues with trespassers 24/7 365 days a year. Which included a high number of vacation renters who are from out of the area as well as locals too, that leave behind beer bottles and cans, discarded cigarettes on the ground, dogs off the leashes, not picking up after their dogs defecate in my front yard, minors hiding in the adjacent bushes smoking and drinking alcohol, drug paraphernalia. One of my dogs was attacked on my property front sidewalk which resulted in over \$6000.00 in Vet bills. So, after repeated recommendations from the Sonoma County Sheriff Department coupled with the illegal attempt to put the road in by converting the existing walking - wildlife trail by Halliday and associates, which would have greatly increased and encouraged more people to believe they could trespass through my private property. I put up a fence as the direct results of these actions and events. Frankly, it's a simple but effective 5 feet high completely see through wire fence that was installed on my Deeded property in accordance with my rights as the legal Deeded property owner, PC 602 and GCC 1008 to protect myself, my partner and personal property. This fence is nothing more than a few 2x4's and 2x2 wire which is easily removable should there be an appropriate need to traverse through my Deeded property and with my permission. Of course, we all know that in the event of an emergency First Responders can and will do what they need accordingly. This fence was designed and constructed with this in mind. In addition, I have posted all the proper signage in accordance with applicable local and State laws and regulations.

The writes document statement (which in pertinent part states) "that my fence prevents an elderly couple from using a ramp required for her husband's mobility issues to access their car" (sic) is factually false and deceitful. The couple living adjacent to my property do not have any legal easement through my Deeded property. I have given them permissive usage to their house via their driveway. California law does not have or mandate totality access. The path they do have is direct from their driveway - car to the front door of the house and is shorter for them. There is and never has been a "ramp" and more factual is that my fence is not even close to the area. So, I am completely astonished to see such a false and deceitful statement being made.

As for the main topic of the writers document to the BOS's, it appears that they have seen and or reviewed the Final Civil Grand Jury Report 2024-2025 "Sonoma County Emergency Evacuation Plans". Of special note to me, is the part about "the roads we have today will be the roads available during the next evacuation, roads aren't wide enough to support simultaneous residents' evacuation and emergency vehicles egress. That is absolutely the case here and there should never be a plan or proposed plan that is bad and highly dangerous from the beginning.

Of special note, is the fact the very same elderly couple that writer notes in their document, are the same people who evacuated in my RV with my partner, our two dogs and their dog for three days during the Kincaid fire in 2019. Also, during the Walbridge fire of 2020, when the order for evacuation was given, I personally communicated with the same elderly couple and assisted them with evacuation and ensure they safely departed.

In closing, my partner and I (by the way we are both 64 years old) do care and will be ready and willing to assist anyone and everyone regardless of who they are and any ill feeling real or perceived they may have.

The matter regarding private property access – easement is not within the jurisdiction of the Board of Supervisors; the proper venue is Superior Court of California.

I think the BOS's with their Subpoena power, which is enforceable via the Superior Court, should hold a Hearing with people given testimony under Oath and under Penalty of Perjury of the Law to determine the true intent and full involvement and true knowledge of this matter and whether any funding was or was not appropriately expended on this project. Also, if any Civil Service employees and or persons holding a position of special interest and possible influence of others who were involved.

If you have any questions or need clarification, please feel to contact me via email at [twrossetti@aol.com](mailto:twrossetti@aol.com). This email is used for very limited usage, and I prefer not to provide my telephone number via this document as I am unsure of all the noted individuals. Also, I do not communicate via email or phone/texting with Halliday and prefer to maintain that. I only use US Mail for communicating if absolutely necessary.

Thank you

  
Timothy Rossetti

W/ATTACHEMENTS (8) PAGES

CC: P C ATTORNEY  
LITIGATION FILE  
NOTED CC ON ORIGINAL HALLIDAY EMAIL  
STATE FARM LEGAL  
TWR

 Outlook

Fwd: Urgent request for Emergency and Safety needs of Elderly, disabled and many residents of West Sonoma County Russian River Corridor

From: [REDACTED]  
Date: Fri 8/8/2025 11:47 AM  
To: [REDACTED]

----- Forwarded message -----

From: Cynthia Halliday <[cynthiamft@me.com](mailto:cynthiamft@me.com)>  
Date: Thu, Aug 7, 2025, 12:07 PM  
Subject: Urgent request for Emergency and Safety needs of Elderly, disabled and many residents of West Sonoma County Russian River Corridor  
To: <[bos@sonomacounty.gov](mailto:bos@sonomacounty.gov)>, <[generalplan@sonomacounty.gov](mailto:generalplan@sonomacounty.gov)>  
Cc: Roberta MacIntyre <[boardpresident@firesafesonoma.org](mailto:boardpresident@firesafesonoma.org)>, Cyndi Foreman <[cforeman@sonomacountyfd.org](mailto:cforeman@sonomacountyfd.org)>, <[sheriff-outreach@sonoma-county.org](mailto:sheriff-outreach@sonoma-county.org)>, Amy <[Amy@amybelharz.com](mailto:Amy@amybelharz.com)>, <[roxanne.ezzet@sonomacounty.gov](mailto:roxanne.ezzet@sonomacounty.gov)>, <[samwallis@sonomacounty.gov](mailto:samwallis@sonomacounty.gov)>, Nancy A. Brown <[nancy.a.brown@sonoma-county.org](mailto:nancy.a.brown@sonoma-county.org)>, <[Tracy.Lyons@sonomacounty.org](mailto:Tracy.Lyons@sonomacounty.org)>, Hct Cope <[hctcope@gmail.com](mailto:hctcope@gmail.com)>, Fire Council <[firecouncilhct@gmail.com](mailto:firecouncilhct@gmail.com)>, Geoff Peters <[gpeters@showa-farm.com](mailto:gpeters@showa-farm.com)>

Attachment available until Sep 6, 2025

*\* NOTED Recurring names ? ? ? which have reported no involvement or knowledge of this specific Road work ? ? ? project*

To the Sonoma County Board of Supervisors and General Plan,  
We are aware of your upcoming meeting and want to make sure that our voices are heard regarding the urgent need for policy related to identifying and securing adequate emergency egress for all residents of Sonoma County. We call your attention to specific areas within the Russian River corridor. Please see attached letter regarding urgent need to address Emergency evacuation and Safety for the West County Residents of the Russian River.  
Please contact me with any questions or follow up needs.

[Click to Download](#)

Letter to BOS and General Plan Emergency Egress: Private Property policy needed.pdf

Sincerely,

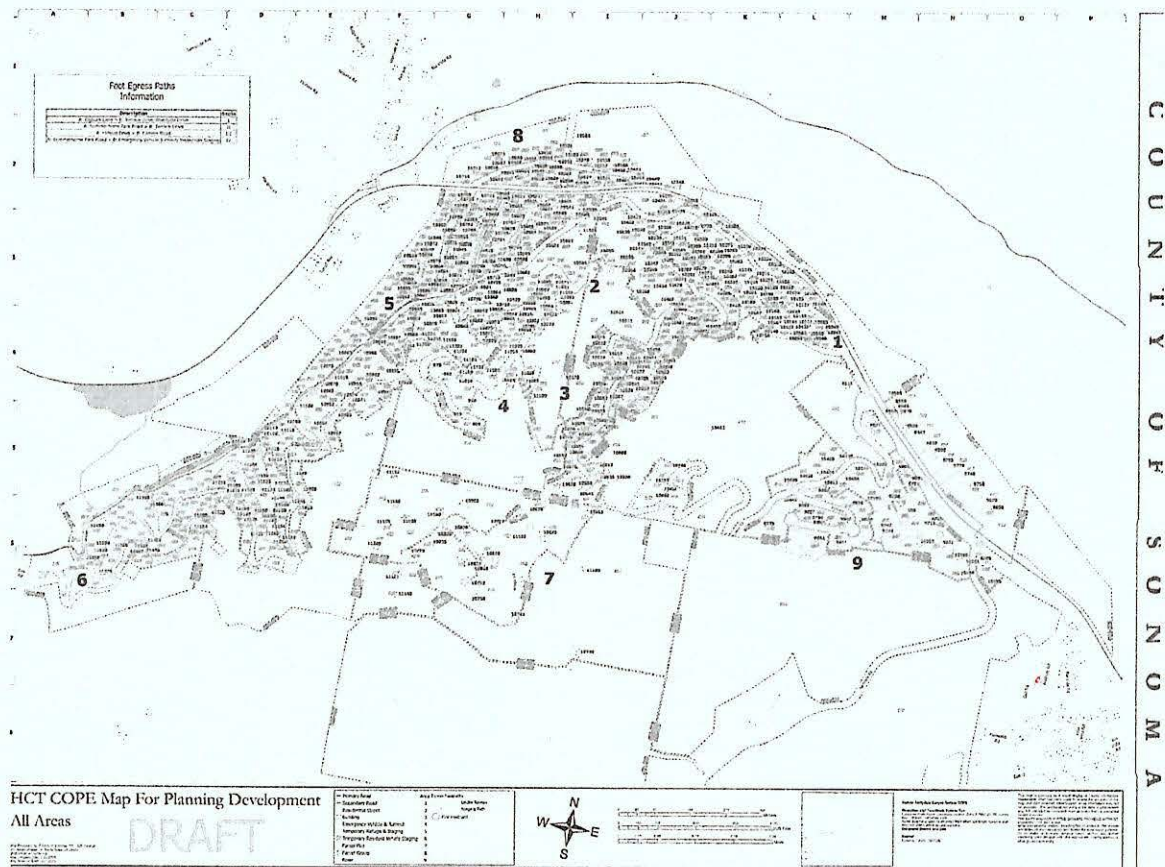
139.8 MB

Cynthia Halliday  
HCT COPE representative and Russian River Community Resident Cell # 707-321-6050



To the Sonoma County Board of Supervisors and Sonoma County General Plan,

We are writing to you today with an urgent request to address a critical public safety issue in west Sonoma County: the lack of adequate emergency egress routes, particularly along the Russian River corridor from the Laguna to the Sonoma Coast. This issue is a matter of life and death, and we believe it requires your immediate attention and action.

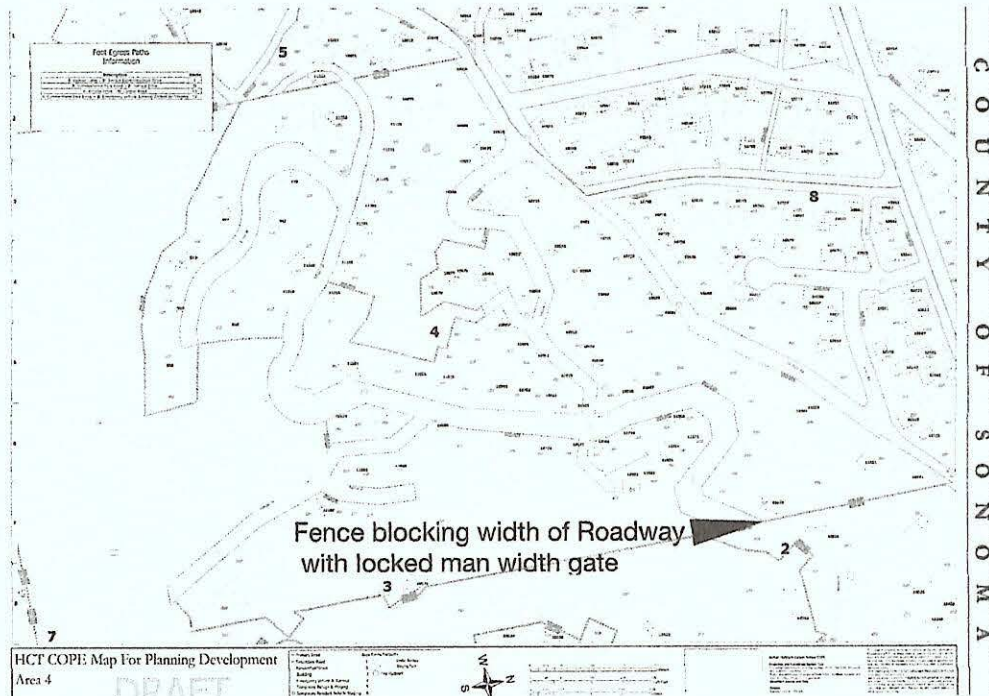


HCT COPE Community of Neighborhoods #1-#9

Many of our local roads are narrow, steep, and often serve as the sole point of entry and exit for entire neighborhoods. In the event of a wildfire or other disaster, these roads would quickly become impassable, trapping residents and first responders. This situation is made even more dangerous by a pervasive issue that we are requesting the General Plan to address: **the blocking of potential alternative egress routes that cross over private property.**

In many cases, these routes have been obstructed either verbally by property owners, by physical gates with no public access, or by fences built directly across the width of a road's right-of-way. These actions effectively eliminate crucial escape paths for the public and emergency services.

*NO Right away.*



Elderly safety and welfare danger and Ogburn to Woodside Alternate Emergency Egress concern area for immediate attention shown on HCT COPE Neighborhood Map Area #4 and #2

*There is NO RIGHT OF WAY - PRIVATE DEEDED PROPERTY NO EASEMENTS -*

There is a pressing example of this on **Terrace Drive in Forestville** that demands immediate intervention. A fence with a locked, man-width gate has been erected across the full width of Terrace Drive. This fence blocks a right-of-way that could serve as a vital alternate egress route for residents on Ogburn Court and Middle Terrace, connecting them to Woodside Drive via Ogburn Lane.

*False*

Furthermore, this specific fence is causing a direct and immediate hardship for an elderly couple living right next to it. It prevents them from using a ramp — required for the husband's mobility issues — to access their car and a portion of their own property. This is an unacceptable and dangerous situation.

*\* This issue is a civil matter for the courts NOT the B.O.S.*

We implore the Board of Supervisors and the Sonoma County General Plan to take swift action on this matter.

*This is a false statement. [Signature] is intentionally being untruthful - There is NO ramp. husband's mobility. ??? My fence does not or is not even within this area.*

We request that you:

1. Immediately address the situation on Terrace Drive in Forestville to restore access through the right-of-way. *False - never has been a Right away or even a road its a walking trail*
2. Develop and implement a plan to identify, clear, and secure emergency egress routes throughout west Sonoma County, including those that have been blocked by private property owners.
3. Include clear language and enforceable policies in the General Plan that prevent the blocking of public rights-of-way and mandate the creation of alternative emergency egress routes.

The safety of our community cannot be compromised by private actions that block access to public rights-of-way. We urge you to act now before a disaster strikes.

Sincerely,

A Concerned Resident of West Sonoma County

\* *False-Statement.  
Halliday knows there is and  
never has been a road or  
Public Right Away.  
Property is Deeded  
Private Property  
with NO Easements.*

*?? who is  
this - why  
unwanted ??  
I think we  
all know.*

*until  
Jan, 2025  
when  
Halliday  
and  
associates  
started  
illegal-  
Non-  
Permitted  
Road work.  
Stopped -  
By C.D.F.W.  
and  
Sonoma.  
code enforcement*

NIJOLE [REDACTED]  
10689 TERRACE DRIVE  
FORESTVILLE CA 95436

JULY 26, 2025

RE: YOUR LETTER DATED 7-21-25 – ALLEGED FIRE SAFETY CONCERNS AND DEMAND FOR ACCESS TO MY PERSONAL DEEDED PROPERTY

This letter is in response to the above captioned matter.

First, due to the Pending Criminal Court Case SD240913011 which is currently in proceedings here in Sonoma County Superior Court (I am the main victim of attempted murder/Assault with a Deadly Weapon and the pending Civil Lawsuits with me as the Plaintiff, I will only be providing a limited response to your allegations. The information and facts stated herein are not to be considered full and final regarding these matters. I reserve the rights to supplement my response and facts at a later date as necessary and in legal proceedings accordingly.

For the record, you are lacking in candor as the way you report the alleged facts in your letter. Because of the pending court matters, I will not fully address things and only provide what I feel is enough to cover your and your associate's actions towards us.

This matter is not new and you and your associates – Cynthia and Larry (here after identified as associates) *have been trying to manipulate my deeded property rights and force access to and though my property* despite there is no Public and or other Private deeded access. You know this because of your personal attorney you hired and the Survey you had done. The matter has also been verified with the County of Sonoma too.

In regard to your statement about having to use Ogburn as an "escape route", you have an access gate off your property and do not have any rights to use and or expect and or demand that I give you the combination to my personal gate much less demand that I install a key lock and give you a copy of the key. On repeated occasions, there have been persons who have walked though my private property and when asked of their destination, they have made statements to the effect "we are going to Nikkis, or Nikki said it was alright for me to walk thought ". This has been even when you are not home and or the people do not stop or stay at your house and merely walk though your yard out your gate towards Ogburn and continue. This is obviously to circumvent and manipulate the fact there is no deeded public or private right away though my property.

Regarding Steves' truck, it is and has been parked on my deeded property and will remain there as needed. Your over-exaggerated claim about it catching fire and exploding would be laughable if it was not such a serious topic. However, the truck does not pose any heighten fire safety or explosion risk. The truck is a good distance from your house and for many - many years you have had as many as 4 + vehicles (not even running too) parked within the same proximity. However, the difference now, is that this is my property and you are not allowed to park there any longer, and now you and your associate's wanting to erroneously claim "it's a fire safety concern". What is an extreme fire danger and risk of exploding is your outdated under sized propane tank which is located in the immediate area of overgrown brushes, an old rotten dilapidated wooded deck and other debris. That is in addition to Johns large all wooden workshop with plywood as the outside decking on the other side of your house covered by numerous Bay trees. Your question as to " why he has it parked (his truck) immediately next to the bushes"? That is my deeded property, and you have repeatedly tried to control what I do with it and that is simply not going to happen.

What about the 50-60 feet of OLD Creosote utility pole that you and your associate's have placed along the creek bank and adjacent to your actual pedestrian gate? not only the environmental impact from chemicals leaching out of them by the aquatic area which drains into the Russian River, but the extremely highly flammable Creosote and other tar treatments. They lay in and on vegetation to help catch them on fire. That is not a very fire wise safety choice.

I also believe you have another hidden agenda behind why you are suddenly now claiming fire concern and wanting it moved. It's not going to work.

Regarding the bushes its parked next to, they along with the beam and other old board and debris will soon be removed for the very fire safety concerns you are expressing and due to the "liability issues" of them being on "My deeded property". They also cause problems - reducing the ability of weekly delivery services vehicles to efficiently turn around. This would also include emergency vehicles, especially at nighttime.

In closing, your statement that" you deserve to be safe (we all do and it has been one of our main points as to why my property is closed off to prevent undue risks) after living here for 45 years and paving the road" (sic) is just another clear and obvious attempt by you and your associates to manipulate, circumvent my deeded property rights and try to draw on others for apparent sympathy. And it's not going to change my decisions. I have noticed the individuals you have indicated you "CC" your letter to. I will also send them a copy of my response to you and provide a few of the prior letters regarding my deeded property, which will include the letter from your personal attorney so they will have a better understanding of the facts. A reader of my response may feel or view it as being harsh? However, they have not dealt with you and your associates (which by the way you have not had any or little if any involvement and contact with until recent events. Historical records can confirm this) during the past 5+ years.

Also, for the record and to repeat my prior advisement to you and your associates and anyone working for them directly or indirectly, you are not to be on my property and or do anything and I mean any type of work regardless of how little or insignificant you or they may feel it is. It will be considered a violation of California Penal Code 602, and I will report it to the appropriate law enforcement. I believe this is necessary considering what you and your associates did back in January 2025 with the illegal road work and alteration of the creek. The fact the properties you guys did this to was not even yours, but the deeded private property of three others who were completely unaware of the illegal work being done. This matter was handled by the California Department of Fish and Wildlife and the Sonoma County Code Enforcement. You and your associates repeatedly provided false information and mislead other neighbors by telling them "The work was approved by numerous agency". There are also still unanswered questions about *who actually funded the illegal work too?*

It is our position that this was nothing more than retaliation and harassment (based on documented statements by a person/s involved and the timing again) while trying to manipulate and circumvent my deeded property rights. Your associates have made it well known that they feel they have an inside connection with certain individuals (as noted by the names you have listed as CC) due to their involvement – ingratiation with community actives. In fact, one of your associates provided false and misleading information and name/s to the Game Warden who was here on site and reviewed the illegal work project you all facilitated. That area remains unfinished, a horrible mess and you guys have disrupted the natural riparian zone and habit of the Salamanders that lived in and around the creek, and the numerous other wildlife that called it home. The work area has areas of significant slides since you guys engaged in the illegal work.

The creek flowed with heavy debris, mud and soil as they washed away with the rain due to the poor work and lack of proper preparation. For the record, we have all the before, during and after pictures and videos too.

Your letter claims it is worried about fire safety and escape routes during an emergency.

Well, have you addressed the overgrowing highly flammable Bay trees – which are more like bushes and other vegetation that are at least 6-8+ feet growing out into and over the actual roadway of the main entrance of Terrace Drive at 10330 and 10338 Terrace which belong to your associates? Those overgrown flammable bay trees should be of extreme concern to you. How about the two elderly people (late 70s /early 80s, who you informed us were your good friends?) who rent the home at 10338 Terrace from your associates, do you not care about their safety? A site review would confirm how bad and dangerous the condition is with the overgrown trees. In fact, those very people often park in the roadway and reduce the space needed for a reasonable and safe egress and ingress accordingly. It is often difficult for regular size vehicles to pass much less the weekly larger trash trucks and even larger Propane trucks. It's ironic, these are the very same people who are allegedly chairing and running the local fire safety programs and widely known to be the people directly responsible along with you for the illegal roadwork that was stopped adjacent to your address and has been sitting abandoned since January 2025. And what was the real reason for that illegal non permitted work and why it was so urgent to do the work in winter with historical rainfall?

We want to enjoy our property under the deeded rights and in accordance with Local, State and Federal laws and regulations and be free from the harassment and nuisance caused by you, your family, visitors and associates. The saying, Good fences make good neighbors, could not be truer here. I also want you to stop trying to dictate what and how I use my deeded property.

  
T. ROSSETTI

Property Owner

10655 Terrace Drive Forestville CA 95436

\*\*\* NOTE! I am not sure of any of your involvement in the above captioned matters. I have included you only in response to N. Barsky indicating she sent you a copy of her letter that she sent to me.

CC: J. CHISPIP, ATTORNEY

HONORBLE P. BRODRICK, CIVIL DIVISION SONOMA COUNTY

SONOMA COUNTY DEPUTY DISTRICT ATTORNEY

MARSHALL TUBERVILLE, BATTALION CHIEF CAL FIRE

ROBERTA MACINTYRE, FIRE SAFE SONOMA???

CYNDI FOREMAN, SONOMA COUNTY FIRE DISTRICT

SONOMA COUNTY ADULT PROTECTIVE SERVICES

TWR LIT FILE

With enclosed documents as noted to respective CC's



# SONOMA COUNTY SHERIFF'S OFFICE

EDDIE ENGRAM  
Sheriff-Coroner

Updated  
REQUEST  
TR

## TRESPASS ACTION REQUEST

To: SONOMA COUNTY SHERIFF'S OFFICE  
2796 Ventura Ave, Santa Rosa, CA 95403

FROM: Name: TIMOTHY W ROSSETTI  
Address: 10655 TERRACE DRIVE  
FORESTVILLE CA 95436  
Phone Number: 707 328 3433

I am the owner, owner's agent, person in lawful possession of the property closed to the general public located at:

10655 TERRACE DR FV CA 95436 and bounded by: A fence with clear signage

In accordance with California Penal Code section 602 (o), I hereby request that the Sonoma County Sheriff's Office enforce the provisions of California Penal Code section 602 and request any persons not having lawful business on such property to leave forthwith or be subject to arrest. The specific reason being: (check one)

- ☐ A hazardous fire condition exists on my property. (Valid for a maximum of 30 days.)
- ☐ I will be absent from the property. (Valid for a maximum of 30 days.)
- ☒ The area is closed to the public and is posted along all exterior boundaries and at all roads and trails entering the property. (Valid for a maximum of 365 days.) Not to exceed 12 months.

I request that this letter be effective starting: 08-08-2025

If there is a change of condition, occupancy, or ownership during the effective dates of this request, I agree to notify the Sheriff's Office immediately.

I understand that this notice does not apply to persons engaged in lawful labor union activities which are permitted to be carried out by the California Agricultural Labor Relations Act, or by the National Labor Relations Act. Further, this request will not apply to persons on the premises who are engaged in activities protected by the California or United States Constitution, or to persons who are on the premises at the request of a resident or management and who are not loitering or otherwise suspected of violating, or actually violating any law or ordinance.

Date: 08-08-2025

Printed Name: TIMOTHY W ROSSETTI

Signature: Timothy W Rossetti

### TO BE COMPLETED BY PERSON RECEIVING FORM

Date Received:

Expiration Date:

Revised 02.21.24

Administration  
2796 Ventura Avenue  
Santa Rosa, CA 95403  
707.565.2781

Law Enforcement Division  
2796 Ventura Avenue  
Santa Rosa, CA 95403  
707.565.2511

Detention Division  
2777 Ventura Avenue  
Santa Rosa, CA 95403  
707.565.1422

Coroner  
3336 Chanate Road  
Santa Rosa, CA 95404  
707.565.5070

**From:** Jill Templeton <jillt007@gmail.com>  
**Sent:** Thursday, August 7, 2025 10:10 AM  
**To:** BOS  
**Subject:** Emergency Evacuation routes

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

EXTERNAL

Dear Supervisors,

I understand that you are in the process of updating the general plan and that it addresses emergency operations.

I am concerned about emergency evacuations in the steep rural areas. Many of the roads are reminders of long ago logging days. They are narrow. Many have “one lane only” widths. In an emergency it would be very difficult for emergency crews to get to an emergency while residents are trying to evacuate. Such roads should be identified and mapped in any evacuation planning. Passing widths should be established at regular intervals.

These passing zones should be required on both private and public roads. (Napa County requires this.)

Thank you for your attention.

Jill Templeton  
20500 Siri Road  
Guerneville

**From:** Peter Hackett <shrunk-outwit-kung@duck.com>  
**Sent:** Monday, August 11, 2025 11:04 AM  
**To:** GeneralPlan  
**Subject:** Sonoma County BOS Meeting Aug 12 2025. Item 2025-0803: Rezoning of parcels on the Russian River.

## EXTERNAL

To: Sonoma County Supervisors and Permit Sonoma.  
BOS Meeting August, 12, 2025  
Item #2025-0803

Re: Adoption of Safety Element (Specifically Goals SE-10Q & SE-11F) and the taking of commercial properties forcefully rezoned to F1 / Legal Non-Conforming

To Whom it May Concern / For Public Record:

My name is Peter Hackett and I'm the agent for the owner of two properties on River Road. I founded Stumptown Brewery in 1997 and we purchased Stumptown Carwash in 2017. Along with about 50 other parcels, we have been materially adversely impacted by the county's recent adoption of the updated FEMA flood map. Along with those other parcels we have been rezoned from F2 to F1, resulting in the existing structures being assigned the new official designation "Legal Non-Conforming".

Both of our properties are also zoned commercial, are in use, and both sit on parcels that exceed 1/2 acre. We're deeply concerned by this zoning change and, to the extent that we can decipher the existing code, appear to be in the most restrictive category; that if the status quo prevails, the structures on our parcels can no longer be improved and cannot be rebuilt in the event significant repairs are needed. Even if a rebuilding project was approved (and the code makes that seem unlikely especially with the further restriction for commercial properties over 1/2 acre), the surveys, studies, reports and additional building requirements would make reconstruction cost prohibitive.

The late notice of this change, coming over two years after Permit Sonoma received notification from FEMA and after FEMA's appeal period had closed, created an unsettling urgency for those of us effected and removed from us the opportunity to contest FEMA's newly drawn map. At that time, I would have liked to share that we have experienced three flood events that have entered our buildings in the past 27 years. In each we observed our properties are in a spillway. The river is virtually still by the time it reaches our elevation. The river's current remains well within the channel of the river. We have always had ample notice to prepare our space, remove or elevate our equipment and, as the water recedes, have been left with a few days to a week of cleanup before we're ready to reopen for business and our staff are back to work. Our flood insurer has enjoyed a net gain in premiums vs claims with the only flood related damage to our building being the National Guard's unhinging our double doors in the wake of their Unimogs driving up and down River road.

Even if an appeal was futile, as was suggested in a previous meeting and justification for none being attempted, the timing of the notice to the affected property owners and the Board of Supervisors resulted in

an immediate need to comply with FEMA and ratify the zoning changes, or lose FEMA's support. It feels as though we squandered over two years in which we could have been calmly exploring options and/or alternatives to the removal of the vested property rights of Sonoma County residents.

All of us affected by this are well aware of the substantial benefit, financial and otherwise, FEMA compliance brings to the County and to the welfare of our small community. Even further, the additional value received by participating in FEMA's Community Rating System (CRS) would be a clear win for a significant number of residents. We are just asking that the County doesn't impose the cost of that compliance solely on us, as victims of circumstance. While we have no reason to doubt Permit Sonoma's good intentions on this matter regarding assurances that have been made to those of us most damaged by the forced rezoning, it's difficult to see how restoration of our property rights and FEMA compliance are not mutually exclusive.

I'm sure you are aware that without the restoration of our land and use rights with a clear, reasonable and non-subjective path to the reconstruction of our existing properties, then no prospective buyer would take on the risk of ownership. Without buyers we have nothing to sell and as such, the rezoning has rendered our properties worthless. Arguably, the value of our properties has been confiscated for "the greater good".

Supervisor Hopkins mentioned in the January 14<sup>th</sup> meeting, that numerous communities faced with a similar dilemma have found a path to resolution. A voluntary buyout has allowed those jurisdictions to meet the goal of satisfying, and the opportunity to exceed, FEMA requirements while mitigating the burden placed on affected parties owning the forcefully rezoned parcels and preserving their constitutional rights. The most recent example we could find, in a neighboring California jurisdiction, began in December 2024 in Rancho Palos Verdes and is currently underway:

( <https://www.rpvca.gov/1782/Voluntary-Property-Buyout-Program> ).

Goal SE-10Q of Safety Element, put before the Board at this meeting, suggests the County should "Consider developing a voluntary, community-led relocation program through public purchase of flood-prone property, prioritizing flood prone property". I agree, and if we had two years, I would not object to this wording. However, the precarious position our properties have been placed in, already rezoned as Legal Non-Conforming creates a greater imperative. As stated, I am not concerned about flood damage, I'm concerned that some other event might cause substantial damage to our properties and render our structure/s irreparable. The County should place a priority on the pursuit of this goal, recognize the exposure they have placed us in, and treat this matter with the same level of urgency it did when ratifying the stripping of our property rights. The word "consider" should be dropped and SE-10Q should be considered a duty, to "develop" and "implement".

For those of us facing the most severe restrictions on use (F1, Commercial, over 1/2 acre) the County could and should give us a choice: Buyout, or accept the imposed zoning. Speaking solely for Downstream Properties, Stumptown Brewery, and Stumptown Carwash, if offered just compensation as remedy, and the County then chose to "support rebuilding, remove barriers, and protect the economic vitality of communities and critical local services" by discounting and expediting the permit process associated with our relocation, then we would seek to find a suitable alternative, out of FEMA's path, allowing us to preserve the goodwill, the unique products and services, our staff, and the relationships we've worked very hard to establish over the last 27 years in our community.

Thank you for taking the time to read this. I hope it doesn't come across too much as a rant and further hope the decision makers can empathize with our plight: that many of us have invested years of our lives into our properties, our businesses and our communities. I, for one, would like to continue to do so.

Sincerely,  
Peter Hackett  
For Downstream Properties and  
Stumptown Brewery / Stumptown Carwash

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** Sonia Taylor <great6@sonic.net>  
**Sent:** Monday, August 11, 2025 11:46 AM  
**To:** Lynda Hopkins; Chris Coursey; district4; Rebecca Hermosillo; David Rabbitt  
**Cc:** Tennis Wick; Scott Orr; Katrina Braehmer  
**Subject:** Re: Safety Element, 8/12/25 BOS Agenda, Item 42  
**Attachments:** 8\_12\_25\_bos\_safety\_element\_comments\_final\_1.pdf

EXTERNAL

Attached please find my letter of comments on your proposed adoption of the Safety Element and Addendum to the GP EIR.

Apologies for length of the letter (there is an "Executive Summary" at the beginning that's shorter, at least!), and apologies for doing math, which I wish wasn't required.

Please do not hesitate to contact me if you have any questions or would like additional information.

Sonia

Sonia Taylor  
707-579-8875  
great6@sonic.net

Sonia E. Taylor  
306 Lomitas Lane  
Santa Rosa, CA 95404  
707-579-8875  
[Great6@sonic.net](mailto:Great6@sonic.net)

11 August 2025

Lynda Hopkins, Chair  
Chris Coursey, James Gore, Rebecca Hermosillo, David Rabbitt  
Sonoma County Board of Supervisors

Via email

Re: Sonoma County General Plan Safety Element and Appendices, Item 42 on 8/12/25

Chair Hopkins and Members of the Sonoma County Board of Supervisors:

I'll start by saying something nice – there is no question that Sonoma County's proposed Safety Element is head and shoulders above many other California city/county Safety Elements, and believe me, I've read a few. With that said, however, there's also no question that Sonoma County's proposed Safety Element does NOT comply with State laws, specifically SB 99, AB 747 and/or AB 1409, and pretending otherwise is futile.

### **Executive Summary**

**SB 99 – Govt. Code §65302(g)(5)**<sup>1</sup> requires that the Safety Element shall “identify residential developments in any hazard area . . . that do not have at least two emergency evacuation routes.” It's not optional, is required by State law now, a full identification cannot be completed at some future nebulous time, and certainly cannot require future BOS direction to complete.<sup>2</sup>

Our Governor considers safe evacuations important enough to have released a 2023 Evacuation Planning Technical Advisory manual (draft)<sup>3</sup> which recommends coordinating SB 99 efforts with the CalFire Subdivision Review Program results.

The within Safety Element identifies 12 residential areas for all types of hazards with only one emergency evacuation route. CalFire's parallel Subdivision Review Program, in 2020-21, identified 98 +/- residential areas in wildfire hazard with only one emergency evacuation route.<sup>4</sup> That's far too large of a discrepancy to be either an accident, or acceptable. Fact is, the within Safety Element does not comply with SB 99. If you adopt the Safety Element as is, you'll be in violation of State law.

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<sup>1</sup> SB 99 -- [https://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=201920200SB99](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201920200SB99)

<sup>2</sup> “The assessment may be further broadened and refined by community input and additional analysis over time with direction from the Board of Supervisors.” Sonoma County Safety Element, Section 2.1.2, page 15 of the pdf.

<sup>3</sup> <https://lci.ca.gov/planning/general-plan/guidelines.html> (link on top left or bottom right), at page 16 of the pdf.

<sup>4</sup> See <https://experience.arcgis.com/experience/74787e13de0c443eb80e27abc176b8fa> for the statewide CalFire Subdivision Survey Reports GIS map.

**AB 747 – Govt. Code §65302.15** requires that the Safety Element shall “[I]dentify evacuation routes and their capacity, safety, and viability . . . under a range of emergency scenarios.”<sup>5</sup> It’s also not optional, is required by State law now, a full identification cannot be completed at some future nebulous time during the full General Plan update (whenever that actually happens).

Sonoma County has done a capacity evacuation Assessment<sup>6</sup>, which is more than many other jurisdictions have bothered to do, but has not done any assessment/identification of the safety and/or viability of the evacuations studied, which is required by AB 747. Obviously, identifying evacuation routes is only part of the problem, because if the routes identified aren’t safe or viable, they’re useless and dangerous.

If you want to understand what an identification of the safety and viability of evacuation routes would look like, you can take a look at the Governor’s Evacuation Planning Technical Advisory, at pages 26-27.<sup>7</sup>

Again, while identification of at least some of the capacity of evacuation routes in our Safety Element is great (although basic math errors raise questions about the validity of the entire Assessment), it is not compliant with State law, and such compliance has to be accomplished before you can adopt the within Safety Element.

**AB 1409 – Govt. Code §65302.15** (which amended AB 747) requires that the Safety Element shall “[I]dentify evacuation routes and their capacity, safety, and viability and evacuation locations under a range of emergency scenarios.”<sup>8</sup> (Emphasis added) It’s also not optional, is required by State law now, and identification of evacuation locations cannot be completed at some future nebulous time during the full General Plan update (whenever that actually happens).

Of course, identification of evacuation locations will always to some degree depend on the emergency situation faced, but we have more than ample information at this point (unfortunately) to understand the hazards Sonoma County residents face, and can easily identify specific evacuation locations for each hazard, which is in fact required by law. Not doing so in this Safety Element leaves the Safety Element in violation of State law.

Notwithstanding the County’s reliance on the Board of Forestry’s review<sup>9</sup>, this Safety Element is not in compliance with State law, and must be amended before adoption to ensure not only compliance with the law, but the safety of all Sonoma County residents.

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<sup>5</sup> This is one of the shortest laws ever. See

[https://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=201920200AB747](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201920200AB747)

<sup>6</sup> It’s great that the consultants amended their Appendix A chart (to Appendix C of our Safety Element) to provide adequate information about the evacuations assessed, but unfortunately that chart still has problems that can only be deduced by doing math. I’ll do that math for you later, in case you want to follow along. The problem, of course, is that if the numbers don’t add up, it calls the validity of the entire evacuation assessment into question – if they got one thing wrong, how many other things are wrong?

<sup>7</sup> <https://lci.ca.gov/planning/general-plan/guidelines.html> (link on top left or bottom right)

<sup>8</sup> This is one of the shortest laws ever. See

[https://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=202120220AB1409](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB1409)

<sup>9</sup> The Board of Forestry is not legally authorized to “approve” any Safety Element – their task is to review and comment. Unfortunately the BOF is apparently unwilling in their review to require compliance with State law.

Additionally, on a different subject, I do not understand the County's resistance to establishing mandatory objective policies, such as requiring a fire protection plan for all residential (and other) development, not just discretionary residential (and other) development, as well as requiring trees/solar for residential parking lots as well as commercial/industrial parking lots (both of these will be discussed in my letter, below).

By right housing development is going to become an ever increasing issue in Sonoma County (SB 423, SB 9, etc.), and we are allowed to have objective standards requiring things like fire protection plans for that by right development. Why wouldn't we want to prioritize safety in all housing?

### **Detailed Discussion**

Following is my detailed dissection of the current version of Sonoma County's Safety Element. I have been commenting since the initial public comment period, and appreciate that at least some of my suggestions (as well as other suggestions made by the public) have been incorporated into the revised Safety Element that you will be reviewing on August 12<sup>th</sup>.

Unfortunately, there are significant remaining problems with the current draft of the Safety Element that I believe preclude your being able to accept the Addendum to the General Plan EIR, and preclude your ability to adopt the proposed resolution herein.

With this letter, I request that you instruct Staff to require compliance with state law, with any necessary amendments to both the proposed Safety Element and the Addendum to the General Plan 2020 EIR, **before** you consider approval of either document. Please reject the requested approvals herein.

### **SONOMA COUNTY MUST COMPLY WITH STATE LAW**

There are two "new" state laws that the County must comply with – laws enacted as a result of SB 99 (2019) and AB 747/AB1409 (2019/2021). The two Assessment reports prepared by Fehr & Peers that purportedly comply with those laws are Appendices B and C, respectively, to the within Safety Element.

**Neither of those Assessments comply with the requirements of their respective laws.** Even worse, after I pointed out this noncompliance in my April 30, 2025 letter, instead of obtaining compliant Assessments, the Safety Element was instead revised to tacitly admit that noncompliance by stating that compliance with those state laws would take place at some undefined point in the future.

With regard to compliance with SB 99, the Safety Element claims that it:

[I]s an initial screening effort to identify communities that may have limited access. The assessment may be further broadened and refined by community input and additional analysis over time with direction from the Board of Supervisors. (page 15 of the Safety Element pdf)

As is obvious the four corners of Govt. Code §65302(g)(5), which mandates the SB 99 Assessment, there is **no** provision for "initial screening" or that the Assessment "may" be broadened/refined at some nebulous time in the future – instead compliance is required now, and BOS "direction" is irrelevant.

With regard to compliance with AB 747/AB 1409, the Safety Element added Policy SE-2, Program 2<sup>10</sup>, which proposes to continue to evaluate evacuations, including identification of the capacity, safety and viability of same, to be incorporated into any future updates to the General Plan and/or the Hazard Mitigation Plan, with no date certain for actual compliance with Govt. Code §65302.15.

**This is unacceptable and renders this Safety Element defective on its face.** These State laws require compliance in the Safety Element update, which is before you now, and do not allow delay in compliance to some future time. In fact, the Resolution you are requested to approve both claims that compliance has been “substantively” achieved<sup>11</sup>, while also admitting that “further” compliance will take place in the future, rendering it out of compliance with both SB 99 and AB 747/AB 1409. The Resolution you are being asked to adopt states:

d. The Safety Element Update identifies residential developments in hazard areas that have fewer than two emergency evacuation routes and includes an implementation measure for additional review of residential areas with limited emergency egress.

e. The Safety Element Update identifies potential evacuation routes and assesses the capacity, safety, and viability and potential evacuation locations under a range of emergency scenarios, and further includes an implementation measure for additional review of evacuation constraints. (at page 6 of the Resolution)

While the statements that actual compliance is being deferred is accurate (although not permitted by law), neither statement implying that legal compliance has been achieved in this Safety Element is correct.

**Again, please demand that new Assessments be prepared that comply with the laws enacted by SB 99 and AB 747/AB 1409, that the Safety Element and the Addendum to the General Plan 2020 EIR then be revised as necessary as a result of those new legally compliant Assessments, and then, and only then, that this Safety Element and its accompanying EIR Addendum be returned for you to consider.**

Discussion of how both Appendices B and C are noncompliant with state law is below.

### **SB 99 Compliance**

In 2019, SB 99 was approved into law, amending Govt. Code §65302(g)(5), and requires that

Upon the next revision of the housing element on or after January 1, 2020, the safety element shall be reviewed and updated as necessary to identify residential developments in any hazard area identified in the safety element that do not have at least two emergency evacuation routes.

This is a clear directive – SB 99 compliance “shall” be accomplished, and the Safety Element herein must contain this identification of residential developments in hazard areas that do not have two emergency evacuation egress routes.

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<sup>10</sup> At page 67 of the Safety Element pdf.

<sup>11</sup> State law says that you shall do the work; the law doesn’t give credit for taking it seriously, but only partially doing the work.

**Unfortunately, Appendix B to the Safety Element – the SB 99 Assessment – does not adequately accomplish this identification, and therefore is defective.**

The SB 99 Assessment identifies **12** residential development locations in Sonoma County with only one egress route. A separate program legally required by Public Resources Code §4290.5 with essentially the same mandate, the CalFire Subdivision Review Program<sup>12</sup>, identifies **98 +/-** residential development locations in Sonoma County with only one egress route.<sup>13</sup>

Clearly there is a very large disconnect between the within SB 99 Assessment and the CalFire Subdivision Review Program. In El Dorado County's SB 99 Assessment, they started with their relevant CalFire Subdivision Review Program results and worked from there, and such coordination/alignment is recommended by the Governor's Evacuation Planning Technical Advisory Manual at pages 16-17 of the pdf. Sonoma County's SB 99 Assessment, however, appears to have feigned ignorance of the 2020-21 CalFire assessment, which is inexcusable.

In fact, Sonoma County's SB 99 Assessment should have identified more residential locations than CalFire identified, because the CalFire program only identifies residential locations in certain fire hazard severity zones, and the within SB 99 Assessment is required to identify residential locations for all types of hazards.

There are likely multiple reasons for this wholly inadequate SB 99 Assessment, which I will discuss in the body of my letter below, but **the bottom line is that the within SB 99 Assessment does not satisfy the legal requirements of Govt. Code §65302(g)(5), so you must reject this document and demand a legally adequate Assessment prior to considering both the Safety Element and its EIR Addendum.**

#### **AB 747 and AB 1409 Compliance**

In 2019, AB 747 was approved into law, amending Govt. Code §65302.15, and in 2021, AB 1409 was approved into law, further amending Govt. Code §65302.15.

Govt. Code §65302.15 requires the County to:

[I]dentify evacuation routes and their capacity, safety, and viability and evacuation locations under a range of emergency scenarios.<sup>14</sup>

This required identification "shall" be accomplished with any Safety Element update after January 1, 2022. There is no wiggle room in this law that allows compliance at some future undefined date; the law clearly states that this identification "shall" be accomplished with the Safety Element update.

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<sup>12</sup> <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/subdivision-review-program>

<sup>13</sup> My April 30, 2025 letter regarding the Safety Element identified another 3 residential developments with only one egress route, and other public comments have identified other locations.

<sup>14</sup> This is one of the shortest laws ever. See [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202120220AB1409](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB1409)

While the Appendix C AB 747 Assessment attempts to identify the capacity of evacuation routes, it is faulty. Further, that Assessment completely and utterly fails to identify the safety and/or viability of any evacuation routes. This renders this Assessment completely useless for purposes of legal compliance.

### Faulty Evacuation Capacity Identification

This AB 747 evacuation analysis makes clear on its face that it is ONLY an evacuation route capacity evaluation, which is reiterated in the Safety Element, in Section 2.1.3, page 16 of the pdf.

This document describes the methodology for an assessment of roadway capacity and time needed to evacuate a designated study area under described evacuation scenarios. (Page 1 of the AB 747 Assessment)

Since none of the underlying data is available to evaluate this evacuation capacity analysis, I am left to rely on what is provided in this document, which is a table showing the estimated number of vehicles that will be attempting to evacuate in each scenario. Any analysis of capacity has to start with the number of vehicles evacuating, and therefore the math must be correct, at a minimum.

After my multiple complaints about the original Appendix A chart, the consultants revised that chart to include enough information so that the numbers would add up. Of course, there's no evidence that the emergency evacuation route Assessment used the numbers in the new chart to evaluate emergency evacuation route capacity.

However, even if we are to presume that the consultants did use the numbers contained in the new chart in their Assessment, there is an additional problem with this Appendix A chart – which has existed in all versions of this chart (I just finally did the math). The consultants have underestimated the cars evacuating in Scenario 2 in 2040 by almost 700 cars, and have significantly overestimated the number of cars evacuating in Scenario 3 in 2040 by almost 11,000 cars – or by almost 10%.

While the underestimation for the 2040 Scenario 2 evacuation is small – only about 2%, and the overestimation for the 2040 Scenario 3 evacuation seems like good news – the evacuations will likely take less time due to 10% less cars attempting to evacuate – the reality is that if you can't trust the math in this chart, how can you trust the evacuation Assessment at all? Is this a matter of a computer error? An AI hallucination? Or are all/some of the data and numbers used to create this evacuation Assessment in question?<sup>15</sup>

The only thing I know for certain is that inaccurate numbers in a document provided to the public and to the Board of Supervisors who will be making a decision at least partially based on those numbers is unacceptable.

As promised, now I'll crunch the numbers. Apologies for the math that follows.

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<sup>15</sup> Yes, it's also possible that I don't have enough information because all of the underlying data driving the assumptions in Appendix A is hidden. Which would also be a problem – publicly facing documents should provide enough information so they can be fact checked.

The revised table, below, is from this current AB 747 evacuation Assessment, in Appendix C to this Safety Element.

## Appendix A: Estimated Evacuation Demand

Scenario	Population	Households	Household Vehicle Ownership					Estimated Residential Evacuation Demand (Number of Vehicles)	Employment	Estimated Employee Evacuation Demand (Number of Vehicles)	Estimated Total Evacuation Demand (Number of Vehicles)
			0	1	2	3	4+				
Scenario 1 Base (2019)	31,511	12,684	418	3,853	4,868	2,278	1,267	20,811	7,293	7,293	28,104
Scenario 1 Future (2040)	47,700	19,141	763	5,980	7,174	3,272	1,952	31,059	8,969	8,969	40,028
Scenario 2 Base (2019)	23,158	8,627	244	2,114	3,340	1,996	933	14,695	5,605	5,605	20,300
Scenario 2 Future (2040)	26,633	9,942	303	2,435	3,892	2,265	1,047	17,400	8,613	8,613	26,013
Scenario 3 Base (2019)	100,936	40,059	1,886	13,134	15,305	6,519	3,215	64,752	24,079	24,079	88,831
Scenario 3 Future (2040)	108,994	43,244	2,023	14,209	16,511	7,013	3,488	69,878	37,142	37,142	107,020
<b>Total (2019)</b>	155,605	61,370	2,548	19,101	23,513	10,793	5,415	100,258	36,977	36,977	137,235
<b>Total (2040)</b>	183,327	72,327	3,089	22,624	27,577	12,550	6,487	118,337	54,724	54,724	173,061

Source: Sonoma County Transportation Authority (SCTA) Travel Demand Model, American Community Survey 2019-23.

To properly evaluate this table, you need to know that:

- In Scenario 1, the consultant is predicting a 51.4% growth in residential population and a 23% growth in employment population for 2040. (Page 11 of Appendix C)
- In Scenario 2, the consultant is predicting an 18.2% growth in residential population and a 57.5% growth in employment population for 2040. (Page 12 of Appendix C)
- In Scenario 3, the consultant is predicting an 8% growth in residential population and an 8% growth in employment population for 2040. (Page 13 of Appendix C)
- 100% of all households will be home and will be evacuating. (Page 8 of Appendix C)
- All workers who will be evacuating will each take one car to evacuate. (Page 8 of Appendix C)

Then, fact checking the Appendix A table is just math.

In Scenario 1, the increase in 2040 residential population and employment population results in the more or less the correct number of vehicles evacuating.

In Scenario 2, the increase in 2040 residential population and employment population results in both the residential and employment population numbers in 2040 being incorrectly calculated, and are too low. To evaluate the number of estimated cars evacuating in 2040, first you multiply the residential population 2019 number 23,158 by .182 (18.2% increase in residential population) = 4,215 (new residential population) + the original 23,158 (2019 residential population) = 27,373 for the new 2040

Scenario 2 residential population. (On Appendix A, that number is 26,633, so obviously wrong). To determine the new household population for 2040 you divide the old 2040 households, 9,942, by the old residential population, 26,633, which gets you .373, which is the multiplier to be used to determine households. Multiply the new residential population  $27,373 \times .373 = 10,210$  residential households. The next step is to determine the number of vehicles the consultant has determined will be used by the residential household population to evacuate in 2040. To do that you divide their current (incorrect) number of vehicles for the 2040 residential population evacuation – 17,400 – by their current (incorrect) residential households – 9,942, and you get 1.75 vehicles used per household to evacuate. Now, multiply that 1.75 by the new residential household number –  $1.75 \times 10,210 = 17,868$  residential vehicles evacuating. You'll need to add the employee vehicles, so to figure the increased 2040 employee population, multiply the original 2019 employee population by .575 (57.5% increase in employees) to determine the increased employee population –  $5,605 \times .575 = 3,223$  new 2040 employees + 5,605 2019 employees = 8,828 total 2040 estimated employees. Since each employee will be driving one car, the total number of employee vehicles evacuating will be 8,828. So, the correct total number of 2040 vehicles evacuation will be  $17,868 + 8,828 = 26,696$ , and you get 683 more vehicles evacuating than shown in Appendix A for their 2040 numbers.

In Scenario 3, the increase in 2040 residential population and employment population results in both the residential and employment population numbers in 2040 being incorrectly calculated, and are too high and too low, with the over all result a reduction in the number of vehicles evacuating. To evaluate the number of estimated cars evacuating in 2040, first you multiply the residential population 2019 number 100,936 by .08 (8% increase in residential population) = 8,075 (new residential population) + the original 100,936 (2019 residential population) = 109,011 for the new 2040 Scenario 2 residential population. (On Appendix A, that number is 108,994, so obviously wrong). To determine the new household population for 2040 you divide the old 2040 households, 43,244, by the old 2040 residential population, 108,994, which gets you .396755, which is the multiplier to be used to determine households. Multiply the new residential population  $109,011 \times .396755 = 43,251$  residential households. The next step is to determine the number of vehicles the consultant has determined will be used by the residential population to evacuate in 2040. To do that you divide their current (incorrect) number of vehicles for the 2040 residential population evacuation – 69,878 – by their current (incorrect) residential households – 43,244, and you get 1.62 vehicles used per household to evacuate. Now, multiply that 1.62 by the new residential household number –  $1.62 \times 43,251 = 70,067$  residential vehicles evacuating. You'll need to add the employee vehicles, so to figure the increased 2040 employee population, multiply the original 2019 employee population by .08 (8% increase in employees) to determine the increased employee population –  $24,079 \times .08 = 1,926$  new 2040 employees + 24,079 2019 employees = 26,005 total 2040 estimated employees, significantly less than their current estimate of 37,142 2040 employees. Since each employee will be driving one car, the total number of employee vehicles evacuating will be 26,005. So, the correct total number of 2040 vehicles evacuation will be  $70,067 + 26,005 = 96,072$ , and you get 10,948 less vehicles evacuating than shown in Appendix A for their 2040 numbers.

On the surface, this looks great – almost 11,000 less vehicles evacuating in Scenario 3 in 2040, so evacuation times may be shorter.

However, what these two discrepancies really mean is that the entire AB 747 evacuation Assessment is unreliable. If these two math errors happened, what else is wrong with all of the Assessment?

Prior to your adopting the within Safety Element, the consultant should be required to, first, correct their Assessment to reflect accurate numbers (or explain how their calculations are correct), and, second,

disclose exactly how they've reached the conclusions they've reached by disclosing all data they are relying on in reaching said conclusions.

#### No Evacuation Safety or Viability Identification

Govt. Code §65302.15 clearly requires that the County identify not just the capacity of evacuation routes under a variety of emergency scenarios, but also that the safety and viability of those evacuation routes be identified.

This AB 747 evacuation Assessment, and the Safety Element itself, does neither of those legally required identifications. In fact, the words "safe," "safety," "viable" and "viability" only appear in both the Safety Element and this AB 747 evacuation Assessment in unrelated contexts.<sup>16</sup>

**The bottom line is that the within AB 747/AB 1409 Assessment does not satisfy the legal requirements of Govt. Code §65302.15, so you must reject this document and demand a legally adequate Assessment prior to considering both the Safety Element and its EIR Addendum.**

What follows are specific comments about the revised Safety Element and the Appendices thereto.

#### **SAFETY ELEMENT POLICIES**

Before my specific comments, I want to address the recommendations contained in the AB 747 Assessment, which is Appendix C to this Safety Element. There are a few policy recommendations in the AB 747 Assessment that I consider important which do not appear to be contained in the Safety Element and with this letter I request that they be considered for addition, as follows:

1. Page 14 of the Appendix C, Demand section, fifth bullet: I agree that new developments and residential construction projects must be required to plan for their construction employees' evacuation needs as part of their construction permitting approvals. I think this should go further, however, and that the completed projects should be required to consider the evacuation needs of their employees, guests, and/or visitors as part of their development permitting approvals. I would suggest a policy such as:

"Require all new developments and residential projects to have an approved plan to evacuate construction workers as a mandatory part of their construction permits, and require all new developments and residential projects to have an approved plan to evacuate all employees, visitors and/or guests of the completed project as a mandatory part of their project approvals.

The closest the Safety Element comes to this requirement is with Policy SE-2c and Policy SE-2k:

Policy SE-2c: Continue to explore and implement strategies to enhance safe evacuation protocols for workers inside evacuation zones. (page 21 of the pdf)

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<sup>16</sup> The one place the word "viable" appears in relationship to evacuations is at page 3 of the SB 99 Assessment in the Appendices to the Safety Element, numbered paragraph 12, where it is stated that a particular location effectively only has one egress route because the other existing egress route is unlikely to be "viable" in an emergency.

Policy SE-2k: Consider the presence of non-residents, including visitors and tourists, in all evacuation planning efforts. (page 21 of the pdf)

Obviously, neither policy comes close to what either the AB 747 Assessment recommended, nor what I am requesting.

The Safety Element also contains Policy SE-8g (page 36 of the pdf), which mandates fire protection plans for all new discretionary development within all high and very high fire hazard severity zones that include evacuation plans. While this is a good policy, it does not go far enough. Soon enough Sonoma County will be subject to all State housing streamlining ordinances that remove all discretionary decision making, and therefore Policy SE-8g's application **only** to discretionary development means that soon up to 100% of development in fire danger will not be required to plan in any way for safe evacuations.

2. Page 15 of Appendix C, Supply section, sixth bullet: I believe it is critical to require developments other than single family homes to provide, at a minimum, a permanent source of emergency power as part of their approvals. I would also recommend that all congregant developments (such as hotels, tasting rooms and hospitality centers, hospitals and health care facilities, senior living facilities, schools, offices – basically all locations where there will be gatherings of people who may need to be evacuated) be required to not only have an approved evacuation plan as part of their project approvals, but be required to provide transportation to evacuate anyone without a vehicle or who is too afraid to drive themselves. See, mitigation measures recommended for the proposed Koi Nation Casino (<https://www.shilohresortenvironmental.com/eis/>, Appendix N)
3. Page 15 of Appendix C, Supply section, ninth bullet: Since there are no federal, state or local rules or regulations establishing standards to provide safe facilities for sheltering in place during wildfires, I would recommend in the strongest possible terms that the County never identify any locations as being recommended for sheltering in place during wildfires. However, I do think that identification of possible refuges of last resort throughout the County should be considered, as long as they are identified clearly as not being safe, with no guarantee of survival. Refuges of last resort should be clearly understood as locations that are only to be used when individuals have no other choices.
4. Page 15 of Appendix C, Policy section, third bullet: I believe it would be a good idea to create a registry of locations where "Access and Functional Needs" populations are located (such as senior living facilities, schools, hospitals and health care facilities, and locations where individuals may not have a personal vehicle such as offices, hotels and all tourist serving locations). While the County cannot assume responsibility for evacuating those individuals (see my recommendation in #2, above), a registry would at least inform public safety officials.

## **SAFETY ELEMENT QUESTIONS/COMMENTS**

1. Sonoma County's Multi-Jurisdictional Hazard Mitigation Plan (HMP) is currently being updated. I understand that this draft Safety Element was necessarily prepared using the "old" HMP.

However, the Safety Element states: “Safety Elements are required to be reviewed and updated as needed upon revision of the LHMP or Housing Element.”

What process will be followed to review and update this Safety Element when the updated HMP is finalized and released?

2. Page 9 of the pdf, Section 1.2, Second bullet point: The Safety Element is required to avoid or minimize flood risk to new development. Although the law doesn’t require it, shouldn’t this Safety Element also address minimizing flood risk to existing development?
3. Page 15 of the pdf, Section 2.1.2: Government Code §65302(g)(5) (SB 99) requires that “Upon the next revision of the housing element on or after January 1, 2020, the safety element shall be reviewed and updated as necessary to identify residential developments in any hazard area identified in the safety element that do not have at least two emergency evacuation routes.”

Nothing in that Code section provides a definition of a “residential development” in a Safety Element hazard area. The only comparable statute of which I’m aware is CalFire’s Subdivision Review Program.

Public Resources Code §4290.5(a) establishes that CalFire Subdivision Review Program, which requires identification of existing subdivisions located in a SRA or a VHFHSZ (in a Local Responsibility Area – LRA) at significant fire risk without a secondary egress route. Public Resources Code §4290.5(d) defines subdivision as an existing residential development of more than 30 dwelling units.

The within Safety Element and its SB 99 Assessment acknowledges that the CalFire Subdivision Review Program is a “parallel” program to the SB 99 requirement, but instead of using the existing PRC §4290.5(d) definition of a “residential development” – more than 30 dwelling units – chooses to evaluate residential developments of 30 or more parcels instead. Further, the Safety Element and the SB 99 Assessment narrows the number of residential candidates for SB 99 evaluation by only looking at those 30 or more parcel residential developments with only one egress route where the road is at least ¼ mile long, because of the assumption that when a road is at least ¼ mile long those residences will be in locations with an “urban and suburban area with substantial street grids.” (See, question/comment #1 in my comments to the SB 99 Assessment in Appendix B, below.)

The results of these decisions are unacceptable, and evidences no attempt to comply with SB 99. In fact, the result of these decisions is that the SB 99 appendix identifies 12 residential areas with only one egress route, whereas the CalFire Subdivision Review Program (from 2020-21) identifies 98 (+/-) residential areas with only one egress route.<sup>17</sup>

While the Safety Element tries to explain the noncompliance with a statement that the SB 99 Assessment is an “initial screening,” that statement is rather shocking, considering the

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<sup>17</sup> In my discussion of the SB 99 appendix, later in this letter, I will also identify other possible residential locations with only one egress route that I believe both the SB 99 appendix and the CalFire Subdivision Program missed, so the total number of residential areas of more than 30 dwelling units with only one egress route may be higher than 98.

preexistence of the CalFire Subdivision Review Program. It's hard for me to believe that the consultant performing the SB 99 Assessment didn't **start** with the CalFire Subdivision Review Program, and work from there to include residences subject to hazards other than wildfire, as appears to have been done by El Dorado County's consultant,<sup>18</sup> and is contemplated by the Governor's Evacuation Planning Technical Advisory manual.

4. Page 16 of the pdf, Section 2.1.3: Government Code §65302.15 (AB 747/1409) requires that the County "identify evacuation routes and their capacity, safety, and viability and evacuation locations under a range of emergency scenarios."

As discussed above, the Safety Element AB 747 Appendix identifies the capacity of the three selected scenarios, generally, and at least partially incorrectly. However, there is no identification/discussion/evaluation anywhere of the "safety" or "viability" of evacuations under any of those three scenarios, or generally, or at all. The words "safety" and "viability" do not appear in any location in either the Safety Element or the AB 747 appendix, other than when quoting the law or using the word safety in unrelated sentences/titles, and the word "viable" appearing in one unrelated location.

This is unacceptable. Both the Safety Element and the AB 747 Appendix are required by law to not only identify the capacity of evacuation routes, but are also required to identify their safety and viability, and neither perform that required task.

5. Page 21 of the pdf, Policy SE-2k: This policy should not only consider the presence of visitors and tourists in all evacuation planning efforts, but also the presence of patients, employees and students.
6. Page 26 of the pdf, Policy SE-5c: This policy should be mandatory, not "prioritized." I would suggest language such as:

"Require design, installation and maintenance of roads serving existing and new developments to allow safe simultaneous ingress and egress for emergency responders and residents, and resilience to anticipated climate extremes."

7. Page 31 of the pdf, Figure 5: I believe it's irresponsible not to show the perimeters of the historic 1964 Hanly fire, at least, in this map, if not other older Sonoma County fires. The Hanly fire, in particular, is striking by the extremely similar perimeters to the 2017 Tubbs/Sonoma Complex fire. History is important, and educates us on our likely future.
8. Page 35 of the pdf, Policy SE-8a: While this is a good policy, it doesn't go far enough. An additional directive policy should be added to develop objective development standards for all nondiscretionary development that occurs in County areas in all FHSZs and in areas who have experienced fires in the past.

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<sup>18</sup> I have been unable to find any county level AB 747 assessments in California, with the exception of the assessment done by El Dorado County, and the El Dorado County Multi-Jurisdictional Hazard Mitigation Plan – Wildfire Evacuation Study is available at <https://www.eldoradocounty.ca.gov/Public-Safety-Justice/Safety-Justice/sheriff/operations/oes>

9. Page 35 of the pdf, Policy SE-8c: I doubt it is possible to “achieve an acceptable level of risk,” no matter how you define it when talking about building in areas of the County subject to fire danger, and in fact I would recommend eliminating that statement because it implies that mitigation measures exist that will result in “an acceptable level of risk.”

First, studies have shown that only 40% +/- of fully Chapter 7A/defensible space compliant structures are likely to survive a wildfire<sup>19</sup>, and second, there are no existing studies/evaluations by CalFire<sup>20</sup> about the risks/hazards of urban conflagration, which we are now aware is a very real problem (see, Coffey Park, Altadena, Pacific Palisades).

By using this phrase, Sonoma County is stating that there are mitigation measures that exist that can lower the danger from wildfires to an “acceptable” level. If you insist on using this phrase, you must define what the County considers an “acceptable” level of risk, how specific mitigation measures have been shown to achieve that acceptable risk, and provide evidence for that definition.

Please revise this policy to state something like: “In reviewing development projects, maintain stringent initial site design and ongoing maintenance standards, and incorporate all required state and local mitigation measures.”

10. Page 35 of the pdf, Policy SE-8f: I believe that this policy should be expanded to High Fire Hazard Severity Zones, as well.
11. Page 36 of the pdf, Policy SE-8g: While this policy is good, it should be expanded and not limited to discretionary developments. It is probable that Sonoma County will lose all ability for discretionary decision making on housing projects in the future, given the extensive State housing streamlining legislation already passed and currently undergoing the State process.

In fact, this is an objective statement: “Require fire protection plans for all new [elimination of the word “discretionary” makes the statement objective, obviously] developments in all High and Very High Fire Hazard Severity Zones.” Additionally, the remainder of this policy is also either objective, or very close to it, and would require very little to make objective.

It is critical that **all** development occurring in HFHSZs and VHFHSZs – discretionary and by right – do the work necessary (most required by state and local laws) to ensure the safety of the structures and the residents, guests, employees, patients and students in the structures.

Question: what specifically is the “emergency preparedness and evacuation plan” that is required by this policy and are completed plans available to the public?

12. Page 36 of the pdf, Policy SE-9a: Sonoma County should become a member of the First Street Foundation (<https://firststreet.org/>), which is the only publicly available **risk** assessment organization, with relatively modest fees for governmental organizations. Sonoma County

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<sup>19</sup> One such report is available at <https://fireecology.springeropen.com/articles/10.1186/s42408-021-00117-0> -- additional other reports are available.

<sup>20</sup> See, LA Times article, <https://www.latimes.com/environment/story/2025-02-04/cal-fire-maps-did-not-predict-altadena>

should take advantage of First Street Foundation's deep data to inform all their actions and policies. The insurance companies all have their own private risk consultants – it's inexcusable for Sonoma County not to take advantage of a publicly available risk assessment consultant.

13. Page 44 of the pdf, Policy SE-10i: This should be "required." This policy should read: "Prohibit variances to building setbacks along streams and in the 100-year floodplain.
14. Page 45 of the pdf, Section 2.6: Please confirm that the seismic maps used by this Safety Element are those that were most recently updated, I believe in 2023-4.
15. Pages 53-54 of the pdf, Policy SE-12h: This should be mandatory, as follows: "Prohibit 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." I have no idea why the County would prefer to "discourage" instead of prohibit this unacceptable behavior.
16. Page 56 of the pdf, Policy SE-13g: Impacts should not be "minimized," they should be eliminated, further, this should not be discretionary, but should be a mandatory policy. Rewrite this policy as follows: "Require siting and design during application review for new and redevelopment projects to eliminate impacts to surrounding uses and people due to runoff, aerial spray, or other means of exposure."
17. Page 56 of the pdf, Policy SE-13j: This policy should include not just avoidance of siting "within one quarter mile of schools," but should include other existing and new sensitive uses, including but not limited to health care facilities, parks, open spaces, etc.
18. Page 63 of the pdf, Policy SE-15h: First, why is this policy only applicable to commercial and now industrial uses? This policy should also be required of any residential use with a parking lot. Second, if a development decides to install shade structures with solar arrays, they must be required to do those installations prior to development sign off for occupation instead of delaying installation, sometimes for years.
19. Pages 67-73 of the pdf: See above comments that apply to these goals/programs, along with a few specific comments, below.
20. Page 71 of the pdf, Goal SE-8, Program 52: In addition to my comments, above, about making this policy/program objective, rewrite last sentence to make mandatory, as follows: "Risk reduction measures will be incorporated into project design or conditions of approval."
21. Page 71 of the pdf, Goal SE-10, Programs 56 and 58: The word "should" must be replaced by "will." These should not be suggestive, but mandatory.
22. Page 73, Goal SE-15, Program 78: See above comment about inclusion of residential parking lots. What does "flexible options for compliance" mean? Under no circumstances should any development, residential or commercial, be able to get sign off without either planting trees or installation of shade/solar.

## **SAFETY ELEMENT APPENDIX A QUESTIONS/COMMENTS**

1. Page 109 of the pdf; Wildfire Infographic: This infographic should be redone to include the information in the CalFire LRA FHSZ maps, released in February, and which have been adopted by the County. The information in those maps will change the “Number of People/Households in Wildfire Hazard Areas,” and the “Exposed Structures in Fire Hazard Severity Zones” in the central, top “Present” panel. Further, they will potentially change the representation made in the lower right panel of the infographic, copy in “Projected Change in Annual Average Area Burned.”

Additionally, in the middle, bottom panel, “Factors Affecting Wildfires,” this infographic must add the “built environment” or “structures.” As we have learned from the urban conflagrations in Coffey Park, Altadena and Pacific Palisades, the built environment, especially structures, is a very large factor affecting wildfires.

2. Page 110 of the pdf, Figure 8: Must be updated to include the 2025 CalFire LRA maps. Sonoma County has no choice but to adopt those maps as is (although Sonoma County can choose to expand beyond the CalFire identified FHSZs). Therefore, there is no excuse for this map not including the current LRA maps.
3. Page 111 of the pdf, Figure 9: Again, I believe it’s irresponsible not to show the perimeters of the historic 1964 Hanly fire, at least, in this map, if not other older Sonoma County fires. The Hanly fire, in particular, is striking by the extremely similar perimeters to the 2017 Tubbs/Sonoma Complex fire. History is important, and educates us on our likely future.
4. Page 147 of the pdf, Figure 19: See comments, above, in this letter, including comment 2 directly above.
5. Page 160 of the pdf, Figure 22: See comments, above, in this letter, including comment 2 directly above.

## **SAFETY ELEMENT APPENDIX B QUESTIONS/COMMENTS**

1. Page 364 of the pdf, SB 99 Approach Section: As discussed in my questions/comments to the Safety Element, above, the approach taken by this SB 99 Assessment is legally unsupportable. If there were a minor difference between the number of affected residences in this Assessment and the CalFire Subdivision Review Program, it might be understandable, but clearly the difference between the 12 residential areas identified in the within Assessment and the 98 +/- residential areas identified in the CalFire Subdivision Review Program is substantive and extremely concerning.

The El Dorado County SB 99 Assessment, in fact, appears to incorporate the CalFire Subdivision Review Program, unlike the within SB 99 Assessment.

The alleged “reason” that this SB 99 Assessment doesn’t start with the CalFire identified residential units is because of odd differences to identify such affected residential locations – instead of the 30 + dwelling units, this Assessment uses 30 + parcels, and this Assessment imposes an additional requirement that any egress route be at least ¼ mile long, for the

“reason” that if a single access route is at least ¼ mile long, they will be able to “exclude cul-de-sacs in urban and suburban areas with substantial street grids.”

Please provide the following information:

- a. The explicit reason this SB 99 Assessment didn’t start with the CalFire Subdivision Review Program identified parcels and add, as necessary, locations including for hazards other than wildfire;
- b. The explicit reason that this SB 99 Assessment chose to evaluate areas with 30 + parcels instead of the 30 + dwelling units the CalFire Subdivision Review Program uses.
- c. Identify every CalFire Subdivision Review Program identified residential area with only one egress route where there is another way out due to “substantial street grids.”
- d. Identify every CalFire Subdivision Review Program identified residential area with only one egress route where that egress route is a cul-de-sac.
- e. Identify every location excluded by this AB 747 Assessment because it consists of 30 + parcels on a single egress route that is **less** than ¼ mile long.

Frankly, this SB 99 Assessment’s criteria that a road must be longer than ¼ mile makes no sense at all. First, if by cul-de-sac, they’re referring to a driveway with 1-29 dwellings/parcels using that driveway, that wouldn’t be included anyhow. Second, if there’s a cul-de-sac with 30 + dwellings/parcels, and that cul-de-sac is the only way out, those residents are in grave danger in any evacuation and I cannot understand why they would be excluded. Third, if there is a “substantial street grid” in an area of 30 + dwellings/parcels, but that “substantial street grid” still leads to only one way out, all that “substantial street grid” does is provide more locations for cars to be stuck.

2. Pages 364-365 of the pdf, Identification of 12 “clusters of residential parcels”: Seven of these identified parcels appear to be duplicated by the CalFire Subdivision Review Program. I’m sure at least some of the remaining parcels are identified because of hazard dangers other than wildfires. Nonetheless, the fact remains that the CalFire Subdivision Review Program (from 2021) identified up to 91 locations that are not identified by this Assessment.

I have identified a few other locations that I believe have 30 + dwelling units with only one egress route, and believe that they all must be evaluated and included both in this SB 99 Assessment, and in the next iteration of the CalFire Subdivision Review Program (which should take place in 2026), as follows:

- a. Sea Ranch: Leeward Road, North of Halcyon and after FishRock, 6700 ft (1.25 miles) headend. 162 homes/building sites (almost all are with homes, except ~5 lots that are listed for sale or under construction)
- b. Los Alamos Road, uphill (East) after Futura Way, road continues another 4.5 miles and dead-ends at Hood Mt. Regional Park; the last home is at ~ 4 miles. There were ~150 homes before the 2020 fire, although many burned, many have been or are being rebuilt.
- c. Freestone Street/Bohemian Highway) - single access dead end with 30 + dwelling units, although many of them may be unpermitted....but they do exist.

3. Page 365 of the pdf, First Full Paragraph: I don't understand how the travel distance is a "proxy for accessibility." Please explain, in detail.
4. Page 365 of the pdf, bulleted list of "external gateways": As discussed, below in my comments to Appendix C, the AB 747 Assessment, the idea that anyone is going to be evacuating to Napa County using, for instance, Petrified Forest Road, is unlikely. This list must be revised to take into account typical winds during fire events and historic fires in Sonoma County, and all alleged evacuations to locations that actually are more likely to be the origination point of fires must be eliminated.
5. Page 366 of the pdf, SB 99 Mapping Overview, Figure 1 description: All identification of fire hazard severity zones must include the current SRA maps, as well as the February 2025 LRA maps, as Sonoma County has adopted those maps.
6. Page 367 of the pdf, Figure 1: This map must include the February 2025 LRA maps, as well, at least for VHFHSZs. Of course, I also object to this map for its incredible incompleteness, by leaving out all of the CalFire Subdivision Review Program locations.
7. Page 369 of the pdf, Figure 3: Again, alleged evacuations to Napa County, and even to Lake County, are unlikely, and so shouldn't be relied on by the Safety Element, by the AB 747 Assessment, or by this SB 99 Assessment.
8. Pages 370-381, Figures 4-1 through 4-12: Again, while these maps may be fine as is, this SB 99 Assessment must include maps of all missing CalFire Subdivision Review Program identified locations with 30 + dwelling units and only one egress route.

#### **SAFETY ELEMENT APPENDIX C QUESTIONS/COMMENTS**

(When this letter was written, the revised Appendix C was not a part of the very long Safety Element and Appendices pdf document, so references below are to the Appendix C pages numbers.)

1. Page 2, AB 747 Approach: Both AB 747 and AB 1409 (Government Code §65302.15) require that Sonoma County "identify evacuation routes and their capacity, safety, and viability [following underlined section was contained in AB 1409, which updated AB 747] and evacuation locations under a range of emergency scenarios."

Nowhere in this entire Safety Element are evacuation locations identified. There is no provision in AB 1409 to identify evacuation locations "on the fly" during emergencies, or at some future time. The failure of the Safety Element to comply with AB 1409 is substantive and significant.

This AB 747 Assessment makes clear that this is only a "capacity assessment." The law requires that Sonoma County identify not only the capacity of evacuation routes under a range of emergency scenarios, but must identify the safety and viability of those evacuation routes. This Assessment, and the Safety Element, does neither of those things. In fact, the words "safe," "safety," "viable" and "viability" only appear in both this AB 747 Assessment and in the Safety

Element in other contexts<sup>21</sup>. There is no identification or evaluation of the safety and/or viability of any evacuation routes in any of the three selected scenarios.

This is unacceptable and does not comply with the law. This AB 747 Assessment must be redone to identify/evaluate the safety and viability of evacuation routes, and to comply with AB 1409 and identify evacuation locations.

2. I have been unable to find any county level AB 747 Assessments in California, with the exception of the assessment done by El Dorado County<sup>22</sup> (there are numerous city AB 747 assessments, but a county assessment is more likely to be comparable).

At page 3 of the pdf, AB 747 Approach: Although this Assessment uses three scenarios to study evacuation capacity (see above), that appears to be most commonly done in city assessments. El Dorado County evaluated five scenarios, three more general scenarios with two additional scenarios based in two subdivisions with only one egress route. I believe that El Dorado County's approach is more appropriate for Sonoma County's AB 747 Assessment, particularly given the 98 +/- identified CalFire Subdivision Program residential developments with only one egress route, and request with this letter that the within AB 747 Assessment be expanded to evaluate evacuations in two single access route residential developments in addition to the three more general scenarios.

3. Pages 3-4 of the pdf, last paragraph on page 3: While I appreciate the idea that studying evacuations at 4:30 pm on the Friday preceding a holiday weekend would result in both rush hour traffic and tourist traffic, most of that traffic would be on major roadways instead of on the roads customarily used for at least the commencement of evacuations. Generally, most residents will not be home at 4:30 pm, and given the purported holiday weekend, could already be out of town, or on their way out of town.

Later in this AB 747 Assessment (page 8 of the pdf) it is stated that the Assessment assumes that 100% of the residents will be in their homes at the time of the needed evacuation and that all the employees in each evacuation area will also be evacuating in a single occupancy vehicle.

Please clarify exactly how the selection of this time/date/holiday weekend will provide Sonoma County with a realistic stress test analysis of its transportation network for each of the three scenarios studied.

4. Page 4 of the pdf, bulleted list of evacuation expected by time period: This differs significantly from assumptions in the El Dorado AB 747 evacuation Assessment, particularly for the early evacuations, raising questions in my mind about the validity of the assumptions in the within AB 747 Assessment. The El Dorado AB 747 Assessment used 10 minute intervals over an hour, unlike these 15 minute intervals over an hour, but even so, the within Assessment assumes that in the first half hour 60% of the people evacuating will have begun their evacuation, unlike the El

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<sup>21</sup> The one place the word "viable" appears is at page 111 of the appendices pdf, in the SB 99 assessment, numbered paragraph 12, where it is stated that a particular location effectively has only one egress route because the other existing egress route is unlikely to be "viable" in an emergency.

<sup>22</sup> The El Dorado County Multi-Jurisdictional Hazard Mitigation Plan – Wildfire Evacuation Study is available at <https://www.eldoradocounty.ca.gov/Public-Safety-Justice/Safety-Justice/sheriff/operations/oes>

Dorado Assessment, which assumes that only 40% of evacuations will have begun at the half hour mark.

It appears that this AB 747 evacuation Assessment is more optimistic than the El Dorado County Assessment, which raises questions about the validity of the within Assessment. Please justify the times used by the within Assessment.

5. Page 4 of the pdf, second full paragraph: Please describe all reasons, including all evidence supporting the decision, why the within AB 747 Assessment has determined that there will only be a “10% reduction in capacity” during the evacuations. This appears to be wildly optimistic based on not only the El Dorado County Assessment (40% reduction in capacity<sup>23</sup>), but other city AB 747 Assessments. It’s further suspect, given that many if not most of the evacuations will be taking place on roads where obstacles are likely (downed trees/power lines/abandoned cars, etc.), presence of emergency response vehicles, as well as the likelihood of very high winds with ember cast which will increase the probability of attempting to evacuate with fire on all sides of streets. Additionally, smoke has proven to be a significant impediment to evacuation in the past, even when the fires are not in the locations being evacuated, given the high winds that are probable. All of these concerns in fact should be part of the missing identification of the safety/viability of evacuation routes.

This assumption must be validated, and, if too optimistic, corrected.

6. Page 5 of the pdf, Table 1: There is no discussion, or even mention, of fire behavior in this AB 747 Assessment, which means that there is no acknowledgement of winds in Sonoma County that contribute to wildfire spread. As a result, this Table assigns evacuation destinations to locations such as Napa and Lake Counties that are in fact likely to be the origination point of a wildfire, or, at a minimum, would require driving through the wildfire to reach those counties.

Given past fire behavior in Sonoma County, including wind behavior, I consider it highly unlikely that between 20% - 35% of evacuees from a fire in Scenario 2 will be evacuating into Napa County. And, frankly, even the 5% “expected” evacuation to Napa County in Scenario 3 is debatable.

Please provide all evidence supporting these evacuation destinations.

Further, Scenario 3 is at least somewhat similar to the Tubbs/Nuns fires, and my recollection/lived experience is that a large number of evacuees went west to Sebastopol and even as far as the beaches, which is not reflected in these destination points. While I realize that the destinations in Table 1 are not the “final” evacuation destinations, using Santa Rosa as an

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<sup>23</sup> “During a wildfire evacuation, there are many factors that can influence the capacity of the system that may result in the evacuation traffic not flowing at the same rate as under ideal non-emergency conditions. These factors may include heavy smoke conditions that limit visibility, the presence of emergency response vehicles, and non-typical driver behaviors because of the emergency conditions. To capture these effects all the model scenarios were analyzed with reduced roadway capacity by approximately 40% to capture the worst case of traffic efficiency during a wildfire. This 40 percent reduction in capacity was selected based on the professional judgment of the consultant team. The capacity reduction contributes to congestion patterns that influence both the evacuation route assignment and the ETEs.” El Dorado County Multi-Jurisdictional Hazard Mitigation Plan – Wildfire Evacuation Study, page 14 of that pdf.

evacuation destination is disingenuous, given how the size of Santa Rosa and Scenario 3's outlines. Does this AB 747 Assessment contemplate evacuees arriving at Mendocino Avenue as their first evacuation point, meaning that their danger is reduced? Or is this Assessment assuming that the Santa Rosa evacuees will have the Vet's Building or a Place to Play as their first destination? Given the history of wildfires in Santa Rosa (and the new CalFire LRA maps), there's a significant difference between saying that arriving at Mendocino Avenue (for example) is a safe interim destination and saying that the Vet's Building is a safe interim destination. This Assessment must provide all information showing what the identification of "Santa Rosa" as an interim evacuation destination means – including specific locations considered that interim destination.

In Scenario 3, location 7, this Table assumes that 85% of evacuees starting in Santa Rosa/Valley of the Moon will end up in Santa Rosa as an interim destination. Given the identified roads being evacuated in Santa Rosa, this identification is meaningless, and could easily mean that evacuees were considered to be at their interim destination just by travelling ¼ mile, or less. Again, this Assessment must clarify what is actually meant when referring to "Santa Rosa" as an interim evacuation destination.

7. Page 6 of the pdf, Subarea Module, First Paragraph: Please provide the presumed socio-economic data of evacuees that resulted in the travel demand in this AB 747 Assessment.
8. Page 6 of the pdf, Last Sentence: This sentence confirms the problem with using Santa Rosa as a "gateway" destination for evacuees. If all of NE Santa Rosa is evacuating in Scenario 3, location 7, which is not an unreasonable assumption given past fire experiences and the presumed location of the Scenario 3 fire, specifically identify what this AB 747 Assessment assumes about how far those evacuees would have to travel to be at their interim destination.
9. Page 7 of the pdf, Big Data Adjustments: Please identify Sonoma County's population difference between August 30, 2019 and the date of this Assessment.
10. Page 8 of the pdf, Evacuation Traffic Section: Please confirm that this Assessment included evacuations of patients at any healthcare facilities in the evacuation areas, as well as students in all schools within the evacuation areas, and if not, explain why not.
11. Page 9 of the pdf, Evacuation Destinations Section: Again, please provide the specific locations this AB 747 Assessment is using as the "model gateways." If a trip starts in Santa Rosa, and ends in Santa Rosa, how are you qualifying reaching a model gateway?
12. Page 10 of the pdf, Additional Considerations Section: I am surprised that this AB 747 Assessment does not include evacuation of people with access and functional needs. El Dorado County's AB 747 Assessment appears to include this Assessment, using "WSP Research & Innovation Fellowship Program Manager" Environmental Justice Screening and Mapping Tool Descriptions - <https://www.epa.gov/ejscreen/ejscreen-map-descriptions#soci>

Please explain why this important and critical need was not included in this Assessment.

13. Page 11 of the pdf, Scenario 1 Section: There are approximately 26 CalFire Subdivision Review Program identified locations of 30+ dwelling units with only a single egress route inside the

boundary of this area. Based on the description of Scenario 1, it doesn't appear that those single access locations have been taken into account in assessing the capacity of the evacuation routes (and we know that there's been no assessment of those evacuation routes' safety or viability). Please state whether the CalFire Subdivision Review Program single access route residential developments were considered in this Assessment of Scenario 1.

Additionally, the predicted residential population increase of 51.4% and 23% increase in employment population in this area of the County seems high. Please explain the source/assumptions that led to these predicted increases.

14. Pages 12, Scenario 2 Section: There appear to be approximately 13 CalFire Subdivision Review Program identified locations of 30+ dwelling units with only a single egress route inside the boundary of this area. Please state whether the CalFire Subdivision Review Program single access route residential developments were considered in this Assessment of Scenario 2.

15. Page 12-13, Scenario 3 Section: Although the map of Scenario 3 (Figure 1) appears to include northern Santa Rosa, including the location of the Tubbs fire, generally, this scenario chooses not to duplicate the Tubbs fire perimeter, which seems unrealistic given past fire behavior/history. Please explain why the Tubbs fire perimeter was not included in Scenario 3.

Again, there appear to be approximately 23 +/- CalFire Subdivision Review Program identified locations of 30+ dwelling units with only a single egress route inside the boundary of this area. Please state whether the CalFire Subdivision Review Program single access route residential developments were considered in this Assessment of Scenario 3.

As requested earlier in this letter, please provide the locations of the Santa Rosa interim "gateway" destinations for all evacuees in this scenario.

16. Page 15 of the pdf, Supply Section, fifth bullet point: The first sentence of this proposed action/policy should be revised to require compliance with state Fire Safe Road laws. "Adequate" is meaningless, and "two roadways with widths and lengths" is nonsensical. As far as the second sentence is concerned, if an adequate SB 99 identification had been accomplished, that would have helped with this policy.
17. Page 15 of the pdf, Policy Section, second bullet point: Adequate SB 99 identification (which was not accomplished), would significantly help the County to conduct regular evacuation training in those SB 99 locations.
18. Pages 18-168, Maps: A legend explaining what the colors/line widths on each map mean must appear on each map. As is, these maps are unintelligible.
19. Page 169 of the pdf, Appendix A Estimated Evacuation Demand Table: Revision of the original Appendix Table to include necessary information to evaluate the evacuation demand is helpful. However, as discussed earlier in this letter, this Table still includes basic math errors that call into question the validity of all the data and calculations of this entire AB 747 Assessment.

This is of critical importance, since all information and conclusions in this AB 747 Assessment and therefore in the Safety Element appears to be based on incorrect data.

This completes my comments to the updated Sonoma County Safety Element and its Appendices.

As requested at the beginning of this letter, please reject the Addendum to the General Plan EIR and the within Safety Element on the basis that neither the SB 99 Assessment nor the SB 747 Assessment are legally compliant, and there is no required AB 1409 Assessment. Please require that both of those Assessments be redone to be compliant, that an AB 1409 Assessment be completed, and that the Safety Element and the Addendum to the General Plan EIR be revised as necessary, before returning them to the Board for consideration.

Please do not hesitate to contact me if you have any questions or would like additional information.

Very truly yours,

Sonia E. Taylor

Cc: Tennis Wick, Director, Permit Sonoma  
Scott Orr, Assistant Director, Permit Sonoma  
Katrina Braehmer, Supervising Planner

**From:** Peter Hackett <shrunk-outwit-kung@duck.com>  
**Sent:** Monday, August 11, 2025 2:04 PM  
**To:** GeneralPlan  
**Subject:** BOS Meeting August, 12, 2025, 2025-0803, SE Program 61

**EXTERNAL**

To: Sonoma County Supervisors and Permit Sonoma.  
BOS Meeting August, 12, 2025  
Item #2025-0803

Re: Adoption of Safety Element (Goal SE-11F) / Rezoned F1 commercial properties

To Whom it May Concern / For Public Record:

My name is Peter Hackett and I'm the agent for the owner of two properties on River Road.

I've attended numerous BOS, MAC and community outreach meetings and have received assurances that the Permit Sonoma has us on the radar. That the county is aware of our obvious concerns and we've been told that code revisions are in the works to allow us the continued use and preserve the value of our properties. In effect, that our vested rights to protect our livelihoods would be preserved. I can see every reason why, as our neighbors, the staff of Permit Sonoma with the authority to resolve this situation, will treat our problem as though you yourselves were in our position. That said, I don't understand the boundaries and freedoms your department has at its disposal to restore our ownership rights. It's clear, however, you do not have free range.

In correspondence dated February of this year, Permit Sonoma summarized its action plan after the January 14th BOS meeting stating, in part, "As part of the ongoing update to the General Plan Safety Element, staff is developing draft policy that would direct Permit Sonoma to develop recommendations for updates to planning and development policy/regulation to better support rebuilding, remove barriers, and protect the economic vitality of communities and critical local services that are subject to flood risk". The latest wording in the "Sonoma County Safety Element Public Review Draft April 2025", PS. 67 Pgm # 61 is of concern as it seems to qualify those efforts and specifically carve out "grocery stores", stating their mission plan is to:

"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).”

I may be reading this through a defensive lens, but it appears to recommend that Supervisor Hopkins’ call to protect Safeway will be answered (Safeway being the only “grocery store” affected by this change). However, the specific use of the term "grocery stores" places inclusion of not "grocery stores" in a gray area apparently left to the discretion of whomever defines “resident-serving”. I would like to suggest that all the affected businesses are resident serving and serve the community through job creation, diversity of attractions, donations, and tax generation. Further, that as small, locally owned businesses, we are also community members.

In our tenure Stumptown Brewery we have hired countless employees, the majority enjoying year round employment and almost all living in the Russian River area. We hire locally, contract locally, support local suppliers and donate time and money to local charities (by way of example, we estimate that through the Stumptown Beer Revival and BBQ CookOff we have donated over \$600,000 to the Russian River Senior’s Center alone). We believe that we (and other local businesses) are part of the fabric of what makes our local community so special.

I’m not sure why Program 61 requires the qualifier. That even if implemented, the extent to which our historic property rights are diluted. Further, that even if defined “resident-serving”, whether the additional cost of reconstruction to rebuild or repair in our newly assigned zoning will make restoration cost-prohibitive. It’s the unambiguous right to protect and preserve our historic property rights that will maintain the value of our investments in this community; anything short of that is taking.

I’m optimistic to see the inclusion of program 61, and grateful for the County’s effort, but would like to point out the obvious: we didn’t move our buildings into the river, the County put us in the river. Any reduction in the use of our properties, as a product of that action, amounts to a forced compromise and comes solely at a cost to us.

Again, I apologize for the rant. Thank you for taking the time to read this.

Sincerely,  
Peter Hackett  
For  
Downstream Properties  
and  
Stumptown Brewery / Stumptown Carwash